**NPA Working Group: NPA Framework Comment Submission Due January 29**

**On behalf of (company/organization name): Boston University**

**Submitted by (name and email): Dennis Carlberg, carlberg@bu.edu**

**Date: January 29, 2025**

Reference ID (to be filled in by Apex):

## High Level Comments

#### Key proposal strengths: Summary statement of high-level (executive summary-type) strengths of proposal

**The framework provides a process that will guide decision making for local distribution companies to identify non-pipeline alternatives when determining future investments in the gas system.**

#### Key proposal challenges: Summary statement of high-level (executive summary-type) challenges of proposal, including cross-cutting concerns

**While the NPA Framework adequately addresses avoiding stranded asset costs in the gas system, it does not adequately respond to the challenge of meeting the Commonwealth’s climate goals.**

## Project Identification

#### Key Point #1: Key point for Excel matrix of comments

**Proactive NPA planning needs to be a priority across the systems, especially in areas with leak prone pipes.**

#### Key Point #2:

**Proactive NPA planning needs to be done on a neighborhood and regional scales.**

## Gas System Feasibility Review and Electric System Feasibility Review

#### Key Point #1: Key point for Excel matrix of comments

**It is important that gas and electric system planning is coordinated to ensure enough power is available to support the transition from gas to electricity. This is especially true in areas that are already constrained on the electrical side.**

## Benefit Cost Analysis

#### Key Point #1: Key point for Excel matrix of comments

**The benefit cost analysis needs to include the social cost of carbon. The NPA Framework should be consistent with the price already established by Boston and Cambridge: $234/MTCO2e.**

## Project Authorization and Prioritization

#### Key Point #1: Key point for Excel matrix of comments

**Electrification needs to be prioritized in lieu of line extensions and new gas customer connections.**