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

**On behalf of (company/organization name): United Steelworkers Union**

**Submitted by (name and email): John Buonopane: jbuonopane@usw.org**

**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 United Steelworkers represents thousands of workers involved in the maintenance and repair of natural gas infrastructure across the Commonwealth. We are concerned that this process will delay much needed investment and maintenance in this critical infrastructure and therefore create unsafe conditions for our members.

The LDC Process for determining suitable programs for an NPA review is for the most part sound. But the LDC’s, the Working Group participants and ultimately the Department of Public Utilities must provide extreme care when considering what the final NPA evaluation and implementation process will be.

It is imperative that any potential hazardous consequences of the NPA process must be examined to avoid dangerous and alarming impacts for the Commonwealths people’s safety and energy reliance.

Any type of Critical Public Safety related program which is now in place to ensure safe and reliable gas energy to the people of Massachusetts cannot be canceled or delayed (Including but not limited to: Gas Line replacement and repairs / leak, infrastructure and corrosion surveys/ regulation, piping, meter, valve, appliance replacements and inspections). To delay, cancel or make unreasonably costly these types of programs would be a serious mistake with potentially fatal consequences.

## Project Identification

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

The Project Identification Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety must not be compromised.

#### Key Point #2:

Text

#### Key Point #N:

Text

## Initial Viability Testing

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

The Initial Viability Testing Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety must not be compromised.

#### Key Point #2:

Text

#### Key Point #N:

Text

## Gas System Feasibility Review and Electric System Feasibility Review

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

The Gas System Feasibility Review and Electric System Feasibility Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety must not be compromised.

#### Key Point #2:

Text

#### Key Point #N:

Text

## Benefit Cost Analysis

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

The Benefit Cost Analysis Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety Must not be compromised.

#### Key Point #2:

The Benefit Cost Analysis should include costs to the remaining gas customer rates.

#### Key Point #N:

The Benefits Cost Analysis should contain the total customer cost of conversion using the highest inflation adjusted estimated costs determined by the LDC’s.

## Project Authorization and Prioritization

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

The Project Authorization and Prioritization Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety must not be compromised.

#### Key Point #2:

Text

#### Key Point #N:

Text

## Project Execution

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

The Project Execution Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety must not be comprimsed.

#### Key Point #2:

Text

#### Key Point #N:

Text

## Customer Education, Engagement and Commitment

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

The Customer Education, Engagement and Commitment Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public safety must not be compromised.

#### Key Point #2:

Customers should be educated on all of the potential NPA options including GEO thermal.

#### Key Point #N:

Text

## Impacts to Project Implementation

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

The Project Implementation Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety must not be compromised.

#### Key Point #2:

Text

#### Key Point #N:

Text

## Framework Updating

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

The Framework Updating Process must not impede, delay or cancel any of the programs described above within the High-Level comments. Public Safety must not be compromised.

#### Key Point #2:

Text

#### Key Point #N:

Text

## *NPA Identification Requirements*

*Please include any comments in requirements in the relevant sections above rather than a stand alone section.*

## Other (please specify)

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

Insert detailed comments here

#### Key Point #2:

Text

#### Key Point #N:

Text