



January 29th, 2025

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Kenzie Schwartz Energy and Environment Economics, Inc. (E3)  
One Broadway, 9th Floor  
Cambridge, MA 02142

RE: Comments on NPA Framework

Dear Mr. Nelson and Ms. Schwartz,

Thank you for providing this opportunity for comment. For the sake of brevity, we will not be repeating the good points made in the Acadia's Center letter, but we agree with their comments. This is especially true when it comes to their concerns regarding the use of the RIM test and the challenges created by needing to provide comments in a short window of time and without access to examples of real or hypothetical NPA projects to inform those comments.

We are writing this letter to outline two additional areas of concern we have relating to the NPA prioritization section of the draft framework; these regard how NPAs in Environmental Justice Communities are promoted and how the benefits of NPAs are considered in relation to the number of customers they impact. We believe that how these areas are handled could determine the extent to which NPAs are able to deliver on their potential to reduce greenhouse gas emissions and the potential risk of stranded assets.

### **Methods For Environmental Justice Community Prioritization**

Green Energy Consumers Alliance firmly supports the prioritization of Environmental Justice Communities when considering NPA projects. As we transition away from gas, it is important that we do so equitably, and that we do not leave EJ communities behind.

That being said, we should not leave potentially highly cost-effective NPAs on the table solely because they are not in an EJ community. Reduced GHG emissions and stranded costs benefit us all, including low-income and EJ consumers.

We hope the final framework will use a different mechanism to balance both the need to center environmental justice and the need to achieve ratepayer savings and emissions reductions. This could be done either through a point system, where projects in EJ communities are awarded extra points compared to other NPAs, or by setting a quota of projects that must be in EJ communities. Both options would promote environmental justice while giving consideration to energy affordability and GHG emission reduction goals.



### **Focus on Saving and GHG Reduction on a Per-Customer Basis**

While we support projects with greater GHG emission reduction and greater gas system savings being prioritized, we are concerned that this prioritization method does not consider the difficulties that arise under our current legal framework when attempting to discontinue gas service for a large number of gas customers. We suggest that further consideration be given to the reality that large projects, however meritorious, could be stalled due to opposition by a small minority within the community. By considering a project's benefits in relation to the number of customers that must agree to the project, we can ensure that small projects are not crowded out and increase the amount of value NPAs are able to deliver.

Thank you for the opportunity to submit written comments. If you have any questions or concerns, please do not hesitate to reach out.

Sincerely,

Best,  
Carrie Katan