

NPA Working Group: NPA Framework Comment Submission Due January 29

On behalf of the Utility Workers Union of America Local 369 and The Brotherhood of Utility Workers Council

Submitted by Daniel Leary President of UWUA Local 369 and The Brotherhood of Utility Workers Council dleary@uwua369.org 617-593-1188

Date:1/29/2025

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

As a trusted partner in operating and maintaining critical infrastructure across the Commonwealth, the Utility Workers Union of America (UWUA), Local 369 and the Brotherhood of Utility Workers Council represents over 5,000 plus members working in the utility industry across Cape Cod and Martha's Vineyard through the South Shore, Boston, North of Boston, and Central and Western parts of Massachusetts. The UWUA supports the Commonwealth's decarbonization goals while ensuring the transition to clean energy does not jeopardize public safety or the safe and reliable operation of the distribution and transmission systems.

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

Operation of the gas system is very complex. The perspectives and comments from those representing the workforce should not be taken lightly. In order to not only operate these systems day to day but also transition to cleaner energy, a highly skilled and trained workforce is required.

Project Identification

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

Safety must be considered as the top priority in all project identification steps.

Key Point #2:

The LDCs have federal and state regulations they must comply with around the safe operation of the gas system.

Gas System Feasibility Review and Electric System Feasibility Review

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

Operation of the gas system is very complex. The perspectives and comments from those representing the workforce should not be taken lightly. In order to not only operate these systems day to day but also transition to cleaner energy, a highly skilled and trained workforce is required

Benefit Cost Analysis

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

The emissions reductions and safety benefits from the GSEP efforts must accounted for in the BCA tests.

Project Execution

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

Union workforce is committed to promoting positive safety cultures among their peers. The workforce is a pivotal safeguard against potentially unintended and/or catastrophic consequences of not thoughtfully executing the transition. Any substitute for this experience and professionalism would be irresponsible.

Customer Education, Engagement, and Commitment

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

There must be transparency around costs and impact to customer bills around this transition. Costs of transitioning to electrification should not be born by gas ratepayers.

Key Point #2:

Delivered fuels pose a higher risk and leak migration for propane is different. Propane is heavier and does not migrate as natural gas does. Delivered fuels are not regulated and customers do not receive same safety net that LDC's offer with oversight, emergency response and maintenance of their energy system. Operators of delivered fuels are not regulated

Other (please specify)

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

Customer choice must remain in place. The success of an NPA depends on customers exercising their choice to adopt an alternative energy option and move away from a safe, affordable and reliable natural gas service. LDCs have an obligation to provide safe and reliable service to their customers. The LDCs' obligation to provide service to customers arises from its franchise, which obligates utilities to continue to provide non-discriminatory service to customers who desire to be served. *Weld v. Gas & Light Commissioners*.

Key Point #2:

GSEP projects today significantly reduce GHG emissions across the Commonwealth and not only positively contribute to the state's efforts in achieving its 2030 and 2050 climate goals but also increase overall public safety. LDCs must follow their state and federal regulations and fact in risks (DIMP) when considering NPA projects.

