

NPA Working Group Meeting #4  
January 15, 2025  
75 State Street, Boston, MA

Meeting Materials:

[MA 20-80 NPA Working Group Meeting 1-15-25.pdf](#)  
[January 15 2025 NPA Framework.pdf](#)

Agenda:

Time	Topic
10-10:10	Welcome + Agenda
10:10-10:40	Community Focus Group Update – Marti Frank
10:40-11:10	Affordability Presentation + Discussion – Jenifer Bosco
11:10 – 11:45	Intro to Framework Presentation
11:45-12:30	Lunch
12:30-2:45	Framework Presentation + Discussion
2:45-3	Next Steps

## Community Focus Group Update – Marti Frank

**Summary:** The presentation provided an update on progress within the Community Focus Group stakeholder engagement process which is centered on the potential impacts of NPAs in environmental justice (EJ) communities. Marti Frank, whose background includes building commissioning, evaluation, and a focus on climate policy and underserved communities, led this effort. The engagement design targeted key groups, including EJ homeowners, renters, rental property managers, and developers across single-family (SF) and multi-family (MF) housing. Engagement activities consisted of in-home interviews, Zoom calls, and phone interviews, guided by a series of research questions.

An Expert Zoom Group, comprising nine advisors from various EJ-related organizations, was formed to provide insights on engagement strategies, interpret data, and guide the development of findings and recommendations. The group held three meetings from December to February. Fieldwork involved in-depth interviews with 13 EJ households, gathering their opinions on the value of electrification, attitudes toward increased utility costs, understanding of non-gas heat technologies, and willingness to electrify. Example profiles included Tom, a barber and landlord who faced technical and contractor challenges when attempting electrification; Willie, a veteran and renter open to electric heat but hesitant to give up his gas stove due to costs; and Marisella, a new homeowner concerned about high electricity costs and

skeptical about the benefits of electrification. Additional feedback is planned through surveys of elementary school parents in February.

Interviews with seven property owners and managers of affordable rental properties were also conducted, with more planned. These discussions focused on barriers and facilitating factors for electrification in existing properties, as well as considerations for developing new all-electric properties. Emerging themes from the fieldwork indicate that cost remains a significant concern for EJ households, who are highly sensitive to increased utility expenses. The preliminary quotes from EJ households indicated while electrification benefits like improved air quality and better AC are appreciated, they are not compelling enough to justify higher costs according to the interviews. Heat pumps are generally accepted (with the assumption that the homeowner would not incur the costs to switch), with minimal awareness of geothermal technology. Trust in utilities exists but must be reinforced by recommendations from trusted community sources. These findings will contribute to a final report, outlining considerations for the LDCs in their current and future development of the NPA framework.

#### **Key Points from Stakeholders:**

- Stakeholders were interested in participant conversations around stoves. Marti explained that gas stove safety was a minor concern for one participant, with limited familiarity with induction stoves among others.
- The group was interested in how much geothermal was discussed with participants, and the level of detail. Marti confirmed geothermal was specifically mentioned along with a diagram, though the conversation around it was not technical, or a major focus. Awareness of geothermal technology was low, and one participant expressed safety concerns about it. There is interest in additional study into participant willingness around geothermal, as it is an NPA option.

## **Affordability Presentation and Discussion – Jenifer Bosco**

**Summary:** The presentation by Jenifer Bosco of the National Consumer Law Center addressed ongoing utility affordability considerations for low-income consumers in Massachusetts, emphasizing the growing financial burden despite existing assistance programs. Massachusetts has over 500,000 low-income (R-2) electric and gas accounts, but unpaid utility bills are a significant source of household debt, with average R-2 utility debt exceeding \$1,400 per account. According to the National Consumer Law Center, even with programs like discount utility rates and payment plans, utility debt has continued to rise, highlighting the limitations of current affordability efforts.

The presentation identified National Consumer Law Center's critical priorities to improve affordability, including enhancing tiered discount rates, strengthening protections against disconnections, supporting zero-cost energy efficiency and electrification for low-income households, and securing funding sources beyond ratepayer contributions. It also called for re-evaluating failed programs that increase costs without yielding benefits.

According to the National Consumer Law Center affordability challenges are compounded by rising housing costs, making the current monthly energy burden target of 6% of income potentially too high. Some states are adopting lower targets in light of this. The presentation also discussed concerns about the impact of electrification on energy burdens. While the 2022–2024 plans lacked budgets for transitioning from gas to electric systems, the 2025–2027 plan includes provisions for such transitions, provided customers are educated about potential cost increases.

**Key Points from Stakeholders:**

- The group acknowledged collaborative efforts are needed, such as interagency working groups, to address affordability and streamline support for low-income consumers as the state transitions toward electrification.

## Framework Presentation and Discussion

**Summary:** Representatives from the Natural Gas Local Distribution Companies (LDCs) outlined the updated Non-Pipeline Alternative (NPA) Framework. The presentation emphasized incorporating customer feedback at every stage and rethinking project and system designs to prioritize safety and reliability. It introduced the NPA identification process, including viability testing, feasibility reviews, and benefit-cost analysis (BCA). The process also incorporates customer education and stakeholder engagement to align with long-term goals such as reducing greenhouse gas emissions. The presenters highlighted challenges, particularly around emergent safety projects, system flexibility, and integration with climate goals.

**Key Points from Stakeholders:**

- **Definition Clarifications:** Attendees sought clarity on differentiating projects, segments, and programs. Questions were raised about the definition of emergent projects, what they include, and how these definitions might vary by company or year.
- **Investment Strategies:** Participants expressed concerns about balancing safety and reliability investments with climate goals and emphasized the importance of aligning NPA approaches with broader climate objectives.
- **Customer Considerations:** There was interest in understanding how customer choices, such as opting for heat pumps versus geothermal systems, influence overall system design. Attendees also highlighted the need for robust education strategies to ensure informed decision-making by customers, particularly large businesses or new developments. There was some discussion around unregulated fuels such as propane, and if a utility may move customers to it in order to move an NPA through - LDCs confirmed that they have the legal obligation to serve a customer who wants to remain on the gas system, and moving them unilaterally to an unregulated delivered fuel is not something they are in the position to do. LDCs added that from a customer advocate perspective, those types of delivered fuels are not regulated, there are no protections for shut offs, and no low-income discounts.

- **Project Process and Screening:** Questions arose about screening criteria and feasibility for long-term system designs. Attendees questioned whether all benefit-cost analyses (BCAs) need to apply to each NPA, and whether a BCA had to be above 1 in order for the NPA to proceed. The conversation sought clarification on how flexibility is integrated into the process. Concerns were also raised about how projects excluded in prior frameworks will be handled under the updated process.
- **Electric System Integration:** Participants explored the potential impacts of electrification on existing electric infrastructure and sought details on processes for determining whether planned upgrades align with long-term demand forecasts.
- **Regulatory and Stakeholder Roles:** Attendees wanted to know how Department of Public Utilities (DPU) mandates for safety, reliability, and affordability are integrated into all steps of the process. There were also questions about the role of stakeholders in decision-making and how data sharing with the Department would be facilitated.
- **Timeline and Implementation:** Concerns were raised about challenges related to project timelines, permitting, and municipal coordination. Participants sought suggestions for streamlining processes to better align with emission reduction timelines.

## Next Steps

**Summary:** The consulting team outlined how feedback on the framework will be collected, summarized, responded to, and ultimately delivered to the D.P.U. Stakeholders are to use the comment template to organize their comments by January 29<sup>th</sup> and send to [npaworkinggroup@apexanalyticsllc.com](mailto:npaworkinggroup@apexanalyticsllc.com). Those comments will be collated and summarized into a matrix for efficient review and response by the LDCs, while still being able to reference and review the full comment documents. The next Working Group meeting on February 5<sup>th</sup> will be a discussion of the stakeholder feedback, and the elements that will inform the next iteration of the NPA Framework.

### Key Stakeholder Feedback:

- Stakeholders raised the concern that the timing to collect comments is too tight, especially considering how the work of the Community Focus Group has not been completed and shared. Stakeholders requested this to be considered.
  - The consultant team acknowledged the timeline, and confirmed that the deadlines are regulatorily driven, for the completed filing to be sent April 1 to the D.P.U. Stakeholders will still be able to submit comments directly to the docket once filed, if there are additional items they wish to comment on.
  - In response to this feedback, there will be an extended time period for stakeholders to submit comments specific to the study led by Marti Frank for the Community Focus Group. Marti will detail findings during the February 5<sup>th</sup> meeting, after which stakeholders will have until February 15<sup>th</sup> to submit comments about the findings.