NPA Working Group: NPA Framework Comment Submission Due January 29

On behalf of (company/organization name): Arise for Social Justice

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Date: 1/28/2025

Reference ID (to be filled in by Apex):

High Level Comments

Key proposal strengths:

Key proposal challenges:

There is no available customer engagement plan. When that plan is developed there should be time in the process for feedback.

Arise has an overall concern for the handling of new customers, line extensions, and what service providers are doing to reduce the future demand for gas and future dependency on gas infrastructure. The transition away from gas will not be profitable to gas suppliers and producers, but it must be done to comply with state goals. Less priority should be given to the financial viability of energy transition projects.

Project Identification

Key Point #1: More detail needs to be given on the definition and prioritization of emergent pipe fixes

The definition of emergent within the framework is able to shift with time based on service provider's needs. This definition needs to be specific to ensure it does not expand unreasonably. From my understanding emergent pipe fixes are rated 1-3 based on severity and safety concerns. Some emergent issues have longer timelines and delayed implementation of fixes. How can we integrate NPA's into these cases.

Key Point #2:

Text

Key Point #N:

Text

Initial Viability Testing

Key Point #1:

Insert detailed comments here

Key Point #2:

Text

Key Point #N:

Text

Gas System Feasibility Review and Electric System Feasibility Review

Key Point #1:

Insert detailed comments here

Key Point #2:

Text

Key Point #N:

Text

Benefit Cost Analysis

Key Point #1:

Key Point #2:

Text

Key Point #N:

Text

Project Authorization and Prioritization

Key Point #1: NPA's should be considered a priority solution for populations already overburdened with GHG emissions and infrastructure

In places like Springfield where a reliability project is planned to create resiliency in the gas system for the foreseeable future, NPA's should be considered a priority solution to reduce the need for longterm gas infrastructure reliability.

Project Execution

Key Point #1:

Key Point #2:
Text

Key Point #N:
Text

Customer Education, Engagement and Commitment

Key Point #1: Customer Acknowledgement is not an appropriate way to offer NPA solutions to customers

Presenting a customer with a flyer and links to the mass save website does not empower them to make an informed decision on their heating needs. Arise would like to see a more engaged approach that includes specific conversation with service providers as to what options are available, and how to best pursue other options.

Key Point #2: Sending customers to the Mass Save Website to navigate themselves is not effective

LDCs should provide information hosted on their website about NPA and assistance programs to receive NPA. Information needed by customers to execute their transition should be collectively located on their service provider's website. This makes it easier for consumers to pursue and increases confidence in the information because it is on the official website of their service provider.

Key Point #3: Have a plan, allow NGO's, stakeholders etc. comment on it
When a community engagement plan is fleshed out and developed, there should be an opportunity for feedback to ensure that the engagement plan is of substance and does not reduce community engagement to a box-checking exercise.

Impacts to Project Implementation

Key Point #1:

Key Point #2:
Text

Key Point #N:
Text

Framework Updating

Key Point #1:

Key Point #2:
Text

Key Point #N:
Text

NPA Identification Requirements

Other (please specify)

Key Point #1: How are other operations shifting reduce gas demand and accommodate new infrastructure challenges?

Key Point #2:
Text

Key Point #N:

Text