

UTILITY WORKERS UNION OF AMERICA

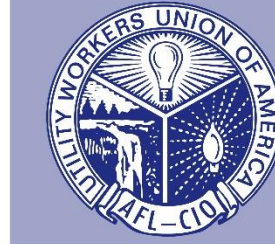
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March 22, 2021

Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Ste. 900
Boston, MA 02114
VIA: *Mass.gov Online Portal*

*Re: Interim Clean Energy and Climate Plan for 2030 (2030 CECP)
Comment from Utility Workers Union of America, AFL-CIO*

Secretary Theoharides:

We welcome the opportunity to comment on the EEA's Interim Clean Energy and Climate Plan for 2030 (2030 CECP). The Utility Workers Union of America represents around 50,000 workers in the electric, gas and water utility sectors. Our members maintain and operate utility infrastructure throughout the United States. Their work places our members at the center of America's energy systems – at the point of consumption in a gas or electric appliance and upstream all along the pipes and wires to the powerplants and industrial processes.

The UWUA supports reducing carbon emissions as our union is made up of technically minded people whose everyday work involves thinking like an engineer, a mechanic and a scientist. We clearly understand the need for Massachusetts to manage its carbon emissions, that global climate change is real and that it is affecting our great Commonwealth.

The members we serve take pride in the work they do, whether it's installing new services or in repairing leaks and maintaining existing service to improve public safety and protect the environment. Our members believe that natural gas is, in fact, a cleaner and cheaper option for both residential and business customers. That this view is shared by their communities is reflected in the fact that requests for new natural gas service increase every year.

However, we have concerns about the implementation of some of the policies enumerated in the 2030 CECP that would directly affect our livelihoods and the customers we serve. Further, these initiatives will also have a bearing on the safety and reliability of the energy delivery systems which we build and maintain.

We disagree with the notion that in order for Massachusetts to effectively manage its carbon emissions, highly skilled, good paying, union jobs must be traded for much lower quality jobs in pursuit of solutions that are economically, socially, and even physically unrealistic. That avenue creates a false choice which does little to ensure that Massachusetts manages its energy transition in a way that benefits all workers and communities.

We see serious issues in undertaking a one-to-one conversion of all gas usages to electric. Affordability, for one, particularly in neighborhoods with older homes, rental properties and low-income populations. The costs of conversion – while not inconsiderable for any end user – could fall disproportionately on those customers least able to afford the change, or the resulting energy costs.

Our members in the electric sector who serve distribution customers are also concerned about the impact of the additional electric load that would be necessary to achieve full electrification, particularly in less densely populated areas where upgrades to infrastructure would require years and only add to the electric distribution bills of the state's electric customers.

We believe that climate goals, particularly with respect to the housing sector, should not be aimed for solely from the standpoint of a literal, one hundred percent electrification of the state's energy systems. The solutions for the housing sector, particularly the existing housing sector, should be discussed in a manner which encourages numerous technologies – as may be appropriate to a given region, town, or even individual building to reduce building emissions and energy consumption.

Limiting energy choice to just electricity is bad for both the economy and community resilience. Relying on a single energy delivery system eliminates consumer choice, suppresses innovation and competition, and could reduce reliability. In addition, limiting to a single energy delivery system unnecessarily increases vulnerability to extreme weather events and disasters caused by climate change.

Natural gas is a very affordable source of energy for residents in Massachusetts, which is particularly important during the region's cold winters. In September 2019, the average price of residential natural gas in Massachusetts was about eight percent below the national average while the price of residential electricity was about 67 percent above the national average.¹ Eliminating new residential natural gas could lead to much higher costs for heat for working families. Estimates are that it costs \$1,391 to heat a Northeastern home in winter with electricity and only \$712 with natural gas.

Further, it is axiomatic that electrification without robust energy efficiency improvements – for every individual building - does not reduce energy consumption, and in many cases results in higher energy consumption. Simply converting a building to all electric, while reducing gas usage, does not necessarily reduce energy consumption in fact, consumption is likely to increase as building envelopes fail to achieve efficiency for electric technologies.

Massachusetts is at an inflection point in the evolution of state energy policy in response to the global climate crisis. Reducing the carbon emissions of our energy systems is a goal shared by everyone, but a narrow tech-specific approach that picks preferred technologies risks setting us back in our energy goals and obstructing work to meet other goals such as affordable housing, pursuing environmental and economic justice, and maintaining the health and well-being of the state's citizens.

The core of our message is that union workers in the energy industry have skills, experience and knowledge that are crucial to addressing the challenges we all face as the infrastructure for which we are responsible evolves. Our work culture empowers workers to make the energy systems on which our economy relies safe, reliable, affordable and clean. That means a workforce that is adequately staffed, well trained, fairly compensated and has a place at the table where decisions are made.

Workforce stability to operate and maintain energy infrastructure is key to de-carbonizing our economy. We are a resource for achieving our state's environmental goals when we are engaged and valued by the process. This includes maintaining continuity in the workforce that operates and maintains our energy infrastructure.

The 2030 CECP would be improved by an explicit statement about the absolute necessity of a highly trained, highly skilled union workforce numerically large enough, possessing all of the necessary skill-sets essential to operating energy systems in accordance with requirements for safety, reliability, responsiveness, leak reduction and affordability at all times. This is a baseline requirement that should be the starting point for any discussion of Massachusetts' evolving energy systems, including the recruitment, training, and retention of workers to achieve those performance levels over the coming decades of gas system evolution.

Because jobs in the utility sector are in a mature industry that have long had higher rates of union density than the broader economy, they are generally highly skilled, well compensated, and have high road benefit packages for both healthcare and retirement. These are some of the most high-quality middle-class jobs in the state, jobs that are truly lifelong career pathways for people to follow. Further, these are both family and community-supporting jobs where these workers live and spend their paychecks, fueling the state economy. Sacrificing jobs of this quality in pursuit of goals that are difficult to the point of being unachievable is not sound public policy.

While we support de-carbonization, we do not support mandated building electrification. As workers who go into homes

¹ <https://www.eia.gov/state/?sid=MA#tabs-5>

every day, we see electrification as being far more costly and orders of magnitude more physically difficult than simply modernizing gas end-uses. Strategies such as reducing building-related emissions through fixing gas leaks, replacing older gas appliances with state-of-the-art efficient gas appliances using electronic ignitions, and blending hydrogen in delivered gas fuels are examples of policy approaches that would be more effective, cost-efficient and, perhaps most importantly, realistically achievable as opposed to a full replacement of our entire gas industry and complete retrofit of every building in the state of Massachusetts.

An obvious example as to why this is so, is to simply think through the issues associated with the physical retrofit of homes with gas appliances to all electric appliances. In most cases they cannot simply be swapped out in a literal one-to-one exchange. The need to upgrade electrical panels, redo ductwork and wiring, open walls and ceiling, and remodel entire building configurations to accommodate the systems needed would be extremely expensive for all homeowners, regardless of income as well as massively, and physically, disruptive. Multiplied over millions of Massachusetts residences, this strategy hardly bears contemplating.

The costs to residents and property owners could be astronomical, particularly in older homes that are not wired to handle the electricity load for modern electric appliances. For context, California has considered similar policies and completed economic analysis that is currently lacking for this policy proposal in Massachusetts. In California, the 2020 cost of purchasing all electric appliances is up to \$2,674 in an existing home. On top of that, the cost of electrical infrastructure upgrades in a single-family residence could cost up to \$7,345 in 2020.²

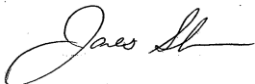
We believe the most responsible – and achievable – approach to decarbonization is to optimize the use of natural gas, not minimize or eliminate it. Sound public policy should direct us to integrate and optimize these systems to support our lives as we reduce our nation’s carbon footprint.

De-carbonization does not equate to electrification. We need to move past an overly simplified set of assumptions and presumed outcomes that privilege electrification over other de-carbonized end use fueling methods. We need a more realistic and grounded, less doctrinaire approach to managing the role of the gas pipeline system for transporting and delivering energy to the users who depend on it.

In closing, serious approaches to policy, grounded in social, economic, and engineering realities will need to be considered if we are going to get real about reducing carbon in the state’s energy systems. Balanced energy solutions should include providing options and incentives that families and businesses can use to achieve climate goals by reducing emissions based on their needs and financial abilities.

We are here to help, and to be a part of the solution. As utility workers, we are confident that as long as we, the technical experts who maintain these systems every day, have a voice at the table, we can meet and overcome the state’s energy and climate challenges.

Sincerely,



James T. Slevin
National President
Utility Workers Union of America, AFL-CIO

² <https://c4bes.org/wp-content/uploads/2018/09/Navigant-Report-Impacts-of-Residential-Appliance-Electrification.pdf>