

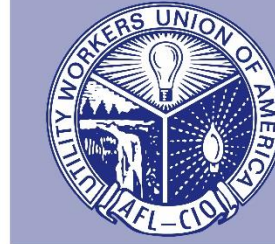
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July 29th, 2022

Mr. Kevin Crane, Hearing Officer
Massachusetts Department of Public Utilities

VIA: Electronic Submission

**In Re: Boston Gas Company d/b/a National Grid – Geothermal Energy Demonstration Program
Implementation Plan (D.P.U. 22-62)**

Mr. Crane,

The Utility Workers Union of America, AFL-CIO (UWUA) writes to urge the Department of Public Utilities to approve National Grid's Implementation Plan submitted under this docket for the geothermal energy demonstration project approved by the D.P.U. under docket 21-24.

The UWUA is a national labor organization, representing some 45,000 members who work in the natural gas, electric, water, wastewater, and municipal services sectors across 22 states. The UWUA has over 3,900 members in Massachusetts, with some 250 highly skilled members employed by National Grid to operate, maintain, and install its natural gas transmission, storage, and distribution systems.

The geothermal pilot program is a key step in meeting the Commonwealth's and National Grid's decarbonization goals. The March 2022 Net Zero Enablement Plan filed by National Grid included a role for networked geothermal systems. Networked geothermal systems were further identified as one of the utility's "four pillars" of a reliable and clean energy future. Installation of geothermal direct heating systems are a component of National Grid's D.P.U. 20-80 net zero enablement plan and supports its Fossil Free strategy.

The ability for National Grid to explore the use of geothermal energy as a means of providing a low-carbon heating solution for customers, and as an energy source that could help system daily peak demands while avoiding leak-prone pipe replacements will enable a heating/cooling solution for customers and serve as an important pathway in decarbonizing the natural gas system. The Program's shared loop system, serving multiple independent residential and/or commercial customers focusing on diversity of load profile, existing gas constraints, replacement of leak-prone piping, and in environmentally challenged or low-income communities not only offers methods to understand and create the best value for National Grid's customers, but also offers National Grid's current workforce a path in which to employ their existing skill-sets, obtain new skills, and contribute to the Commonwealth's decarbonization goals.

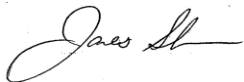
National Grid's investment in geothermal technology provides great opportunities to utilize the existing natural gas workforce in activities such as installation, operation and maintenance of community energy systems. Additionally, since geothermal systems use the same pipe material as the natural gas system, distribution systems are roughly the same, and piping is roughly the same depth as the average natural gas system, the workforce's infrastructure familiarity can be leveraged to build their decarbonizations skills. As Massachusetts

transitions to greener and cleaner fuel strategies, unions like the UWUA have a vital interest in ensuring that new sources of energy are subject to regulation and that the entities who develop these technologies do so with high-quality, family sustaining union jobs. The UWUA believes this is in direct alignment with the Commonwealth's Clean Energy and Climate Plan, which states, in part, "*The goals set in the 2025/2030 Plan require broad communications with diverse audiences, including consumers as well as the workforce that will help build the necessary energy infrastructure and technologies.*"¹

Ensuring that National Grid is able to implement its proposed Geothermal Pilot Project will provide National Grid with the necessary learnings in expanding the build out of geothermal systems of the future. The Company in its Implementation Plan has stated that the Project will gain learnings and experience for training its labor force.² When analyzing the employment impacts of decarbonization ambitions in the energy sector, a key strategy should be to mitigate negative workforce employment impacts of transitioning to a clean economy. For workers who have dedicated their careers to ensuring that the customers served by natural gas utilities have the energy they need when they need it, the best transition to a net-zero economy is one in which they have the opportunities to re-skill or add additional skills, while maintaining their employment with that utility. Therefore, the UWUA looks forward to working with National Grid to gain what additional knowledge and skills are necessary to shift their work from natural gas systems to geothermal systems.

For these reasons, the UWUA encourages the D.P.U. to act quickly and approve the implementation plan so that the pilot program can begin as soon as possible.

Sincerely,



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

¹ Massachusetts Clean Energy and Climate Plan for 2025 & 2030, published June 30, 2022, page 14.

² Boston Gas Company d/b/a National Grid D.P.U. 22-26 Exhibit NG-1 page 20 of 24; V. Internal Engagement.