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November 17, 2021

The New York City Council
Committee on Environmental Protection
City Hall
New York, NY 10007
VIA Online Portal

In Re: Oversight Hearing on Building Electrification, T-2021-8116

Members of the Council:

We welcome the opportunity to comment on the City Council's proposals to study the feasibility of electrifying existing buildings in the city of New York (File# Int 2091-2020). The Utility Workers Union of America (UWUA) represents around 50,000 workers in the electric, gas and water utility sectors across the U.S. In the city of New York, members of UWUA Local 1-2 operate and maintain electric and gas utility infrastructure for Consolidated Edison (ConEd). Their work puts them at the center of New York City's energy systems.

The UWUA supports reducing greenhouse gas 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 New York to manage its emissions, that global climate change is real and that it affects our great city.

Our members are highly skilled and take pride in the work they do, whether it's installing new services or 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 many residential and business customers. That this view is shared by our members 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 that are the subject of today's hearing, policies 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 New York City to effectively manage its greenhouse gas emissions, highly skilled, good paying, union jobs must be placed at risk in pursuit of solutions that are economically, socially, and even physically unrealistic. That avenue creates a false choice which does little to ensure that the city manages its energy transition in a way that benefits the city and its energy workforce.

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 areas where upgrades to aging 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 city'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 neighborhood 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 New York City residents in comparison to electricity rates, which are among the highest in the nation. Eliminating new residential natural gas could lead to much higher costs for heat for working families.

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

New York City is at an inflection point in the evolution of its energy policy in response to the global climate crisis. Reducing the greenhouse gas emissions of the city's 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 city's population.

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.

On this point, one way in which the proposed amendment could be improved would be 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 New York City's 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 city, 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 city's 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 and other greenhouse gas reduction strategies, we do not support mandated building electrification. As individuals who work on energy infrastructure 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 the city's entire gas industry and complete retrofit of every building in the city of New York.

An obvious example as to why this is so, is to simply think through the issues associated with the physical retrofit of dwellings 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 ceilings, and remodel entire building configurations to accommodate the systems needed would be extremely expensive for homeowners and renters, regardless of income as well as massively and physically, disruptive. Multiplied over millions of New York City buildings, this strategy hardly bears contemplating.

The costs to residents and property owners could be astronomical, particularly in older dwellings that are not wired to handle the electricity load for modern electric appliances. We believe the most responsible – and achievable – approach to emissions reduction 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 the city's emissions 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 energy 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 city'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 city's energy and climate challenges.

Sincerely,

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

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President
Utility Workers Union of America, Local 1-2