

October 30th, 2025



Office of Environmental Justice & Equity
100 Cambridge Street, Suite 1020
Boston, MA 0211408

Re: Draft Standards and Guidelines for Community Benefit Plans and Agreements

Dear Members of the Office of Environmental Justice & Equity,

On behalf of the International Brotherhood of Electrical Workers (IBEW) Local 103 and the National Electrical Contractors Association (NECA) of Greater Boston, we appreciate the opportunity to provide comments on the Draft Standards and Guidelines for Community Benefit Plans and Agreements.

We commend the Office of Environmental Justice & Equity (OEJE) for developing this framework to help ensure that energy infrastructure projects deliver meaningful benefits to the communities that host them. If the Commonwealth is to achieve its environmental, economic, and equity goals, and, critically, build trust in the clean-energy transition, the only approach is for projects to move beyond plans and adopt formal Community Benefit Agreements negotiated with bona fide labor organizations.

Through Project Labor Agreements, responsible contracting commitments, and binding commitments to utilize contractors participating in registered apprenticeship programs, developers can ensure that projects are built by local, highly trained professionals working for responsible contractors. These contractors and their workforces are uniquely qualified to install and maintain advanced, high-risk, and high-impact technologies such as battery energy storage systems safely and to the highest professional standards.


Notably, Governor Healey's Executive Order No. 641 (2025) affirms that Project Labor Agreements "help deliver high-quality jobs, maintain competitive costs, and ensure that public projects are completed safely, on time, and on budget." Research from the University of Illinois further confirms that PLAs support competitive bidding and efficient project delivery, reinforcing that strong labor standards and cost-effective outcomes go hand in hand.

Additionally, the 2024 Climate Act (An Act Promoting a Clean Energy Grid, Advancing Equity, and Protecting Ratepayers) directs the Commonwealth and, in practice, municipalities, to give added weight to applicants that demonstrate compliance with prevailing-wage provisions and have a history of participation in certified apprenticeship programs. In this light, it is both prudent and consistent with state policy for the Community Benefits Guidelines to include clear language encouraging developers and communities to proactively conform with these standards.

Project Labor Agreements and high-road labor practices also send an important market signal to responsible developers and investors that Massachusetts' clean-energy economy is one built on quality, accountability, and community trust. Embedding these standards directly into Community Benefit Agreements will ensure that projects not only meet environmental goals but also deliver lasting, family-sustaining careers and tangible benefits for local communities, while ensuring that communities need not fear these projects being irresponsibly constructed.

Thank you for your leadership and the opportunity to provide these comments. We look forward to helping ensure that Massachusetts' clean-energy transition delivers safe, equitable, and high-road results for all communities through tangible labor and responsible contracting centered Community Benefit Agreements.

Sincerely,

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Louis J. Antonellis

Business Manager & Financial Secretary

International Brotherhood of Electrical Workers Local 103

DocuSigned by:

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Kristen Gowin

Executive Manager

National Electrical Contractors Association, Greater Boston Chapter