



NEW ENGLAND GAS WORKERS ALLIANCE

100 MEDWAY ROAD #403, MILFORD, MASSACHUSETTS 01757

March 9, 2022

Patrick C. Woodcock
Commissioner, Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: Building Energy Code Straw Proposal: Updated Stretch Code and Specialized Opt-in Code

Dear Commissioner Woodcock,

We appreciate the efforts of the Department in crafting this proposal and thank you for the opportunity to provide comments on the Specialized Opt-in Stretch Code Straw Proposal.

The New England Gas Workers Alliance (NEGWA) is an umbrella organization for local unions representing hundreds of skilled gas workers across Massachusetts. NEGWA and its members recognize the need to address climate change and increase renewable energy sources in an affordable and equitable manner.

NEGWA and its members strongly believe that natural gas will continue to be an important and necessary resource for the Commonwealth's clean energy future. We know that with appropriate oversight natural gas will remain an efficient, affordable and safe energy source for residents of the Commonwealth.

We respectfully disagree with the requirements of a HERS 42 rating for projects that choose to include a fossil fuel connection.

Electrification will not be viable for decades.

The green energy projects we can and should build to get to a carbon-free future are simply not coming online anytime soon. The 1,200 megawatts from Quebec Hydropower are delayed, if not dead, thanks to opposition from Maine to transmission lines. Solar projects across rural New England are threatened from groups opposed to the tree-cutting major projects require. Offshore wind takes years to permit, and takes years more to construct, particularly given the lawsuits filed to fight the projects. Even the 800 megawatt Vineyard Wind project, now underway, is at least two years from generating electricity. ISO New England warned *this year* that blackouts could be coming if the region hits a deep cold spell. As drafted, the specialized stretch code will place further burdens on our electric grid that it cannot handle. Further, as the representatives of working families across the Commonwealth, we are deeply concerned about the impact this proposal will have on the cost of electricity and heat for our members and their families for years to come.

Our existing infrastructure is valuable.

Our natural gas infrastructure is critical for our economy as it will continue to heat the homes of families and businesses in Massachusetts for decades to come. Radical efforts to halt the maintenance programs that keep residents safe and warm is dangerous and shortsighted. Disincentivizing connections limits the future use of our system for new technologies being developed that may rely on the adaptation of this infrastructure. Due to our region's cold climate, Massachusetts needs to keep its options open so that when affordable heating technologies emerge such as renewable natural gas, hydrogen, or other technologies in production they can be easily deployed. Our trained and skilled workforce must be kept intact and afforded the opportunity to both maintain the existing infrastructure while being trained on cleaner technologies as they continue to emerge.

Housing Production will suffer. Massachusetts has long endured an affordable housing crisis. The cost of housing production continues to soar, pricing many families in the Commonwealth out of home ownership. The additional requirements on fossil fuel connections in this proposal, including solar and electrification provisions, will stifle the transit-oriented development that promises to alleviate some of our housing shortage.

Additionally, as a matter of equity, many of the communities that aggressively advocated for the adoption of a specialized stretch code are the same affluent towns that have historically limited the development of affordable housing within their own borders. With the adoption of the specialized stretch code as it is written, or with more extreme modifications, the code will raise the cost of production to an unsustainable level in these communities. The result will be a back door moratorium on affordable housing production that is contrary to many efforts to reverse this longstanding injustice.

Thank you again for your continued efforts on these issues and please do not hesitate to contact us if you should have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Laflash".

Kathy Laflash
President
NEGWA, Inc.
USW Local 12003 & 12012 -National Grid employees,
USW Local 12004 & 12026-Eversource Gas employees,
USW Local 12325 -Berkshire Gas employees