

September 8, 2022

Dear Members of the Public Facilities Committee:

I am writing in opposition to the National Grid petitions to install new gas pipelines in three areas of Newton. There are many good reasons for this opposition that have been outlined in a letter to which I am a signatory. Here I wish to provide documentation from the Massachusetts Clean Energy and Climate Plan for 2025 and 2030 that supports accepting the recommendation in that letter, namely to pause a decision on this proposal until more information can be made available and understood about the most cost effective option to safely manage our gas system while adhering to Newton's Climate Action Plan. Specifically, many sections of the CECP advocate restraint in installing new gas pipelines and a preference for repairing rather than replacing. For example, it states [emphasis added]:

<https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download>

p. 25. Continued investments in natural gas pipelines can create stranded costs that must be borne by either remaining gas ratepayers or gas utility shareholders. **Thus, any additional pipeline investments must be made with deliberation and care.**

p,29. While existing gas pipeline infrastructure will continue to serve customers through 2030, **the declining throughput should motivate efforts to reduce gas system fixed costs as soon as possible.**

p. 49. **“The Commonwealth’s plan for building decarbonization should include strategies to mitigate the risks of locking in additional investments and costs of pipeline systems that must eventually be paid for by either ratepayers or gas utilities’ shareholders”.**

p. 78. “...the DPU is seeking to develop a regulatory framework to guide the gas utilities and align with decarbonization efforts...**gas utilities will need to assess the need for full replacement versus lower-cost repairs, minimizing additional capital investments** and avoiding the risks of installing a brand-new asset which is likely to be stranded in the future”.

Thank you for considering these arguments.

Sincerely,

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