

May 14, 2025

Acadia Center's Verbal Panel Testimony at Massachusetts Senate Committee on Climate Change and Global Warming Hearing On Draft Climate Compliance Plans Submitted to the Department of Public Utilities by the Local Distribution Companies (Gas Utilities)

Ben Butterworth
Director: Climate, Energy, & Equity Analysis

Thank you Chair Creem, Vice Chair Barrett and members of the committee for offering me the opportunity to testify today. My name is Ben Butterworth and I'm the Director of Climate, Energy & Equity Analysis for Acadia Center, a non-profit research and advocacy organization that works to advance bold, effective, and equitable clean energy solutions.

In Order 20-80-B, the DPU called for each LDC to develop a CCP addressing several key topics including, *"...demonstrating how each LDC proposes to contribute to the prescribed GHG emissions reduction sublimits set by EEA for both Scope 1 and Scope 3 emissions."* Notice the term "sublimits" in that quote – not a single sublimit, but multiple sublimits.

There are six sector-specific sublimits set by EEA and discussed in depth in the state's Clean Energy and Climate Plans (or CECPs), three of which are directly applicable to LDCs:

- 1) Residential Heating & Cooling
- 2) Commercial and Industrial Heating & Cooling and
- 3) Natural Gas Distribution & Service

The first two heating and cooling sectors are the big ones – they include combustion of fuels in buildings and account for about 35% of the state's total GHG emissions currently. Looking at natural gas alone in the heating and cooling sectors – it accounts for about 22% of total state emissions. The third relevant sector here is Natural Gas Systems, which includes leaks from the gas system and accounts for only about 1% of total state emissions.

One of the core problems of the CCPs is that the LDCs don't acknowledge their lynchpin role in achieving the heating and cooling sublimits. Quoting both the Eversource and National Grid CCPs, for example, they state, *"...the Secretary of the EEA has established two sublimits that apply to LDCs: (1) the natural gas distribution and service sublimit and (2) the energy efficiency emission reduction target for the 2025-2027 Three-Year Energy Efficiency Plan...."* Notice there is no mention of the heating & cooling sublimits in that quote.

Firstly, the three-year plan reduction target is not a "sublimit" as defined under the 2021 Climate Act or the CECPs, and secondly, it's well known that the emissions reductions projected to be achieved under the MassSave program –

despite being significant – are not nearly enough to put the Commonwealth on a trajectory to achieve the heating & cooling sublimits for 2030 and beyond. In other words – the two critical questions these CCPs needed to answer were:

- 1) What are the LDCs doing above and beyond the MassSave program to help the Commonwealth achieve the heating & cooling sublimits? And....
- 2) What are the key quantitative metrics the LDCs plan to track to ensure they are doing their part in achieving those sublimits?

In my view, these CCPs fail to meaningfully answer either question.

Are the LDCs solely responsible for achieving the heating & cooling sublimits? No, they, for example, have no responsibility for reducing emissions associated with the combustion of heating oil...but they do need to demonstrate how their proposed actions reduce emissions from combustion of natural gas in buildings, which accounts for about 63% of total emissions in the heating & cooling sectors. Heating & cooling GHG emissions need to decline 36% below 2021 levels by 2030 and 92% below 2021 levels by 2050 to meet the sublimits established by EEA. The lowest cost CECP scenarios call for, at minimum, a 76% decline in pipeline gas delivered to buildings from 2020 to 2050.

Acadia Center's interpretation of the language in the 20-80-B Order, is that the DPU instructed the LDCs to demonstrate, through a well-articulated plan, how their near- and medium-term actions were contributing to this level of gas decline.

Acadia Center simply doesn't see that in these CCPs – we see a very high-level list of action items that will marginally reduce heating & cooling emissions beyond what is already being accomplished under MassSave without any rigorous scenario analysis, modeling, or establishment of quantifiable targets to ensure the proposed actions will result in meaningful progress towards achieving the heating & cooling sublimits.

The lack of quantitative targets in the CCPs is frankly, quite shocking. I'd urge the Senate Committee to take a close look at the "Reporting Metrics" section of the CCPs (for example page 104 of the National Grid plan and page 196 of the Eversource plan). You won't see any targets around declining gas sales over time, number of neighborhoods strategically transitioned from gas to electric heating, or the dollar value of gas system investments avoided via successful implementation of non-pipe alternative projects. That's extremely concerning given the pace at which the Commonwealth needs to reduce emissions from the gas system.

Put simply, the CCPs do not appear to be the comprehensive planning document needed to adequately transition our Commonwealth off of natural gas in a timely and ordered manner. Thank you for the opportunity to testify and I am happy to answer any questions.

Ben Butterworth
 Director: Climate, Energy & Equity Analysis
bbutterworth@acadiacenter.org
 617-742-0054 x111