

March 6, 2020

Mark D. Marini, Secretary
Department of Public Utilities
One South Station
Boston, MA 02110

Re: Eversource Rate Case D.P.U. 1-120: Testimony of the Gas Leaks

Dear Mr. Marini:

The Emerald Necklace Conservancy and the Brookline GreenSpace Alliance submit these comments on the Department of Utilities Docket 19-120, the Eversource Rate Case application.

The Emerald Necklace Conservancy is a non-profit organization dedicated to the maintenance, restoration, and protection of the parks of the Emerald Necklace, whose 1,100 acres of parkland start in the Back Bay of Boston and extend through Brookline and Jamaica Plain to Franklin Park in Dorchester. Central to the Conservancy's mission is caring for the trees that line the parkways traversing this historic park designed by Frederick Law Olmsted in the 1880's.

The Brookline GreenSpace Alliance is a non-profit membership organization dedicated to the protection, preservation, and enhancement of open space in Brookline. The GreenSpace Alliance works closely with the Town of Brookline's Parks and Open Space Division as well as the various boards and commissions of the Town whose responsibility is to care for Brookline's parks, open spaces, and natural resources, including Brookline's tree canopy.

The Emerald Necklace Conservancy and the Brookline GreenSpace Alliance have an interest in this rate case because of the deleterious impact of natural gas on the trees both organizations are charged to protect. Quite simply, methane leaking from pipes under the streets kills trees by depriving their roots of oxygen, and carbon dioxide released when gas is combusted harms trees by polluting the atmosphere. An estimated 48 trees along the Emerald Necklace parkways are believed to have been damaged or killed by gas leaks. More than 500 trees along the streets of Brookline are believed to have been damaged or killed by gas leaks. This is not acceptable, and yet it is difficult if not impossible to hold accountable the gas distribution company responsible for these leaks.

Both methane and carbon dioxide are potent greenhouse gases that significantly contribute to climate change. By contrast, trees are recognized as a significant antidote to the adverse effects of climate change as they sequester carbon, reduce heat island effect, and mitigate storm water flooding.

Like many organizations, municipalities, and citizens, we are deeply concerned about the climate crisis and its effects on the Commonwealth's economy and the health of its citizens. We are committed to doing what we can to ensure that the Commonwealth reaches its goals under the Global Warming Solutions Act to reduce greenhouse gas emissions by 80% by 2050. We are looking for ways to move away from fossil fuels to sources of thermal energy that are non-emitting and renewable.

We are therefore interested in the aspects of the Eversource rate case that relate to its proposal to install pilots in three locations that would provide thermal energy to buildings, not through the combustion of natural gas but through geothermal energy drawn from the earth and delivered through Eversource pipeline infrastructure to the buildings in the projects.

We think it important to move forward with urgency to demonstrate if utility-scale geothermal microdistricts are a viable alternative to natural gas. Such infrastructure provides an opportunity for gas distribution companies to invest over time in a new business model for delivering thermal energy while reducing over time their investment in gas pipelines that are destined to become obsolete by 2050.

Under the Gas System Enhancement Plan, gas ratepayers will be charged approximately \$9 billion over the next 20 years to replace crumbling, leaking, explosive gas pipelines. The replacement pipelines are expected to be stranded assets long before they are paid for. We believe it makes more sense to invest this \$9 billion in an infrastructure that can deliver non-emitting renewable thermal energy to our homes and businesses. The sooner we make this shift, the better. The pilots proposed in this rate case give us an opportunity to innovate, for the benefit of generations to come.

Both the Emerald Necklace Conservancy and the Brookline GreenSpace Alliance are members of the Gas Leaks Allies, a collaboration of over 24 organizations and researchers focused in the short term on reducing methane emissions from the gas distribution system in Massachusetts, and in the long term on developing a path for the Commonwealth to transition to fossil-free sources of energy to heat and cool our homes and businesses. The Emerald Necklace Conservancy and the Brookline GreenSpace Alliance adopt and incorporate by reference the comments submitted by the Gas Leaks Allies. Their comments provide more detail about our concerns and questions.

We hope that the Department of Public Utilities will take seriously the impact of greenhouse gas emissions on the health and well being of the citizens of the

Commonwealth, and will move with urgency to work with Eversource and other gas distribution companies to develop and deliver alternative sources of thermal energy.

Thank you for the opportunity to comment.

Sincerely,

Marilyn Ray Smith /s/

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cc: Karen Mauney-Brodek, President, Emerald Necklace Conservancy
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