



# GROUNDWORK

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## Lawrence

August 28, 2020

Via E-Mail

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, 5th Floor  
Boston, MA 02110

*RE: D.P.U. 20-59, Joint Petition of Eversource Energy, NiSource Inc., Eversource Gas Company of Massachusetts, and Bay State Gas Company for Approval of Purchase and Sale of Assets Pursuant to General Laws Chapter 164 § 94 and § 96*

Dear Secretary Marini:

Thank you for the opportunity to provide public comment in the above referenced docket. We are grateful to be granted intervenor status in these hearings, and are happy to use this public comment period to acknowledge some of the specific changes we ask the Department of Public Utilities (the “Department”) make as part of its review of the settlement agreement (the “Settlement”).

Groundwork Lawrence (“GWL”) has been making change happen throughout Greater Lawrence since 1999. Through our environmental and open space improvements, healthy food access programs, youth education, employment initiatives, community programming and events, GWL creates the building blocks of a healthy community, and empowers residents to improve their quality of life. GWL develops community based partnerships which empower people, businesses and organizations to promote environmental, economic and social well-being.

GWL played an integral role in the response to the gas explosions. In the immediate aftermath, GWL worked to staff emergency shelters, distribute resources, and coordinate the community response. At the time of the explosions, seven full time and eight part time employees of GWL lived in Lawrence. GWL’s annual Spicket River Cleanup, a community event bringing together hundreds of volunteers scheduled to take place two days later, was cancelled. As part of the initial response, one of GWL’s open space projects the O’Connell South Common was rendered unusable after temporary housing was placed there for those that needed to evacuate their homes, and now GWL is serving as a lead organization in the park’s restoration and renovation. GWL

also continues to work with its community partners to understand the long-term impacts of the gas explosions and address the resulting individual and organizational needs.

Although we are happy to see Columbia Gas will no longer be operating in the state, residents of Lawrence are justifiably skeptical of how effective any other gas distribution company will be in ensuring the safety of its customers. We look forward to working with Eversource to learn how it will protect our community, and know there is much work ahead for the company to gain the trust of our community. We hope Eversource will prove to be a reliable and collaborative partner of the community as they take over operations. We appreciate the work the Attorney General's office ("AGO"), The Department of Energy Resources ("DOER"), and the Low Income Network have done in reaching this Settlement with Eversource, and are happy to see much needed resources will be dedicated to Lawrence, Andover, and North Andover as conditions of the sale. There are, however, changes the Department should make to this Settlement to strengthen the equity of its impacts.

The Merrimack Valley Renewal Fund will be an important resource for recovery and resiliency for all three municipalities, but processes and procedures must be put into place to ensure an equitable distribution of the funding throughout Lawrence, Andover, and North Andover. The housing and business environments in the City of Lawrence differ greatly from that in Andover and North Andover, and thus the city requires a different strategy from DOER and AGO to ensure Lawrence receives an equitable portion of resources. Specifically, we respectfully request the following changes to the Settlement:

1. Require the AGO to dedicate resources outside of what has already been identified as part of the Settlement to protect tenants who may be evicted or priced out of their homes when landlords update their housing through any of the initiatives outlined in the Merrimack Valley Renewal Fund, in order to ensure rents are not raised for a set period of time and then ensuring any increase does not represent an unfair, disproportionate amount when energy efficiency is improved. There were multiple occurrences of rent increases after new appliances were installed by Columbia Gas in affected housing in 2018. We believe it is necessary to incorporate specific and clear consumer and tenant protections as part of these well intentioned and needed grant programs, and believe the AGO is well positioned to serve in this oversight role.
2. Amend the "Municipal Clean or Energy Efficiency" initiative to specifically include climate resiliency projects on municipal owned land. Lawrence residents will be disproportionately impacted by climate change due to a number of factors, including a lack of open space and urban heat islands as a result of minimal urban tree canopy. Climate resilience is necessary to be used in combination with energy efficiency in municipal operations, as it supports and increases energy efficiency, particularly in such urban areas, often termed concrete jungles.

3. Amend the “Public Affordable Housing Energy Efficiency” initiative to allow for Community Development Corporations (“CDC”) and Community Action Agencies/Programs (“CAA/CAP”) nonprofit organizations to apply for this funding. In Lawrence, these nonprofit organizations fill the gap between municipally owned affordable housing and affordable housing owned by for-profit housing corporations. CDC and CAA/CAP nonprofit organizations should be eligible to apply for both this funding and the “Private Affordable Housing Energy Efficiency” funding.
4. In the “Removing Energy Efficiency Barriers and Increased Access to Efficient and Clean Energy for Low and Moderate Income Residential and Multi-Unit Housing” initiative, clarify if there will be a cap on administrative costs of the program within DOER and how much will go towards projects and infrastructure within the municipalities. Additionally, clarify how DOER will mitigate barriers to these programs given the high amount of renter-occupied housing in Lawrence, and how such mitigation will support access to existing rebate programs on an ongoing basis.

Thank you for your consideration of our requests and we look forward to further participation in this critical docket. Please reach out with any questions you may have.

Sincerely,



Lesly Melendez  
Deputy Director

Cc: Sarah Spruce, Hearing Officer  
Service List, D.P.U. 20-59 (by e-mail)