



July 8, 2020

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

Re: DPU 20-80 — Support for the petition from the Office of the Attorney General requesting an investigation into the impact on continuing business operation of local gas distribution companies as the Commonwealth achieves its 2050 climate limits.

Dear Secretary Marini:

Climate Code Blue endorses the petition from the Office of the Attorney General requesting that the Department of Public Utilities (the Department) initiate an investigation to assess the future of local gas distribution company (LDC) operations and planning in light of the Commonwealth's legally binding statewide limit of net-zero greenhouse gas (GHG) emissions by 2050.

#### **I. Statement of Interest**

Climate Code Blue is a Boston-based advocacy organization composed of physicians from Boston's major teaching hospitals and other local health care institutions. Our mission is to reduce climate change-associated health harms, particularly among the most vulnerable communities by partnering with local grassroots groups in advocacy and educational efforts. Our members are nationally-recognized experts in public health, environmental health, emergency medicine, disaster preparedness, and the health effects of climate change.

We support the Attorney General's petition and we applaud the urgency with which you advocate for ending our dependence on natural gas. Burning gas is unsafe for humans and the planet. It contributes to indoor and outdoor air pollution, it exacerbates existing health inequities, and it is hastening climate change, which is already having devastating effects on our health.

Burning natural gas increases nitrogen oxides and particulate matter in both indoor and outdoor air. Air pollution is associated with increased rates of asthma, chronic obstructive pulmonary disease (COPD), cardiovascular disease and death. Outdoor air pollution kills over 100,000 people a year in the United States. Gas cooking stoves result in indoor air pollution. Children living in homes with gas cooking stoves have increased asthma rates, compared to those in

homes with electric stoves. In Massachusetts, communities of color disproportionately suffer from illnesses associated with air pollution.

Gas is flammable and explosive. Explosions in 2018 in the Merrimack Valley resulting from an over-pressurized gas pipeline killed a young man and displaced 30,000 people. With over 32,000 unfixed gas leaks in Massachusetts, the gas system is inherently unsafe.

As of June, 2020, over 100 public health and health organizations have warned that climate change is a health emergency. Effects of climate change include, but are not limited to, marked increases in the range and number of vector-borne illnesses, like Lyme disease; heat-related illnesses and deaths; allergies and respiratory illnesses; and mental health disorders. As with Covid-19, communities of color suffer disproportionately from the health impacts of climate change.

## **II. Support for Attorney General's Petition**

Climate Code Blue recommends that the Department quantify the externalized costs of using natural gas and unmitigated climate change on health, mental health, and economic prosperity.

With the commitment of the State to health equity, the Department should consider the additive and synergistic impacts of burning gas on vulnerable populations and environmental justice communities already burdened by environmental harms.

According to the Applied Economics Clinic brief, the cost of replacing gas pipes will be \$17 billion. At current payment rates, it would take over 100 years to pay back, leaving billions of dollars in stranded assets. These costs to Massachusetts citizens are an underestimate because they do not include lost productivity due to illnesses associated with air pollution or climate change. We cannot continue with business as usual. It is critical that the Department evaluate the costs of alternative investments like networked geothermal pilots, community solar, wind, and grid-scale storage.

## **III. Conclusion**

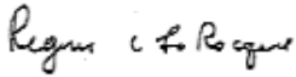
Burning natural gas harms our health and contributes to systemic health inequalities. The cost to the Commonwealth in economic and human suffering is immense. We must develop a comprehensive plan to transition off of gas in an equitable way. The Department must lead so that all gas companies are compelled to work toward goals that serve the needs of the public, on a shared timeline.

Climate Code Blue joins many other groups and individuals in urging the Department to initiate the requested investigations and welcome the opportunity to work with you and others in this process.

Thank you for your consideration.

Respectfully,


Climate Code Blue Leadership Team



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