

August 25, 2026

The Honorable Mark J. Cusack
State House, Room 43
Boston, MA 02133

The Honorable Michael J. Barrett
State House, Room 312-B
Boston, MA 02133

The Honorable Aaron M. Michlewitz
State House, Room 243
Boston, MA 02133

The Honorable Cynthia Stone Creem
State House, Room 312-A
Boston, MA 02133

The Honorable Bradley H. Jones, Jr.
State House, Room 124
Boston, MA 02133

The Honorable Bruce E. Tarr
State House, Room 308
Boston, MA 02133

Dear Members of the Committee of Conference on H.5175 and S.3143,

On behalf of the Northeast Gas Association (NGA)¹, I write to you regarding your efforts to pass energy affordability, and specific provisions in S.3143 that would significantly alter the Commonwealth's Gas System Enhancement Program (GSEP).

First, thank you for your work on behalf of the people of Massachusetts and your commitment to finding meaningful savings for consumers. We applaud your efforts and support your commitment to ensuring Massachusetts families and businesses have access to affordable, reliable energy. It is with this shared goal in mind that we respectfully offer our concerns.

¹ NGA is a regional trade association that focuses on pipeline safety and safety culture, education and training, technology research and development, operations, energy reliability and affordability, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas suppliers and associate member companies. Its member companies provide natural gas service to more than 13 million customers in 11 states (CT, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VT).

As you know, the Legislature established GSEP more than a decade ago to accelerate the replacement of aging, leak-prone natural gas infrastructure, improve public safety, reduce methane emissions, and modernize the Commonwealth's gas distribution system. Since then, Massachusetts Local Distribution Companies (LDC) have made significant progress replacing aging, leak-prone pipe with modern, safer, more reliable infrastructure. Indeed, Massachusetts LDCs have replaced more than 4,000 miles of leak prone pipe since GSEP's inception. Further, from 2014 to 2024, the total number of gas leaks have been reduced by more than half.

These investments have produced measurable public safety and environmental benefits. They have made Massachusetts communities safer. They have dramatically reduced gas leaks, lowered methane emissions, and modernized one of the oldest gas distribution systems in the nation. Yet additional infrastructure still requires replacement.

Still, we must acknowledge that Massachusetts families continue to face some of the highest energy costs in the nation. Residential electricity prices are among the highest in the country, and, while natural gas prices in the Commonwealth are higher than in many other states, natural gas remains the most affordable heating option for Massachusetts families and businesses in almost all cases.

Affordability cannot be achieved by making the Commonwealth's most affordable heating fuel less affordable, less reliable, or less accessible.

That is why we are concerned that S.3143 would move the Commonwealth away from the balanced approach that customers deserve. Characterizing continued investment in the existing natural gas system as simply an avoidable expense overlooks the reality that millions of Massachusetts residents and businesses will continue relying on the natural gas distribution system beyond 2050.

Natural gas remains the primary heating fuel across much of the Commonwealth and supplies more than half of New England's electricity generation. Regardless of long-term decarbonization goals, Massachusetts will continue depending on this commodity for decades to come.

Maintaining the system that safely and efficiently delivers this fuel to heating customers is not optional—it is a moral and legal obligation.

It is also important to recognize what GSEP is—and what it is not.

GSEP is not a program to expand the natural gas system into new communities. It is a proven regulatory mechanism under the Massachusetts Department of Public Utility's authority and oversight allowing utilities to quickly and affordably modernize older infrastructure already serving Massachusetts customers. Delaying or curtailing those investments does not eliminate the need to maintain the system; it simply leaves customers dependent on older infrastructure for longer while postponing necessary safety and emissions-reduction work – ultimately increasing costs to consumers in the long run.

NGA recognizes that any long-term infrastructure program should be periodically reviewed to improve efficiency, strengthen oversight, and protect ratepayers. We welcome that discussion and want to be an integral part of it. Improving GSEP, however, is fundamentally different from prematurely winding down a program that continues to deliver measurable safety and environmental benefits while substantial work remains unfinished.



Massachusetts is investing billions to build tomorrow's energy system, but the reality is millions of customers depend on natural gas as a critical part of our energy mix. Neglecting natural gas infrastructure today is not the answer for tomorrow. The transition will inevitably require maintaining both systems for some time. Policies that underinvest in the existing natural gas system will not eliminate that dependence; they will simply make it more expensive and less reliable.

NGA supports the Commonwealth's efforts to address affordability, while reducing emissions and advancing new energy technologies. Our members are investing in technology that safely extends the life of pipes, renewable natural gas, hydrogen research, advanced leak detection, and other innovations that will continue lowering emissions while safely and reliably serving customers. We believe these efforts should complement, not replace, the continued modernization of the gas infrastructure that Massachusetts families and businesses rely upon every day.

As the House and Senate prepare for conference negotiations on their affordability bills, we encourage conferees to prioritize savings that do not come at the expense of essential safety and infrastructure investments. The House passed legislation, H. 5175, which demonstrates that meaningful affordability measures can be achieved through reforms to energy-efficiency programs, administrative costs, procurement, and other areas while preserving the core mission of GSEP. Massachusetts can find ways to promote energy affordability without abandoning the infrastructure that safely, reliably, and most affordably serves millions of residents.

We appreciate your consideration and welcome the opportunity to work with you toward that shared objective.

Sincerely,

José Costa

President & CEO

Northeast Gas Association

