



January 30, 2025

NEW YORK CITY DEPARTMENT OF BUILDINGS
Notice of Public Hearing and Opportunity to Comment on Proposed Rules
The Department of Buildings (DOB) is proposing to amend its rules
regarding course providers - **Course Provider Rule Proposal Comments**

Oral Testimony
Robert D. Wilson, Vice President, Special Projects
Northeast Gas Association

Good morning, my name is Robert Wilson, Vice President of Special Projects for the Northeast Gas Association (NGA). I have over 40 years gas industry experience including 33 years with National Grid and its predecessor company Brooklyn Union Gas. Prior to retiring from National Grid, I held the position of Director of Pipeline Safety for National Grids US Operations. NGA is a not-for-profit regional trade association that focuses on education and training, technology research and development, operations, planning, pipeline safety and increasing public awareness of natural gas in the Northeast U.S. NGA represents natural gas distribution companies, transmission companies, liquefied and compressed natural gas suppliers, and associate member companies and organizations. Its operating member companies provide natural gas service to over 13 million customers in 11 states (CT, DE, ME, MA, MD, NH, NJ, NY, PA, RI, VT). Thank you for the opportunity to testify here today. While we applaud your efforts to enhance the Course Provider program and address potential unethical business practices, we urge caution as some of the proposals may have significant unintended consequences. NGA has submitted detailed comments and suggestions we believe meet the intent of DOB proposals to enhance Course Provider rules and urges the Department to consider these comments in their final rule.

Looking Back in History

The Northeast Gas Association (NGA) is part of a larger gas safety collaborative group formed after the East Harlem and 2nd Avenue incidents and includes, in coordination with GTI Energy, New York City Utility Members including Con Edison and National Grid and the plumbing trades of New York City represented by The Plumbing Foundation of New York (PFCNY), The Master Plumbers Council (MPC), UA Plumbers Union Local No. 1 Trade Education Training Center of

New York City along with representatives from the Westchester County plumbing community are herein collectively referred to as Gas Safety Joint Trades (“GSJT”).

As the Department is aware, the GSJT, under the leadership of PFCNY, and in coordination with NYCDOB and the New York State Department of Public Service (NYDPS) has led the state, and arguably the nation, in developing gas safety training and qualification programs specifically focused on supplementing existing gas training and certification programs required of Licensed Master Plumbers (LMP’s) in New York City.

With GTI Energy acting as the NYCDOB Registered Course Provider of record¹, and NGA providing delivery of the training program as an ICC Preferred Training Provider in conjunction with MPC and UA Plumbers Union Local No. 1 Trade Education Training Center of New York City; the GSJT has successfully trained, tested, qualified, and manages close to 2,000 plumbing technicians in over 750 individual LMP organizations.

Given the significant efforts that have gone into the development of this training, and the efforts of the individuals and associated organizations, the GSJT is concerned that proposed enhancements to current Course Provider Requirements, while well intended to improve the Course Provider program and address unethical business practices of some “bad actors”, may have significant unintended consequences on those that operate appropriately utilizing third-party relationships, such as that described above with GTI Energy, NGA and the GSJT.

Recommendations:

NGA is therefore respectfully suggesting alternative approaches that would meet the intent of enhancing the integrity and quality of Course Providers while offering the flexibility to continue proven industry leading training and qualification programs to meet Local Law 152 and NYCDOB requirements. In addition to these comments, NGA supports comments made by individual GSJT collaborative members including The Plumbing Foundation of New York.

These suggestions, as detailed in our written comments, include consideration of:

- Implementing a *validation process* to ensure continued use of valued third-party relationships in delivering the highest quality training experience for participants. This validation process could include disclosure of a formal agreement and further limit the third-party exception to nonprofit organizations (including 501(c)(6)) to avoid the perverse incentives of profit-seeking entities. These two suggestions would address DOB's ongoing concerns with third party relationships without placing an extreme detriment on the plumbing and utility industry.
- Additional/alternate credential options for non-profit organizations seeking Course Provider Status including Pipeline Safety Operator Qualification Program Providers meeting state and federal pipeline safety regulations recognized by the New York State Department of Public Service Pipeline Safety Program and approved by gas Utility Operators and/or, recognition of Approved International Code Council ICC Training Providers through the ICC Preferred Training Provider Program.
- Acceptance of existing training and qualification identification cards, containing similar training information to the Worker Wallet Card for the DOB 7-Hour Periodic Gas Piping Inspector Qualification.
- Consideration of tiered-program participation cost structure for non-profit organizations.

The NGA appreciates the opportunity to work collaboratively with the Department to ensure the greatest degree of Course Provider program integrity while achieving our parallel goals of ensuring competency of individuals providing periodic gas piping inspection services.