

Massachusetts Climate Justice Working Group Comments

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Via Electronic Mail

New England Energy Vision  
C/o Claire Sickinger  
Connecticut Department of Energy and Environmental Protection  
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Subject: New England Energy Vision Equity and Environmental Justice Comments

Dear Connecticut Department of Energy and Environmental Protection, Maine Governor's Energy Office, Massachusetts Executive Office of Energy and Environmental Affairs, New Hampshire Public Utilities Commission, Rhode Island Office of Energy Resources, and Vermont Department of Public Service:

We write as the Massachusetts Global Warming Solutions Act Implementation Advisory Committee Climate Justice Working Group in response to the New England States' Vision for a Clean, Affordable, and Reliable 21<sup>st</sup> Century Regional Electric Grid (Vision Statement). The undersigned organizations are committed to ensuring that the regional and state energy planning systems result in greenhouse (GHG) emission reductions while also ensuring targeted benefits to environmental justice (EJ) populations and other historically marginalized communities.

Since first forming in November 2019, the Climate Justice Working Group has sought to help define equity and climate justice for the Massachusetts Executive Office of Energy and Environmental Affairs and encourage these issues to be a primary consideration in evaluating energy and climate policy. Our working group has discussed at length the importance of prioritizing and anchoring energy policies in equity and justice, of supporting a people-centered approach to policy making, program design and implementation, and of taking a holistic approach to achieving climate goals, net zero by 2050, and overall compliance with state climate targets.

We thank the New England states for working together to produce the Vision Statement. We recommend that the New England States incorporate the following recommendations into the next phase of working toward a clean, affordable, and reliable 21st-century regional electric grid.

- Prioritize and anchor equity and environmental justice in the mission of ISO-NE to avoid further harm to populations most vulnerable to and most at risk from climate impacts, pollution, displacement, energy burden and cost while prioritizing climate, environmental, and health benefits to such populations.
- Prioritize analysis of cumulative impacts, while reducing burdens and increasing benefits to environmental justice populations.
- Employ a people-centered approach to market design, transmission planning and governance, providing for and ensuring broad-based stakeholder participation and input. The interests of and people from populations most vulnerable to effects of

climate change and most at risk of pollution, displacement, energy burden, and cost must be represented and influential.

- Reduce or remove market barriers to clean energy resources so they can participate in the market fairly to result in an increased share of our regional energy system supplied by renewable resources. An equitable response to climate change can not be achieved through verbal commitments alone. Dollars must be directed and invested in a way that supports community-led planning and fosters climate-smart building, community resilience, and markedly increased access to clean energy solutions than currently exists for environmental justice populations and communities most vulnerable to climate change. Existing data should be utilized to direct and track targeted investments and set a threshold for investments in environmental justice populations and climate vulnerable communities.
- States must push forward on clean energy and climate change mitigation priorities, including environmental justice even as they assess longer-term market designs. Such mitigation should redress harm of long-standing environmental, energy, and development policies that have burdened environmental justice populations and other vulnerable residents. Investments in clean energy and climate measures made to address environmental, health, and energy burdens imposed on environmental justice populations and other climate vulnerable residents should not induce displacement. Instead, processes should include measures to ensure that communities do not turn over as a result of environmental, energy, housing, and economic improvements tied to regional energy planning.
- States must broaden their approach to evaluating impacts of market design proposals to account for impacts such as retaining or incentivizing development of new fossil-fuel powered electricity generating resources.
- Transmission planning must be open, accessible, and transparent with respect to information relating to planning, including comparisons between the costs and benefits of transmission and non-transmission alternatives.
- Transmission planning must: 1) include a wide-array of environmental justice community stakeholders' voices during the entire planning process; 2) seek input from environmental justice populations; and 3) translate environmental justice populations' viewpoints into coherent and concrete policies. Environmental justice populations should not bear greater adverse impacts from transmission planning and siting than non-environmental justice populations. Planners must ensure environmental justice stakeholders understand the need for transmission investments and have a vested interest in and commitment to the planning and siting process.
- Transmission planning must be analyzed through an environmental justice and equity lens and such concerns must be addressed at the earliest stage, throughout the process, and as projects evolve.
- Technical information on transmission planning must be translated into plain language and into the first languages of environmental justice populations that are affected by transmission planning. The costs of translation and interpretation during planning meetings must be borne by the state or the project proponent, not

## Massachusetts Climate Justice Working Group Comments

community organizations or individuals in neighborhoods where transmission infrastructure is or may be located.

- Planning entities must prevent transmission siting from exacerbating existing equity concerns and impacts on environmental justice populations. In fact, the burdens of existing energy infrastructure must be reduced for nearby residents and workers. Additionally, the New England states must ensure that increased clean energy investments do not increase the energy burden in low-to-moderate income communities and environmental justice populations. The states must acknowledge that existing energy infrastructure disproportionately burdens environmental justice populations. The states should evaluate existing operating licenses and approvals to see if more stringent conditions can be applied to reduce burdens on nearby residents and workers.
- Transmission planning must consider a cumulative and holistic approach to transmission upgrades that redefines the benefits and costs of transmission investments to fully account for environmental justice and equity considerations, produces widespread benefits for environmental justice populations, and avoids impacts to environmental justice populations.
- States should have a stronger role in ISO-NE and NEPOOL processes, so that they can further the intent of their environmental justice laws and policies.

We offer these recommendations as a starting point for what should be reflected in the Energy Vision statement. Thank you for your consideration of our comments.

Sincerely,

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