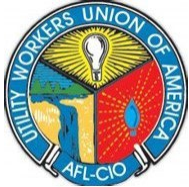


From: Les Wutka <lwutka@uwua.net>
Sent: Tuesday, December 06, 2022 11:48 AM
To: Planning <Planning@a2gov.org>
Subject: UWUA comments on 22-1967

Please see the attached comments regarding opposition to item 22-1967

Thank You,

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December 6, 2022
City of Ann Arbor
City Planning Commission

Re: 22-1967 Amendments to Chapter 55 – Unified Development Code (UDC)

Dear Chair Shannon Gibb-Randall and Commissioners,

We welcome the opportunity to comment on Ann Arbor's Planning Commission's consideration of approving amendments to chapter 55 of the Unified Development Code (UDC), which would ban natural gas connections for new construction, substantially renovated, or expanded buildings within the city.

The Utility Workers Union of America (UWUA) is a national labor organization whose roughly 45,000 members operate and maintain the electric, gas, water, wastewater, and municipal services sectors in 22 states. The UWUA has nearly 10,000 members in Michigan alone, most of whom are employed in the natural gas and electric sector or Michigan's economy. Many of our members live and/or work in Washtenaw County.

The UWUA supports reducing carbon emissions as our union consists of technically minded people whose everyday work involves thinking like an engineer, a mechanic, and a scientist. We clearly understand the need for Michigan to manage its carbon emissions, that global climate change is accurate and that it is affecting our great State. Our members take pride in their work, whether installing new services, repairing leaks, or maintaining existing services to improve public safety and protect the environment. Our members believe that natural gas is, in fact, a clean and cost-effective option for both residential and business customers. That this view is shared is reflected in the fact that requests for new natural gas services increase every year.

We believe that climate goals, particularly concerning the housing sector, should not be addressed solely from the standpoint of one energy application. The solutions for the housing sector, particularly the existing housing sector, should be discussed in a manner that encourages numerous technologies, as may be appropriate to an individual building, to reduce building emissions and energy consumption, limiting energy choices to electric-

only harms the economy and community resilience. Relying on a single energy delivery system eliminates consumer choice, suppresses innovation and competition, and could reduce reliability. In addition, being limited to a single energy delivery system unnecessarily increases vulnerability to extreme weather events and disasters caused by climate change. Natural gas is a very affordable energy source for residents in Michigan, which is particularly important during the region's cold winters. Without the option for natural gas for powering homes or preparing food, or providing hot water, when the power goes out, people are left with no energy alternatives to support their lives.

According to Chooseenergy.com, Michigan ranks 6th in the top 10 states nationally for the lowest cost to customers for natural gas per MCF, well below its neighbors.¹ Eliminating new residential natural gas could lead to much higher prices for heat for working families. It is axiomatic that electrification without robust energy efficiency improvements does not reduce energy consumption and, in many cases, results in higher energy consumption. Simply requiring or converting a building to all-electric while reducing gas usage does not necessarily reduce energy consumption. Consumption is likely to increase as building envelopes fail to achieve efficiency for electric technologies.

We see severe issues in undertaking a mandated conversion of all gas usage to electricity only—affordability, particularly in neighborhoods with older homes, rental properties, and low-income populations. Rental conversion costs are sure to be passed on to renters, which could lead to reduced housing options for residents. While not inconsiderable for any end user, the conversion costs could fall disproportionately on those customers who are least able to afford the changes or the resulting energy costs.

The Commission should discuss decarbonization issues in a manner that does not lead to a patchwork of conflicting regulations overlying physically vast, existing gas delivery systems that must, by their very nature, be engineered and maintained consistently across geo-political lines.

While we support decarbonization, we do not support bans on natural gas at any level. We see electrification as being far more costly and, on orders of magnitude, more physically tricky than simply modernizing gas end-uses. Strategies such as reducing building-related emissions through fixing gas leaks, replacing older gas appliances with state-of-the-art efficient gas appliances, and providing cost-effective incentives for energy efficiency and energy savings, are examples of policy approaches that would be more effective, cost-efficient, and, perhaps most importantly, realistically achievable as opposed to the elimination of energy choices and a complete retrofit of building stock.

From a workforce perspective, UWUA members working in natural gas occupy some of the most high-quality middle-class jobs in the State, jobs that are genuinely lifelong career pathways for people to follow. Further,

these are family and community-supporting jobs where these workers live and spend their paychecks, fueling the state economy. Sacrificing jobs of this quality to pursue climate ambitions that will likely have disparate economic impacts and may increase the energy burden for community segments is not sound public policy.

The costs to residents and property owners could be astronomical. For context, high electric demand means increased loads, additional electric supply costs for winter peak capacity, and incremental transmission and distribution upgrades necessary to meet peak demand. Regardless of whether customers are expressly subject to this proposed ordinance, all customers will be subject to these costs. We believe the most responsible and achievable approach to decarbonization is to optimize the use of natural gas, not minimize or eliminate it. Sound public policy should direct us to integrate and optimize these systems to support our lives as we reduce our State's carbon footprint. De-carbonization does not equate to electrification. We suggest solutions to our climate crisis should move past an overly simplified set of assumptions.

We thank you for the opportunity to provide input to your consideration of this proposed ordinance.



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ⁱ <https://www.chooseenergy.com/data-center/natural-gas-rates-by-state/>