July 3, 2013

Hon. Benjamin B. Downing  
Senate Chair  
Joint Committee on Telecommunications,  
Utilities and Energy  
State House  
Boston, MA  02133

Hon. John D. Keenan  
House Chair  
Joint Committee on Telecommunications,  
Utilities and Energy  
State House  
Boston, MA  02133

Dear Chairman Downing and Chairman Keenan:

On behalf of the Gas Utilities in the Commonwealth, the Northeast Gas Association (NGA) is pleased to provide comments on proposed House Bill 2937, regarding the replacement of gas meters. We support this legislation.

NGA is a trade association based in Needham that represents natural gas interests in the Northeast region – including Massachusetts, the other New England states, New York and New Jersey. The natural gas distribution companies in the Commonwealth deliver natural gas to approximately 1.5 million customers every day – from homes and businesses to schools, hospitals and power plants.

H. 2937 proposes to revise the time requirement for gas meter changes from the current seven year level to fifteen years. It further states that a gas company or municipal lighting plant may petition the Department of Public Utilities, or DPU, for approval of an alternate gas meter replacement plan, and that the department may approve such an alternate plan upon a determination that the plan is consistent with the public interest.

The current statute, originally passed in the 1930s, was adopted at a time when manufactured gas was the norm and which, due to its characteristics, impacted the accuracy of metering equipment at that time. This is not the case with the dry natural gas available through the interstate pipeline system in the decades since.

Data from across the country indicates that Massachusetts has among the shortest time period for meter change-outs for residential gas meters, at 7 years currently. Half of U.S. states set the meter change-out at 10 years or greater and/or offer flexibility in terms of allowing sample or statistical testing. Massachusetts is one of only 5 states in the country that mandates a periodic change program but without the option of presenting an alternate plan for review by the state public utility commission. Finally, as stated previously, the meter technology installed today is
more advanced, with much greater quality and accuracy than what was installed when the current statute was originally passed in the 1930s.

We feel this change is warranted. Enabling the DPU to review the matter and make its recommendation is also appropriate in our view.

Thank you for the opportunity to provide comments.

Sincerely,

Thomas M. Kiley
President and CEO