



To: The Massachusetts Energy Efficiency Advisory Council (EEAC)
From: The Boston Green Ribbon Commission Commercial Real Estate and Health Care Working Groups
Re: Public Comments on the Draft Three Year Plans
Date: June 20, 2018

This memo is a follow-up to [our previous comments](#) shared at the February listening session. It continues the Boston Green Ribbon Commission’s feedback on the Three-Year Plans. As a reference point, the Boston Green Ribbon Commission (GRC) is a coalition of business, institutional, and academic leaders from the metro Boston community that support efforts to advance sustainability and climate action. The GRC’s membership constitutes many of the large C&I utility accounts within Eversource and National Grid territory. These comments are submitted on behalf of the Commercial Real Estate and Health Care Working Groups led by A Better City and Health Care Without Harm.

We thank the EEAC and the program administrators for their work and commitment in drafting the resolution and Three-Year Plans, respectively. However, we are concerned by the decline in the C&I savings target in the Draft Plan, the lack of detail with the Plan, and limited transparency on the success or discontinuation of current initiatives. Specifically:

- **Increase the C&I Savings Target as well as Timeliness of Data tracking and Reporting:** From conversations with our membership, significant savings remain in the C&I sector from measures such as linear lighting, construction lighting, and CHP. Similarly, the potential assessments presented to the EEAC also identified more opportunities in C&I --- the plans proposed electric savings target had a 1.31% difference from the Consultant’s projections. Due to the impact of the lighting baselines on the residential sector, we see an **increased need for the programs to focus on delivering C&I savings**. In addition, CHP has made a significant contribution to the achievement of C&I targets, and we are concerned that relying on an MMBTU metric could hurt the achievement of the C&I sector’s goals. **We would encourage the use of all three metrics (MMBTU, kWh, therms) for continuity in data tracking and reporting**, and to allow for a holistic view of energy conservation across the residential, low-income and C&I programs.
- **Include and Integrate Strategies and Tactics:** The plan offers extremely limited specifics on program offerings. The plan provides C&I market segment barriers, but no solutions (Page 68). We and the Council should be able to see **how specific approaches map to and overcome the barriers: for example, to support energy reductions in large commercial facilities, increased granularity of building data and trainings for building operators can deliver deeper and more enduring savings**. This would enable all parties to more effectively provide feedback and track progress.
- **Increase Transparency and Reporting Within and Across Segments:** During the last Three-Year Planning cycle, the Commercial Real Estate Working Group (CREWG) commended the PAs for the inclusion of programs to improve the participation from the commercial real estate sector and for the launch of the Sustainable Office Design Program and Eversource Tenant Energy Efficiency Pilot. Since then, our

Working Groups and their constituents and the Council have received limited information on the success of these programs making it challenging to identify areas for improvement. We provide the tenant energy efficiency programs as an example, but these programs are indicative of a larger need for further transparency and reporting on the success of new programs or pilots. In addition, the proposed restructuring of the C&I programs may increase challenges with data continuity and tracking. The Plan should indicate how the utilities will coordinate with the EEAC and the EEAC Consulting team to continue to support timely tracking and monitoring of program activities.

In an important addendum to this letter, we resubmit our previous comments, with recommendations for how the Plan's current treatment of each item can be improved. We would welcome the opportunity to discuss these points of feedback with the PAs, Councilors or EEAC Consultants in the coming month. We would like to thank the EEAC and the PAs for the opportunity to submit comments, and for providing an additional public comment session for the draft plans. We appreciate your time and attention to these matters.

Sincerely,

The Boston Green Ribbon Commission's Commercial Real Estate and Health Care Working Groups

For more information

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##SEE ADDENDUM BELOW##

Addendum:

This addendum is designed to accompany [our previous comments](#) from the listening sessions. We reviewed the plan relative to the priorities we identified in our initial comment letter. The following addendum offers suggestions for the improvement of the segments of the plan related to our priorities.

Focal Area	Status and Recommendation
<p>Explore Further Savings Opportunities from Lighting</p> <p>(This concern aligns with Council’s 5th recommendation, “Increase program savings from the C&I sector from HVAC, process, lighting and CHP measures” and the Council’s sector-specific recommendations under Commercial New Construction on lighting and controls)</p>	<ul style="list-style-type: none"> • The C&I savings target is lower than the previous plan – it is unclear that all available lighting opportunities are being utilized in the utility’s assessment of the C&I savings potential. <ul style="list-style-type: none"> ○ The plan does reference an expansion of the Upstream program to additional products, but it is unclear what these products are and if they include additional lighting opportunities or will support advanced controls (Page 73). • Recommendation: We would appreciate clarity on the Upstream program expansion, and an understanding of how the PAs will act upon the significant linear lighting opportunity identified during the stakeholder workshops – the Consultants shared that linear lighting is almost 75% of all C&I lighting and the linear LEDs are becoming more cost-competitive. • Recommendation: Within the Greater Boston area, our membership has identified significant savings potential from construction lighting, which could be an appropriate area for a programmatic expansion.
<p>Focus and Expand Offerings Targeted at Tenant Spaces and Plug Loads</p> <p>(Aligns with Council’s 5th recommendation: “Increase program savings from the C&I sector from HVAC, process, lighting and CHP measures.”)</p>	<ul style="list-style-type: none"> • In the introduction to the C&I New Construction program in the plan (Page 54), supporting large tenant fit-outs is briefly mentioned, but it is not clear if this is coming from existing offerings (e.g. the Sustainable Office Design Program and the Eversource Tenant Energy Efficiency Offerings) or programmatic expansion. • Recommendation: The Plans should mention the existing offerings, any plans for an expansion and/or changes in marketing tactics for tenants. We remain supportive of the existing programs because tenants constitute a significant portion of C&I energy loads. However, both we and the Council have not received updates on the program’s successes and challenges. As such, it is hard to generate lessons learned and provide feedback. In addition to more detailed reporting, we would also encourage the PAs to conduct an evaluation of recent programmatic expansions of tenant-focused programs in other states, such as NYSERDA’s Commercial Tenant Program, which receives approximately 30 applications per month from the New York City area.
<p>Offer Expanded Training Through Mass Save and Simplify the Application Process</p> <p>(Aligns with Council’s 9th</p>	<ul style="list-style-type: none"> • We acknowledge and commend the utilities for implementing the Mass Save Application Portal (MAP). (Page 73) • We also note that the PAs are launching two training programs focused on lighting (Page 59). However, our membership has indicated that one of the most severe barriers to energy efficiency is suboptimal operation of building

<p>recommendation: “Modernize data management across all PAs and sectors, enhance accessibility to and usefulness of the data to the public, and leverage additional data sources to accomplish items 1-8 above,” and the Commercial New Construction Recommendation on HVAC and Controls.)</p>	<p>management systems and limited institutional knowledge due to facilities staff turnover. To ensure that there a strong base of effective operators will require a more robust, continuous training offering.</p> <ul style="list-style-type: none"> • Recommendation: The pilot municipal building operator controls training currently being funded by the utilities be expanded to the rest of the C&I sector. The Plan should include how the intended improved performance will be tracked, and maintained.
<p>Increase Continuous Commissioning through Stronger Support for C&I Data Collection</p> <p>(Align with Council’s Commercial & Industrial Recommendation on Data-Driven Customer Acquisition and Engagement Strategies and Big Data)</p>	<ul style="list-style-type: none"> • We were excited by the inclusion of the streamlined retro-commissioning (RCx) and O&M programs as well as the use of historical data to support these programs (Page 58). • Recommendation: The proposed program will not be available until 2021. We would urge the utilities to make this available much sooner, as this is a significant pathway for C&I savings. • Recommendation: This program should integrate improved building data granularity and advanced building operator controls training to help facilities better understand how to utilize, interpret, and take advantage of the data analytics that will be integrated into the streamlined RCx offering.
<p>Study the Incorporation of Resilience into Efficiency Programs</p>	<ul style="list-style-type: none"> • Recommendation: As stated previously, we believe that the efficiency programs can also add value as a resiliency strategy. This opportunity should be studied during the next planning cycle. The ACEEE has already begun investigating how energy efficiency analyses can incorporate considerations of resilience, and this could be a pathway for Massachusetts to retain its thought leadership on efficiency programming.
<p>Increase Savings from Utility-Sponsored Demand Management Programs</p> <p>(Aligns with Council’s 2nd Recommendation, “Include goals specific to active demand management and integrate the delivery of active demand management offerings within the EE programs in the 2019-2021 Plan, and the cross-cutting recommendation on active demand management.”)</p>	<ul style="list-style-type: none"> • The C&I program now contains an Active Demand Management Offering. The program is designed as a pay-for-performance program, which will reward any technology which is able to deliver peak demand reductions (Page 75). • Our members have expressed interest in stronger demand management and energy storage technologies over the past year, and support a more ambitious goal than the PAs proposed. Several hospitals are participating in the MassCEC ACES program, and the Commercial Real Estate Working Group hosted a member event in April, purely focused on storage opportunities. This is an area of significant interest, and we believe the active demand management offering could be more closely aligned with the Consultant’s estimated potential, which was 437 MW with the inclusion of storage. • Recommendation: Ideally, this program would provide support for both summer and winter peak, increasing the opportunity for savings. We would also encourage the utilities to look closely at program design

	<p>models from utilities, such as Con Edison, whose demand management program jump-started the storage market in New York City. The active demand management offering can simultaneously deliver savings and support market development for new technologies.</p>
<p>Continue to Expand Savings from Combined Heat and Power (Aligns with Council’s 5th recommendation, “Increase program savings from the C&I sector from HVAC, process, lighting and CHP measures,” and the commercial and industrial CHP recommendations.)</p>	<ul style="list-style-type: none"> • We note that the utilities restated their commitment to explore combined heat and power, and are encouraged by the focus on targeting smaller-scale applications for multifamily, hospitality and restaurants (Page 71). • Recommendations: We would like to see a specific target for CHP in the plan text, aligned with CHP’s potential for energy savings throughout the state. This target should include an articulation of how CHP savings will be evaluated in light of the proposed MMBTU metric. We would encourage the use of all three metrics (MMBTU, kWh, therms) for continuity in data tracking and reporting.

Thank you for your attention, and we look forward to continuing to engage with you on these matters.