

Comments at June 27, 2018 EEAC Public Comment Meeting  
MACDC and LISC Boston

Commissioner Judson, Energy Efficiency Advisory Council, Investor Owned Utilities, and Department of Public Utilities:

My name is Don Bianchi, and I am the Senior Policy Advocate for the Massachusetts Association of CDCs. On behalf of MACDC and LISC Boston, I would like to comment on the proposed Statewide Three-Year Energy Efficiency Investment Plan for 2019 through 2021. These comments are consistent with the letter we submitted to the EEAC dated May 15.

Thank you for your work to develop and expand nation-leading energy efficiency programs in Massachusetts. We encourage you to allocate resources via the 2019-2021 Three-Year Energy Efficiency Plan in four strategies. We feel investment in these strategies focused on the building sector broadly, and affordable housing specifically, will help achieve the energy efficiency goals we have as a Commonwealth.

**The first three strategies pertain to Passive House, as encouraging Passive House standard construction will help drive deep energy savings for the building sector.**

1. Because Passive House is a new construction technique, more training is needed for all general contractors, subcontractors, and consultants working on these projects to ensure quality construction and cost containment. *We suggest the EEAC consider \$1 million of Passive House Training funding via the next Three-Year Plan, which would include training, curricula development, demonstration training equipment, and specialized facility needs, to help drive this innovative building method forward.*
2. In addition to incentivizing training, we believe funding affordable multifamily Passive House pilot projects will be critical to move toward achieving scale in the affordable housing sector, and generate learnings and approaches that drive down project costs. *We recommend the EEAC allot \$5 to \$10 million within the next Three-Year Plan to cover any potential Total Development Cost (TDC) gap for emerging affordable multifamily Passive House projects in MA. As a condition of receiving this funding, pilot projects could be required to benchmark their projects for at least 5 years to generate adequate post-construction energy savings data.*
3. The third strategy is Green Design Charrettes for Affordable Multifamily Passive House New Construction. *We encourage the EEAC to offer \$7,500 per multifamily affordable Passive House new construction project, for development teams to engage in a “green” or integrated design charrette.*

**The fourth strategy is expansion of the LEAN Multifamily Program to 80% SMI with an accompanying 20% increase in its total budget** – From speaking with LEAN Multifamily Program Administrators, our understanding is that flexibility was provided in the last Three-Year Plan for LEAN to provide services to properties with a majority of households up to 80% of State Median Income (SMI). However, this

eligibility cutoff is currently determined on a case-by-case basis and not marketed. We think expanding the LEAN Multifamily Program to 80% SMI, which would bring its eligibility guidelines in line with HUD's definition of low-income, should be fully standardized. *We recommend that LEAN's budget be proportionally increased by up to 20% to ensure all residents at or below 80% SMI are equitably served by this valuable program.*

On behalf of LISC Boston and MACDC, we thank you for your leadership in the design of cost-saving, environmentally-beneficial energy services, and ask for your partnership moving forward.