

5/16/2018

To: Members of the EEAC
From: Steve Cowell, President, E4TheFuture

Re: Public Comments on the proposed 3 year plan

I would like to begin by providing a summary overview of our perspective and feedback on the proposed Three Year Plan submitted by the PAs on April 30, 2018.

Initially I'd like to present a positive recognition of some of the key parts of the plan:

1. Massachusetts is the number one state in the country for energy efficiency (EE) and this plan with its more than \$2.3 billion investment over three years is certainly significant. I believe it's higher, certainly on a per capita basis, than any other state. This is a positive proposed investment with a very positive return on the investment.
2. The plan has a very strong focus on low/moderate income customers and the strong collaboration with the low-income network through LEAN, which is more established than for any other state.
3. There is a clear focus on fuel-blind MMBTU goals which are strong and focus on the benefit to all consumers, not stuck into fuel or technology silos.
4. The level of Non-Energy Benefits (NEBs) is perhaps more comprehensive than for any other state.
5. There is a recognition of hard to reach sectors, including renters, middle income and small/micro businesses, which is a positive step toward improving service delivery.
6. Treating multi-family buildings as a whole building and not broken down into commercial and residential meters and uses is positive.
7. Lastly, the fact that the PAs are projecting continued high savings in spite of facing the decrease in lighting savings is a positive sign.

Some recommendations for improvement or development in the next more detailed version of the plan:

1. Increase development of, and access to, data on the proposed and implemented service delivery, perhaps to a targeted group of stakeholders as well an appropriate level to the general public.
2. Include background data on electric and gas savings, including time of impact--if possible, to understand and calculate the impact for purposes of reducing the winter cost of unregulated natural gas that increases the cost of electricity and level of emissions.

3. Develop and include an opt-in smart meter and Time Varying Rates (TVR) for customers receiving energy assessments to facilitate introducing Active DR as well as provide a better ability to measure and estimate savings results both to consumer and for evaluation purposes.
4. Increase focus on both natural gas heating savings and perhaps active DR for gas to reduce or avoid winter price spikes and any potential for unnecessary pipeline construction (as per the Analysis Group study).
5. Improve the strategy of addressing the needs of 'micro' small business through targeted collaboration with third parties, targeted third-party 'ambassadors' that have clear customer focused skills based on the sectors of the micro business energy needs.
6. Create a clear and close collaboration with DOER and MassCEC on the evaluation and integration, on an expedited basis, of new technologies and products as they become available. Technology is moving fast; incorporating these new technologies and partners quickly will facilitate hitting aggressive and expanded goals.
7. Include the Home Energy Score (HES) as part of the energy assessment. This is being proposed in the legislature but could be included as part of the program without a controversy. We would encourage all PAs to include the HES.
8. One "out of the box" idea is to include solar installations as part of the HEAT Loan program but perhaps without any interest write-down unless it is from MassCEC; this would allow customers to package renewables and efficiency in a much more facilitated manner and would not violate any current required separation.
9. Finally, expand relationships with community based or sector-based partners to assist with outreach and follow through on measures. This is mentioned in the plan but might be more effectively emphasized.

Thank you for your consideration.