

Comments on September 14th, 2018 draft of the 2019-2021 Three Year Efficiency Plan
To: Energy Efficiency Advisory Council
From: Northampton, MA Mothers Out Front

As citizens of Massachusetts, we are concerned with the sluggish response of the DPU to the need to aggressively support the switch away from fossil fuels to renewable energy sources. After reviewing the September 14th 2018 draft of the 2019-2021 Three Year Efficiency Plan under review by the Energy Efficiency Advisory Council, we respectfully submit the following comments:

1. The over \$22 billion in benefits to gas and electric ratepayers as a result of the \$8.1 billion invested since 2010 is laudable. In addition, we are pleased that the Sept. 14th draft of the plan incorporates expanded outreach to low and moderate-income households. We also applaud the effort to target peak demand as well as the commitment to storage of solar and wind generated power.

2. We are concerned that the September 14th draft contains energy consumption savings goals that are lower than those recommended by the consultants. In their report, the consultants recommended goals of 2.9% electrical consumption savings and 1.25% gas consumption savings. The September draft includes lower goals (2.47% and 1.08% respectively). This is the wrong direction. If anything, the goals should exceed those recommended by the consultants.

3. We also disagree that the “Energy Optimization” effort allowing All fuels to All fuels conversion. Since electricity generation is most easily converted to renewable supplies, energy conversion should encourage the switch to electricity, not to gas or propane. EE dollars should be spent to drive conversion to renewable based electrical energy sources. In addition, higher incentives should be provided to make electric air source heat pumps affordable to a broader income swath of homeowners.

4. In addition, energy efficiency not only reduces GHG emissions but also contributes to cost avoidance for GWSA compliance (\$35/ton). This should be reflected in the accounting of benefits in the 3-year plan. Including this contribution should increase resources available to dedicate to energy efficiency measures.

5. The incentives proposed in the draft 2019-2021 Plan represent a substantial increase over the 2016-2019 plan, but the return in benefits is substantially lower. There is no justification provided for the increased incentives and they should be lowered.

Thank you for this opportunity to comment. We look forward to the final plan.

Mothers Out Front Northampton