



To: The Massachusetts Energy Efficiency Advisory Council (EEAC)

From: The Boston Green Ribbon Commission Commercial Real Estate and Health Care Working Groups

Re: Final Comments on the Draft Three Year Plans

Date: October 29, 2018

This document is a final supplement to the previous comments of the Boston Green Ribbon Commission's Health Care and Commercial Real Estate Working Groups [on the draft plan released in April, our verbal comments at the June listening session, and our comments on the September Plan](#). The Boston Green Ribbon Commission (GRC) is a coalition of business, institutional, and academic organizations which constitute many of the large C&I utility accounts within Eversource and National Grid territory.

To begin, we commend the utilities, the Council, the Massachusetts DOER and the EEAC Consulting team for collaborating to produce a robust plan. The savings levels proposed in the term sheets, the increased ambition of the active demand program, and the inclusion of metrics for active demand in the utilities' performance incentives all signal a spirit of innovation and transformation. We would also like to thank the utilities for accelerating the timeline for the retrocommissioning and O&M offerings for the C&I sector. These will help deliver meaningful additional savings from the C&I sector. There are a few additional areas where we have final recommendations and comments for the Plans:

- **Additional Lighting Savings:** During the extraordinary EEAC meeting, the Consultants commented that they believed there were additional lighting savings available for the C&I sector. Due to this, they stated that they expect the PAs to overachieve the C&I target. Our members have repeatedly emphasized that there are additional opportunities within linear lighting and construction lighting. Expanded outreach and programming for these measures through the upstream and prescriptive incentive pathways could increase achievable savings and move the electric savings target closer towards the Consultant's original potential electric potential estimate of 2.9%.
- **Timelines for Other C&I Programming:** While we did receive clarity on the RCx program, the timeline for other announced C&I program enhancements, like the SEM cohort or the two active demand programs, are not clear. These additional clarifications will help us effectively communicate with our membership about upcoming opportunities. An earlier launch date would also enable the enrollment of facilities in these program enhancements faster, generating additional opportunities for C&I savings over the plan term. In the interest of transparency, these timelines should be reported to the Council before the end of the calendar year, and ideally be placed within the text of the Plans.
- **Metrics:** We are pleased to see the series of additional metrics that the PAs have agreed to report to the Council and key stakeholders on a regular basis. This will enable more robust stakeholder support for the plan, and monitoring of the Plan and revisions to programming throughout 2019-2021 to better serve customers. The utilities offered to report on up to six additional metrics in the term sheets. Given the importance of C&I savings to the achievement of the overall savings goals, we would urge the PAS to include several additional C&I-focused metrics. We second the ideas in Council's [April Resolution](#), which asked for metrics on:
 - Savings for Lightings and HVAC by PA; and
 - Square Footage projected to be served, number of individual customers, and energy savings projections by PA for the CRE-specific offering

We also suggest that savings and participation rates are presented by the C&I customer segmentation introduced within the Three-Year Plans (page 94, September draft). This would be in accordance with previous reporting for plan year 2012, when the utilities periodically provided these metrics by segment. Finally, we second MAPC's comment made during the extraordinary meeting, which called for parallel metrics to the residential sector, such that C&I participation rates could also be disclosed by zip code.

Again, we would like to thank all parties involved in the Three-Year Plan development for constructing a set of priorities responsive to constituent feedback. We look forward to continuing to collaborate with you in the years ahead to advance efficiency in the Commonwealth.

Sincerely,

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

For more information

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