



Green Justice Coalition Response to the Program Administrators' Draft EEIP for 2016-18

Green Justice Coalition appreciates this opportunity created by the Council to respond to the PAs' draft Three Year Energy Efficiency Investment Plan. Given our own ongoing investments in improving Massachusetts' efficiency program, we are eager to help ensure that the next EEIP reaches its full potential and that longstanding concerns about access are addressed.

Several Council members have expressed their disappointment at the timid savings goals in the draft, and we concur there is significant room for improvement. As the consultants' presentation shows, adhering to the current draft would result in a sharp drop-off from the current savings trajectory, and would undoubtedly result in an embarrassing slowdown of economic and climate benefits that have accrued so far to MA ratepayers, rather than the acceleration we need, and that is demonstrably possible with concerted PA effort. We urge the PAs to explain the assumptions behind their figures, and how the consultants' assessment of potential can be refuted. Failing to do so opens the door to concern that PAs are failing to meet basic obligations under the program's enabling statutes.

With regard to renters, we are glad to see mention of a special 'triage' visit aimed at providing some immediate relief, with the potential for more given landlord cooperation and appropriate structural circumstances. We do wish to go on record that, by definition, a triage is an emergency fix that holds one over until full attention can be provided. With this in mind, we urge the Council not to support any Plan draft until the **special visit concept is fully developed with specifics**, and a procedure is in place for providing efficiency services to renters on par with other ratepayers. Further, and more importantly, we ask that, as a mechanism for ensuring attention to this long-sidelined ratepayer segment, **an explicit commitment to serving renters be included in the Plan language, along with benchmarks** for meeting the pent-up demand. This is a sizable group, making up often two-thirds or more of households in many MA cities. Without a stated commitment and a timeline for reaching that commitment, there is no means for accountability. Similar standards are used in serving other customer segments and we ask for no less a focus with renters. Once the commitment is firm, a special visit can be developed, along with other promising ideas such as expanding the Whole Building approach, developing landlord-specific messaging and materials, engaging municipalities on building code upgrades, etc.

In the second (current) EEIP, the PAs created Efficient Neighborhoods Plus with the aim of serving moderate-income ratepayers, who were acknowledged as having specific needs, and who the PAs describe as being a “high priority” in the third Plan draft. Seeing no mention of an expansion of the tailored incentive in EN+, with its success in drawing customers into the program who would not have participated otherwise, we remain hesitant about PA intentions. Our unease is compounded by the lack of specifics in the proposed partnership with LEAN to serve these customers. For example, what is the enhanced incentive the draft mentions? What about customers who fall into the 80-100% SMI bracket who were eligible under EN+? Have the PAs considered the significant barrier that income qualification presents, about which GJC and others have expressed concerns in the past- and how do they plan to address it? If LEAN is already stretched to capacity serving the 0-60% bracket, will serving this new segment entail a proportionate budget increase? **These and other questions deserve satisfactory answers before the Council signs off on this draft**, or we may be stuck with another three years of mediocrity in serving this important constituency.

Will the data so obviously needed for developing effective programs ever be made available by the PAs? Given their staunch efforts over the years to block the release of this fundamental information, we urge the Council to use its leverage during this Plan process to **hold strong for language in the Plan requiring the regular reporting of program data by zip code** (with provisions for adequate privacy protections of course), as the Department of Public Utilities ruled in December 2014. With this structure in place, the PAs would be free to develop the actual reporting mechanism that best suits them. Let us be honest: failing such a requirement, the prospect of continued myopia in program design is very real.

Again, we members of the Green Justice Coalition commend you on the Commonwealth’s sustained achievements in this vital field, and express our gratitude for your sincere efforts to ensure the program’s benefits are shared equitably. We look forward to a dynamic new EEIP, and a world-class efficiency program in which we can all share pride.

For the Green Justice Coalition: Community Labor United, Alternatives for Community and Environment, Boston Climate Action Network, Chelsea Collaborative, Clean Water Action, Chinese Progressive Association, Coalition for Social Justice, Mass Energy Consumers Alliance, Neighbor To Neighbor MA