



HCWH BOSTON OFFICE

HEALTH CARE WITHOUT HARM  
41 OAKVIEW TERRACE  
JAMAICA PLAIN, MA. 02130  
WWW.NOHARM.ORG

Date: March 31, 2015

Re: ***EEAC Resolution Concerning Its Priorities for the Development, Implementation, and Evaluation of the 2016-2018 Three-Year Energy Efficiency Plans***

To: Energy Efficiency Advisory Council, MA DOER, Consultants, and Program Administrators

From: Boston Green Ribbon Commission (GRC) Health Care Working Group participants<sup>1</sup>, MASCO and Health Care Without Harm (HCWH)

Health Care Without Harm, MASCO and the GRC-HC Working Group commend the Counsel, DOER, consultants and PA's for producing an excellent document. This year's effort clearly demonstrates good collaboration and rapid learning, even better than 3 years ago. Kudos to all. We strongly support its approval, as is, at the March 31, 2015 meeting, and that the 3YP fully comply with its content.

We also strongly support the March 5, 2015 EEAC consultant's conclusions, that there are significant opportunities to increase savings cost-effectively, especially in C&I. Administrators spent:

- Gas: 2/3 of their C&I budget in 2014 and achieved 92% of savings goals
- Electric: 86% of their C&I budget in 2014, achieved 89% of savings goals.

Given the cumulative C&I savings shortfalls of prior years and the substantial wiggle room in the Benefit Cost Ratio, the rapidly improving programs can afford to continue their progress beyond low hanging fruit to include the fruit at the very top of the tree in the back corner of the smaller orchards.

To achieve the aggressive targets that will soon begin development, the following must be addressed in the draft plan, workshops and/or final 3YP as appropriate:

**Remaining workshops:**

Address the C&I topics that were not covered previously:

- Project Management Support Services\*, and customer resistance to ESCO's ESA, & performance contracting
- Segment strategies\*, including the Health Care Best Practice Study's recommendations
- C&I financing\*
- Enhanced comprehensiveness –Metrics for multiple-measures installed
- Mid-size customers\*
- Expanded upstream programs.

\*We will not be able to fully support a plan that fails to address these.

**Segment Specific Approaches**

6. *C&I customers need to know whom to call, especially as the programs and personnel change. Find a way for the MassSave web site to identify each major segment's utility point(s) of contact, categorized by customer size, geography, etc.*

*To address audit quality inconsistencies, create segment-appropriate standards and training for audit content and processes, and provide education in their use to both customers and vendors.*

**Retro-Commissioning, Building Controls and Sub-metering**

12.f. Expand training to increase the number *and qualifications* of vendors *for specific segments* who provide retro-commissioning and building controls in the marketplace.

**Hockey Stick Pattern**

16.b. Avoid offering incentives that create inequities or unintended consequences (e.g., waiting to the end of year, not moving forward, *or the inability of willing C&I customers to act on end-of-year deals due to staffing limitations and/or time constraints*).

Thank you for the opportunity to be part of this process and submit comments, which we ask be made part of the meeting's formal record.

Respectfully,



Paul Lipke, for  
Health Care Without Harm, and  
Boston GRC Health Care Working Group participants



Sarah Hamilton  
MASCO

---

<sup>i</sup>[The Boston Green Ribbon Commission](http://www.greenribboncommission.org/health-care) is a group of business, institutional and civic leaders in Boston supporting the implementation of the city’s Climate Action Plan. The plan includes strong recommendations on how Bostonians can increase efficiency, reduce emissions and prepare for extreme weather and higher sea levels. Many cities have produced similar plans. But few have also enlisted the support and leadership of the local business community as effectively as Boston, to help reduce greenhouse gas emissions 25 percent by 2020 and 80 percent by 2050. <http://www.greenribboncommission.org/health-care>

**Health Care Without Harm** <https://noharm-uscanada.org/> works to transform the health sector worldwide, without compromising patient safety or care, so that it becomes ecologically sustainable and a leading advocate for environmental health and justice. [HCWH-Boston](http://www.healthcarewithoutharm.org/boston) leads some of its most ambitious efforts, covering toxic reductions, green building, energy efficiency, and climate change. As a result, Boston's health care sector is playing a leadership role in regional efforts to address climate change.

The Boston Green Ribbon Commission’s Health Care Working Group is coordinated by Health Care Without Harm-Boston, and includes:

Beth Israel Deaconess Medical Center	Heywood Hospital
Boston Medical Center	Massachusetts Eye and Ear Infirmary
Brigham & Women's Hospital	Massachusetts General Hospital
Cambridge Health Alliance	MetroWest Medical Center
Carney Hospital	Partner's Health Care, and its 11 hospitals
Children's Hospital Boston	St Elizabeth's Medical Center
Dana Farber Cancer Institute	Steward Health Care
Harvard Medical Collaborative	Tufts Medical Center