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Massachusetts Energy Efficiency Advisory Council

Commissioner Judith Judson, Chair
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: City of Cambridge's Priorities for the 2019-2021 Three Year Energy Efficiency Plan

Dear Commissioner Judson:

Thank you for your leadership on expanding the Commonwealth's nation-leading energy efficiency programs. The state's energy efficiency programs are central to supporting residents, businesses, and municipalities in implementing energy and cost saving measures, and in achieving the greenhouse gas reduction goals of the Global Warming Solutions Act and municipal net-zero goals. The City of Cambridge appreciates the dedication of the Energy Efficiency Advisory Council (EEAC) and the Program Administrators (PAs) in developing the draft 2019-2021 Three Year Energy Efficiency Plan. However, as outlined below, we feel there are further opportunities to expand access to energy efficiency, improve the uptake of programs, and better deliver energy savings and greenhouse gas reductions for Massachusetts beyond those proposed in the draft plan.

The program design and measures proposed by the Plan should align with state and local climate goals. In addition to the Commonwealth's own Global Warming Solutions Act, many municipalities are setting net zero or climate-related goals. In Cambridge, we have adopted a Net Zero Action Plan to eliminate greenhouse gas emissions from buildings, and we promote low-carbon solutions for all sectors and building types. The Plan should include incentives for residential, multifamily, low-income, C&I, and municipal buildings to adopt fossil fuel free and low-carbon measures, and should integrate this into program design by considering the greenhouse gas emissions impacts of measures. In particular, the Plan should provide much greater support for renewable thermal for heating and cooling, in both retrofits and new construction, through incentives and education that align with the Commonwealth's Alternative Energy Credits and MassCEC offerings. Today, the state programs for renewable thermal and the statewide program for energy efficiency remain siloed.

We strongly encourage incorporating concrete opportunities for municipalities to partner directly with PAs to advance our mutual goal to promote energy efficiency. Like many municipalities, we work at the community level to foster energy efficiency and connect our residents to the appropriate programs. In any given year, we conduct dozens of tabling events, workshops, canvasses, mailings, and in-school education sessions to promote energy efficiency programs. Yet we have very limited opportunities to collaborate with the PAs on setting goals, creating engagement materials, or sharing leads. For the construction of new developments, the PAs should also work with municipalities to coordinate master planning

and utility planning. More broadly, municipalities are aware of the goals and constraints of their residents, and the draft Plan provides no opportunities for the PAs and municipalities to collaborate on engagement.

The Plan should help residents overcome common obstacles to energy-efficiency measures and take advantage of opportunities for deeper energy savings. As a community where 65% of our households are in multifamily buildings, we are pleased to see the proposal of a Residential Coordinated Delivery model where even renters will be able to access home energy efficiency kits. Nonetheless, the PAs should continue to engage the landlords of those buildings in conducting whole-building energy efficiency, to help overcome the common barrier of landlord engagement.

In addition, we would like to see the Plan provide greater decision-making support to owners for HVAC upgrades, similar to the support provided for lighting or envelope measures. Over the past year, we have collaborated with MassSave on the Cambridge Multifamily Pilot, coordinating to help Cambridge apartment and condo buildings pursue both energy efficiency and on-site solar energy in one streamlined offering. However, we have seen that the largest opportunity for energy savings, in heating and cooling, is often left untapped, as the MassSave structure often leaves owners to face significant decision-making challenges in identifying solutions, selecting contractors, and picking efficient systems. The result has been that most multifamily buildings, once finally engaged, are only completing lighting projects. The opportunity for energy savings could be fully realized if the PAs provide an integrated, systems-based approach to supporting HVAC upgrades, similar to that provided for lighting.

Commitment to data transparency and routinized data sharing with cities and towns remains critical. With improved access to local energy use data, municipalities can more effectively measure progress toward community goals and partner with PAs to conduct data-driven outreach. Our community greatly appreciates the PAs commitment in the draft Plan to provide public access to monthly energy use data on an annual basis. We would like to see additional progress toward disclosing anonymized measure uptake information by municipality, including the number of HEAs completed, measures installed, results of municipally-shared leads, and solar interconnection.

The Plan should take advantage of energy-efficiency opportunities during building renovation, particularly promoting Net Zero Ready or passive retrofit pathways. We are encouraged by the Plan's inclusion of Passive House and passive systems for new construction. However, given the tremendous volume of home renovation and improvement in Massachusetts, it will be critical to engage existing buildings in deeper energy savings at a time when other work is being done. In particular, the Plan should support pathways to help buildings undergoing renovation to become Net Zero Ready or passive, including the use of renewable heating and cooling. Upstream education of contractors and vendors should be part of this effort as well.

We encourage the PAs to provide expanded outreach to a diverse set of consumers and trade professionals. We support the Plan's goals of increasing engagement with trade professionals. The Plan should ensure that incentives and their application processes are

communicated clearly to owners, architecture and engineering professionals, and contractors. In addition, the Plan should seek to provide better outreach for underserved and non-English-speaking communities, working with municipalities to help residents and small business owners participate in program offerings.

The Commercial and Industrial (C&I) program should provide a suite of offerings tailored to address the challenges unique to municipal facilities. Municipal facilities have distinct needs from those of traditional large C&I buildings. Aligning PA programs, offerings, and expectations to complement and optimize municipal assets, capital planning cycles, and goals is one way to leverage more savings in the municipal sector. We would like to see additional support for HVAC investments, including an increased payback period eligibility, and improved incentives for end-of-use replacements with high-efficiency equipment, recognizing that municipalities rarely engage in early retirement of equipment. Additionally, improving the C&I program's alignment and coordination with other statewide incentive programs will improve the process for municipalities interested in accessing the energy efficiency programs; specifically, this includes aligning program timelines and processes with those of the Massachusetts School Building Authority (MSBA), Green Communities program, and MassCEC programs. Finally, while we have been able to save significant energy through the use of dimmable streetlights, we are continuing to work with Eversource to have our billing reflect this, instead of a flat rate. We encourage the Plan to support municipalities that use efficient, dimmed light fixtures, through accurate billing of actual usage.

We support the Plan's focus on active demand reduction and encourage the Plan to enable and incentivize demand management for all customers. We understand the multiple benefits of active demand reduction, and the corollary technologies of energy storage, beyond simple energy savings, as peak-focused savings result in greater reduction of greenhouse gas emissions. We believe that a more proactive initiative is needed to engage customers and support active demand management in their homes and businesses. In particular, we believe the Plan should proactively help customers install demand management technologies and storage, similar to other efficiency measures. This initiative would align with the DPU's Grid Modernization order as well as the DOER's work on energy storage and solar+storage incentives. We also encourage the support for the use of renewable energy for demand management, as piloted in other New England states. Finally, active demand management should target the reduction of both summer and winter peak demand periods.

Thank you for your consideration of our comments and attention to these suggestions. We look forward to our continued collaboration on energy efficiency and greenhouse gas emissions reduction in Massachusetts.

Sincerely,



Susanne Rasmussen
Director of Environmental and Transportation Planning
City of Cambridge