

EEAC Public Comment January 2015

Overview

*Please note that this is meant to be a high level summary of key points and not an exhaustive, detailed document. Councilors are encouraged to read the full public comments posted to the EEAC website.

Massachusetts Interfaith Power and Light

- There are over 2,500 faith communities in Massachusetts that are underserved through the existing programs due to multiple buildings, sometimes some that are residential and some small commercial and due to the buildings' unique usage patterns.
- Massachusetts Interfaith Power and Light supports market segmentation strategies to meet C&I goals, specifically including faith communities.
- Massachusetts Interfaith Power and Light provided multiple examples of dissatisfaction with the current Mass Save® program, including an example of long wait time and an example where vendor would provide assessment and recommendation for lighting only despite many other opportunities and interest.
- Massachusetts Interfaith Power and Light stresses the important of zero-interest, below market-rate loans for costs not covered by rebates in order to successfully reach the faith community. They recommend that smaller loans allow for customized energy savings criteria due to the varying costs of labor and materials between their residential and commercial use buildings.

Don Ogden, The Enviro Show

- The state and utilities are not doing enough to address climate change, the most urgent issue for today and future.
- Suggest comprehensive education of the public about energy efficiency and clean, renewable energy through media and public schools systems.
- Find claims regarding electrical energy shortage during peak winter months as the reason for additional gas pipelines unsupported. Encourages fixing gas leaks in existing pipelines and compressor stations as well as looking at renewable generation and battery storage options.

Janice Kirkoski, North Quabbin Energy and Chair of Warwick Building and Energy Committee

- Suggesting legislation to mandate a stepped rate for electricity, under which consumers who use less would pay a lower rate per kWh than those who use more. Believe this program would address the issue of inertia by creating a direct incentive program for using less electricity.
- Examples of similar programs: WMECo points program, British Columbia Hydro Conservation Rate, and Washington Electric Cooperative in Vermont

Patricia Larson, Orange Town Committee

- Support Janice Kirkoski's proposal for stepped electricity rate.
- Propose more funds toward insulation, lighting, heating units through Mass Save®.
- Propose increased publicity, phone, door to door campaigns.

Felicity Luebke

- Support maximizing energy efficiency to meet criteria in the GWSA Clean Energy and Climate Plan
- Prioritize energy efficiency over new pipelines and production of non-renewable resources

Jennifer Luebke

- Urge increase in savings goals aligned with Clean Energy and Climate Plan

Peggy White

- Support efficiency programs

Diane Nassif

- Support expansion of efficiency programs

Trudy Berkovitz

- Support expansion of efficiency programs

Marcia Gagliardi

- Endorse more funds for energy efficiency

Pixie Holbrook

- Continue national leadership on energy efficiency

James Markham

- Strive for carbon neutrality in all energy production, strong investment in renewable energy sources, no new investment in fossil fuel infrastructure, institute recycling, energy conservation, and energy efficiency measures

Ted Cady, Town of Warwick Planning Board

- Against the 2% proposed tariff on electricity rates to pay for natural gas pipeline, doesn't solve peaking problem
- Suggest putting that money toward energy efficiency such as LEDs, smart meters, encouraging off-peak use, energy storage, high efficiency furnaces

Kathryn R. Eiseman

- Support major expansion of energy efficiency programs
- Support particular attention to municipalities as C&I customers – start with lighting, offer comprehensive energy audits to help municipalities think systematically about their energy use
- Believe that municipalities need more guidance, education, and support before becoming Green Communities
- On residential, focus on how renters can benefit from programs

- Call for a complete, accurate, and accessible database

A Better City

- To address C&I goals shortfall, suggest:
 - building on program elements from the previous three-year plan (expansion of CHP program, segmentations or Class B buildings and commercial multi-family)
 - aligning with current state and municipal priorities (encourage training and education of architects, engineers, and designers to advance zero net energy buildings)
 - implementing key strategies from the Commercial Real Estate Roadmap (efficiency in tenant spaces through Office of the Future Program, research and implementation of incentives for tenant fit-outs, third-party partners, performance contracts, early replacement options, commercial bulk purchasing programs, bonuses for customers that pursue multiple projects)
 - fostering an environment that encourages innovating in energy efficiency programs (allocating funding toward innovation and making processes more open for non-IOU pilots)

Berkshire Environmental Action Team

- Need stronger efficiency goals to meet Global Warming Solutions Act targets set forth in the Clean Energy and Climate Plan

Cathy Ann Buckley

- Support Secretary Beaton's concept of energy justice
- Need to encourage people who do not pay their utilities through education and potentially through incentives that are paid back by the building as a whole through energy conservation
- Need increased outreach to general public to explain how the grid works and how to reduce energy usage
- Do not support new gas pipelines

Co-op Power

- Develop greater menu of energy savings options (see full list in public comment)
- Increase payments to contractors according to true costs of implementation (increase compensation of energy assessments/rigid board/wall insulation/carpentry/ventilation/combustion safety, include annual increases, providing additional funding to Home Performance Contractors for their administrative and outreach costs)
- Create an adjustment compensation scale to reflect geographic cost of living differences
- Expand workforce development and training subsidies
- Modify the recently expanded background check/drug test requirements

First Fuel

- The next Three-Year Plan should build on the strong momentum of the first two Three-Year plans and outline a strategy for continuing to save customers money by tapping savings potential throughout Massachusetts
- Recognizing that the cost of achieving energy efficiency may increase over time, it is critical to identify new ways to target energy efficiency projects with high savings potential.

- DOER, stakeholders, and program administrators can benefit from the use of technology tools to engage customers in a low-cost and continuous way.
- The deployment of technology and analytics within Massachusetts represents an untapped resource for efficiency savings.

Healthcare Without Harm

- Fully implement the recommendations of the health care energy efficiency best practices study
- Continue to increase the attention paid to energy efficiency, especially at mid-sized and small hospital, including addresses hospital energy efficiency staffing constraints, improving hospital senior management support for efficiency, jumpstarting energy efficiency through innovation in institutions that lack funds to match incentives and hesitate using ESCos
- Launch a comprehensive, integrated, energy efficiency Smart Lab pilot program with statewide expansion to following, including health care, higher education, and biotech.
- Increase CHP in health care facilities
- Continue solid funding for C&I efficiency programs and require that the Plan spell out how underspent C&I funds and staffing will ramp up to improve performance and capture all cost-effective energy efficiency
- For each major C&I subsector, the Plan should include high level strategy and specific benchmarks to track and eliminate the cumulative C&I performance gap
- Develop and use the statewide data-base to improve targets, implementation, reporting, analysis, midterm modifications, and ultimately, results.
- Pursue solutions to split incentives in C&I sector
- Set specific targets, and track major reductions or elimination of the hockey stick
- Plans should address demand management, load shifting, and non-transmission alternatives in synergy with other state and regional policies
- Include societal health and resilience benefits from energy efficiency in cost benefit analysis and marketing/outreach

Home Energy Efficiency Team

- Recommends that state or federal registered nonprofit organizations are given the opportunity of having 0% interest on-bill financing for longer periods than for-profit companies

Julia Blythe

- Oppose pipeline slated to run through Northfield. Increasing energy efficiency will reduce demand sufficiently to render most new fossil fuel infrastructure unnecessary. \$4 billion price tag of pipeline project could be put toward energy efficiency.
- Next plan should include goals in line with Clean Energy and Climate Plan requirements
- Need to increase energy efficiency in C&I sector in order to meet goals

47 Coffin Street

- EEAC should prioritize proven retail electric demand response, specifically demand side management to address the Commonwealth's poor load factor and out-of-control growth in peak demands.

- Support DPU's policy determination to launch time-sensitive retail rate design promoting price signal for economic demand response and should be used in conjunction with demand side management

Manny Chaves

- Proposing the adoption of one set of rules for all utilities to decrease program administration costs and streamline processes.
- EEAC should look for ways to limit the liability of the utilities.
- Recommend that there be a faster way to make changes and adopt new products into the program.

Martijn Fleuren

- HPCs should be represented on the Residential Management Committee
- Suggest finding ways to increase percentage of rate payers that get Home Energy Assessments. HPCs can do more focused and small-scale marketing to supplement program level marketing, but HPCs do not receive financial help in bringing customers into the program.
- Costs of acquiring a new customer are prohibitively high (~\$100 per HEA), leaving only \$75 left to pay for labor, equipment, overhead. This is not a sustainable model as HPCs are generally operating at a loss on a per customer basis.
- Propose an equitable marketing subsidy for every HEA customer acquired by a HPC.
- Propose removing the incentive cap to allow salespeople to offer 75% incentive to increase conversion rates
- Propose increased safety remediation incentives for knob and tube removal, failed combustion safety test remediation, and vermiculite and asbestos abatement
- Additional investment in HPCs to allow living wage for employees, investment in expanding workforce, and improve install quality.

Mass Energy Consumers' Alliance

- Council should prioritize maximum savings by capturing all cost-effective efficiency in the residential and C&I sectors. More ambitious goals are required to meet the Global Warming Solutions Act.
- Next three-year plan must do more to capture savings in the C&I sector. C&I sector is responsible for about twice the electric load of the residential sector and over half of the residential gas load.

Northeast Energy Efficiency Council (NEEC)

- Maintain robust energy savings goals and budgets that have enable energy efficiency companies to flourish and create jobs.
- Energy efficiency programs are an engine for economic growth. Consistency and stability are keys to business and job growth for the industry.

Northeast Energy Efficiency Partnership (NEEP)

- Encourage electric and gas PAs and DOER to continue to leverage resources and opportunities to work regionally through NEEP's various stakeholder working groups.
- Residential lighting
 - State should support continued and aggressive residential lighting programs

- Massachusetts should work to allow programs flexibility to adjust incentive levels as necessary to maintain relevance in market (i.e. changing cost of LEDs)
 - Move specialty promotions away from CFLs to LEDs
- Home Energy Management Systems (HEMS)
 - Promotion of HEMS should be considered as a key strategy for efficiency savings in the next three year plan
 - Include smart and wifi thermostats in conjunction with demand response and behavioral programs
- Business and consumer electronics
 - Increase promotion of advanced power strips
 - Consider rebates for other electronic measures such as television and desktop computers
- Air source heat pumps (ASHP)
 - Consider new technical specifications for ASHPs aimed specifically at cold-climate heat pumps
 - Require a product listing to be part of the incentive requirements
 - Fossil fuel savings from ASHPs should be recognized and claimed by electric PAs
 - Align PA offerings with MassCEC renewable thermal incentive program
- Heat pump water heaters
 - Continue strong incentive amounts, marketing promotion as well as more contraction education on how and where to install heat pump water heaters
- Clothes dryers – explore new program opportunity
- Appliance standards – state-based standards
- Improving online customer engagement
 - Develop new online shopping tools geared to promote efficiency consumer choices, connect consumers with program offerings, and develop more targeted marketing opportunities for further program engagement
- Advanced lighting controls are underutilized opportunity
- Building asset rating – findings from DOER and NEEP’s Building Asset Rating pilot phase 2 should be used to help substantiate the potential role for streamlined rating practices to be used in coordination with disclosure ordinances and in state utility programs.
- Residential energy labeling – pursue a mandatory statewide home energy labeling program based on the HomeMPG and Home Energy Score tools, encourage DOER and PAs to follow and support legislation around these developments
- High performance schools and public buildings – continue to provide incentives for high performance school construction to ensure that the school building itself acts as an outreach and engagement platform
- Multifamily energy efficiency program – NEEP can be resource for regional best practices in multifamily and low income
- Building energy codes
 - there is an important role for utilities and PAs to play in advancing codes, supporting the Stretch Code, and providing training for code compliance efforts
 - allowing utilities to claim savings for supporting new building energy codes is an effective means of coordination between ratepayer-funded efficiency programs and complementary public policies that aid Massachusetts in achieving its energy savings goals
- LED street lighting
 - program should continue to provide strong incentive support for conversion initiatives

- utility cost recovery should be granted for labor hours spent mapping current inventories and associated sunken costs
- Utility data access
 - Utilities should be able to recover costs through their efficiency program marketing for implementing of data access initiatives
 - Streamlining ease of access for utility data will help make energy usage more visible to consumers and provide for greater customer engagement and participation in efficiency programs
 - Interval or real-time access to energy usage information could greatly improve behavioral-based demand side management programs
- EM&V – Regional EM&V Forum will continue to support Massachusetts’ energy efficiency goals by promoting appropriate policy and effective EM&V methods

Rich Cowan

- Recommend energy auditors remove and destroy incandescent bulbs when they install efficient bulbs.
- Recommend outdoor lighting be prioritized over indoor lighting for replacement.
- Recommend training and support to contractors to build up expertise on how to economically address pre-weatherization barriers. Propose a hotline be set up so that homeowners can get suggestions from a public advocate.
- Recipients of large rebate awards could have some obligation to participate in demand response
- Costs of gas conversions could be open and transparent so the Council can understand the impact on program dollars, particularly now that the spread between price of gas and home heating oil has narrowed significantly.

Rosemary Wessel, No Fracked Gas in Mass

- Expanding energy efficiency goals is important to reduce demand on fossil fuels and alleviate need for more generation capacity and natural gas infrastructure.
- Expanding energy efficiency crucial to economic growth.

TNT Energy

- Works as a small business vendor
- TNT Energy and similar companies have had rapid growth and success through the robust energy efficiency programs, offering a stable environment to grow businesses.
- Continued funding of these programs at their current levels is necessary for TNT and many other companies to maintain presence in the marketplace, follow through with future growth and expansion plans, and to support the prosperity and sustainability goals of thousands of businesses throughout the Commonwealth.

Wyatt Couture

- Proposing a significant program pricing increase of 30% from the current CSG pricing model which all lead vendors would be required to adhere to. This would end the differences in utility program pricing, but most importantly, it will increase industry wage rates to advance industry’s ability to sustain training and production efforts, and attract greater supply of candidates to the industry.

- Propose that all Mass Save marketing efforts from the utilities not go solely to the lead vendors, but that the leads from Mass Save website and utility hotline be evenly distributed by the utilities amongst lead vendors and HPCs by the percentage of energy specialist the company has available in each zip code they service.
- Propose eliminating the \$2,000 incentive cap to stimulate larger weatherization projects to be completed, eliminating overhead costs of splitting projects over multiple years.