



March 29, 2018
Massachusetts Energy Efficiency Advisory Council
Commissioner Judith Judson, Chair
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: EEAC Recommendations for the 2019-2021 Massachusetts Three-Year Energy Efficiency Plans

Dear Commissioner Judson:

NOAH, the Neighborhood of Affordable Housing, is a 30-year old East Boston-based community development corporation structured to collaborate with and support residents and communities in their pursuit of affordable housing strategies, environmental justice, community planning, leadership development, and economic development opportunities. NOAH's goals and programs are built on a commitment to equality, fairness, diversity and respect for all people.

East Boston is a large and vibrant peninsular community with great diversity. More than half of the population is Hispanic, many are first, second, or third-wave immigrants, and many do not speak English proficiently. We are also very exposed to the effects of climate change-related flooding, and have a long history of suffering environmental burdens and lack of open space.

As part of NOAH's commitment to climate mitigation and resilience work, we have been leading local projects in East Boston focused on helping residents be more resilient and reduce their climate footprint. One of those projects is promoting energy efficiency. Through this project, we've partnered with the City of Boston's Renew Boston team to try to increase audits in East Boston. Because the audits are required for participation in energy retrofit programs and MassCEC clean energy incentive programs, increasing audits is an essential first step for increasing East Boston participation in these other programs. Activities included supporting a City-sponsored workshop, promoting sign-ups at community meetings and events, and promoting the MassSave program on the NOAH website and at in-person meetings and events. Our goal is to ensure that our multi-lingual, multi-cultural neighborhood is taking advantage of and has equal access to the benefits of these programs that they are paying into and that would greatly improve their quality of life through reduced bills and more comfortable living spaces.

Our efforts suggest that program design and delivery changes are needed to improve access to the programs in very diverse, low-income communities like East Boston. To track our efforts and people's experience in the program, we selected a subset of the people who signed up through our activities to periodically check up on their progress. What we found is that most did not have success in getting an



audit scheduled. We think that barriers might include: language (many are Spanish-speaking) and timing (calls are made during the day when people are at work). Multi-language access is crucial in our neighborhood, not only in promotional materials, but also in scheduling, websites, in-take services, auditors, reports and post-audit information. Currently all of that information, or most of it, seems to be offered only in English, which leaves out large portions of Boston's and surrounding communities' populations. For East Boston, our main request is Spanish, but this applies to other scores of other languages spoken here and in other ethnic communities as well.

Other areas of concern in program design include the fact that program materials and offerings are not targeted to renters. Since East Boston is over 50% renters, we are also concerned that current program offerings that people can easily take advantage of are mostly low-hanging fruit, and deep energy retrofits or clean energy conversions are hard to do due to cost and complexity of the process. More program elements should be included to increase deep energy retrofits, as well as to better target small-building landlords and increase participation.

Some requests and feedback we have for future program design include having more detailed localized data about who is using these programs and what retrofits are being done, in order to help with targeting outreach for broader participation. We believe this can be achieved while still protecting personal information through aggregated data that gets analyzed and parsed out in more ways than is currently done. It would also be helpful for nonprofit and community organizations such as NOAH to have greater access to this data.

The 2019-2021 Three-Year Energy Efficiency Plan should also incentivize the Program Administrators to partner with and provide funding to locally-based organizations such as community development corporations (CDC's such as NOAH) as a means for reaching underserved communities like East Boston and increasing program participation. NOAH serves thousands of individuals and families each year.

Finally, we would like to express our support of the recommendations and feedback shared by the Conservation Law Foundation in their March 14, 2018 letter. As such, we have added NOAH to the list of supporters for that joint letter.

We are thankful for the opportunity to share our experience, comments, and advice, and hope that they contribute to making a great program work better for underserved communities like ours.

Respectfully submitted,

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