

40 In July through September of 2015, the DOER, the Executive Office of Energy and
41 Environmental Affairs (“EEA”), and the Attorney General’s Office (“AGO”) met to discuss and
42 explore common agreement of the 2016-2018 goals and budgets with the PAs. These goals were
43 incorporated into the September 23rd draft plan which was presented to the Council. Through
44 September and October the Council provided additional input on the draft Plan, culminating in
45 this resolution.

46 **Overall Plan Comments**

47 The Council appreciates the significant efforts the PAs have invested in the development of the
48 Statewide Plan to address the priorities of the Council and stakeholders. We recognize and
49 appreciate the significant contributions of PA staff, Council consultants, Councilors, the Low-
50 Income Energy Affordability Network (“LEAN”), and stakeholders in preparing these energy
51 efficiency plans. The development of the 2016-2018 Statewide Plan reflects significant
52 collaboration across PAs and among members of the Council, DOER, EEA and the AGO.

53 These comments present the judgment and determination of the Council based on its review of
54 the draft of the Statewide Plan, which was submitted by the PAs on October 23rd, 2015:

- 55 • The Council has reviewed the Statewide Plan that the PAs submitted to the EEAC on
56 October 23rd, 2015. We approve and support the 2016 – 2018 Statewide Plan, as these
57 savings levels represent record levels of energy efficiency savings in the United States
58 and continue Massachusetts on a path to achieving all cost effective energy efficiency.⁴
- 59 • We confirm that the Statewide Plan⁵ includes ambitious energy savings goals, sensible
60 program budgets, and substantial benefits to Massachusetts consumers as required by the
61 GCA, and highlights a continued commitment to innovation and technology,
62 demand/peak reduction efforts, and contractor engagement. The programs and strategies
63 in the Statewide Plan represent a significant opportunity to maximize the benefits of
64 energy efficiency for the Commonwealth over the next three years, and represent an
65 increasing commitment to gas and electric savings through energy efficiency.
- 66 • We expect the Individual PA Plans will remain fully consistent with the Statewide Plan.
67 Specifically, the energy savings levels and budgets in the Statewide Plan, and reflected in
68 the electric and gas Terms Sheet should be reflected fully in the Individual Plans.
- 69 • While the current savings, budgets, and benefits proposed in the Statewide Plan are
70 appropriate, there exists significant variation in the plan details among individual PAs.
71 The Council urges the PAs to continue their joint planning and best practices efforts, with
72 the goal of achieving programmatic consistency and equivalency while fostering
73 creativity and providing ~~more~~ equitable service for customers across the Commonwealth.
- 74 • We recognize the opportunity for energy efficiency to reduce energy usage at times of
75 peak demand and mitigate peak—energy and capacity prices. We support the
76 establishment of a Demand Savings Group with input from interested and qualified

⁴ This approval is provided there are not unexpected or contrary data or details that appear in later PA submissions. In approving this resolution, the Council also acknowledges the right of the DOER, the Attorney General, and any other member of the Council to participate in the proceedings before the DPU.

⁵ <http://ma-eeac.org/plans-updates/>

77 | Councilors and other stakeholders, to address opportunities to reduce peak demand in an
78 | expeditious way.

- 79 | • We recognize that performance incentives are an integral part of the planning and
80 | implementation of the energy efficiency programs. We accept, consistent with DPU
81 | Guideline 3.6, the performance incentives set forth in the Statewide Plan, including the
82 | performance incentive pool (emphasizing the maximum performance incentive pool at
83 | the design level shall be \$118 million, comprised of \$100 million for electric programs
84 | and \$18 million for gas programs).
- 85 | • We believe that the costs to implement and operate energy efficiency programs should be
86 | kept as low as possible, while achieving the objectives and requirements of the GCA. We
87 | appreciate the willingness of the PAs to project reduced costs to achieve savings and plan
88 | for sensible program budgets consistent with the Council's priorities as defined in the
89 | Council's July 21st Resolution. Achieving ambitious energy savings at sensible program
90 | costs will provide significant and lasting benefits to ratepayers, businesses, and the
91 | Commonwealth.
- 92 | • We expect that the PAs will use competitive procurement whenever possible to obtain the
93 | highest quality, lowest cost service providers in the implementation of the Statewide
94 | Plan.
- 95 | • We recognize that minimizing bill impacts on customers is an essential consideration.
96 | The approach in the Statewide Plan to be filed on October 30th, 2015 pursues ambitious
97 | savings goals at sensible program costs, and indicate that most PAs' customer bill
98 | impacts are expected to result in moderately low incremental cost compared to prior
99 | years. The Council and PAs will continue working together to ensure that savings are
100 | being delivered cost-efficiently, including maintaining a keen eye on program costs.
- 101 | • The Council and PAs will continue to work collaboratively throughout the three-year
102 | roll-out of the Individual Plans, as directed by the GCA, through continued quarterly
103 | reports and specific updates in regular meetings that focus on topics to be determined by
104 | the Council. We expect the PAs to analyze new lessons learned, develop adjustments, and
105 | put them into practice.
- 106 |

107 | On a statewide basis, the October 23rd, 2015 Statewide Plan reflects the highest levels of
108 | efficiency savings goals, as well as close PA attention to Council recommendations from the July
109 | 21st resolution, and inclusion of many specific recommendations. We appreciate that these
110 | elements are reflected in the plan including: *(items in italics not yet incorporated by PAs)*

- 111 | • A renter-specific initiative to be rolled out in Q1 2016, including periodic-semi-annual
112 | PA reports to the EEAC that will include timely rental visit metrics including
113 | participation levels and conversion rates by renters and their landlords by PA, and
114 | qualitative information on any barriers encountered and plans to address them.
- 115 | • A moderate income initiative beginning in Q1 2016, including periodic-semi-annual PA
116 | reports to the EEAC on participation rates by PA.
- 117 | • PAs will continue to work with the Commonwealth's public-housing financing funding
118 | agencies (with mutual expectations and deliverables) and LEAN (with mutual
119 | expectations and deliverables) to develop and implement enhanced approaches that

120 | ~~will to~~ leverage multi-family refinancing events to maximize retrofit potential, ~~and~~
121 | ~~develop a~~ The parties will specifically consider performance-based retrofit products ~~for~~
122 | ~~these situations~~. The PAs will present the results of these efforts and specific proposals
123 | derived from them by the close of Q1 2016.

- 124 | • More detail about the PA's Massachusetts Technology Assessment Committee (MTAC),
125 | and semi-annual updates to the Council on progress reviewing and implementing new
126 | technologies into programs.
- 127 | • A clear commitment to Combined Heat and Power (CHP) installations, and tracking
128 | CHP project savings and expenditures (subject to customer confidentiality requirements)
129 | against PA's CHP Plan projections in semi-annual presentations to the EEAC and in
130 | data sets provided on Mass Save Data.
- 131 | • Regular and specific updates to the Council on C&I program progress and penetration
132 | (including segment specific approaches - especially for challenging subsectors such as
133 | small and mid-size commercial, small hospitals, non-profits, and multifamily - measures
134 | such as street lighting and LED costs and conversion, and innovations such as strategic
135 | energy management) through semi-annual presentations to the EEAC. The PAs will
136 | collaborate with DOER by the end of 2015 to consider how best to present this
137 | information (e.g., potential use of roundtables, webinars, etc.) and to develop a schedule
138 | for updates on specific topics.

139 |
140 | However, data tracking and reporting issues have yet to be satisfactorily resolved by the Mass
141 | Save Data website. We recommend that the DPU continue to investigate the need for greater
142 | state-wide data transparency and reporting by the PAs through its open proceeding D.P.U. 14-
143 | 141 *Response of the Department of Public Utilities to Data Privacy and Data Security Issues*
144 | *Related to the Statewide Energy Efficiency Database*.

145 |
146 | The PAs have recently provided the Technical Reference Manual (TRM), 2016-2018 Plan
147 | Version, which provides the important supporting details for the savings included in the
148 | Statewide Plan. The Statewide Plan commits that an online Technical Reference Library (TRL)
149 | will be available in 2016. Since the Council has not had an opportunity to review the TRM and
150 | subsequent TRL, the Council reserves its rights to complete a review of these documents and
151 | provide comments to the DPU as appropriate.

152 |
153 | Accordingly, the Members of the Energy Efficiency Advisory Council in recognition of the
154 | aforementioned reasons, respectfully request the Commissioners of the Department of Public
155 | Utilities to approve the 2016-2018 Massachusetts Joint Statewide Three-Year Electric and Gas
156 | Energy Efficiency Investment Plan and the Individual Plans of the electric and natural gas
157 | companies and municipal aggregators, to the degree that the Individual Plans are fully consistent
158 | with the Statewide Plan. We further request that said approval consider, embrace and reflect the
159 | comments that we articulate above.