

#	DESCRIPTION	STATUS 1 Plan to implement & in Plan 2 = Plan to implement, not in plan 3 = Still under consideration 4 = Not in plan, not being implemented	COMMENTS	REFERENCES
Recommendations				
Cross-Cutting				
1	The PAs, in coordination with the Council, shall develop a methodology and report accurate program penetration and participation numbers that are linked to individual account holders as opposed to participation in various programs.	4	<p>The PAs work to create common participant definitions for each program and initiative. The definitions are designed to most accurately reflect unique participants and are constantly being refined over time. Appendix G has draft participant definitions for 2016-2018.</p> <p>Accurately assessing program penetration and the number of unique customers participating in energy efficiency programs across the Commonwealth is a more complicated process. It is a difficult number to derive for two reasons: 1) because of customer overlap between PA territories and 2) because certain program delivery models, such as upstream, work through manufacturers and distributors rather than customers. For example, lighting incentives through the products program are delivered by hundreds of retailers across Massachusetts. It is not practical to ask every customer that buys an incentivized light bulb to provide enough information to track individual customer participation for that extensive initiative. The PAs use periodic Residential and C&I Customer Profile Studies to accurately determine penetration and an approximate count of customers being served across the Commonwealth. The first Residential Customer Profile Study will be complete in summer 2015. The 2013 C&I Customer Profile Study was completed in April 2015. A 2014 C&I Customer Profile Study will be complete in Spring 2016.</p>	Section III.A.5.b, page 179 Appendix G, page 258
2	The PAs shall support products and practices that reduce winter and summer peak demand by taking the following actions:	1	The PAs recognize the special value of products and practices that can reduce winter and summer peak demand.	Section II.H.3.a, page 153
a	Design, implement, and evaluate a demand reduction or demand response offering in each PA's service territory.	3	The PAs have not fully developed all of their strategies for addressing these issues in the April 30 draft, but the discussions are active; the PAs expect to provide further detail as the Plan is refined. This draft of the 2016-2018 Plan projects electric demand savings of 514,175 kW (summer) and 617,294 kW (winter). In 2010-2014, the PAs achieved over 650,000 kW of summer capacity savings. Current 2016-2018 Plan expectations for demand savings are included in Table 3.2.i., Savings Summary.	
b	Present to the EEAC a joint report with EEAC consultants on the impacts, opportunities and challenges of time varying rates on the energy efficiency programs, within 3 months of the Department's order approving such rates. Such report shall also include an analysis of incorporation of technologies like advanced metering in the efficiency programs, including potential adverse impacts on particular customer segments, such as low-income.	4	Issues relating to demand savings can be complex. The PAs have formed an <i>ad hoc</i> group to discuss these matters informally with the Council's consulting team. The PAs are sensitive to designing efforts that take into account unintended negative consequences, such as increased energy usage (which, for example, can be an unintended result of subsidizing ice storage plants that reduce demand). The <i>ad hoc</i> group is also exploring demand response, load-shifting and geo-targeting.	
c	Support the EEAC consultants in investigating the potential impact on efficiency savings if the Council were to place more emphasis on demand savings or peak demand savings.	4	Efforts like time-varying rates and advanced metering are also recognized by the PAs as an important part of our energy future and are being addressed by many PAs under	

			their Grid Modernization efforts.	
			With respect to reports or investigations requested of the EEAC consultants in the Council recommendations, the PAs believe that is a matter for the Council and its consultants to develop and implement directly between themselves. The PAs will remain actively engaged with the Council, but any reports requested of the consulting team should be the responsibility of the consultants, at the direction of the Council, and not a responsibility of the PAs.	
3	The PAs shall proactively promote efficient renewable thermal technologies.	3	The PAs have not fully developed plans for renewable thermal technologies at this time, but are carefully examining these exciting technologies. At the heart of the PAs process are four questions 1) Are there cost-effective energy efficiency renewable thermal options, as opposed to renewable supply side measures? 2) Which renewable thermal technologies should be prioritized (if any) 3) What are the quantifiable energy savings and benefits?, and 4) What funding sources would be available for renewable thermal strategies under consideration?	Section II.H.3.b, pages 154-155
a	Develop and implement a methodology in coordination with DOER and the EEAC Consultants to claim savings associated with the installation of renewable thermal equipment and fully account for savings associated with the reduction in use of the prior fuel source.	3		
b	Provide rebates and incentives for renewable thermal technologies, where deemed appropriate and cost-effective at the program level pursuant to the above methodology, not later than Q3 2016.	3	The PAs currently work with the Massachusetts Clean Energy Center and DOER to promote rebates and incentives for renewable thermal that work under current program design and delivery.	
c	Coordinate with the Massachusetts Clean Energy Center and DOER to provide information to customers and promote rebates and incentives for renewable thermal technologies.	3		
Commercial & Industrial (C&I)				
C&I Reporting				
4	The PAs shall report on the following as separate initiatives within the C&I New Construction Program:	1	The PAs share the Council's desire for increased transparency. Following a review of the C&I programs, the PAs have decided to separate out elements of those programs for budget/planning/reporting purposes. Within the New Construction Program, the PAs have created a Core Initiative for "New Buildings & Major Renovations" and another for "Initial Purchase & End of Useful Life" thereby increasing the granularity with which the Program, and its component elements, will be tracked during the course of the 2016-2018 Plan period.	Section II.G.2.a, page 100
a	Upstream	1		
b	End of Life Replacement	1		
c	New Construction/Major Modifications	1	In summary, the PAs New Construction Program will consist of two Core Initiatives: - New Buildings & Major Renovations - Initial Purchase & End of Useful Life	
5	The PAs shall report on the following as separate initiatives within the C&I Retrofit Program:	1	Similar to New Construction, the PAs reviewed the Retrofit Program and, to facilitate increased transparency and granularity and clarity of reporting, have decided to include two new stand-alone core initiatives -- Multifamily Retrofit and Upstream Lighting. C&I Multifamily Retrofit aligns with the parallel Residential Multifamily Retrofit Core Initiative. Together, these two initiatives present a seamless approach to all elements of multi-family housing and represent the PAs' commitment to harmonizing these important offerings across both sectors. Upstream Lighting has been moved from New Construction to Retrofit based on a determination that the vast majority of upstream lighting purchases have been, and will continue to be, for purposes of retrofitting existing equipment.	Section II.G.2.b, page 116
d	Combined Heat and Power	4		
e	Retrofit Programs	1		
f	Control systems (including retro-commissioning, control upgrades, sub-metering and performance metrics)	4		
g	Engagement programs (continuous energy improvement, strategic energy management, behavioral programs)	4	After careful consideration, the PAs have decided not to separately plan for and report on CHP, control systems, or engagement programs as separate core initiatives. CHP results are, by nature of the complexity, relative risk, and long lead times of projects, highly variable and exhibit large fluctuations year to year, usually due to both the size and unpredictability of individual projects. It should be noted, however, that CHP measure level information is available in the electric PAs BCR screening models.	

			<p>Controls related offerings, as well as engagement initiatives, have been and will continue to be important components of the PAs portfolio of C&I offerings and are often effectively included in the context of an MOU/SEMP. However, in light of their narrow applicability and relatively small (lifetime) savings relative to other parts of the portfolio, the PAs have concluded they do not warrant the level of attention of a separate Core Initiative.</p> <p>In Summary, the PAs Retrofit Program will consist of four Core Initiatives:</p> <ul style="list-style-type: none"> - Existing Building Retrofit - Small Business - Multifamily Retrofit - Upstream Lighting 	
Segment Specific Approaches				
6	The PAs shall continue to improve their delivery of efficiency services via C&I market segment specific approaches using the following strategies:	1	<p>The PAs have been early and longstanding proponents and practitioners of segment-based approaches to serving C&I customers and are pleased that the Council appreciates and supports that those efforts are key to achieving both broad and deep savings. The PAs will continue to develop additional customized approaches for specific segments of their C&I customers, making use of local EM&V studies, the experience of peer programs around the country, and data reported in studies and program evaluations from Massachusetts and other jurisdictions. The PA's Draft Plan specifically addresses a number of segments -- large customers, municipalities and water/wastewater treatment, commercial real estate, industrial, and non-profits, etc. -- and the PAs have or will develop customized approaches to serve additional segments within their unique customer bases and across the state.</p> <p>The PAs have and will continue to address evaluation recommendations in their Plan Year Reports in detail. In order to avoid redundancy and manage costs, the PAs will continue to emphasize EM&V and the impacts of EM&V on program design and delivery in Plan-Year and Term Reports, and will not provide separate reports on these efforts. As they have historically done, the PAs will continue to provide periodic presentations/reports to the EEAC on segment-specific activities and associated results and lessons learned. The PAs feel that reports presented closer to real time activity is more effective and impactful than reporting that is dependent on a rigid calendar schedule. Accordingly, while the PAs are not adopting a semi-annual approach, they do fully embrace continued and timely reporting related to incorporation of EM&V recommendations into program design and delivery.</p>	Section II.G.2.b, pages 130-131 and 134-141
a	Provide more targeted communication materials to different market segments, explaining the benefits from, and availability of, energy savings opportunities to drive participation.	1		
b	Improve of the Mass Save® website to provide these sector-specific materials, including PA-specific materials, such as marketing materials, case studies and educational opportunities.	2		
c	Leverage partnerships with trade associations and other sector-specific partners to tailor efficiency program implementation to address sector-specific barriers and opportunities.	1		
d	Inform the EEAC in semi-annual reports about sector specific approaches (e.g., municipal, health care, commercial real estate, education, non-profits, hospitality, mid-size and small C&I), including:	4		
i	The impacts of sector specific strategies being implemented across the state.	4		
ii	How the results of EM&V studies and market research are being incorporated in program design.	4		
Commercial Real Estate				
7	The PAs shall continue to improve the efficiency programs targeted to the commercial real estate sector through the following strategies.	1	<p>As described in the PA's Draft Plan, once available, the results of the CRE Working Group will be reviewed and used to develop strategies for more effectively engaging with commercial real estate customers. In the interim, the PAs have and will continue to utilize a number of approaches specifically targeted to CRE customers -- sustainable office design (SOD), whole building approach, and MOU/SEMPs with large CRE customers across their portfolio of properties.</p>	Section II.G.2.a, pages 105-106 Section II.G.2.b, pages 127 and 139
a	Implement recommendations from Commercial Real Estate Working Group Roadmap, Massachusetts Commercial Real Estate Survey Analysis and Office Market profile report.	1		
b	Expand the Sustainable Office Design program features, including streamlined review of incentives to technologies beyond lighting. Implement pre-packaged offerings to address multiple end-uses.	3		
c	Use a whole building approach to target mid-size office buildings.	3		

d	Leverage energy reporting and disclosure ordinances to identify commercial real estate participants and explore the use of low-cost, streamlined whole building audits to support multi-year engagements on energy efficiency with interested property managers.	3		
e	Explore market transformation opportunities, including updated advanced building operator training, sub-metering, wireless controls and better financing opportunities.	3		
f	Investigate the main drivers for commercial real estate energy efficiency investment opportunities.	3		
Small Businesses				
8	The PAs shall continue to improve their delivery of efficiency services to small businesses through the following strategies.	1	The PAs have included a lengthy description of Small Business in their Draft Plan including plans to thoroughly review every aspect of the Small Business Core Initiative – administration and delivery, target markets, measures, marketing, etc. -- in order to develop the next generation version of this already extremely successful model.	Section II.G.2.b, pages 118, 125-127 Section II.G.2.b.ii, pages 147-148
a	Provide deeper savings to each participating customer.	1		
i	Expand the menu of prescriptive services to better advance natural gas energy efficiency opportunities and non-lighting electric measures;	1	Examples of the options under consideration include: addition of more gas measures, including thermal measures; better and more referral follow-up services for measures not amenable to the direct install delivery model (such as thermal measures and heating systems so that deeper treatments can be undertaken); further segmentation to reach the smallest of the small customers through consideration of web portals, self-service delivery concepts, further development of the "Main Streets" or other geographically-focused delivery models, adaptation of successful residential delivery models such as HES, etc.; and more targeted marketing and measure mixes by business type.	
ii	Use more comprehensive (e.g. integrated gas/electric) marketing programs for small businesses.	1		
b	Increase participation in the program.	1		
i	Use building analytics and benchmarking to target small business customers;	3		
ii	Increase outreach and awareness programs;	1		
iii	Continue to work with trade groups and associations.	1		
c	Continue to customize services based upon customer size and type.	1		
i	Investigate the potential for varied program implementation approaches to better serve the various strata of Small Business customers.	1		
ii	Determine which implementation strategies, technologies and building diagnostic capabilities employed in other programs are transferable and effective for serving Small Business customers.	1		
iii	Explore a Home Energy Services-type approach for the smallest business customers.	1		
Combined Heat and Power				
9	The PAs shall increase the overall number of Combined Heat and Power (CHP) installations.	1	The PAs have included a lengthy description of CHP in their Draft Plan and plan to aggressively target CHP opportunities during the 2016-2018 period including a commitment to increase education and outreach as well as the commissioning of a best practices review of CHP programs nationally and a reassessment of CHP potential in Massachusetts.	Section II.G.2.b, pages 132, 141-143
a	Provide additional education and outreach on CHP technology, including cost-effectiveness and other implementation barriers.	1		
b	Deliver a report on CHP by the end of 2016 that:	1	While sharing the Council's strategic commitment to excellence with regard to CHP delivery and the undertaking of research to enhance performance, the PAs do not feel it appropriate to adopt a specific time line for reporting on CHP activities or the results of any related research.	
i	Provides a statewide, bottom-up analysis of potential for custom, pre-packaged and third-party CHP projects;	3		
ii	Identifies technical, policy, financial, legislative, and market barriers and potential solutions, including, but not limited to, custom, pre-packaged and third-party CHP;	3		
iii	Determines the costs and feasibility of the PAs' implementing the identified solutions;	3		
iv	Investigates the challenges for installing CHP systems posed by natural gas availability and volatility in fuel	3		

	prices, and potential programmatic approaches to mitigating those risks; and			
v	Assesses the interconnection challenges in area networks and how these challenges have been addressed in other cities, states or countries.	3		
c	Implement cost effective CHP program enhancements according to the findings of the report.	1		
Continuous Technology Improvements				
10	Given the importance of ongoing research and development of energy efficiency technologies, the Council recommends the PAs fully utilize all pilot funds.	1	There are no budgeted funds for pilots in the PAs Draft Plan, but the PAs plan to continue their long-standing practice of regularly evaluating and field testing new/emerging technologies.	N/A
11	The PAs shall develop a piloting or demonstration process and guidelines to facilitate and incentivize a more rapid and nimble adoption of emerging technologies, products, services, and strategies that enable energy efficiency savings. To that end, the PAs shall:	1	The PAs plan to continue assessing new, market ready, technologies and determine their eligibility for incorporation in program offerings, as well as technologies that are on the near horizon for marker-readiness. MTAC, a group comprised of PA technical and engineering representatives, provides a consistent statewide approach for identifying and evaluating new efficiency technologies. In furtherance of this work, MTAC communicates and cooperates with similar emerging technology assessment groups around the country. MTAC, with assistance as necessary from other C&I Subcommittees, will continue to maintain summaries of the results of all such technology reviews and make available information regarding approved technologies on the Mass Save website. Additionally, the C&IMC and other related subcommittees will continue to discuss the programmatic structures that best serve the introduction of emerging technologies and associated strategies. To support these efforts, the PAs have specifically budgeted R&D funds in the hard-to-measure line item to pursue technologies of interest.	N/A
a	Assess products that reflect rapid innovations in the marketplace, are of high customer interest, and/or have dependence on the customer for persistent savings (not limited to: data analytics, advances in sub metering, and advanced controls). As appropriate, adopt these measures into the C&I Programs.	3		
b	Examine combinations of products, services and strategies that enable energy efficiency savings or measurement of savings to assess their effectiveness.	3		
c	Report to the EEAC semi-annually on program selection, design, key performance indicators, and results.	3		
d	Complement the existing Massachusetts Technical Assessment Committee (MTAC). However, unlike the MTAC, the PAs will take the lead to identify and pilot these new technologies, services, and strategies.	2		
Retro-Commissioning, Building Controls and Sub-metering				
12	The PAs shall increase participation in retro-commissioning, building controls and sub-metering initiatives by enhancing the current offerings and incentives.	1	The PAs will continue to support and facilitate the implementation of RCx strategies, building systems optimization, and advanced controls operations wherever appropriate and consistent with energy efficiency program guidelines. To this end, the PAs will proactively implement the recommendations of the recently completed Retro-Commissioning Best Practice Study to streamline the RCx offerings and to achieve greater implementation of these strategies. For example, the PAs have already tested some of the RCx Best Practices recommendations by developing and implementing customized approaches to providing targeted RCx services to hospitals with a similar approach for labs currently in development. In addition, the PAs are committed to developing a common tool for RCx measures and expanding training for RCx for providers.	Section II.G.2.b, pages 118 and 120-121
a	Use data analytics and benchmarking processes to identify ideal retro-commissioning candidate projects.	1		
b	Promote continuous commissioning projects for retrofit and new construction projects by changing incentive structure to promote program participation, offering appropriate incentives, sponsoring new technologies, and training system operators.	3		
c	Where appropriate, incentivize the replacement of legacy building controls and open architecture in control systems to facilitate simpler system upgrading.	3		
d	Educate customers and vendors about new technologies and education opportunities, including regularly posting webinars, case studies, and videos on the Mass Save® website.	3		

e	Update and expand building operator training offerings, with input from customers, and explore the impact of combining these trainings with peer-to-peer based group learning.	3		
f	Expand training to increase the number of vendors who provide retro-commissioning and building controls in the marketplace.	3		
Behavioral and Engagement				
13	In recognition of the significance of C&I customer behavior on energy efficiency, the PAs shall:	4	<p>There is a significant investment in staff time and expense required of both customer and the PA to implement successful Strategic Energy Management (SEM) initiatives. For that reason SEM has only been applied successfully to a very small universe of the largest, primarily industrial and large commercial customers in a few parts of the country. Additionally, SEM approaches are generally designed to provide incremental savings over and above the traditional capital investments, which typically provide substantially greater and more predictable and sustainable savings. Many experts in the field also believe the results of SEM and related behavioral efforts remain inconclusive in terms of their ability to produce significant savings and whether those savings can be produced and sustained cost effectively.</p> <p>At this juncture, the PAs believe SEM remains a narrowly applicable approach to energy efficiency that does not warrant significant investment of time and resources. However, the PAs do understand the value of SEM to specific subsets of customers, and will be refining and expanding existing approaches to better serve those customers. The PAs also examine methods to expand SEM approaches to a broader market as the concept becomes a more familiar model in the business community, and as various emerging models demonstrate a record of success. Activities that the PAs have supported and will continue to support include retro-commissioning, an array of training and education opportunities, and customized process and behavioral approaches within the broader context of a customer-specific Memorandum of Understanding (MOU)/Strategic Energy Management Plan (SEMP).</p> <p>It should also be noted that behavioral approaches will also be considered as part of the PAs reexamination of approaches to serving small business customers</p>	Section II.G.2.b, pages 120-125, 129-130, and 136
a	Deliver a report by the end of 2016 on Strategic Energy Management (SEM)/ Continuous Energy Improvement (CEI) programs for large commercial and industrial customers that:	4		
i	Researches SEM/ CEI programs to determine their applicability, cost effectiveness, and feasibility of implementation in Massachusetts;	3		
ii	Evaluates the potential savings from SEM/CEI programs;	3		
iii	Develops guidelines for how energy savings from SEM/CEI programs can cost-effectively be measured and verified; and	3		
iv	Explores leveraging such programs for dispatchable load control.	3		
b	Based on the reports, if appropriate, implement SEM/CEI with large commercial and industrial customers, including providing technical assistance to identify opportunities and/or project management support for implementation.	4		
c	Deliver a report by the end of 2016 on behavioral programs for small and mid-size commercial customers that:	4		
i	Investigates successful commercial behavioral programs to determine the critical elements for success and their cost-effectiveness;	3		
ii	Evaluates the potential savings from commercial behavioral programs;	3		
iii	Develops guidelines for how energy savings from commercial behavioral programs can cost effectively be measured and verified; and	3		
iv	Explores leveraging such programs for dispatchable load control.	3		
d	Assess and, if appropriate, implement upfront incentives for building operators and owners for behavior-based and operational savings, building operator training around behavioral strategies, and support for peer-to-peer cohorts.	3		
LED Streetlights				
14	The PAs shall [support LED street lighting technologies]:	1	<p>The PAs remain committed to providing their municipal customers with the most up-to-date street lighting technology options -- including lighting and controls -- as well as providing options for them to assume ownership and maintenance of lighting where it is cost-effective and they so desire. The PAs remain committed to working with any community wishing to explore the process of conversion to municipal ownership. Local conditions and priorities of the local governing body in each unique city or town will control the rate at which the conversion can be accomplished.</p>	Section II.G.2.b, page 143
a	Retrofit the majority of utility-owned street lights with LED technology statewide by 2018 and create a plan to retrofit the remainder by 2020, or sooner if possible.	4		
b	Work with municipalities to retrofit the remainder of municipally-owned street lights to LED technology by 2018.	4		

c	Enable and incentivize advanced controls for LED street lights for both municipally and utility-owned street lights	3	<p>The PAs have to date successfully supported the conversion of a very large number of customer-owned streetlights to LED technology. For example, in the eastern portion of Eversource's territory where roughly 90% of the streetlights are already customer-owned, over 60% of those streetlights have been converted to LED. Somewhat by contrast, in National Grid's territory, less than 20% of municipalities have purchased their streetlights thereby limiting the opportunity to convert to LED technology. Cape Light Compact has also completed a large number of street lighting conversions spanning a number of communities during the current 2013-2015 Plan period.</p> <p>The PAs are also committed to supporting the conversion of utility-owned streetlights to LED technology once the electric utilities in the state have developed, filed, and had approved the necessary tariffs.</p>	
Delivered Fuels and Thermal Efficiency				
15	The PAs shall promote non-gas customers' ability to self-fund the thermal portion of a comprehensive energy assessment using a PA auditor.	2	When working with customers whose heating fuel is neither electricity nor natural gas, the PAs have and will continue to make those customers aware of the efficiency opportunities that may nonetheless exist to reduce energy consumption related to space heating, and direct them to other funding sources that may be available to help them do so. The PAs always explain to these customers that, due to regulatory constraints, the PAs are not able to provide financial support for any engineering assessment of those opportunities, but that the customer should consider undertaking that analysis on their own behalf and, should the customer so desire, the PAs can direct them to qualified engineer firms with whom they work regularly on such projects.	N/A
Hockey Stick Pattern				
16	To address the uneven distribution of C&I savings occurring primarily at the end of the calendar year, the PAs shall:	2	The so-called "Hockey Stick Pattern" is a reliably predictable phenomenon, which the PAs factor into their forecasting efforts. The PAs will continue to provide reasonable and accurate forecasts of expected year-end results and increased visibility regarding those forecasts to the Council.	N/A
a	Improve C&I pipeline forecasting and reporting to the Council to increase visibility and predictability.	2	The PAs assist their business customers in understanding, evaluating, and implementing the energy efficiency opportunities that maximize the benefits of those efforts. In so doing, the PAs must be aware of and adapt to the financial and operating constraints that influence customer decision-making -- both in terms of the projects they may undertake and the timing of those projects.	
b	Avoid offering incentives that create inequities or unintended consequences of delay and deferral.	2		
Net Zero Energy Ready Buildings				
17	The PAs shall assess offering a tier within the C&I New Construction initiative to enable net zero energy readiness.	3	The PAs have an interest in staying closely engaged in the Net Zero movement. This may take a number of forms including participation in research and development efforts, particularly where Massachusetts participation can be used to leverage resources from program administrators in other jurisdictions and/or government research investments. It may also take the form of support for demonstration projects in partnership with developers or owners who are motivated to have a Net Zero building, or a building along the continuum to Net Zero: e.g., "Net Zero Ready" (highly efficient but renewables not yet in place) or "Near Net Zero" (highly efficient). The ZNE market remains very immature and as such it would be premature to design and implement a separate tier within the C&I New Construction Program; however, as the market develops in the future, a variety of options for enabling this market will be considered including perhaps a tier within the New Construction Program.	Section II.G.2.a, pages 102-103

Residential & Low-Income

New Initiatives

18	The PAs shall develop and implement by Q2 2016, a moderate income specific initiative designed to increase participation from this specific customer sector.	1	<p>The PAs are exploring a moderate income offer. PAs are committed to ensuring moderate income customers are able to successfully access and participate in all Mass Save® efficiency opportunities in 2016-2018. The 2016-2018 Plan includes the strategic commitment to ensuring designs effectively serve moderate income customers. The PAs will be addressing this within the first year of the three-year plan. Some of the details of implementation are not included, both because they are evolving and because they may be inappropriate to the Plan level. PAs must maintain the ability to be nimble and flexible in delivery, allowing the program's design to adapt to learning, especially as PA's trial new offerings. We have provided detail on some of the areas PAs are exploring to provide context and depth to our strategic commitment. As these efforts evolve they will be tested and refined and may begin to take different design direction.</p>	<p>Section I.A.2, page 11 Section II.E.2, pages 34 and 37 Section II.E.3, pages 39-40 Section II.E.4.c, pages 54 and 60 Section II.E.4.h, page 85</p>
a	Assess and determine appropriate population (within the 60-120% Area Median Income range) to serve and ensure that there is continuity with the low-income programs.	1	<p>In addition to a moderate income specific offering, PAs recognize that approaches focused on renters and 2-3 family properties will have overlap with moderate income populations. Therefore while PAs discuss a renter specific offer in the comments under recommendation 19, PAs consider the renter-specific efforts to be part of our holistic design to reach all customers and specifically moderate income customers. It is also important to note the whole house program is not the only opportunity to serve moderate income customers. The products program also reaches moderate income customers. PAs are very mindful of this in our program and will explore how to leverage locations or special promotions to ensure access for moderate income consumers. This is noted in the plan.</p> <p>PAs initial planning of the moderate income offer has focused on concerns raised during the workshop discussions and in the recommendations regarding the need for continuity with the low-income programs and "simplification" of entry for customers to weatherization. In response, and in consideration of other program factors, PAs have focused on an offer that: 1) targets the 61-80% state median income, i.e., moderate income, population just above "low-income" service definition, and 2) preserves the Mass Save brand awareness and current penetration success of the HEA channel. The preliminary exploration has focused on entry and service through HES –HEA. Customers with identified weatherization opportunities, uncovered as part of an HEA, can be offered an opportunity to be "qualified" for an increased incentive where income is a barrier. This has the advantages of maintaining the ability to market the Mass Save® initiative broadly, being fair and available to all customers, and allowing customers to decide if they want to be "income qualified". It further limits the pool of participants for increased support to customers with realizable weatherization opportunities, increasing the balance of funds expended for customer's direct incentive and energy savings, while controlling the growth in program administration overhead from adding a unique "offer" to a targeted sub-segment. PAs are still examining methods and costs for the income verification element of this more prescribed offering.</p> <p>Using the same scale for income qualification as is currently used by the low-income program will allow customers who enter through the low-income portal to be more easily transitioned into this offer. Customers who have completed income verification</p>	
b	Consider proxy means of income qualification (e.g. by zip code, rent costs), with protocols to assure that households eligible for low-income services are referred to the low-income programs.	3		

c	Develop and leverage partnerships with community groups to help with marketing and education, and coordinate with municipal efforts, that yield savings.	2	<p>prior to assessment through the low-income program and are over income for low-income services can be triaged into HES for an HEA and the existing low-income qualification will go with the customer into the HES program. Details on this process will be developed in close partnership with LEAN.</p> <ul style="list-style-type: none"> • Learning from Efficient Neighborhoods+® (EN+) and Renew Boston is still on-going in evaluations. There may be more information coming in that can help inform an approach to moderate income. Our review and incorporation of this information is part of how we approach “assess and determine appropriate population.” PAs initial focus on 61-80% state median income is to respond to the need for continuity of services with low-income programs. • A primary concern PAs have with proxy methods of income verification is that they restrict the ability of PAs to broadly market the program through traditional, low cost, effective marketing mediums. Proxy methods also can cause customer confusion and result in poor customer perception of the program. Finally there is no evidence that such proxy methods would actually have lower overhead costs relative to direct income verification. So far, we have indications from the EN+ evaluation that at least one proxy method of targeting paired with targeted outreach has a very high cost per opportunity secured. PAs are interested in exploring opportunities that can put more of the program dollars directly to work benefiting customers and securing weatherization opportunities. • One advantage of the opt-in design is the continuity with the low-income programs, achieved by utilizing the same “qualification” scale and maintaining the two program structure. Details on how to refer customers and methods and costs to income verification for “opt-in” customers all need and will receive further examination. • PAs are very enthusiastic about the ideas discussed in workshops regarding existing municipal efforts and local community organizations that currently serve this target market of moderate income customers. PAs have noted in the Plan their commitment to learn more and leverage opportunities to use such connections to increase access for moderate income customers to Mass Save® opportunities, with an emphasis on increasing installations. As these opportunities and relationships are inherently service area based, more detail and differing specific implementation opportunities are likely for each PA. 	
19	The PAs shall develop and implement by Q2 2016, a separate renter specific initiative, designed to address the split incentive and increase participation from this specific customer sector.	1	<p>PAs have begun planning for the introduction of a renter-specific initiative within the first year of the 2016-2018 Plan. The PAs are currently exploring program enhancements that provide effective screening and direction of renters to a specially designed visit that responds to renter opportunities and constraints. PAs see the potential for a well-designed special renter visit to increase participation in HES offerings, both by renters and landlords. The visit will focus on installation of instant savings measures such as efficient lighting, water saving devices and advanced power strips and will inform the customer of other appropriate opportunities for renters.</p> <p>Given the potential overlap of renters and moderate-income households, this effort</p>	Section I.A.2, page 11 Section II.E, pages 37-38 Section II.E.4.c, page 57

a	Develop and leverage partnerships with community groups to help with marketing and education and coordinate with municipal efforts and/or consider alternative program models to better serve renters.	2	<p>may simultaneously increase access and participation by moderate-income households, a high priority for the PAs, LEAN, and the Council (Council recommendation #18). Deployment of a special renter visit may also help to increase cost-effective program delivery by providing the right level of service at a reduced delivery time and cost. Triaging customers in this way may also help vendors providing HEAs to effectively serve renters while garnering information on landlord interest, thus increasing the opportunity to convert to deeper measures, consistent with the shared goal of increasing closure rates (Council recommendation #20).</p> <p>PAs are very enthusiastic about the ideas discussed in workshops regarding leveraging existing municipal efforts and local community organization that currently serve this target market of rental housing (renters and landlords). PAs have noted in the plan their commitment to learn more and leverage opportunities to use such connections to increase access for renters and moderate income customers to Mass Save® opportunities, with an emphasis on increasing installations. As these opportunities and relationships are inherently service area based, more detail and differing specific implementation opportunities are likely for each PA.</p>	
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Home Energy Services Initiative				
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20	The PAs shall achieve deeper savings per household in the Home Energy Services (HES) Initiative through the following strategies.	1	<p>PAs plan to conduct an extensive review of the customer experience to identify opportunities for increased streamlining, simplifying and better targeting time and content of customer information to maximize our opportunity to influence customers taking action. This will include investigating digital and online options that improve the customer experience, and exploration of enhanced customer follow-up strategies that continue to track and reach out to customers at key moments, helping them pursue deeper measures and stay on track with open recommendations from their HEA. This holistic assessment process is fundamental to PA program design and implementation. It includes continuous review of cost effective incentive levels, for customers and vendors within the context of all elements of the program as a system to maximize savings realization. Most PAs have adopted a reporting/rating system to help contractors understand their performance in a holistic manner. These systems award work and/or financial bonuses based on performance. This is an ongoing effort and is discussed in the Plan</p> <p>Mass Save® Data, www.masssavedata.com, updated quarterly, already provides information on weatherization jobs, closure rates and savings. PAs are conscious of redundant reporting and the attendant overhead costs and do not plan to add new layers to the existing robust tracking and reporting in place.</p> <p>Tracking data at the customer or household level is an outstanding issue in an open docket with the DPU.</p> <p>Based on the Council recommendation, PAs reviewed the current composition of the best practices working group and determined it currently provides a higher representation of HPCs as a proportion of participating contractors statewide. HPCs hold 45% of the contractor seats while representing approximately 18% of the contractors in the program. The current structure is working well, and PAs have not included adjustments in the plan. PAs are open to discussing balancing the representation to better reflect proportionate representation (i.e., increase proportionate representation of IICs) if this remains a critical concern to the Council.</p> <p>PAs currently provide incentives for heat pump technologies and are continuously reviewing /screening heat pump technology in specific applications in the residential sector. To date, heat pumps have not screened as being cost effective as a whole house heating system replacement for any heat source, including electric resistance heat (baseboard). The technology is rapidly evolving along with complementary technologies, which may, in time, support optimizing heat pumps as primary heating</p>	<p>Section II.E.1, page 33 Section II.E.2, page 34 Section II.E.2.c, page 36 Section II.E.3, pages 38 and 40 Section II.E.4.c, pages 52-54, 56, and 60 Section II.E.4.f, page 73</p>
a	Increase the closure rate for weatherization jobs:	1		
i	Assess why home energy assessments are not resulting in installation of recommended weatherization	1		
ii	As soon as practicable, use findings to implement changes to increase the close rate	1		
iii	Report findings and progress in the quarterly reports to the EEAC.	4		
b	Assess the potential impacts of adjusting the insulation incentive, including maximum dollar value and percentage, and consider eliminating the cap on these incentives. Assess offering different tiers for market rate vs. moderate income households, while allowing for broad awareness marketing.	3		
c	Provide customized approaches, technical assistance, and offerings to specific customer types/segments (e.g., homes doing remodeling work, high energy users and electric heat resistance customers).	3		
d	Track all measures implemented at the household level where technically feasible to provide the Council with more comprehensive information on the penetration rates, and the depth of savings achieved when multiple measures are implemented.	4		
e	Continue to create incentives for lead vendors, Home Performance Contractors (HPCs), and contractors to achieve overall savings targets through a whole building approach.	1		
f	Reassess the structure of the Best Practices Working Group to ensure HPCs have an equitable role in decisions.	4		
g	Integrate renewable thermal technologies into the HES delivery model, building on the success of the early boiler/early furnace replacement offering	3		

			systems. As cost effective implementation opportunities ripen, PAs will adjust program offers to respond. The early boiler/furnace model may or may not represent an optimal mechanism for deployment.	
21	The PAs shall optimize the effectiveness of the Home Energy Assessment (HEA) and the HEA delivery channel.	1	<p>Massachusetts' HES is a mature initiative with over 20 years of program delivery experience, including many refinements and expansions. The core initiative consistently delivers strong energy savings while reaching over 80,000 participants statewide in 2014 and continues to grow. The Massachusetts HES core initiative has the greatest reach of any whole home program in the nation. Nevertheless, PAs remain committed to continuous improvement and this 2016-2018 Plan focuses strongly on optimizing all aspects of the HES-HEA delivery channel. As discussed above in response to Recommendation #20, PAs plan to conduct an extensive review of the customer experience to identify opportunities for increased streamlining, simplifying and better targeting to maximize opportunities to influence customers to take action.</p> <p>The current design and implementation of the initiative includes a one stop shop approach and provides comprehensive information to customers on Mass Save® opportunities with a fuel blind approach. The Mass Save® website has become a critical focal point in the comprehensive marketing program, providing a consolidated one stop shop for residents and businesses to learn about energy efficiency, program offerings, and opportunities. The Mass Save® website and strategies that drive customers to the website will continue to be refined to ensure the highest quality customer experience. A majority of residential customers are aware of the website and 30% report using the website more than once in the past year. The Mass Save® assessment collateral links customers to a federal website with updated information on tax credits and additional incentives. If the Commonwealth would like to provide a link to a static URL that is updated on a regular basis and encompasses all available state incentives, the PAs would be pleased to link to that as well.</p> <p>Under current RCS regulations the PA's Lead Vendors and HPCs are providing comprehensive HVAC and hot water recommendations in a fuel blind manner during the HEA. Modifications may be necessary based on anticipated RCS regulation changes and will be made when RCS regulations become final. Recommendation of renewable thermal technologies may expand based on RCS regulation changes but will also need to be screened for cost effectiveness.</p> <p>The deployment of the online assessment tool, speaks to the on-going commitment of PAs to reach out broadly and provide an effective and creative entry point for customers. The on-line assessment tool is beginning to offer what the Council has highlighted in their recommendation as a desire to "optimize" the effectiveness of the HEA and the HEA delivery channel. The on-line assessment effectively provides customers with a no-cost home energy score card, tied directly to customer-specific actionable Mass Save® energy efficiency opportunities based on the resident's unique circumstances, all from the comfort of their keyboard and at their leisure. Each user can be tracked and followed up with, regardless of whether they move on to an HEA or are better suited to another Mass Save® opportunity. PAs look forward to exploring how our existing on-line assessment tool and resultant score card, a cost effective customer centric approach, already addresses the Council's interest in ensuring customers have access to actionable home energy score cards. PAs will also continue to monitor DOE's ongoing research in neighboring states on alternative score cards.</p> <p>The plan will not be including artificial deadlines or additional reporting or research requirements. This level of design detail is not appropriate to the plan and runs the risk of distracting effort and effectiveness from providing customers with the highest quality information and greatest access to efficiency opportunities, a strategic commitment shared by both the PAs and the Council. PAs are particularly concerned with</p>	<p>Section II.E.2, page 35 Section II.E.4.c, page 54 Section II.I.1, page 156</p>
a	Improve the integrated "one-stop shop" customer experience:	1		
i	Provide the customer with comprehensive information about Mass Save®, state and federal incentives for HVAC, hot water, and renewable thermal technologies, regardless of the customer's existing fuel source.	2		
ii	Direct lead vendors and HPCs to provide customers with comprehensive HVAC/hot water and renewable thermal technology options, regardless of the customer's fuel source, when recommendations to upgrade are made.	1		
b	Identify, assess, and, where appropriate, implement ways to streamline and better customize the offer and information presented at the HEA through strategies such as pre-screening customers and additional customer follow-up protocols.	1		
c	By Q1 2016, collaborate with DOER and EEAC Consultants on a report that:	4		
i	Identifies actions needed to provide customers with an asset-based "home energy scorecard", similar to the one implemented in the Home MPG initiative and;	1		
ii	Quantifies costs and benefits associated with providing customers with such a scorecard.	4		

			explorations of offerings, such as review of alternative score cards which are already being studied by neighboring jurisdiction, that increase administrative overhead without connecting to energy savings.	
Products Program				
22	The PAs shall fully incorporate LEDs in both the Products and Whole House programs, and phase out CFLs, as follows:	1	The Plan clearly commits to fully incorporating LEDs and phasing out CFLs, as market factors allow, and with attention to ensuring the highest value investment and benefits for ratepayers over the 2016-2018 Plan period. PAs have shown their commitment over the 2013-2015 period with major advancement in this arena – driven entirely by PA long term research efforts, professional program design, and effective procurement strategies that have allowed the program to lead the nation and market in technology deployment and cost effective savings. PAs remain committed to sharing information through quarterly reports with the Council and using the existing EMV and research frameworks to continue their success in this area. The Plan will not be including artificial deadlines for the phase out or additional reporting or research requirements that are a level of design detail not appropriate to the Plan and run the risk of distracting effort and effectiveness in achieving the shared strategic commitment of the PAs and the Council to fully incorporate LEDs in both the Products and Whole House programs, and phase out CFLs.	Section II.E.1, pages 33-34 Section II.E.2, page 34 Section II.E.2.a, page 36 Section II.E.3, page 40 Section II.E.4.h, pages 80 and 85
a	As soon as pricing allows, and no later than Q4 2016, offer only LEDs in the Whole House program and specialty lighting in the Products program.	1		
b	As part of ongoing assessment activities conducted in conjunction with EEAC consultants, progress towards providing only LEDs for general lighting in the Products program, and report on such assessments and progress in the quarterly reports to the EEAC.	4		
c	To support and maintain Massachusetts' position as a leader in accelerating the adoption and installation of new technologies and practices, the PAs, in conjunction with the EEAC consultants, shall assess upstream program designs for HVAC and DHW-related technologies no later than Q3 2016.	4		
HEAT loan/financing				
23	The PAs shall, by Q2 2016, evaluate the following proposed changes to the HEAT loan program. The PAs shall report findings to the EEAC no later than Q2 2016:	4	The Mass Save® HEAT Loan initiative is the most successful initiative of its kind in the nation, growing from 532 loans in 2006 to over 11,000 loans in 2014 (annual). Since inception, the Mass Save® HEAT Loan has made over \$200,000,000 available to thousands of homeowners implementing home energy efficiency improvements. With over \$250 million financed (residential) - more than other leading states, combined- the Mass Save® HEAT Loan initiative has the largest volume of loans. It also has the broadest lender participation with over 60 local Banks and Credit Unions across the Commonwealth offering this product. Since 2011, the initiative has incorporated a broad FICO score acceptance, well into the sub-prime category. Approximately 45% of households taking the HEAT Loan in 2014 had incomes between \$40 and \$80 K, and banks indicate that income is not a major barrier for HEAT loan approval (detail found on page 229 of the DRAFT 2016-2018 Plan).	Section II.E.2.a, pages 35-36 Section II.E.4.b, pages 47-48 Section II.E.4.c, page 55 Section II.E.4.e, page 66 Section II.H.2, page 152 Section V.B.5, pages 228-230
a	Provide low interest (e.g. 2%) loans for market rate customers, and maintain 0% for moderate income customers.	4		
b	PAs fund a loan loss reserve for moderate income customers and customers with marginal (e.g. 600-	4		

24	The PAs shall coordinate with DOER to expand the HEAT loan-eligible measures to include those currently funded by DOER under the Expanded HEAT Loan program.	3	<p>leveraging the expertise and capital of the existing lending community. Similarly it does not appear at this time that there is reasonable justification for a loan loss reserve given the programs current success in serving moderate income customers and current broad FICO score acceptance. The PAs will continue their efforts to understand the nature of barriers for different customer segments, which may be related to accessing capital, and to explore financing products/solutions to address them. The PAs will also continue to review the cost to administer the HEAT Loan offer and seek out efficiencies and cost savings.</p>	<p>Section II.E.4.a, pages 47-48 Section II.H.3.b, page 155</p>
25	The PAs shall identify and implement appropriate ways to simplify and accelerate the HEAT Loan application and approval process.	2	<p>PAs have not fully developed strategies for addressing all possible technologies. PAs are reviewing these matters, while also seeking to ensure that each technology is addressed in the most appropriate forum. The outcomes of the anticipated RCS regulation changes and cost effectiveness screening will be critical to understanding which technologies may be eligible for a HEAT Loan and whether efficiency resources may be appropriately applied. PAs are open to leveraging their highly successful HEAT Loan infrastructure to support additional related energy technologies but only if additional funding is available. It is contemplated that HEAT Loan expansion will require additional funding sources that could vary by measure.</p> <p>The current HEAT Loan offering was developed, deployed, and offered to customers in conjunction with the Massachusetts Bankers Association and Credit Unions. PAs will continue this successful partnership working closely with our partners in the lending community who are best positioned to offer advice on loan application and approval processes. The current loan volume is a strong indication that the current process is well designed and administered. PAs remain ever vigilant to ensure the best possible customer experience across all customer/program touch points and work continuously to simplify and accelerate the process.</p>	Section V.B.5, page 230
New Construction Initiative				
26	The PAs shall enhance the New Construction Initiative:	1	The PAs are enthusiastic about continuing to enhance the new construction initiative in ways that motivate builders to use the most energy efficient technologies and building practices for Massachusetts homes. PAs are committed to promoting the value of net zero and renewable ready measures to builders in the New Construction Initiative. Currently, multiple builders in the highest performance tier are including renewable ready elements along with super-efficient designs and construction resulting in homes that achieve net zero or renewable ready status. PAs have already begun to share these success stories and promote the approaches used in training and educational offerings and through marketing. In this way, PAs support the industry in achieving increased numbers of high performance homes and support customer understanding of their value within the market. For 2016-2018 the PAs will be increasing their education and marketing on how builders can use the existing initiative to reach net zero or net zero ready in the current new construction training programs.	Section II.E.2.c, page 37 Section II.E.3, page 39 Section II.E.4.a, pages 41 and 45
a	By Q1 2016, implement a “renewable ready” requirement in the highest two performance-based tiers and the top prescriptive incentive tier.	4		
b	By Q2 2016, deliver a report to the EEAC that assesses:	4		
i	Creating a Zero Net Energy (ZNE) incentive top performance tier.	3	The High Rise path (serving buildings that are 4+ stories) offers a custom option, which is prescriptive based. The Joint Management Committee (“JMC”), including residential and commercial new construction technical experts from the PAs staff and the lead vendor, will continue to assist in defining performance targets, establishing incentive structures, recruiting developers, completing energy analysis, and providing technical guidance on energy efficiency construction practices. A more detailed or clearer articulation of how the custom path reflects a “performance path” will be considered.	

ii	Adding a performance path for multi-family housing (4+ stories).	3	The plan will not be including artificial deadlines or additional reporting or research requirements that are a level of design detail not appropriate to the plan and run the risk of distracting effort and effectiveness in achieving the shared strategic commitment of the PAs and the Council to achieving the deepest savings possible in the New Construction Initiative.	
iii	Increasing incentives for rental housing new construction as a way of mitigating rental split-incentives.	4	The PAs are unable to include increased incentives for rental housing in the plan. The New Construction Incentives are not stratified by housing type, and incentives are provided to the builder. Savings are calculated based on the unit level savings above an agreed upon baseline. PAs cannot currently claim different savings based on planned occupancy. The new construction initiative experiences some difficulty in maintaining cost effectiveness, leaving no room for incentive increases without some corresponding increased savings. This is also a concern for adding new incentives for non-energy savings items such requiring renewable ready, net zero, or achievement of these elements. Incentives and requirements of the program shall remain focused on maximizing energy efficiency savings. Although not specifically recommended by the Council, the PAs will be exploring the savings opportunities home automation technologies can provide to the new construction initiative. The PAs feel home automation could be an exciting advancement in new construction market that could also help make the initiative more cost effective.	
Behavior Initiative				
27	The PAs shall expand savings from behavior programs and explore the incorporation of home automation technology into their behavior initiative and report to the EEAC on the results of their findings.	1	<p>The PAs are actively deploying behavioral programming, specifically through the Home Energy Report initiatives that the majority of PAs intend to continue. Two gas PAs have been unable to secure a reasonable cost for the HER deployment in their service areas, though given the broad reach of the electric PA programs, many of these customers may already have been treated, thus a spillover effect is in play. PAs intend to continue to monitor opportunities for amendments to the current HER model and new behavioral initiatives. The field of behavioral energy efficiency is evolving, with new product offers from vendors as well as new opportunities created by technology and engagement tools.</p> <p>PAs share the Council's enthusiasm for supporting cost-effective emerging technologies and will continue exploration of how home automation technology can be woven into initiatives, including exploring its use in combination with behavioral elements. There is considerable discussion in the Plan on this topic (see narrative under New Construction Initiative above). PAs are also continuing to evaluate and explore opportunities to leverage home automation technologies including eligible wireless enabled thermostats and their associated communication tools as well as other custom engagement tools for behavioral savings.</p> <p>The Plan further notes that some PAs may explore offering behavior initiatives that have the ability to provide near real time electric consumption feedback, and have the ability to offer a mobile based application in addition to traditional web based or paper reporting. Some PAs may also look to see what potential exists to tie in home automation, smart appliances, and other controls where applicable. Some electric PAs may leverage funding from their Grid Modernization Plan in areas where energy efficiency and grid modernization cross over.</p>	Section II.E.2.b, page 36 Section II.E.3, page 38 Section II.E.4.d, pages 62-64
Multi-Family Retrofit Initiative				
28	The PAs shall increase savings from, and improve the customer experience in, the multi-family retrofit initiative:	1	PAs remain committed to continuous improvement of the multi-family program to increase savings and improve the customer experience. PAs expressly commit in the Plan to continued improvement of the customer's single point of contact experience,	Section I.A.2, page 11 Section II.E.1, page 33 Section II.E.2.a, page 35

a	Provide weatherization incentives and HVAC and hot water equipment rebates to multi-family buildings that heat with unregulated fuels (e.g., oil or propane) to the same extent provided to gas or electric resistance-heated multi-family buildings.	1	<p>leveraging and expanding from the success of the MMI model to further support customers. PAs also commit to seamless program delivery, linking rebates, incentives and services to the customer in a way that provides a comprehensive energy efficiency offer and maximizes savings. PAs are committed to coordinating the residential multi-family and commercial initiatives through the joint participation of the Multi-Family Working Group of Residential and C&I program management staff and vendors, working together to streamline delivery of packaged, comprehensive energy efficiency services to the multi-family sector. PAs are also committed in the Plan to tracking and reporting residential and commercial meter savings separately.</p> <p>PAs have planned for expansion of weatherization, HVAC, and water heating to multi-family customers utilizing oil and propane, pending (and dependent on) finalization of RCS regulations.</p> <p>PAs currently offer and will continue to offer support for Multi-Family properties to benchmark their properties through the EPA Benchmarking tool (Portfolio Manager). The link to this nationally recognized tool is included on the website page(s) associated with the Multi-Family Retrofit core initiative. EPA Portfolio Manager is a publicly available and free tool accessible to all property owners. PAs have supported data upload through the Green Button Initiative and have extensively coordinated with disclosure efforts such as the Boston Energy Reporting and Disclosure Ordinance to support customers' ease of access to benchmarking and compliance with reporting requirements.</p>	<p>Section II.E.2.c, page 37 Section II.E.3, pages 39-40 Section II.E.4.b, pages 47 and 51-52</p>
b	By Q2 2016, for buildings that benchmark, use benchmarking to:	NA		
i	Institute or demonstrate a "pay for performance" approach to retrofits using pre- and post-retrofit baselines for evaluation.	4		
ii	Customize incentives to facilitate participation and deeper savings per building.	1		
c	By Q2 2016, develop and implement a plan or initiative for benchmarking in the multi-family sector.	1		
d	Seamlessly deliver services, rebates and incentives to the customer, regardless of whether such services, rebates or incentives are supported by the commercial or residential program.	1		
i	Provide customers with a single point of contact to act as a project manager offering whole building services for both residential and commercially metered buildings, including overseeing energy efficiency installations and coordinating with the PAs and their vendors.	1		
ii	For each building, link all services, rebates and incentives provided, regardless of whether such services, rebates or incentives are supported by the commercial or residential program, to provide a comprehensive view of commercially- and residentially-metered energy use and savings.	1		
iii	For each building, track and report both commercially-metered energy use and savings, and residentially-metered energy use and savings.	1		
e	Segment the sector (e.g. according to ownership patterns, building types, or meter configurations) and implement tailored approaches to facilitate increased participation and savings per building within such segments.	1		
f	Prioritize comprehensive whole building based performance.	1		
g	By Q2 2016, implement an initiative, in partnership with housing finance institutions, to integrate efficiency work into opportunities such as refinancing or retrofitting of larger multi-family buildings.	3		
Low-Income Programs				
29	The Low-Income Energy Affordability Network (LEAN) shall expand their eligible scope of services:	1	<p>PAs have planned for expansion of weatherization, HVAC and water heating for eligible participants in the low – income multi-family program utilizing oil and propane, pending finalization of the anticipated revised RCS regulations. PAs will work with their partners at LEAN to ensure any efforts designed to serve moderate income customers up to 80% of state median income are coordinated. This is discussed above in response to Council recommendation # 18. With respect to recommendation #29.b, the PAs believe that changing the 60% state median income standard used with consistency at the DPU for low-income EE matters is beyond the scope of these current program design efforts.</p>	<p>Section II.E.2, page 11 Section II.E.3, page 38-39 Section II.E.4.a, page 85 Section II.E.4.b, page 90</p>
a	Provide weatherization, HVAC, and hot water technology services to low-income multi-family buildings that heat with unregulated fuels (e.g., oil or propane).	1		
b	Define low-income multi-family buildings as those with at least 50% of tenants earning up to 80% of Area Median Income (AMI).	4		
c	Assess and report to the Council on expanding 1-4 family program to serve customers up to 80% AMI.	Refer to #18		

d	Evaluate and, if appropriate, serve non-profit organizations that primarily serve low-income customers, provided that:	3	It should be noted that non-profits are served as commercial entities and therefore any program or initiative activity will be the province of the C&I programs, regardless of delivery vendor.
e	Such services are clearly defined, and synched with Mass Save® C&I sector non-profit initiatives;	NA	
i	There is adequate funding such that providing such services does not reduce services to preexisting LEAN markets or exacerbate the low-income residential program queue;	NA	
ii	The PAs and LEAN report annually to the EEAC on which non-profits are served, what services are provided, and the cost per building	NA	