July 27, 2018

Massachusetts Energy Efficiency Advisory Council

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

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

Dear Commissioner Judson:

Thank you for your work and leadership on expanding the state’s nation-leading energy efficiency programs. The state’s energy efficiency programs are central to supporting residents, businesses, and municipalities in implementing energy and cost saving measures. The City of Quincy would like to provide the following input for consideration by the Energy Efficiency Advisory Council (EEAC) and the Program Administrators (PAs). Based on our experiences with the state’s energy efficiency programs both for our municipal buildings and those available for residents and businesses, our municipality has three priorities for the 2019-2021 Three Year Energy Efficiency Plan.

The program design and measures proposed by the Plan should align with local, regional, and state climate goals. As more municipalities are setting net zero or climate-related goals, municipalities are seeking to implement strategies, such as strategic electrification, to address energy use in all sectors and populations of their communities. We strongly encourage incorporating concrete opportunities for municipalities and staff to partner directly with PAs to advance our mutual goal to promote energy efficiency. We would also like to see residential, multi-family, low-income, C&I, and municipal incentives to adopt fossil fuel free and low energy alternatives called out the plan and integrated into the program design by including consideration of greenhouse gas emissions impacts of measures.

Commitment to data transparency and routinized data sharing with cities and towns remains critical. With improved access to local energy use data, municipalities can more effectively measure progress toward community goals and partner with PAs to conduct data-driven outreach. Our community greatly appreciates the PAs commitment in the draft Plan to provide public access to monthly energy use data on an annual basis. This is an important step toward improved data transparency and will allow our community to better understand seasonal trends in energy use by sector. We would like to see additional progress toward disclosing anonymized measure uptake information by municipality, as is currently reported at the state or PA level on MassSaveData.com (e.g. number of REAs completed and insulation, air sealing, lighting, refrigerators, and faucet aerators and low flow showerheads installed).

The Commercial and Industrial (C&I) program should provide a suite of offerings tailored to address the challenges unique to municipal facilities. Municipal facilities have distinct needs from those of traditional large commercial and industrial buildings. For instance, many municipal buildings are recycled from one function to another, resulting in an older building stock and older equipment. Aligning PA programs, offerings, and expectations to complement and optimize municipal assets, capital planning cycles, budgeting processes, bonding appetite, and bandwidth is one way to leverage more savings and benefits from the municipal sector. Improving the C&I program’s alignment and coordination with other statewide incentive programs is another way to improve the process for municipalities interested in accessing the energy efficiency programs. Specifically, we would like to see alignment of the energy efficiency program timelines and processes with funding available through statewide programs such as the Massachusetts School Building Authority (MSBA), the Department of

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Energy Resources (DOER) Green Communities program, and Massachusetts Clean Energy Center (MassCEC) programs.

Thank you for your consideration of our comments and attention to these suggestions as the EEAC develops recommendations for the July Resolution in response to the draft Plan.

Sincerely,

Shelly Dein
Energy & Sustainability Director

cc: Mayor Thomas P. Koch
    Helen Murphy, Director of Operations