



September 17, 2021

To: Energy Efficiency Advisory Council

Subject: **Massachusetts Sierra Club comments for the 2022-2024 plan**

The following remarks are general in nature, but important. The EEAC, and by extension, the DPU, must address three critical points:

- Ensure that the plan adopts the Equity Working Group recommendations.
- Ensure that the plan eliminates all incentives for fossil fuel conversions now.
- Ensure that the plan identifies results-oriented numeric goals, transparently tracks performance and that the rewards are tied to this performance. Chapter 8 of the Acts of 2021 requires EEAC to demonstrate that it's taken the social value of greenhouse gas emissions into account in its comments and approval decisions.

Over 80 organizations have written to the Eversource calling out the company for examples of its efforts to resist clean energy: The CEO has insisted that despite state climate laws, the company still plans to renew long-term gas contracts and spend billions of dollars upgrading gas infrastructure. Second, Eversource is a leader in a coalition meant to stymie building electrification. And Eversource-branded pro-fossil-fuel propaganda has been distributed to elementary school kids.

The plan for 2022-2024 must not be an example of the gas utilities' resistance to electrification and equity. In the past, there was a business case for using ratepayer fees for incentives to take customers away from oil distributors, and there was no meaningful mandate to break down barriers that prevent low income and marginalized residents from participating in Mass Save.

Times are different now. The EEAC and the DPU are now empowered and legally required to act in the interest of at least 50% emissions reductions by 2030, and to ensure a just and equitable transition in doing so. This creates an obvious tension for the gas utilities. Promoting and investing in electrification will reduce their customer base and the justification for new gas transmission infrastructure. And prioritizing investments in EJ communities presents new challenges in developing outreach materials and strategies.

The EEAC and the DPU are called upon to use your powers to the fullest extent to ensure that the state's mandates are front and center in the plan and not compromised by the utilities' outdated and parochial interests.

The Sierra Club looks forward to a plan that puts us on a solid track to electrifying 1 million households by 2030, and honors the Baker administration's commitment to "ensuring that the policies guiding the transition to a new low carbon economy do not exacerbate but instead assist in closing the health and economic disparities experienced in Environmental Justice communities and communities of color." Quoted from page 10 of the Interim 2030 CECP.

Thank you,

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