



EQUITY WORKING GROUP MEETING MINUTES

Monday, September 22, 2023
Virtual Meeting: Zoom

Equity Working Group Members Present: Brooks Winner, Maggie Downey, Mary Wambui, Alexis Washburn, Stephanie Terach, Margie Lynch, Mary Wambui, Sonakshi Saxena, Jo Ann Bodemer, Cindy Luppi, Doug Quattrochi, James Collins, Jhenny Saint-Surin, Charlie Harak, William Rose

Equity Working Group Members Absent: Ben Cartwright, Kyle Murray

Other Attendees: Adrian Caesar, Alissa Whiteman, Ina Dasso, Angela Parnay, Anxhela Mile, Benjamin Silverman, Bob Eckel, Brandy Chambers, Chris McClellan, Danilo Morales, David Lyons, Degen Larkin, Emma Zehner, Kai Palmer-Dunning, Katelyn Mazuera, Leah Cohen, Melanie Coen, Molly Fairchild, Sam Nigro, Sherri Borrelli

1. Call to Order

Bodemer, acting as Chair, called the meeting to order at 11:03 AM.

2. Equity Working Group (EWG) Updates and Public Comment

There were no updates from the EWG or public comments.

3. Draft EWG Recommendations for the 2025-2027 Three-Year Plan

Considerations Driving EWG Draft Recommendations

Bodemer thanked Whiteman and Lynch for compiling feedback and described the framework by which the EWG developed its recommendations for the 2025-2027 Plan. Bodemer also indicated that some recommendations require further analysis in order to determine specific targets.

Harak expressed support for many of the recommendations at the highest level, but the program administrators (PAs) need to assess the feasibility of and strategies for implementing each recommendations in practice. Bodemer agreed and replied that the EWG will discuss such considerations with the PAs after reaching consensus on the desired outcomes for each

recommendation. Harak suggested that the PAs assess the feasibility of the EWG recommendations as quickly as possible.

Summary of EWG Feedback

Bodemer summarized the goals, current approaches, and proposed concepts and strategies to achieve equitable outcomes in areas such as income qualification, expanded contractor services, incentives for renters and moderate-income customers, rebate processing,

EWG Discussion – Income Verification

Harak recommended that the PAs simplify income verification but expressed concern that all renters in environmental justice municipalities (EJMs), including those in upscale buildings, would automatically qualify for enhanced incentives. Harak said that this recommendation represents an instance in which the PAs should help set parameters and define requirements. Harak said that if the PAs implement this strategy, then they should identify luxury-rental properties with affluent occupants that should be ineligible for enhanced incentives. Bodemer responded that the desire to ensure that market-rate customers do not receive enhanced incentives must be balanced against the need to streamline and simplify access to incentives for renters and produce desired outcomes.

Quattrochi suggested that the PAs narrow the scope of the automatic-income qualification by using a combination of factors, such as income, language and race, to mitigate the concerns that Harak characterized.

Lynch said that the recommendations proposed that the Department of Public Utilities (DPU) reconsider the current designations for EJMs, which are much more inclusive than what the PAs and EWG suggested for the 2022-2024 Plan.

Rose seconded Quattrochi's suggestion to use demographic factors beyond renter status and residing in an EJM to determine eligibility for enhanced incentives. Wambui agreed that enhanced incentives for market-rate customers are not required to enable their participation.

Wambui stated that targeted support and offerings create circumstances that enable underserved customers to participate, which is a benefit to everyone. Wambui said that wealthier communities like Andover have received program benefits while lower-income communities like Lowell have paid into programs without receiving equitable access to benefits. Wambui said that avoiding a new strategy to enable renter participation in EJMs is a denial of justice, but agreed that the eligibility requirements should include some guardrails. Wambui emphasized the fact that program benefits have not been delivered equitably over the concerns about wealthier renters potentially benefitting from enhanced incentives.

Winner asked if all renters in EJMs should qualify for enhanced incentives. Wambui replied that an analysis of the benefits delivered to and costs incurred by each town would illustrate the inequitable distribution of program benefits and costs. Wambui said that the DPU should align the definition of EJMs with the prior EWG and PA proposal. Wambui suggested that restricting the eligibility requirements using additional demographic indicators should be reasonable but might not produce the most desired outcomes.

Lynch said that one method to target enhanced incentives is to apply a limit for monthly rent, which would effectively remove the luxury apartments that may be in EJMs. Bodemer said that another suggestion was to offer enhanced incentives for deed-restricted buildings.

Terach asked if the recommendation also guides the PAs to remove assistance for customers that lack flood insurance. Quattrochi suggested that automatic eligibility for enhanced incentives be limited to EJMs outside of zones susceptible to extreme-flood risk, since rental-property owners inside extreme flood risk areas could receive funds from both Mass Save programs and flood insurance. Terach said that the PAs have already served some rental properties in EJMs through the income-eligible programs. Bodemer reiterated that the EWG wants the PAs to review each recommendations to determine their feasibility.

Washburn commented that criteria for instant-income verification might confuse customers if the PAs continue to market different programs and offerings. Washburn said that other proxies and public data, like building age, can address Harak's concern about luxury buildings receiving enhanced incentives.

EWG Discussion – Allow Service by Any Mass Save Provider

Bodemer clarified that the recommendation is to allow any qualified Mass Save contractor to serve any type of customer (e.g., market rate, moderate income, low income) rather than to remove contractor qualification requirements or prevent community action agencies (CAAs) from continuing to serve income-eligible customers.

Harak said that several contractual relationships would need to be in place and pointed out that some home-performance contractors (HPCs) would not contract with the Low-income Energy Affordability Network (LEAN). Bodemer replied that the PAs can establish protocols for collaboration between HPCs and LEAN.

Washburn suggested that the protocols require HPCs to collaborate with LEAN to serve any income-eligible customers they solicit.

Downey noted that some CAAs have no additional bandwidth to spare and said that the lead-vendor model could help increase capacity. Bodemer indicated that the recommendation would provide customers with a seamless experience by guiding them through the appropriate program pathways. Downey said that Cape Light Compact has concerns with the oversight of HPCs if/when they serve income-eligible customers. Winner agreed that general-market contractors can employ predatory practices when serving income-eligible customers, but the early impacts of allowing HPCs to serve income-eligible customers has relieved pressure on CAAs. Winner supported this strategy since it provides flexibility for customers and breaks down rigid barriers between customer pathways. Downey said that HPCs do not serve all communities and the PAs should not prescribe a one-size-fits-all solution.

Luppi left the virtual meeting at 10:45 AM.

Terach indicated that many lead vendors have contracts with CAAs or Action for Boston Community Development, but not all HPCs want to collaborate with CAAs. Terach asked if the EWG is recommending that the PAs also allow contractors in the heat-pump-installer network (HPIN) to serve income-eligible customers. Lynch said that the recommendation applies to all Mass Save contractors. Terach said that there is an existing process for lead vendors and CAAs to coordinate weatherization services, but the 1,400 HPIN contractors would need to sign agreements with the CAAs. Lynch replied that the goal is to make the customer experience more seamless by allowing all Mass Save-service providers to direct customers to the appropriate service channels.

Washburn requested that the PAs investigate the extent to which HPCs are willing to collaborate with CAAs to serve income-eligible customers in order to identify areas that require more capacity and investments.

Harak suggested that the language for the recommendation clarify the objective to ease the customer experience through referrals from HPCs to CAAs.

EWG Discussion – Expanded Incentives for Renters and Moderate-Income Customers

Winner expressed support for all recommendations to expand incentives for renters and moderate-income customers. Winner said that the requirement to remove fossil-fuel equipment for low- and moderate-income customers is a potential concern and that the requirement does not seem consistent across income levels. Winner asked whether the requirement for the removal of fossil-fuel equipment was motivated by concerns with the cost-effectiveness of heat-pumps; if so, Winner said that the recommendation should prioritize the best decisions for customers above cost-effectiveness. Bodemer said that the requirement to remove fossil-fuel equipment would apply to all residential buildings.

Washburn also expressed support for expanded incentives, but asked how panel upgrades and other investments are considered as part of these recommendations. Bodemer said that the EWG is recommending that the PAs increase incentives for barrier mitigation and other electrical upgrades.

Rose suggested that full vs. partial displacements of heating systems might determine the requirement to remove fossil-fuel systems, e.g., partial displacement suggests that the customer needs a backup heating source. Washburn said that heating systems are ideally designed to meet all space-heating needs in home; in reality, this is not the case and customers will be reluctant to remove backup fossil-fuel heating when installing heat-pumps. Winner asked whether the requirement to remove fossil-fuel systems would exacerbate heat-pump costs, which have been raised as a concern in 2025-2027 Plan workshops. Rose said that deactivating gas lines could prevent further gas consumption and guarantee that greenhouse-gas emissions decrease after heat-pump installation.

Lynch suggested that the PAs release a request for proposals (RFP) for bundled-service providers for moderate-income customers that will provide support for pre-weatherization barriers, weatherization, electrification, and other upgrades. Lynch said that the RFP could include a fixed-pricing mechanism in order to control project costs.

Luppi rejoined the virtual meeting at 11:06 AM.

EWG Discussion – Provide Certainty Around Qualification and Instant Rebates

Luppi reported that a local TV station received customer complaints due to delayed rebates, which is a point of vulnerability for public opinion. Luppi said that instant rebates should be implemented in a way that does not harm small contractors. Luppi encouraged everyone to be thoughtful about responding to the media. Bodemer said that the PAs experienced issues with rebate processing with their prior vendor but are now providing monthly reports to the AGO, DOER, and EEAC which have shown improvements in rebate processing times.

Washburn asked if the programs would provide direct-to-contractor or instant rebates to cover costs for pre-weatherization barriers and inspections. Lynch replied that all program rebates should be instant and Bodemer said that the PAs should assess the feasibility of the EWG recommendation. Washburn said that instant rebates increase the importance of project-quality assurance and control.

EWG Discussion – Community First Partnership (CFP)

Winner commented that all recommendations for the CFP closely reflect feedback from participating municipalities. Winner acknowledged concerns about oversight of CFP marketing, but said that participating CFPs have been diligent and effective in marketing Mass Save to underserved populations to date.

Washburn added that changes to programs and rebates for 2025-2027 warrant oversight, but the PAs should expedite review of CFP-marketing materials. Wambui said that the CFP enables participating communities to effectively serve and connect with its members, and that PAs should expedite their review of marketing materials to avoid bottlenecks. Bodemer agreed with PA oversight to ensure consistency in marketing materials, but said that this should not result in long delays.

EWG Discussion – Tailored Materials for Community First Partners

Luppi emphasized that all communities are unique and may implement specific methods to improve outreach, education, and engagement. Luppi said that the CFP needs to balance the need for accuracy of messaging in tailored materials with the effective communication of program offerings.

Winner commented that tailored materials produced by CFPs should address regional differences in dialects. Winner highlighted the need to grant autonomy to CFPs in the development of marketing materials, as he heard from several communities that they currently have many restrictions on their ability to be creative.

Saxena said that the PAs are exploring a prescriptive-marketing approach in which CFPs can select prepared materials in several languages which consider dialects and cultural relevance. This will be combined with a customizable approach for the CFPs that includes streamlined oversight by the PAs.

Quattrochi emphasized Winner's points and said that targeted messaging will ensure that messaging resonates with customers.

EWG Discussion – Data Availability for Community First Partners

Bodemer stated that the DPU has restrictions on PA-data sharing and the EWG recommendation on data availability for CFPs works within the DPU guidelines.

Luppi expressed disappointment that the data provided to CFPs has not enabled them to understand participation gaps to date. Bodemer responded that there may be mechanisms such as non-disclosure agreements that enable the PAs to share more information, but the EWG recommendation is that the PAs work within the DPU requirements to provide the CFPs with more useful data.

Winner seconded Luppi's point that CFPs have not received useful data from the PAs and agreed that the PAs should work to provide actionable information to the CFPs within the DPU guidelines.

Lynch said that Martha Grover, who supports the CFP in the City of Melrose, communicated that the goal is to provide the CFPs information on buildings that have been treated. She said that there is building data that is already publicly available and sharing such information should not violate DPU guidelines. Lynch suggested that non-disclosure agreements are another potential option to facilitate better data sharing.

Wambui amplified the role of third parties in getting data to support equity work. Wambui said that other states have tried to leverage third parties in order to circumvent data restrictions, so the EWG and PAs should consider third parties as a solution. Bodemer asked Wambui to share information on jurisdictions that use third parties for data sharing.

EWG Discussion – Environmental Justice Municipalities

Winner argued that concerns about serving wealthy renters in EJMs are not enough to deny the proposed approach for automatic qualification for enhanced incentives in EJMs. Winner said that renters are underserved so the PAs should implement new methods to serve them better, then evaluate the offerings to determine their effectiveness.

Wambui raised that renters in naturally-occurring-affordable housing are the most impacted by injustice and have no offerings that target them, so they will benefit most from the automatic qualification

Chambers asked for clarification on how the automatic qualification will work in practice since the PAs do not have a qualification process for the current renter offering, other than confirming that tenants occupy rental units. Lynch responded that the recommendation calls for full project-cost coverage for all renters in EJMs. Chambers requested that the recommendation clarify that the automatic qualification is based on location and not income.

Rose suggested that the current eligibility requirements for EJMs are over-inclusive, so the strategy to qualify all renters in EJMs should use additional demographic factors.

Harak asked if the PAs have the legal discretion to limit enhanced incentives for renters in EJMs by using specific demographic factors. Bodemer said that the limitations would help control costs and hoped that the DPU would understand the rationale.

Quattrochi commented that multifamily properties can participate in either residential or C&I programs, but that the 2 programs are not consistent in terms of incentives (e.g., for weatherization.) Quattrochi added that renters need to provide utility bills to confirm their rate codes, which is income qualification in some sense.

Lynch noted that the current definition of EJMs considers both historical participation and marginalization of communities, but the concepts were applied differently than the proposed EEAC/PA framework for 2022-2024. Wambui said that the EWG recommendation should continue to consider historic participation and inequity.

EWG Discussion – Language Access

No EWG discussion.

EWG Discussion – Measuring Success

No EWG discussion.

Proposed Recommendation – Workforce Development

Bodemer described the proposed recommendation for workforce development which suggests that equity be considered in PA coordination of workforce-development efforts with the Massachusetts Clean Energy Center (MassCEC), and that equity efforts consider both the customer and contractor standpoints.

Luppi suggested that addressing workforce development should include addressing language isolation, and said that the Emerald Cities Collaborative has implemented effective strategies in this space. Luppi asked Washburn for input on this EWG recommendation. Washburn replied that one issue is that contractors often have difficulty understanding how their business models would work in the Mass Save programs, particularly if they provide complementary services (e.g., electricians). Washburn said that contractors who speak languages other than English could also use additional guidance on how to participate in programs.

Harak emphasized the need to ease entry into the workforce for returning citizens, as many are BIPOC and may be able to serve their communities more effectively. Harak said that background checks should not prevent people with minor offenses from participating as Mass Save contractors.

Quattrochi left the virtual meeting at 11:55 PM.

Proposed Recommendation – Small Business

Bodemer said that the proposed recommendation for small business is to ensure that equity considerations are included in the design and implementation of any small business programs;

however, more detailed recommendations were discussed during the workshop on small businesses.

Lynch highlighted the recommendations to hire small-business liaisons within CFPs and provide concierge services for small businesses in EJMs. Lynch also noted that another stakeholder suggestion is to provide translation and language-access services during Main Street events.

Washburn suggested that findings from the Massachusetts Center for Eco Technology pilot for weatherization in small businesses should be included in the EWG or EEAC recommendations.

4. Next Steps

Bodemer stated that DOER and the EEAC Consultants will revise the draft recommendations based on EWG feedback and recirculate the revised draft by September 25. Bodemer requested that EWG members share additional feedback by September 26 such that the group can finalize recommendations by the October 10 Equity Workshop.

Harak replied that providing feedback in this timeframe is difficult and reiterated that the PAs should assess the feasibility of the recommendations as soon as possible.

5. Adjournment

Bodemer, acting as Chair, adjourned the meeting at 12:02 PM.

Meeting Materials:

- Official Meeting Notice
- Meeting Link
- Agenda
- Draft EWG Recommendations for the 2025-2027 Three-Year Plan