COMMONWEALTH OF MASSACHUSETTS
MASS SAVE THREE-YEAR PROGRAM REVIEW
2022 - 2024

January 4, 2021

TO: Patrick Woodcock
Chair, Energy Efficiency Advisory Council (EEAC)
Commissioner, Massachusetts Department of Energy Resources (DOER)
100 Cambridge St, Suite 1020 Boston, MA 02114

FROM: Browning the Green Space

RE: Browning the Green Space Comments to inform the three-year energy efficiency plan for the years 2022 through 2024

We commend the DOER, EEAC and the Program Administrators for the sustained success in building and maintaining a nation-leading energy efficiency program. Thank you for providing the opportunity to comment on the plans for the draft three-year energy efficiency plan for the years 2022 through 2024. Your willingness to consider and adjust plans based on public input from the ratepayers who fund these nation-leading programs is paramount to maintaining a transparent and inclusive process.

Browning the Green Space is a new non-profit voluntary coalition of leaders and organizations, primarily in the New England region, that share the passion to advance Diversity, Equity, and Inclusion ("DEI") in clean energy. Our goal is to increase the participation and leadership of Black and Brown people and of women (collectively, "underrepresented groups") in the clean energy space in the Northeast and to increase consumer diversity as well here in the Commonwealth. Together, our views represent the collective insight from dozens of leaders in the clean energy industry working to bring energy efficiency and renewable energy services at a larger scale to gateway cities and environmental justice communities.

Since its founding, the Mass Save program has led the nation in efficiency and climate mitigation while also consistently falling short in serving broad swaths of low-income ratepayers — concentrated in gateway cities — that have been paying into the Mass Save program through their energy bills and have seen relatively little financial benefit. These funds have instead gone to benefit more affluent neighborhoods with fewer barriers to participation, reinforcing a perception, and creating a reality, that clean energy and energy efficiency products are primarily for middle and upper-income households.

To address these unintentional shortcomings in the policy, Browning the Greenspace has put together three categories of policy change we believe will serve to level the playing field and pave the way for dramatic growth in efficiency services adoption in environmental justice neighborhoods for the 2022 - 2024 cycle:

 # 1: Establish Goals & Benchmarks to Increase Workforce Diversity

- Problem:
  - There is a lack of meaningful participation in the Mass Save program among some neighborhoods in the state due to a variety of social and economic barriers.
- Thesis:
  - As for any product, trust is one of the key components required to bring communities into a marketplace. Increasing diversity among the vendors who complete the Mass Save work can help build this trust in underserved communities and can help cross these education barriers by making the message and the fact of their participation known in these communities.
- Strategy:
  - A) Create a MBE and WBE goal specifically for Lead Vendor, HPCs, and IICs.
    - Example 1: The City of Boston has requirements for diversity for all of its construction work - which includes energy efficiency work.
    - Example 2: The Energy Trust of Oregon has enacted a set of diversity, equity, and inclusion goals
  - B) Allocate meaningful Workforce Training funds to help defray the costs and barriers to entry for these new vendors. Funding should be targeted to support job training and placement for residents from environmental justice communities in roles across the energy efficiency landscape, beyond just energy efficiency technicians.
  - C) Track and report key indicators of workforce diversity among Mass Save Lead Vendors, HPCs, and IICs. Create goals for these metrics and incorporate diversity into performance metrics for these vendors.
  - D) Prioritize supporting non-English language speaking ability as a key hiring goal for Mass Save energy auditors and phone support; set benchmarks for this that are tied to primary languages spoken in each region of MA so language can be eliminated as a meaningful barrier to participation

#2 Program Administrator Equity Metrics

- Problem:
  - As currently stated, the policies governing the financial incentives for the Mass Save program administrators do not tie performance payments to achieving diversity amongst participants and are solely tied to GHG reductions.
- Thesis:
  - It is natural and to be expected that for-profit businesses, such as our publicly regulated utilities, will follow financial incentives. Indeed they are required by their shareholders to do so. As a result, we believe that one of the most effective ways to achieve stronger programmatic outcomes in terms of diversity of race, ethnicity, homeownership status, and income among program participants is to tie it to this performance incentive -- making it the business of the administrators to innovate on and effectuate.
- Strategy:
  - A) At present the IOUs hit their funding threshold by achieving at a minimum 75% of their programmatic goals and have the opportunity to earn a higher incentive if they hit 125%. We propose that both metrics have an equity component added, meaning that

performance would be tied not only to greenhouse gas (GHG) reductions at a system level, but also at the environmental justice census tract with an annual increase over prior year's benchline for outcomes.

- B) Require IOUs to publicize aggregate program investment in each environmental justice census tracts

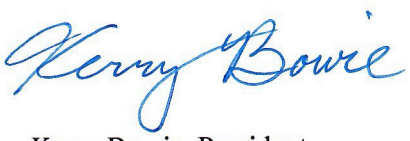
#3 Pre-Weatherization Barriers for Environmental Justice Census Tracts

- Problem:
  - At present, it is well documented that preinstallation barriers — including mold, asbestos, vermiculite, poorly operating or failing combustion device, knob and tube wiring, code violations and more — can disqualify households from participating in the Mass Save program. It is also true that older housing stock owned by lower-income families faces the majority of these issues. Remediating these issues is important prior to implementing energy efficiency, but can cost thousands of dollars and often puts energy efficiency permanently on hold for households.
- Thesis:
  - If we wish to address the program on an equity basis (vs. equality basis), then we need to acknowledge the fact that we are not operating in an environment with a level playing field and continue to provide targeted funding to address these inequalities.
- Strategy:
  - A) Create a targeted funding program for pre-weatherization barriers for households in low-income, environmental justice census tracts. In order for this funding to be most effective, it needs to be able to flexibly address the diversity of barriers and should offer up to $7,000 per household in funding.

Thank you for considering these recommendations for improvements to the Mass Save program. We believe that the Mass Save program can be a leader in both greenhouse gas reduction and equitable resource redistribution; we hope that these policies serve as a starting point for this next round of critical revisions to this program.

Best,

Isaac Baker, Communities Committee Co-Chair
Browning the Green Space



Kerry Bowie, President
Browning the Green Space