

WORKSHOP TOPIC OVERVIEW

Income-Eligible Services (IES) provided in Massachusetts are often held up as a model for low-income energy efficiency programs in other states, and for good reason: The Massachusetts IES programs reach deeply into the market and provide comprehensive services to low-income Massachusetts residents to reduce energy costs and accrue other non-energy benefits.

IES serves households that have income levels that are at or below 60 percent of the State Median Income. Buildings served include single-family and multifamily buildings, with units occupied by homeowners or renters. Program services are designed to address comprehensively all energy end uses, including mechanical and lighting systems, weatherization of the building shell, and appliances.

In 2019, IES total program costs were \$127.1 million. Program results reported by PAs for electric and gas programs are summarized below.

Table 1. 2019 IES Program Results

2019 IES Services	Electric	Gas
Program participants	27,746	16,047
Program costs	\$70,255,892	\$56,849,033
Average cost per participant	\$2,532	\$3,543
Annual energy savings	37,419 MWh	2,423,934 therms
Average annual savings per participant	1.35 MWh	151 therms
Lifetime energy savings	311,674 MWh	47,331,380 therms
Average measure life	8.3 years	19.5 years
Total benefits	\$147,900,438	\$131,149,966

In 2020, the COVID-19 pandemic caused a virtual halt to non-emergency IES services for 4 months in late spring. As Massachusetts began to ease restrictions about movement and interaction in the summer, IES services were restarted, but with fundamental restructuring of the ways in which participant interactions are carried out. Similar to residential market rate program protocols, nearly every protocol of the IES program was reviewed and revised, requiring a significant investment of resources in training of all staff and contractors. Of course, no one knows for how long these new protocols (including protocols required by the Department of Housing and Community Development to enter units) will be required or what additional changes may be necessary to maintain the health and safety of both workers and customers.

Our expectation is that COVID has also brought an increase in the number of households eligible for IES. Although the PAs have not seen a significant uptick in discount rate enrollments as of November 2020, reductions in employment forces and hours undoubtedly result in lower incomes in many households. The level and the length of these effects are one of the unknowns that need to be part of the next planning cycle. More than any Plan in the past, the 2022-2024 Three-Year Plan will need to have some level of flexibility to adjust to changing economic and public health conditions.

Massachusetts Program Administrators (PAs) are responsible for IES energy efficiency program delivery. By statute, the Low-Income Energy Affordability Network (LEAN) is the Lead Vendor that provides IES under contract to the Program Administrators (PAs). LEAN is comprised of the full contingent of Community Action Programs (CAPs) across the State. These are experienced providers with deep roots in the communities they

serve.

Organizing the Workshop Discussion

Five topics will be addressed in the workshop to focus on ways in which IES can continue to lead and innovate in 2022-2024. The topics are directly tied to the long-term goals that Massachusetts has articulated as well as responding to current pandemic conditions that are even now changing the face of poverty in the Commonwealth. The topics are:

1. Ensuring equitable service
2. Measures: increasing heat pump installations and introducing new measures
3. Strengthening multifamily pipelines and protocols
4. Ensuring adequate budgets
5. Improving data and systems for program assessment and improvement

Attention to each of these as plans are created for the 2022-2024 Plan will help Massachusetts respond appropriately to current conditions while looking forward to new challenges and opportunities.

OVERVIEW OF RECOMMENDATIONS FOR COUNCIL CONSIDERATION

In each of the areas identified above and discussed below, there are recommendations for action and attention. These are summarized here for ease of reference.

Ensuring equitable service

- Determine if there are differences in service by CAP territory, PA territory, or PA program (gas or electric) that are not warranted by differences in proportions of low-income households. Develop and implement strategies to correct unwarranted service differences.
- Expand efforts to enroll customers newly eligible for IES services as a result of COVID.
- Develop complete detailed mapping of customer journey for those who may be isolated by limited English proficiency (LEP), from first point(s) of contact, through intake, application, assessment, installation, and quality assurance. Utilize mapping to develop and implement a strategy to improve service to LEP customers in coordination with CAPs.

Measures: increasing heat pump installations and introducing new measures

- Increase heat pump installations, including by identifying and prioritizing cost-effective applications, developing protocols to standardize decision-making, identifying and addressing barriers to installation, and working to increase customer satisfaction post-installation through customer education and support for operation and maintenance.
- Increase opportunities for participation in active demand reduction, including developing protocols for determining appropriate households for installation of WiFi thermostats for energy efficiency and demand reduction. Include follow-up, when necessary to provide customer support.
- Test and deploy new technologies, such as interior foam for masonry buildings, in order to increase energy and demand savings.

Strengthening multifamily pipelines and protocols

- Develop and implement a strategy for increasing and improving service to multifamily buildings, including naturally occurring affordable housing (NOAH). This should include:
 - Working with the Massachusetts Department of Housing and Community Development (DHCD), the U.S. Department of Housing and Urban Development, and public housing authorities to identify and reach out to owners and managers of small multifamily buildings that are part of the certificate-based Section 8 program.
 - Utilizing PA account data to identify multifamily buildings.
- Develop and implement strategies to provide more flexibility for multifamily building owners undergoing scheduled rehabilitation, renovation, or refinancing, to enable installation of deeper energy-saving measures.

Ensuring adequate budgets

- Income eligible budgets should increase to reflect expected increases in the number of low-income households due to COVID. IES budgets should also increase as needed to reflect revised measure mixes and improved protocols. The Plan should incentivize additional spending on income eligible programs.

Improving data and systems for program assessment and improvement

- Strengthen regular reporting in order to identify areas of improvement and resources needed to support comprehensive and equitable service to all submarkets. Reporting should provide insight into specific program activities and buildings served, as well as identify where program designs are working well or need modification. Reporting to the EEAC should allow differentiation of program activities by more granular parameters, including:
 - PA and CAP territory
 - Program (gas, electric)
 - Service type (Appliance Management Program (AMP), weatherization, heating system)
 - Building size (number of units)
 - Resident status (owner or renter)
- Develop and implement a statewide computerized audit that can provide regular, timely, and consistent information to support identification of best practices and needed continuous improvement as well as reporting to the Council and providing data for EM&V.

Other recommendations

- Ensure that best-practice models for participant recruitment and interaction are being followed uniformly to increase participation. This includes use of a single point of contact for multifamily building owners and the mixed-income protocols.
- Realize program savings from investment in benchmarking, providing building owners and managers who have participated with information on building energy performance over time.

ENSURING EQUITABLE SERVICE

Background/Current Status

While it is not a perfect proxy for the total number of income-eligible households, and errs on the side of undercounting, DOER maintains data on the percent of customers on low-income utility rates. This can be

used for comparison purposes with PA spending on IES. The chart below shows those data for 2019.

Table 2. 2019 Percent of Customers on Low Income Utility Rates

Utility	Total residential customers	Customers on low-income rate	IES spending	Total efficiency spending	Percent customers on low-income rate	Percent IES to total efficiency spending
Electric						
EverSource	615,820	61,981	\$ 32,043,930	\$ 283,065,149	10.1%	11.3%
NGrid	668,703	67,484	\$ 33,370,919	\$ 289,042,221	10.1%	11.5%
Unitil	17,659	2,772	\$ 1,083,259	\$ 5,831,199	15.7%	18.6%
Gas						
Columbia Gas	293,438	39,382	\$ 10,010,559	\$ 61,328,302	13.4%	16.3%
Berkshire	34,886	6,325	\$ 996,088	\$ 4,969,499	18.1%	20.0%
NGRID	817,150	66,360	\$ 32,021,931	\$ 152,646,150	8.1%	21.0%
Liberty	51,868	10,056	\$ 1,792,063	\$ 6,168,584	19.4%	29.1%
Eversource	261,663	28,013	\$ 11,181,028	\$ 52,666,653	10.7%	21.2%
Unitil	14,335	2,734	\$ 847,364	\$ 2,686,979	19.1%	31.5%

Electric PAs are each exceeding the statutory requirement that IES spending be at least 10 percent of budgets, and in each case the spending is higher than that percent of customers on the low-income rate. For gas utilities, all except one had spending in excess of the 20 percent requirement, and in all cases, IES spending exceeds the percent of customers on the low-income rate.

The PAs consistently meet income eligible goals, and income eligible budgets have increased over the last several plans. There are reports, however, that budget constraints on gas funds limit the energy efficiency services provided. This is generally positioned as a delay in service rather than a difference in service. When funds are insufficient, one set of measures might go forward while a participant may have to wait for until resources are available for completion of the full suite of comprehensive services. More information from LEAN is required to determine the full impact of this situation.

Different service providers or protocols may also affect the service provided. There continue to be anecdotal reports of different levels of service depending on where a building is located or what type of building it is. Ensuring that all protocols and best practices are applied uniformly throughout all jurisdictions and by all building types is an important goal. When there are differences in protocol or denials / delay of service, reasons should always be shared with participants. Reasons for differences, denials, or delays should relate to overall program goals about comprehensiveness and equity of service.

The EEAC has clearly articulated priorities to improve access and participation by moderate-income residents. As programs to address this group are developed, it is important to ensure that resources for IES are maintained at or above both the levels mandated by statute as well as the levels that can be ascribed by the proportions of IE households. No one would want to see an adverse impact on IES resources from the development of effective moderate-income program initiatives.

The nonparticipation study showed barriers to participation related to trust and language. This was augmented by a partial look at the customer journey for those who are English-isolated. A full map of the customer journey that explores all key points of customer contact would help to illuminate points where trust could be improved. Adequate resources should be allocated to design and deploy effective strategies to increase trust and remove barriers to participation by English-isolated customers.

Recommendations

- Determine if there are differences in service by CAP territory, PA territory, or PA program (gas or electric) that are not warranted by differences in proportions of low-income households. Develop and implement strategies to correct unwarranted service differences.
- Expand efforts to enroll customers newly eligible for IES services as a result of COVID.
- Develop complete detailed mapping of customer journey for those who may be isolated by limited English proficiency (LEP), from first point(s) of contact, through intake, application, assessment, installation, and quality assurance. Utilize mapping to develop and implement a strategy to improve service to LEP customers in coordination with CAPs.

Next Steps for Draft Plans

- Provide estimates of budgets and service levels, by program and by building type and size, that account for higher per unit costs from additional heat pump installations and reduced lighting.
- Estimate costs and service level for LEP customers from improvements to interaction protocols throughout customer journey, including increased interaction in customers' native language. Include necessary cataloging of language capability and capacity across CAPs and PAs and need for workforce development to improve statewide capacity.

NEW / IMPROVED MEASURES: INCREASING HEAT PUMP INSTALLATIONS AND INTRODUCING OTHER NEW MEASURES

Background/Current Status

The next Three-Year Plan needs strong savings that are outside of lighting. There are some candidates for replacing lighting savings and providing deeper savings for IES program participants. Like nearly all energy efficiency measures, the barriers for installations in IES-eligible homes are often much higher than barriers in market-rate homes, but some of these barriers can be cost-effectively addressed, even for part of the IES-eligible population.

Heat pumps: The long-term decarbonization goals in Massachusetts call for residential heat pumps at large scale. Under the current Term Sheet, the goal for IES heat-pump installations was established at 6,082. Through Q2 2020, there have been only 703 IES heat pump installations. In 2019, challenges with heat pumps were a reason National Grid cited for only achieving 74 percent of its plan value for lifetime electric savings. In its 2019 Plan Year report, National Grid stated it found fewer than planned opportunities to replace electric resistance heat with air source heat pumps in multifamily properties. Additionally, COVID has undoubtedly had an impact on the ability to install heat pumps this year.

The high cost of installation is a large program issue for IES. First and most important is the high measure cost. The program-level implication of the high cost of this measure is that either the IES budget needs to be significantly increased or there will be many fewer eligible households served by the program. There are also installation barriers. LEAN identified some of these barriers in its August 2020 presentation to the EEAC:

1. The measure requires custom analysis to determine appropriateness of approach, based on existing fuel(s) and housing layout. LEAN reports that its lead agencies are reviewing, and it is working on defining protocols that can be taken to scale for different technologies and situations.
2. Projected savings levels also require custom analysis and depend heavily on contractor competence, owner maintenance, controls and education, original heating fuel, and house configuration.
3. There are concerns that maintenance needs and costs of heat pump systems are a significant issue for households that are seriously resource constrained. When systems are not maintained, there may

be significant loss of savings.

4. Proper control systems can be difficult to configure, especially when legacy heating systems are left in place to heat spaces not covered by the heat pump or as back-up systems for very cold weather. When controls systems are failing or are not understood, there can be significant degradation of savings.

WiFi thermostats: These are an appropriate measure for some IES-eligible homes with cost-effective savings in the right circumstances. There are barriers for many households, which have been cited in a study by the National Consumer Law Center,¹ including access to internet, cost of internet service, and difficulty programming for some. The savings for this measure are large enough that a larger investment in removing some of these barriers to allow for greater numbers of installations is appropriate. The market-rate residential program has estimated lifetime savings per unit installed at 966 kwh for electric and 47 MMBtu for natural gas, oil, or propane. In 2019, gas savings claimed for this one measure was 9 percent of all gas lifetime savings for the residential sector, yet there were no IES installations reported.

Barriers in some households should not preclude installation in other households that do not have the same barriers. The measure is sufficiently cost-effective that differentiation among installation types is worth the time and effort. The development of clear protocols that identify when and where this measure is appropriate is critical. Determination of what barriers exist and what resources are necessary to overcome the barriers should be a priority. The necessary resources to overcome barriers should not be constrained by the first cost of installation. If additional costs are necessary to overcome barriers, they should be explored. This could include monitoring the installation electronically, with customer consent, and intervening by phone or in person with programming assistance when needed.

Insulation and airsealing of masonry buildings: Advanced methods for installing foam from the interior of masonry buildings have been developed and tested in other jurisdictions. With proper approvals and assessments of cost-effectiveness, this product could be used in multifamily buildings that have are new candidates for weatherization as well as those multifamily buildings that have been weatherized, but which did not have effective insulation and airsealing because of technology limitations.

Recommendations

- Increase heat pump installations, including by identifying and prioritizing cost-effective applications, developing protocols to standardize decision-making, and identifying and addressing barriers to installation.
- Increase opportunities for participation in active demand reduction, including developing protocols for determining appropriate households for installation of WiFi thermostats for energy efficiency and demand reduction. Include follow-up, when necessary to provide customer support.
- Test and deploy new technologies, such as interior foam for masonry buildings, in order to increase energy and demand savings.

Next Steps for Draft Plans

- Define potential for heat pump installation for the next three years using base conditions, further development and improvements to program protocols (including identifying and addressing barriers to installation), and a set of improvements to program protocols that could be defined as aggressive.

¹ <https://www.nclc.org/media-center/report-assesses-the-value-of-smart-thermostats-in-low-income-weatherization-programs.html>

- Define potential for other new technologies, such as WiFi thermostats and interior foam insulation, with estimates of the potential for number of households served (new or returning) and the extent to which that would address the potential.

STRENGTHENING MULTIFAMILY PIPELINES AND PROTOCOLS

Background / Current Status

LEAN's work in the multifamily sector has been aggressive over the last ten years, with a focus on properties that are publicly owned or assisted. By its own estimate, since 2010, LEAN has served 84 percent of all state-identified low-income multifamily buildings. Early attention was on large projects: In the full 2010-2020 period, 61 percent of the low-income multifamily buildings LEAN served were buildings with more than 25 units. In the last two years, that percent has been reduced to 38 percent, showing an increased focus on smaller buildings (5-25 units).

There are a number of ways in which small multifamily building owners could be reached. DHCD maintains information on properties that may have one or multiple units that participate in the certificate-based Section 8 program. Collaboration with DHCD on outreach to building owners of these buildings could provide an excellent boost to the pipeline of small multifamily buildings. The housing authorities and the U.S. Department of Housing and Urban Development (HUD) also have these data. Additionally, having PAs identify multifamily buildings through their records, as was done by Eversource, can provide another important set of multifamily leads for development.

While there has been strong focus on publicly owned or assisted housing, it continues to be a challenge to bring buildings that are considered naturally occurring affordable housing (NOAH) continue into IES. While there can be some overlap, in general, the motivations of owners and managers of NOAH can be very different than those of owners and managers of publicly owned or assisted housing. Understanding these concerns and motivations is an important precursor to driving more deeply into the submarket.

In the August 2020 EEAC meeting, the Consulting Team recommended a full characterization of the market of multifamily buildings. It is important that such a study leverage what is already known from, for example, the census of multifamily buildings completed in 2019 and data on IES participation that LEAN compiled and presented in 2020. Such a market characterization should provide and analyze information on each submarket of multifamily buildings, defined by size, ownership, residents (senior, family, e.g.), and include a catalog of the many players (building owners, managers, maintenance, contractors, suppliers, etc.) in this complex terrain. Motivations and barriers should be identified with differentiation among different market subsegments and different players. Development of a full market characterization should not impede work to improve current strategies and uniform application of protocols.

Protocols for delivery of multifamily services should adhere to best practice models that are designed to improve the customer experience. These include the one-stop shop model, which has been proven effective in many multifamily programs. There are inconsistencies with this model built into processes now, with multiple service providers interacting with multifamily building owners. While this may be necessary, higher levels of coordination and information exchange may be needed to improve the customer experience. As an example, if multiple CAPs are involved in improvements to different systems of a multifamily building, the experience of the customer could be improved by maintaining one point of contact with the customer instead of referring them to different providers. Even if there are multiple players, as there often are in multifamily energy improvement projects, it should not be the customer's responsibility to understand the complex web of providers.

The protocol to effectively address mixed-income buildings has been met with success by building owners. It is important that this protocol be uniformly adopted as an effective strategy to increase the number of small multifamily buildings and NOAH units that participate in IES.

When multifamily buildings are rehabilitated or recapitalized, there is an important market opportunity to

improve the efficiency of the building, sometimes with measures that are only available once or twice in the building's life cycle. These points of intervention are critically important for making energy efficiency improvements in the most cost-effective way possible, rather than relying on retrofit opportunities that have higher costs and more limited scope. For developments that have public subsidies or assistance, these points of refinancing are predictable, often tied to subsidy cycles that are known by subsidy providers and with planning that often starts three to four years ahead of the event. LEAN, PAs, DOER, Local Initiatives Support Corporation (LISC), and others engaged in a process during the 2016-2018 term to ensure that programs are aligned with the refinancing process. An update on whether this process continues to yield the desired results in the current 2019-2021 term is needed.

Furthermore, the mandate to allow for “no lost opportunities” at this critical point is an important priority. This is a sufficiently important mandate as to suggest reporting on any anomalies: if a building is not served, it is important to understand the reasons why to avoid future lost opportunities. Protocols for how measures are supported by IES may need to be addressed as well to maximize energy savings. For example, there may be instances in which direct participation by CAP weatherization crews or contractors in project work may be less effective than the provision of an incentive payment to support installation of a system.

A substantial investment in benchmarking multifamily buildings was made in 2010-2012, for which the PAs received performance incentive. Benchmarking has been shown to be an effective tool for both prioritizing energy efficiency retrofits as well as providing ongoing data to building owners and managers to support strategic energy management to improve and deepen energy savings over time. Existing benchmarking data should be maintained, and the services should be offered to multifamily building owners and managers of buildings served since the initial round of benchmarking was completed. This can become an important tool for comparing buildings, for gaining insight into the savings potential for new measures, and for providing notifications to owners and managers if energy savings are diminishing over time.

Recommendations

- Develop and implement a strategy for increasing and improving service to multifamily buildings, including naturally occurring affordable housing (NOAH). This should include:
 - Working with the Massachusetts Department of Housing and Community Development (DHCD), the U.S. Department of Housing and Urban Development (HUD), and public housing authorities to identify and reach out to owners and managers of small multifamily buildings that are part of the certificate-based Section 8 program.
 - Utilizing PA account data to identify multifamily buildings.
- Develop and implement strategies to provide more flexibility for multifamily building owners undergoing scheduled rehabilitation, renovation, or refinancing, to enable installation of deeper energy-saving measures.
- Ensure that best-practice models for participant recruitment and interaction are being followed uniformly to increase participation. This includes use of a single point of contact for multifamily building owners and the mixed-income protocols.
- Realize program savings from investment in benchmarking, providing building owners and managers who have participated with information on building energy performance over time.

Next Steps for Draft Plans

- Assess cost and implications of recommendations, including energy savings potential.
- Determine opportunities for enhanced coordination with DHCD, HUD, and others.
- Assess success of work to align with refinancing events.
- Understand status of benchmarking data; identify necessary updates that would make it useful to targeting multifamily resources.

ENSURING ADEQUATE BUDGETS

Background/Current Status

COVID has the potential to dramatically increase the number of low-income households in the State. According to the U.S. Bureau of Labor Statistics, Massachusetts had the largest unemployment rate increase of all states from July 2019 to July 2020. COVID hit the State very hard, with an increase in unemployment from 2.8 percent in March 2020 to 17.7 percent in June 2020. There has been some improvement since. Reports on September unemployment levels had Massachusetts at 9.6 percent, significantly above the national average of 7.9 percent. The changing population of low-income households may be a particularly acute issue in the next three years depending on the length and extent of the pandemic economic downturn. The economic effects could linger, with some economists predicting serious economic effects for a decade or more.

COVID's negative impacts have been borne more by groups that have historically been underserved by efficiency programs, including people of color; this is an important reason to ensure sufficient budgets to address newly eligible households.

Budget adequacy must also be evaluated with respect to both increases in installation of heat pumps, as recommended in the section on measures below, and decreases in lower cost lighting measures. Each of these put upward pressure on the cost per household and create need for expanded budgets for IES.

Recommendations

- IES budgets should increase to reflect expected increases in the number of low-income households due to COVID. IES budgets should also increase as needed to reflect revised measure mixes and improved protocols. The Plan should incentivize additional spending on IES.

Next Steps for Draft Plans

- Provide estimates of eligible IES customers for each of the three years under COVID conditions. Estimate eligible IES customers in number and as a percent of households.
- Provide estimates of budget effects for each year due to changes in measure mix.

IMPROVING DATA SYSTEMS AND REPORTING FOR PROGRAM ASSESSMENT AND IMPROVEMENT

Background/Current Status

LEAN provided an important window into the complexity of current data management systems in the IES program when it agreed two years ago to provide geocoded data of buildings that had been served since 2010. The data compilation and cleaning process took 18 months and tremendous staff time and effort, by LEAN's own report. The results were clearly appreciated by the Council in its August 2020 meeting. Councilors posed many questions about deeper dives into the data.

Charts and graphics from the report often raised many more questions. There was clearly interest in detailed cross-tabulations of data behind the maps that were presented at the meeting as well as additional detail in numerical form about program services that were portrayed graphically.

The need for standard and timely data helps Program Administrators – including LEAN and the PAs - and the EEAC to identify when programs are operating to plan, potential gaps or inequity in terms of service or resources, and when adjustments are necessary. It also can be an important source of information for

estimating potential for new measures that might be applied to buildings that have already been served, as for example, likely candidates for heat pump installations in single- or multifamily buildings.

In order for the EEAC and PAs to fully assess and improve the equity and implementation of the IES programs, it is time to ensure that reporting protocols support the focus on innovation in the IES. More programs around the country are establishing equity metrics of service that go well beyond only the amount spent and the numbers of low-income houses served. Massachusetts, among other jurisdictions, now specifies targeted savings levels, which are then independently verified. Other metrics tied to known areas of underservice, currently or historically, are now also under consideration, such as different levels of income, race, language, or location in an environmental justice community. While there may be reasons for not collecting those specific data at the household level, there are overlays available that can help to illuminate the demographics of underservice. LEAN's presentation in August to the EEAC shows some of this with its overlays of data about race and language onto service numbers data, geocoded to better understand patterns of over- and underservice that may exist from historical program rules and protocols.

What data are needed to ensure, on behalf of Massachusetts ratepayers, that program resources for IES are being equitably and effectively distributed? Current data reports provide measure-level data by sector, but do not provide insight into individual programs of IES nor into building size or occupant tenure. When participant numbers are reported, there is not the granularity to assess how different programs are reaching into different markets that comprise the IES. As the network of providers work to gain deeper penetration into underserved markets, such as small multifamily buildings and renters, it will be important to be able to analyze data on progress in each of these areas, and how program providers can continue to improve.

The lack of a standard statewide computer audit continues to be an issue as noted in the Low Income Process Evaluation completed last year.² Rather than being seen as an additional burden in the field, systematic use of a statewide audit can provide consistent information to support identification of best practices and problems that need to be addressed. Energy audit software is often embedded in a system that can report many aspects of work completed, meaning that it would no longer need to be pulled from a multiplicity of sources for purposes of informing program design and implementation and facilitating third-party EM&V.

Data should be easily aggregated to the statewide level, on a regular basis. These data should include all items that are required for planning, evaluation, measurement, and verification. M&V questions may relate to costs and savings, but may also get into areas of equity and consistency of service. Program Administrators will want to know these points of data, and be able to easily share them with those, like funders who may have questions, on a routine basis. Additionally, data necessary for regular impact and process evaluations should be readily available for those activities.

LEAN has much of the data needed, though, as mentioned, it has to go through significant effort to compile and aggregate information that helps it and others understand program performance. The effort that was required for the means that the data are not readily accessible. Additionally, these data are not made routinely available to independent evaluators, so too often, we have LEAN effectively evaluating its own programs. This is not something that we would support in other programs within our portfolio and we need to work toward data that are systematically collected, aggregated over the different jurisdictions to the statewide level, able to be disaggregated to discern trends in service by different characteristics.

Recommendations

- Strengthen regular reporting in order to identify areas of improvement and resources needed to support comprehensive and equitable service to all submarkets. Reporting should provide insight into specific program activities and buildings served, as well as identify where program designs are working well or need modification. Reporting to the EEAC should allow differentiation of program activities by more granular parameters, including:
 - PA and CAP territory

² http://ma-eeac.org/wordpress/wp-content/uploads/RES-38-Income-Eligible-Evaluation-Report_FINAL_7Feb2019.pdf

- Program (gas, electric)
 - Service type (AMP, weatherization, heating system)
 - Building size (number of units)
 - Resident status (owner or renter)
- Develop and implement a statewide computerized audit that can provide regular, timely, and consistent information to support identification of best practices and needed continuous improvement as well as reporting to the Council and providing data for EM&V.

Next Steps for Draft Plans

- Review recommendations of Equity Working Group to determine if metrics recommended above should be modified or expanded.