

Thank you for the opportunity to provide comment.

CLF wishes to highlight for the Council multiple areas in which the Sept. 14 draft plan is fatally flawed:

- First, CLF echoes and supports the points made by the Green Justice Coalition around the need to tie performance incentives to metrics for reaching people who have been left behind over the last ten years, and to improve data collection and transparency so that we can see who is being effectively served.
- Second, we are deeply confused and concerned that the PAs appear to read a statute that says “help people convert to renewable energy and other clean energy technologies” as carte blanche to incentivize conversions to gas. The PAs need to follow the clear statutory mandate and the recommendations of the Council and remove any enhanced incentives for switching from regulated fuels to gas. Getting the Commonwealth off of gas entirely is a longer project, but the Council has made it clear that MassSave needs to be leading the charge to non-fossil heating systems, not entrenching fossil fuels further.
- Third, it defies credibility that in 2018 a Three Year Plan would not incorporate a cost of avoided GWSA compliance study that was produced specifically for that Plan. In the absence of a public process on that GWSA avoided cost study, Applied Economics Clinic performed some review analysis of the Synapse study and found the methodology and conclusions sound. See <https://aeclinic.org/publicationpages/2018/9/10/comment-on-august-2018-analysis-of-the-avoided-costs-of-compliance-of-the-ma-gwsa-5d2z2>.
- Finally, we are deeply disappointed in the savings goals, especially when compared to the PAs’ own assessments of potential and Optimal’s assessment.

We appreciate the nods toward increased accommodation for non-English speakers, increased incentives for moderate income folks, and increased attention to multifamily to help renters, but we would like to see more detail in the Plan in those areas.

Overall, we expect to see major revisions before the Plans are finalized and sent to the DPU for review.

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