



July 31, 2018

Judith Judson
Chair, Energy Efficiency Advisory Council (EEAC)
Commissioner, Massachusetts Department of Energy Resources (DOER)
100 Cambridge St, Suite 1020 Boston, MA 02114

Re: All In Energy, Inc. Comments on the draft three-year energy efficiency plan for the years 2019 through 2021

Dear Commissioner Judson and members of the EEAC:

We commend the 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 2019 through 2021. 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.

All In Energy is a new non-profit with a mission to make the transition to a clean energy economy more rapid and inclusive. We are doing this by creating community-outreach campaigns in underserved communities that drive adoption of energy saving products and services. This summer, our pilot campaign is addressing the unequal distribution of utility program resources identified by a recent report, Accessing Energy Efficiency in Massachusetts, which was commissioned by the Conservation Law Foundation and created by the Applied Economics Clinic at Tufts University. The report found that low-income and racially diverse communities likely have significantly less access to Massachusetts' nation-leading Mass Save program. A definitive conclusion was difficult to achieve because to date, the demographic data necessary to make such conclusions has not been captured by the program.

We are committed to helping families in underserved communities gain access to the program in whatever form it takes over the next three years. However, we believe the following recommendations will increase access for communities in Massachusetts with high rates of renters, low-to-moderate income households, people who speak languages other than English, and people of color. Our recommendations focus on:

1. Capturing and sharing the data that will allow the problems of inequitable distribution of program resources to be fully understood so that success of efforts to remediate these issues can be accurately tracked. This would also allow the

Program Administrators to set real targets for improvement that can be tied to their program goal achievement incentives and

2. Incorporating programs and strategies that close the access gap in underserved communities. These include a combination of outreach programs that will increase participation in the Mass Save energy assessment program and the Low-Income weatherization assistance program in targeted communities and and support services that will increase adoption of weatherization measures for Mass Save participants in these communities.

1) Capture and share the data necessary to understand and correct inequitable distribution of program resources

The CLF / Applied Economics report concluded

“It is not possible ... to make conclusions regarding uneven provision of efficiency services to different Massachusetts groups. The findings of this review point towards unequal access to energy efficiency in Massachusetts, but do not provide conclusive proof. Further data and analysis are needed to provide insight into how Massachusetts’ distribution of energy efficiency access can be improved.”

In order to understand definitively why some communities are accessing the Mass Save program more than others, it is necessary to learn more about which Massachusetts families are participating in the Mass Save program. The CLF / Applied Economics report identified the following data as being captured and not shared or not being captured about those who receive Mass Save energy assessments.

- Collected but not shared (according to CLF / Applied Economics)
 - Household income range as it relates to the state median
 - Status as renter, owner or landlord
 - Request / need language assistance to communicate with efficiency providers
- Not Collected
 - Household members’ age, race, ethnicity, nativity, english language skill level

a. Create a Survey to Capture Demographic Data:

As the report notes, “such data can be produced via anonymous surveys of program participants and reported frequently along with other evaluation, measurement and verification (EM&V) studies.”

All In Energy strongly recommends the creation and deployment of such an optional, anonymous survey as soon as possible. The survey questions should be framed to match those in the American Community Survey issued every two years by the U.S. Census, so that results can be easily aggregated and compared to zipcode and town-wide demographic data.

An online version of this survey could be provided via unique link in an email to the program participant after they schedule their Mass Save home energy assessment. It could also be provided during the home energy assessment along with a stamped envelope for the program

participant to anonymously mail the survey back. The Home Energy Specialist can briefly explain the benefits of completing the survey and assure them of its anonymity before writing the site ID on it and leaving it with the program participant. The survey could be completed during a part of the assessment where the resident's participation is not required, such as when the Home Energy Specialist is creating the contract for recommended weatherization work.

The results of these surveys should be shared publicly on the masssavedata.com website so that the program and third parties can evaluate participation rates of various populations compared to their representation in distinct geographies. As baseline participation rates are established and potential access gaps are identified, participation rate targets can be set and tied to Program Administrator goal achievement incentives. **In the meantime, setting targets for increased participation in underserved zip codes could serve as a proxy until more data is available.**

b. Share More Aggregated Data:

The program should reconsider the minimum number of data points necessary to display aggregated data. While individual customer data privacy is important, it is unclear by what process individual customer data could be identified, especially if data from more than one home is aggregated. The current minimum of 100 data points is excessive and makes it difficult to understand the activities in low-participation geographies.

2) Programs and strategies that can close the access gap in underserved communities

While it is not possible to conclusively prove which populations are underserved given the lack of data captured. It is anecdotally documented and generally understood that renters, low-to-moderate income households, people who speak languages other than English, and people of color are not being served at a rate commensurate with their representation in the greater population. During the period while data is being captured, efforts can be initiated to increase participation of these groups in the energy assessment program and provide support to assist post assessment completion of deeper work.

The three-year plan refers to previous efforts to reach these populations and provides examples including:

“partnerships with municipalities and community organizations, targeted outreach to landlords, the Efficient Neighborhood+® initiative (which included door to door marketing, use of lawn signs, pre-qualifying geographic areas for special incentives, and numerous partnerships), the 2016-2018 Plan moderate income and renter offers, and the trial with LEAN to serve moderate income customers recently underway.”

While the Plan notes that the Program Administrators continue to learn from these efforts, there is very little detail on continued efforts and no suggestions or budget for future pilot programs.

Continue funding community-based social marketing:

Unlocking the power of every community's social and institutional networks through a concept called community-based social marketing remains the best way to reach these target populations. This a proven approach combines behavioral economic concepts of influence with social diffusion. The bottom-line is that people are more likely to take action when invited to do so by someone they know and trust.

All In Energy recommends either a pilot program or a carve out of the “hard to measure” marketing budget success-based program with community groups to deliver customers from target populations. Local community based organizations are equipped to execute these programs if properly supported. In order for programs to be successful, they should:

- Be executed by dedicated staff
- Create face to face interactions with residents that have a connection with the community based organization
- Connect residents with avenues to immediately take action, i.e schedule an energy asseesment during face-to-face interactions
- Funded through a combination of a stipend and a success fee for completed energy assessments and other adopted deeper measures
- Coordinated with the low-income service delivery organizations, ideally with success fees for recruiting participant for the Weatherization Assistance programs.

The Program Administrators should execute a competitive bidding process. Combined fees can be set at or near current customer acquisition cost so that there is minimal impact to ratepayers.

Continue to improve coordination across income eligible programs

Another area of difficulty in engaging with underserved communities is helping them identify and connect to the appropriate program for them. We commend the Program Administrators for focusing on streamlining the entry points for residents of buildings of multiple units. We'd like to see better coordination in buildings with residents who qualify for both the low-income and market rate programs. **The Program Administrators should work to coordinate service delivery between the Mass Save and Weatherization Assistance programs so that landlords and residents can get one whole building energy assessment and then weatherization upgrades on the same day by the same vendor.**

Additionally, qualification for moderate income benefits should be simplified into an affidavit process similar to those used by Renew Boston and Green Homes Brookline to allocate Recovery Act funds to moderate income residents from 2009 to 2011. The Renew Boston Program began by requiring tax returns or pay stubs to prove eligibility, but changed course due to lack of participation. The self-identification affidavits (an example of which is attached: Exhibit A), were able to be e-signed, streamlining the process. This simple process change significantly boosted participation rates in the program and allowed it to exceed its goals. There is no legal mandate that these funds must go to moderate income ratepayers, so there is no legal risk to the program if there should be any mistakes or malfeasance on the part of residents. The

affidavit affirms the right of the program to request and review documents, so a sample audit of the accuracy of the self-reporting could be conducted.

Comprehensive support for non-english speakers and workforce development to recruit alternative language speakers

The program has done a commendable job translating Mass Save marketing materials and the website into multiple languages. However, we have heard multiple reports that alternative language support is severely lacking in the remainder of the process. In order for non-english speaking residents to be served effectively by the program, non-english speakers must be available throughout the process. **It is especially important that lead vendors employ Home Energy Specialists and customer service representatives that speak Spanish, Portuguese, Mandarin, Cantonese, French and French Creole and that materials and contracts used during assessments are available in these languages.** This is the only way to ensure residents who primarily speak these languages can receive full and accurate information about the options for their homes.

Recruiting and training employees who have these needed language skills to fill these roles can be challenging. The Program Administrators should set targets for the number of alternative language speakers required to meet the needs of these communities. **The Program Administrators should designate workforce development dollars for the defined purpose of funding programs that can help the program find and train staff that can be placed at lead vendors, home performance contractors and independent insulation contractors.**

Thank you for allowing All In Energy to submit our comments for your review. We look forward to helping the program achieve its goals by connecting families to ways to save energy and money in the coming years.

Sincerely

Gabriel Shapiro
Gabriel Shapiro, Co-Founder, All In Energy
gabe@allinenergy.org
(781) 656-5359
allinenergy.org

7/31/18
Date



Eligibility Verification Affidavit

I, _____, resident of the City of Boston in the Commonwealth of Massachusetts, declare that I am competent to give the following declaration based on my personal knowledge, unless otherwise stated, and that the following facts and things are true and correct to the best of my knowledge:

1. I live in a single family home or a multi-family building with up to four units in the City of Boston.
2. The number of people in my household is: _____
3. The total annual income of my household falls between 60-120% of the state median income based on the chart below:

Number in Household	Renew Boston Eligibility Guidelines (60-120% of the Massachusetts State Median Income)
1	\$30,752 to \$61,504
2	\$40,214 to \$80,428
3	\$49,676 to \$99,352
4	\$59,138 to \$118,276
5	\$68,599 to \$137,198
6	\$78,061 to \$156,122
7	\$79,836 to \$159,672
8	\$81,610 to \$163,220
9	\$83,384 to \$166,768
10	\$85,158 to \$170,316

4. I do not receive benefits from any of the following programs:
 - Fuel Assistance from ABCD
 - Emergency Aid to Elders Disabled, and Children (EAEDC)
 - Food Stamps (SNAP)
 - National School Lunch Program
 - Public Housing
 - School Breakfast Program
 - Supplemental Security Income (SSI)
 - Veterans' Service Benefits, (Chapter 115)
 - Veterans DIC Surviving Parent or Spouse
 - Veterans Non-Service
 - Disability Pension

5. I, the undersigned, hereby affirm the authenticity of all information provided in this affidavit and accompanying documentation. I authorize the City of Boston to review or examine any and all documents and records, and related data, which may assist in confirming my income. I understand that any false or misleading information in this affidavit, or documents provided to support this affidavit, will result in denial of participation in the Renew Boston Program.

Signature of Resident

Printed Name of Resident

Date

Phone

Street Address and Apartment # (if applicable)

City, State, Zip