



Health Care
Working Group



Commercial Real Estate
Working Group



May 26, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
ma-eeac@mass.gov

Re: Response to April 30 Draft of the 2022-2024 Three-Year Energy Efficiency Plan

Dear Commissioner Woodcock and Members of the Massachusetts Energy Efficiency Advisory Council:

The Boston Green Ribbon Commission (GRC) is a group of business, institutional, and civic leaders in Boston working to develop shared strategies for fighting climate change in coordination with the City's Climate Action Plan. The GRC's membership constitutes many of the large commercial and industrial (C&I) utility accounts within Eversource and National Grid's territories. These comments are submitted on behalf of the Commercial Real Estate and Health Care Working Groups of the Boston Green Ribbon Commission, led respectively by A Better City and Health Care Without Harm. Our comments represent the Working Groups' response to the draft Three-Year Electric & Gas Efficiency Plan for 2022-2024.

Energy efficiency programming is evolving in Massachusetts. In the face of climate change, the focus once placed almost entirely on energy conservation has shifted. We must now also consider how to leverage gas and electric energy efficiency as a primary strategy for achieving equitable building decarbonization commensurate with what is required to comply with the 2008 Global Warming Solutions Act (GWSA) and S9, the 2021 Next Generation Roadmap for Massachusetts Climate Policy bill. Like the Commonwealth itself, these same large energy users are relying on our nation-leading efficiency programs to help achieve ambitious energy conservation and decarbonization goals.

This **fifth** Three-Year Electric & Gas Efficiency Plan represents an opportunity to set the highest bar possible for our energy efficiency programming. Successful implementation of the newly enacted Next Generation Roadmap for Massachusetts Climate Policy Bill demands ambitious energy savings targets, strategically targeted investment of resources, prioritization of equity and customer engagement, support for deep energy retrofits, and progress toward segmented and sequenced electrification across sectors. **And yet, as currently drafted, the April 30, 2021, Draft Three Year Energy Efficiency Plan for 2022-2024 falls woefully short of these objectives, particularly in the C&I sector.**

Health Care Without Harm and A Better City previously submitted [program recommendations](#) on behalf of the Boston Green Ribbon Commission's Health Care and Commercial Real Estate working groups. Of those recommendations, we are pleased to see workforce development and customer support and streamlining referenced in the plan. We greatly appreciate plans to support workforce development through expanded training and coordination. This has been an area of particular interest for many of our stakeholders, particularly as it relates to expanding and diversifying the pool of prospective MassSave

contractors. Unfortunately, many of the other sector recommendations and EEAC priorities submitted by the Healthcare and Commercial Real Estate Working Groups of the Green Ribbon Commission are absent from the current draft Plan.

Program Budget & Energy Savings Goals. Although the proposed budget for the 2022-2024 Three-Year Plan has increased relative to the budget for 2019-2021, the C&I budget has been reduced by more than \$200 million dollars. Similarly, the all-fuels savings target for the C&I sector has been reduced by 40% compared to the 2019-2021 plan. No effort has been made to make up for the loss of claimable savings in lighting with more ambitious savings goals for other measures. No explanation has been provided for these reductions. Furthermore, these cuts run counter to any plans to maximize efficiency as a primary GWSA or S9 compliance strategy, at a moment when we need to be ramping up on efficiency investments and making the program easier to access and implement in order to transform the market and support expanded decarbonization and electrification efforts.

Increased communication and coordination. There is no mention in the draft 2022-2024 Three-Year Plan of a C&I working group to enhance coordination and communication between market actors and Program Administrator (PA) representatives. This level of coordination and communication is critical to future energy efficiency program success. A C&I working group could facilitate more frequent engagement between PAs, key stakeholders, and institutional organizations, enabling more targeted and effective outreach; facilitating refinement of strategies for market engagement; and providing deeper understanding of and opportunities to engage with key MassSave program offerings for organizations of all sizes.

Deep energy retrofit pilot. There is no mention of the deep energy retrofit pilot proposed by the Consultant Team and endorsed by the GRC Health Care and Commercial Real Estate Working Groups. It is imperative that the 2022-2024 program offerings support building owners in achieving the deeper energy and emissions reductions necessary to achieve net zero by 2050

Electrification. Despite discussing a substantial overarching focus on electrification, the specific efforts proposed in the April 30th draft are primarily focused on residential and small commercial offerings, with no commitment to develop a program offering or further support for C&I electrification as recommended by the Consultant Team and supported by stakeholders. However, the C&I sector is one of the highest sources of citywide emissions and some of Boston's hardest-to-decarbonize buildings. It includes large, energy-intensive buildings, like hospitals, data centers, and labs that operate 24/7. The Commonwealth simply cannot meet its emission reduction targets without widespread electrification of the C&I sector that represents. This plan must include a designated program and/or further support C&I electrification. We also note that any electrification strategy must also include plans to address grid infrastructure investments and upgrades needed to ensure reliability and service needed to meet increased demand from electrification.

Resilience considerations. Resiliency is noticeably absent from the draft. Previous recommendations called for a study of incorporating resilience considerations and non-energy benefits more substantially into the Three-Year Plan. This should be included in the revised draft. Additionally, there are no specific targets for energy storage proposed under the expanded Active Demand Reduction program for C&I. This should be explored further.

Combined Heat & Power. There is no mention of the Consultant Team's recommendation to reassess incentives for CHP in the draft. A reassessment of these CHP incentives should be included in the revised draft acknowledging that we need technology advances to tackle thermal load, energy storage and resilience in large C&I buildings that are hard to decarbonize..

Electric Vehicles. There is minimal mention in the draft Plan of expanding electric vehicles (EVs), EV charging infrastructure, or supply equipment outside of encouraging EV charging in off-peak periods in residential buildings as part of active demand response. These strategies must be enhanced in the draft Plan especially since expanded access to electric vehicles and related charging infrastructure is central to the Commonwealth's strategy to decarbonize the transportation sector as presented in the draft Clean Energy and Climate Plan.

We submit these comments for your consideration as you review and improve upon this first iteration of the 2022-2024 Three-Year Plan. We urge the PAs to address these deficiencies and to incorporate our recommendations for improvement in the next draft, well before the Plan is finalized and voted on in the Fall of 2021. We look forward to working together to achieve success in the design and implementation of a comprehensive and robust 2022-2024 Three-Year Plan.

For questions about these comments, please contact Eugenia Gibbons, Massachusetts Director of Climate Policy at Health Care Without Harm, egibbons@hcwh.org or Yve Torrie, Director of Climate, Energy & Resilience at A Better City, ytorrie@abettercity.org.

Thank you and best regards,
Eugenia Gibbons, HCWH & Yve Torrie, ABC

cc: Maggie McCarey, Director, Energy Efficiency Division, DOER
Members of the EEAC