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3 October 2018

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

Dear Commissioner Judson and Members of the EEAC:

Thank you for the opportunity to comment on the draft 3-year energy efficiency plan for 2019-2021. Climate Action Now (CAN) is committed to promoting energy efficiency as the most important way to reduce greenhouse gas emissions, and to doing so in a way that is equitable to utility consumers of all income levels.

These comments to the EEAC are in response to the release of the latest EE 3-year plan that does not assure prompt and ambitious progress towards either of our goals. Therefore CAN urges the EEAC NOT to accept the latest draft 3-year energy plan, but to improve upon it in several important ways.

1. **Savings Goals.** The latest plan has lower savings goals than in the previous 3-year plan and lower than those recommended by the consultants' (lifetime electric savings 11% lower, gas savings 11% lower, and MMBTU savings 30% lower). These low savings goals are not acceptable. The plan should include goals that match the consultants' recommendations.
2. **Gas conversion.** The drafted plan offers incentives for conversions to gas, yet it is imperative that we incentivize the abandonment of fossil fuel burning as much as possible. EE dollars should only be invested in ways that drive conversion to electrification, rather than conversion from oil/propane to gas. The plan needs to explicitly show how conversion to cold climate electric heat pumps will be encouraged and assisted.

3. Performance incentives. The plan, as drafted, proposes increased performance incentives but delivers fewer total benefits. This is an egregious violation of the intention of the program and should not be allowed.

Instead, performance incentives should be structured for setting higher (not lower!) energy efficiency goals and to reward innovation in outreach to underserved consumers (overcoming language barriers and income barriers). It would be sensible to reward the PAs for including community organizations as agents of change to enroll low-income households in the MassSave program and to provide assistance to them in following up with needed improvements to their homes.

4. Outreach to low/moderate income households. The burden of income verification needs to be addressed and novel ways to conduct outreach to low/moderate income households needs to be detailed (see above proposals regarding performance incentives).

5. Better data systems. There is a need for more transparent data systems so that consumers (who pay for the program) can better access information about how and where the funds are being used. In addition, there needs to be better ability for the program to track customers once energy audits are completed, to determine whether recommended actions have been implemented, and if not, to determine how to overcome the barriers.

Sincerely,

A handwritten signature in cursive script that reads "Adele Franks". The signature is written in black ink and is positioned above the printed name.

Adele Franks, M.D.

CAN Steering Committee Member