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Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

May 9, 2021

Comments submitted by email to: ma-eeac@mass.gov

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

On behalf of Climate Action Now, Western Mass (CAN), I offer comments and suggestions to the EEAC regarding the Three-year Energy Efficiency Plan 2022-2024 (the Plan) released on April 30, 2021. CAN is a grass roots group of approximately 2,500 residents of the Connecticut River Valley who are motivated to prevent the worst impacts of climate change through urgent mitigation measures in a manner that furthers environmental justice.

In general, the new priorities of electrification, equity and workforce development represent a highly commendable change that will contribute to reducing our GHG emissions. However, we find that the Plan falls short of what is needed to meet the objectives of the new Massachusetts emissions reduction goals and that it does not include sufficient transparency and accountability to assure successful implementation.

We offer the following comments in the hopes of helping to further improve the Plan.

1. The rationale for continuing to incentivize upgrading fossil fuel furnaces to more efficient fossil fuel furnaces is weak. The full life-time pollution of 'natural' gas - including drilling, transport, and leakage of methane into the atmosphere - is compelling enough to prohibit any incentivizing of the use of 'natural' gas. Furthermore, ratepayer dollars should not be used to promote the use of fossil fuel fired heating systems that are expected to be in use for many years, thus working against our state's goals of rapid and continued reductions in emissions.
2. There is insufficient reason to wait until year 3 to incentivize only heat pump air conditioning, as the technology already exists and is more energy efficient than traditional central air conditioning. The incentives for ac upgrades for non-heat pump air conditioning units should be immediately suspended

3. The inclusion of pre-weatherization measures is laudable as it will remove crucial obstacles to energy efficiency that are commonly encountered. Adding electric panel upgrades to the list of incentivized pre-weatherization measures will be necessary to make electrification feasible for most moderate and low-income families and we urge its inclusion. Such upgrades are as necessary as the knob and tube wiring upgrades already included in the Plan.
4. There is no mention of ground-source heat pumps for new housing developments or commercial buildings. This should be rectified and incentives for this technology added to the Plan.
5. The workforce development sections of the plan should include retraining gas industry workers for a future without reliance on gas.
6. The bill signed into law by the Governor explicitly calls for a net zero stretch code, not a high-performance stretch code (page 23, 3rd paragraph). The language in the plan should be revised accordingly.
7. The plan should include measurable goals throughout, with suitable record keeping for robust evaluation of the Plan's successes and failures so that mid-course corrections can be made. It is very important to provide detailed information on what will and will not be included in reporting across all programs, and to whom it will be reported. The separate Evaluation document does not clearly enumerate the goals, rather lays out a complicated promissory note indicating that studies will be conducted and evaluation will follow.
8. Given that the equity efforts are likely to be especially challenging, goals, measurement and reporting on these equity efforts are essential. If there are no trackable, measurable goals, it is unlikely that progress will be achieved.
9. Budgets are poorly specified for crucial expenditures to expand equity, such as for outreach to renters and landlords, or for CBOs to engage in supportive activities, etc.
10. Incentives for landlords to have audits completed, participate in energy efficiency upgrades and other programs will need to be robust to have a chance of being effective.
11. Funding for C&I measures appear to have been substantially reduced from the prior 3-year plan with no justification provided.

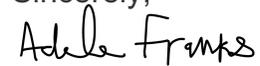
12. Energy storage targets should be specified under the Active Demand Response category for C&I.

13. Incentives for deep energy retrofits should be included in the Plan.

We submit these recommendations for your consideration as you review and improve upon the current draft of the 2022-2024 Three-year Plan. We urge the Program Administrators to address the noted deficiencies and incorporate our recommendations in the next draft.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Adele Franks". The signature is written in a cursive style with a large initial 'A'.

Adele Franks, Steering Committee Member

On behalf of Climate Action Now, Western Mass (CAN)