

August 17, 2021

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

**RE: Ceres Comments on the April 30th Draft Mass Save 2022-2024 Statewide Energy Efficiency Plan**

Dear Commissioner Woodcock and Members of the Massachusetts Energy Efficiency Advisory Council (“EEAC”):

I write on behalf of Ceres — a nonprofit sustainability advocacy organization working with the country’s largest companies and investors to build a more sustainable economy, including many members<sup>1</sup> with significant operations, facilities, and business interests in Massachusetts.

Climate change poses a significant risk to the long-term economic success of our members and the larger business community. It threatens the health and livelihood of the communities in which businesses operate and disrupts the value chains on which they rely. Because of these risks, companies nationwide are making significant commitments to reduce their greenhouse gas (“GHG”) emissions.<sup>2</sup>

However, businesses are often constrained in how much they can do to drive down their total GHG emissions footprint. For example, their direct ability to optimize the sources of energy that power the economy is limited. Therefore, they have a significant interest in finding ways to systematically improve the emissions performance of our power system, including through the support of robust energy efficiency policies and programs.

**The draft Three-Year Electric & Gas Efficiency Plan for 2022-2024 (“Draft Plan”) makes real progress towards helping the state achieve its energy and climate goals. In**

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<sup>1</sup> BICEP Members: **Adobe, Akamai Technologies, Annie’s, Aspen Skiing Company, Autodesk, Aveda, Avocado Green Brands, Ball, Ben & Jerry’s, Biogen, Blue Cross Blue Shield, Burton Snowboards, Burt’s Bees, Clif Bar & Company, CommonSpirit, Danone North America, Dignity Health, DSM North America, eBay, Eileen Fisher, Etsy, Fetzer Vineyards, Gap, General Mills, Hackensack Meridian Health, Hannon Armstrong, Happy Family Brands, IKEA, Impossible Foods, Indigo Agriculture, JLL, Kaiser Permanente, KB Home, The Kellogg Company, L’Oreal USA, L Brands, Levi Strauss, LinkedIn, Lyft, Mars Incorporated, McDonalds, Microsoft, Nature’s Path Foods, Nestle, New Belgium Brewing, Nike, The North Face, Novartis, Outdoor Industry Assoc, Owens Corning, Patagonia, PayPal, PepsiCo, Portland Trail Blazers, REI, Salesforce, Schneider Electric, Seventh Generation, SFO, Sierra Nevada Brewing, Snowsports Industries America, Squaw Valley, Starbucks, Stonyfield Farm, Symantec Corp., Tiffany & Co., Timberland, Unilever, Vail Resorts, VF Corp., Vulcan, Workday, Worthen Industries - Bold indicates operations in Massachusetts**

<sup>2</sup> Nearly half of all Fortune 500 companies have set goals to reduce GHG emissions, procure renewable energy, and invest in energy efficiency, see: Ceres. “Power Forward 3.0: How the largest U.S. companies are capturing business value while addressing climate change” April 15, 2017. <https://www.ceres.org/resources/reports/power-forward-3>

**particular, we laud its focus on electrification, equity, and workforce development.** This shift in energy efficiency programming is necessary for Massachusetts to meet the greenhouse gas emissions reductions targets established by Senate Bill 9 - *An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy* (“Climate Act”). As Massachusetts Energy and Environmental Affairs Secretary Kathleen Theoharides explained in her July 15, 2021, letter, “[M]eeting the Climate Act’s 2050 Net Zero limit and 2030 limit of at least 50% GHG emissions reductions relative to 1990 levels will require a significant increase in the scope and scale of building retrofits through a focus on envelope improvements and efficient electrification.”<sup>3</sup>

**The state’s 2030 and 2050 climate goals, and the Mass Save Energy Efficiency goals for 2022-2024 described by Secretary Theoharides are ambitious, achievable, and necessary.** The Draft Plan includes many important measures that will contribute to the achievement of these goals, including the elimination of fossil-fuel incentives and the addition of heat pump incentives.

**Ceres agrees with the EEAC’s July 28, 2021, Resolution that more specific details and explicit targets should be set in the Plan.<sup>4</sup> As discussed further below, Ceres recommends that:**

1. Explicit, robust targets should be established for equity programs and should be incorporated into any performance incentive mechanism that the Program Administrators are authorized to earn
  2. Commercial and industrial programs should be strengthened and adequately funded
  3. A comprehensive workforce development plan should be developed and should include dedicated strategies for engaging, activating, and fostering a multilingual workforce
- I. Explicit, Robust Targets Should Be Established for Equity Programs and Should Be Reflected In Any Performance Incentive Mechanism that the Program Administrators Are Authorized to Earn**

The profound connections between environmental and human health underscore that a just, sustainable future cannot exist without an end to inequality. And while energy efficiency investments benefit everyone, we have so much more we can do to expand these investments to struggling Massachusetts residents and those who are historically disadvantaged and disproportionately impacted by climate change. Lower-income residents also spend a disproportionate amount of income on energy, and the savings generated from increased

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<sup>3</sup> July 15, 2021 Letter from Secretary Theoharides, Greenhouse Gas Emissions Reductions Goal for Mass Save. <https://www.mass.gov/doc/greenhouse-gas-emissions-reduction-goal-for-mass-save/download>

<sup>4</sup> Energy Efficiency Advisory Council’s July 28, 2021 Resolution, [https://ma-eeac.org/wp-content/uploads/FINAL-July-Resolution\\_Adopted-7.28.21.pdf](https://ma-eeac.org/wp-content/uploads/FINAL-July-Resolution_Adopted-7.28.21.pdf)

efficiency investments could significantly impact other areas of their lives, such as health and comfort.

**Accordingly the Draft Plan should set explicit, robust targets for programs dedicated to environmental justice (“EJ”) communities and low- and moderate-income households. Additionally, these targets should be reflected in any performance incentive mechanism that the Program Administrators (“PAs”) are authorized to earn.**

## **II. Commercial and Industrial Programs Should Be Strengthened and Adequately Funded**

Massachusetts cannot achieve its GHG reduction goals without significant decarbonization gains by commercial and industrial (“C&I”) customers. Surprisingly, the Draft Plan decreases savings goals and budgets for the C&I sector relative to the 2019-2021 Plan, which is out of step with the direction the Commonwealth needs to head to achieve its GHG goals.

**At a minimum, Ceres recommends continuing C&I programs in line with the prior Plan’s savings and budgets levels. The Final Plan should also include robust incentives for combined heat and power (CHP) and describe efforts to improve communication and collaboration between C&I customers and the PAs. Improved communication and collaboration will help to accelerate the shift to a zero-carbon economy by ensuring programs are responsive to the needs of the state’s largest customers and provide the tools and services necessary to decarbonize the C&I building stock.**

## **III. A Comprehensive Workforce Development Plan Should Be Developed and Should Include Dedicated Strategies for Engaging, Activating, and Fostering a Multilingual Workforce**

Ceres supports the Draft Plan’s focus on increasing workforce development diversity and engaging with community partners. Hiring and supporting a multilingual workforce will improve program participation especially among communities and households that are historically disadvantaged or face barriers to energy efficiency investment. **Accordingly, the Final Plan should include a comprehensive workforce development Plan with dedicated strategies for engaging, activating, and fostering a Multilingual Workforce.**

We appreciate the opportunity to provide these comments and share the perspectives of the private sector. Please do not hesitate to be in touch if we can provide additional information.

Sincerely,



**John Carlson**  
Manager, State Policy  
Ceres