



June 15, 2021

Members of the Energy Efficiency Advisory Council,

It's heartening to see the expansion of demand response (DR) programs in this plan. With the expected increased electrification of heating and transportation over time, reducing peak usage will be more important than ever. The planned integration between the demand response and energy efficiency programs will help increase participation, and electric vehicle DR will start to address the transportation sector, although we're looking forward to this moving from pilots to a broader offering.

However, National Grid and Eversource offering winter gas DR programs is concerning. For residential customers, the length of events necessary for gas DR means that traditional thermostat programs are unlikely to work, because of the discomfort they will cause. And for large C&I customers, gas DR will likely result in additional delivered fuel use, increasing greenhouse gas emissions. While reducing gas use is a laudable goal, it can't come at the expense of emissions reduction. We urge the PAs to reconsider the gas DR offerings.

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