



June 23, 2021

Members of the Energy Efficiency Advisory Council,

In the short time that it's been in existence, Mass Save's Passive House New Construction Program has been quite successful, with more than 8,000 high-performing units going through the program. However, a similar level of support for existing buildings doesn't currently exist. Especially for low-income multifamily buildings, where we may only have the opportunity to make a significant change every 20 years, we need to go as deeply as possible with each intervention. In order to meet Boston's - and the state's - ambitious climate goals, and in the face of reduced budgets and savings, the PAs need to be the agents of market transformation, rather than continuing to chase dwindling equipment savings.

I urge the PAs to create a new deep energy retrofit market transformation model. It should be comparable to the Passive House New Construction Program, with options for both 1-4 units and 5+ units, as well as both market rate and low-income. It should incentivize early adopters to pioneer these types of retrofits and identify replicable solutions for greater market adoption and cost compression.

A program called RetrofitNY has been developed by NYSERDA, which aggregates the demand from building owners and the supply of experienced contractors, with the goal of driving costs down to business-as-usual over several years. RMI is developing a similar program in California, called REALIZE-CA, and is looking at Massachusetts as another state where progressive climate policies, when combined with appropriate incentives, could transform the retrofit market. The PAs should be strong partners in that effort.

There are also some specific changes that could be made to the existing programs and replicated in the new market transformation model:

- The evaluation plan should include re-evaluation of equipment measure life, especially for low-income programs and for building envelopes, which we believe last longer than is reflected in the TRM and will increase claimed savings.
- Also, to generate more participation, incentives should have realistic caps. For instance, currently the Passive House program incentivizes the "full cost" of a feasibility study, but the cap of \$5,000 is actually less than the full cost.
- Lastly, deeper collaboration with affordable housing developers and housing finance agencies is critical for identifying these retrofits at the point of refinancing, aligning the timing of utility incentive commitments with housing finance agency awards.

The shorter-term changes that the low-income multifamily strategic energy retrofit working group is discussing will be very helpful to a number of building owners, but we need to think bigger in order to meet our climate goals. While in some cases, legislative changes are needed, we think that this sort of deep energy retrofit market transformation model can fit within the current restrictions that PAs must work under.

Reverend Mariama White-Hammond, Chief
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