

Public Comments

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Northeast Energy Efficiency and Electrification Council (NEEEC)

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To the EEAC:

We want to offer our comments about two topics. One is implementation of the IRA in Massachusetts and the other is legislation that would impact the management and planning for Mass Save.

On the first topic: DOE is in the process of developing guidelines for state energy offices to submit proposals for delivery of the Hope for Homes and HEERA funding. We expect that final guidelines and then state proposals and then approvals of those proposals will take place over this year and funds will be available in 2024. We are very concerned about the implementation of the IRA funds coordinating with Mass Save. The IRA funds would represent approximately 3.5% increase in available funds to support energy efficiency and electrification. This is a small amount of funding and we expect that guidelines combined with the legislation will require incentives to be provided using detailed requirements that will be very complicated to implement along side of Mass Save. Given the potential for a difficult set of requirements such as income verification and other requirements, NEEEC has recommended to DOER and DOE that the IRA funding be targeted to only a limited set of geographic areas which would be Municipal Light Plant customers and a targeted number of Mass identified EJ communities. This would limit the level of difficult combined implementation that will take time and serving customers that need the small amount of additional federal funding the most and limit the administrative time and costs to deliver the Mass Save and IRA services will not cause a statewide challenge. We hope that EEAC can support this proposed plan.

The most valuable part of the IRA legislation in support of clean energy is the expanded tax credits that would be available to all Mass households. the PA's are in the process of working on a customer and contractor information brochure to help all households in the state know how to include these in their calculation of overall costs for implementing measures. We support that effort.

The second topic will be short since most know about the legislation that has been filed by Senator Barrett that would add a new administrative office to manage Mass Save and direct all aspects of the program with limited feedback and management from EEAC and PA's. we feel that this is a big mistake and would cause very complicated rules, program designs and goals with a conflicting oversight process. We will be opposing this legislation and urge the EEAC to also make some public position if appropriate.

Thanks for the opportunity to submit these comments.

Steve Cowell

Executive Director

NEEEC