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**DOER Initial Comments on the April 30<sup>th</sup>, 2015 draft 2016-2018 Massachusetts Joint Statewide Three-year Electric and Gas Energy Efficiency Plan (“draft plan”)**

**Introduction:**

Below are DOER’s initial comments on the April 30<sup>th</sup>, 2015 draft 2016-2018 Massachusetts Joint Statewide Three-year Electric and Gas Energy Efficiency Plan (“draft plan”). DOER extends its appreciation to the Massachusetts Program Administrators (PAs) for the draft plan and the ongoing collaborative effort between DOER, the PAs, and the Energy Efficiency Advisory Council (“EEAC” or “Council”).

The 2016-2018 Three-Year Energy Efficiency Plan is a high priority for Secretary Beaton and the Baker Administration, and DOER is committed to building upon past efforts to maintain Massachusetts’ leadership role in energy efficiency. DOER looks forward to continued collaboration with the PAs and the Council over the next several months to address DOER and other stakeholder comments on the draft plan.

Please note that these comments are intended to serve as a starting point for discussion between the PAs, DOER, the EEAC and its Consultants, but should not be considered comprehensive. These comments do not fully address the extent to which the draft plan addresses each recommendation in the March 31 EEAC Resolution Concerning its Priorities for the Development, Implementation, and Evaluation of the 2016-2018 Three- Year Energy Efficiency Plans (“EEAC resolution”). The June 4 Residential Workshop and the June 9 Commercial and Industrial (C&I) workshop will cover that in more detail.

## **Highlights:**

### **Savings Goals:**

- The PA-proposed draft savings goals are conservative and lack adequate back-up data.
- The draft plan proposes decreasing goals (relative to preliminary 2014 savings results as well as 2013-2015 electric savings goals) with increasing budgets (relative to past budgets and relative to the goals.) See charts on pgs. 7-8 of the draft plan. Based on the analysis to date, DOER believes that savings goals should continue to increase while maintaining reasonable budget levels and bill impacts.
- With regard to residential savings goals, DOER understands that increasing baselines affect the level of savings claimed for measures going forward. However, DOER does not agree with the extent of the impact proposed by the PAs in the draft plan. DOER also disagrees with the draft plan's projections around LEDs in the residential programs, including both the cost projections and the pace at which LEDs will continue to increase in the programs. DOER would like to work with the EEAC consultants and the PAs to ensure that the goals account for an appropriate trend and pace of incorporating LEDs into the residential programs and initiatives.
- With regard to C&I savings goals, in their savings goal framework memo April 30, 2015, the EEAC consultants specified opportunities for savings in various areas, including combined heat and power (CHP), street lights, and small businesses. DOER does not believe these areas have been fully explored and accounted for in the draft plan projections. DOER would like to see these areas explored much further in the Plan and more fully reflected in the goals for the C&I sector.
- The draft plan emphasizes "sustainable" savings and maintaining current program direction and budget, rather than the ongoing innovation and proactive pursuit of cost-effective savings that DOER believes is appropriate given the PAs past performance and requirements of the Green Communities Act.
- Going forward, the PAs and EEAC consultants must analyze the major differences between their respective proposed goals, including reviewing back-up data and should report back to the Council on key drivers in advance of July Council meetings during which the EEAC will be finalizing its comments on the draft plan.
- In sum, DOER supports more aggressive savings goals that build on the success of the past achievements, align with the Green Communities Act and the Global Warming Solutions Act, and support Massachusetts' continued leadership in energy efficiency.

### **Program Enhancements:**

- In general, the draft plan lacks specificity with respect to several key program enhancement areas, including renters and moderate income customers, LED lighting, home automation technology, sector-specific approaches in C&I, Retrocommissioning, the small business initiative and renewable thermal technologies
- The draft plan provides few, if any, firm commitments or dates by which program enhancements or new initiatives will be rolled out. DOER strongly supports including dates, milestones, and additional detail to give the Council and the Council's consultants information needed to fully analyze the draft plan.
- Much of what the PAs characterize as "innovative" is activity already established and underway. DOER believes that the current draft plan passes up on several opportunities to demonstrate

new approaches and advance the energy efficiency market further. DOER encourages more innovation through pilots and programmatic changes in the final plan.

- DOER believes that the PAs have the opportunity to drive the LED market, and the related phase out of CFLs, rather than merely capitalize on it as described in the draft plan.
- With respect to the residential sector, DOER supports the PAs' efforts regarding renters and moderate income customers; however, these efforts are not fully developed and commitments are unclear.
- With respect to the C&I sector, DOER supports the more detailed level of reporting proposed by the PAs as well as the PAs' planned expansion of upstream programs and the small business initiative.

### **Data & Reporting:**

- DOER commends the PAs' on the transition to an electronic Technical Reference Library (TRL) described on page 12, which we anticipate will enable a more accurate, efficient and consistent state-wide view of both planning and reporting.
- The Mass Save Data website, while helpful, does not meet the goals of the statewide database that has been extensively discussed by the EEAC statewide database subcommittee and in the statewide database stakeholder process. The draft plan should not frame the Mass Save Data website as a statewide database, and should instead reference the EEAC stakeholder process.

### **Outreach & Marketing:**

- DOER supports the planned Mass Save website upgrade to include Spanish and Portuguese translation.

### **Renewable Thermal Technology:**

- DOER supports a rebate for electric heat customers installing solar PV (currently under consideration by the Cape Light Compact).
- DOER supports targeting electric resistance customers for installation of high efficiency cold climate ductless mini-split heat pumps or ground source heat pumps.
- DOER supports adding high efficiency biomass boilers to the list of HEAT loan-eligible measures.
- Information about renewable thermal technology alternatives should be appropriately integrated into all communication with customers regarding HVAC and hot water system replacement, including communication regarding early boiler/early furnace replacement rebates.
- DOER fully supports customer-facing videos regarding ductless mini split heat pumps and heat pump water heaters that are currently on the Mass Save website.

## Specific Comments

This section provides more specific DOER comments with page number references.

### Savings Goals

Page #	DOER Comment
14	PAs refer to consideration of "short term" bill impacts when setting goals in the context of statutory requirements. The Green Communities Act (GCA) does not refer to "short term." This should be removed.
17,23	PAs refer to a "sustained" statewide energy efficiency effort and a "sustained, reasonable" pace for achieving energy efficiency. The draft plan characterizes energy efficiency as needing to be "sustained" rather than seeking to achieve all cost-effective energy efficiency.
28	PAs provide only brief and general reasons for reduced goals. DOER would like to see more specificity and back-up data for the proposed goals, particularly in light of the proposed reduction in savings and increase in budgets.
75-79	The PAs should provide more specificity and back-up data for declining savings from the residential consumer products initiative.

### Program Enhancements

The draft plan highlights successes from the 2013-2015 Three Year Plan. It also proposes welcome new initiatives, such as those for residential renters and moderate income customers, but often falls short of committing to innovate in specific areas. DOER believes that the plan needs to go further in order to be characterized as "innovative."

Page #	DOER Comment
38	PAs will "push on" and "explore" how LED deployment and home automation technology can be integrated, but there are no specifics. The PAs should address EEAC recommendations 22 (LED lighting) and 27 (behavior initiative/home automation technology) in detail.
35-37	Plan lists highlights from 2013-2015 but should clarify which of these highlights are continuing in 2016-2018.
39-40	PAs describe a number of "additional enhancement highlights", including home automation technologies in the new construction and behavior initiatives, wireless thermostats, & lighting controls, to explore or evaluate. While this is encouraging, there are very few commitments and no steps or timeframes for making decisions. The plan should provide more detail and firm commitments around what the PAs will implement in 2016-2018.
11-13	"Innovations" for 2016-2018 are described. Although it is helpful to see the items listed, they are, for the most part, things that are currently underway. Please state what is being continued from previous years, and what is being newly introduced in the 2016-2018 timeframe. DOER notes that the Technical Resource Library described on pg. 12 is a new innovation for the 2016-2018 Plan and fully supports this innovation.
11	PAs state that they will continue to provide LED offerings that are in line with the "changing market." DOER recommends that the PAs revise the Plan to include specific recommendations regarding LED lighting as stated in the EEAC March 31 resolution.

## Data & Reporting

Page #	DOER Comment
12, 22	DOER notes that the Technical Resource Library (TRL) is new for the 2016-2018 Plan and fully supports this innovation. DOER fully supports the TRL and the fact that the draft plan includes a timeframe for completion.
15, 22	PAs frame the Mass Save data available at <a href="http://www.MassSaveData.com">www.MassSaveData.com</a> as the statewide database. DOER notes that the Mass Save database does not meet the goals of the statewide database that has been extensively discussed by the EEAC statewide database subcommittee and stakeholder process.

## Outreach & Marketing

Page #	DOER Comment
12, 157	DOER supports the implementation of Spanish and Portuguese versions of the Mass Save website. A date for completion should be included in the Plan.
114	Elaborate how the Mass Save website will be improved to better share New Construction materials, education seminars, webinars, open houses, case studies, etc. as outlined in EEAC recommendation 6b.

## Renewable Thermal Technology

Page #	DOER Comment
155	Ductless mini-split heat pumps have had some success in the residential sector for both more efficient cooling and replacement of electric heating. Elaborate if, when and how the PAs will include cold-climate, ductless heat pumps in the small business setting. Identify if installation of mini-splits during tenant fit-out for small commercial customers will be evaluated.
155	DOER is fully supportive and encourages CLC's consideration of incentivizing solar PV specifically for customers with electric heat either alone or in combination with cold-climate air-source heat pumps or to ground source heat pumps. Please include CLC's consideration in the section on Renewable Thermal Technologies on page 155.
155	Customers with electric heat should be targeted and highly incentivized to switch to cold-climate air-source heat pumps or to ground source heat pumps. Please include a specific description of efforts to switch both residential and C&I customers with electric heat to these much more efficient heating technologies.
155	Include mention of cold-climate air-source heat pumps and ground-source heat pumps in the Renewable Thermal section. These technologies are rapidly gaining market share. Include mention of collaboration with the Mass Clean Energy Center and DOER on these technologies to learn from their pilot programs and research.
155	Include mention of solar hot water opportunities in the context of Renewable Thermal Technologies. This technology could be well deployed for commercial customers with a large hot water load given the pending incorporation of renewable thermal technologies into the Alternative Portfolio Standards and the potential opportunity to generate Alternative Energy Credits.
159	DOER fully supports customer-facing videos regarding ductless mini split heat pumps and heat pump water heaters that are currently on the Mass Save website.

## Residential (including Multi-Family & Low Income) Comments

### *Residential Highlights: Renters & Moderate Income Customers*

Page #	DOER Comment
34,38	PAs state their commitment to better reaching renters and moderate income households, which DOER supports. However, the Plan contains only preliminary detail on these efforts. The final plan should provide more detail, consistent with EEAC resolutions 18 and 19, on the development and implementation of these initiatives, including dates & milestones.
39	The general description of the possible moderate income initiative suggests a relatively narrow focus on serving households that are 61-80% of state median income and have identified weatherization opportunities. While DOER supports this proposal, it appears that this strategy will not serve the majority of moderate income households. DOER recommends the PAs develop a broader moderate income strategy designed to serve the majority of moderate income customers that is consistent with EEAC recommendation # 28.

### *Residential Whole House: New Construction*

Page #	DOER Comment
40-46	This initiative is largely unchanged from current implementation and it does not adequately address EEAC recommendation #26. Field trials for home automation technologies will be explored but no timeframe is stated. DOER believes home automation technology likely has more savings opportunity in existing homes. The PAs express some interest in a "pay for savings" approach but it is in the exploratory stage. PAs have begun supporting homes that are "renewable ready" through marketing "success stories" and supporting builder training, rather than through PA incentive tiers as recommended. The plan should include a timeline for implementing ZNEB strategies, and fully address EEAC recommendation #26.

### *Residential Whole House: Multi-Family Retrofit*

Page #	DOER Comment
39, 46-52	PAs state their commitment to improving the multi-family (MF) retrofit initiative, with particular focus on improving the multi-family market integrator (MMI) model to ensure that customers have a project-level lead single point of contact. DOER supports this approach. However, the Plan contains insufficient detail on these efforts, and does not address all of the specifics in EEAC recommendation # 28 regarding the MF initiative. Specify steps and a timeframe for revisiting the role of the MMI and address EEAC recommendation # 28. Also, clarify whether fully serving oil and propane heated multifamily buildings (consistent with proposed Residential Conservation Services regulations) is being accounted for in savings goals and budgets.

**Residential Whole House: Home Energy Services**

<b>Page #</b>	<b>DOER Comment</b>
52-61	This initiative is largely unchanged from current implementation. Although PAs state they will explore the possibility of a "renter visit", there are no specifics and no timeframe for developing a renter-specific initiative as recommended by the EEAC. Similarly, there is nothing specific about the recommended moderate income initiative. There is no mention of providing customers with comprehensive information about HVAC/hot water technology that includes information about renewable thermal technology, and no mention of home energy scorecards. In sum, EEAC recommendations 18, 19, 20 and 21 are not fully addressed. Provide detail and fully address EEAC recommendations 18, 19, 20 and 21.
35	PAs frame the existing on-line assessment tool as a home energy scorecard. While DOER supports the on-line assessment tool, the tool is not an asset-based scorecard. DOER believes there are benefits to pursuing the integration of home energy scorecards to inform the home audit, and notes that other New England states have committed to doing this. Address EEAC recommendation #21c.

**Residential Whole House: Behavioral/Feedback Initiatives**

<b>Page #</b>	<b>DOER Comment</b>
62-64	This initiative is largely unchanged from current implementation. PAs state that they will continue to explore and monitor developments in this field and make adjustments to the initiative. DOER supports this but would like a specific report on home automation technology pursuant to EEAC recommendation #27.

**Residential Products: Heating & Cooling (electric & gas), Consumer Products, Lighting**

<b>Page #</b>	<b>DOER Comment</b>
79-85	The March EEAC resolution includes clear recommendations regarding incorporating LEDs into both the residential products and whole house programs. While the DOER appreciates the PAs' commitment to phasing out incentives for specialty CFLs in 2016 as recommended by the EEAC, the Plan does not fully address other aspects of EEAC recommendations regarding LED lighting as stated in EEAC recommendation 22. Fully address EEAC recommendation #22.
70-75	Residential products/heating & cooling gas initiative is not changing from current implementation. PAs should commit to improved quality control regarding installation of condensing boilers and providing training for installers to address the results of the March 2015 High Efficiency Heating Equipment Impact Evaluation.
64-69	Two studies may influence deployment of this initiative and not currently mentioned in the draft plan: central A/C (fall 2015) and mini-splits (2015). PAs should share results of those studies and specify changes to this initiative based on the results of the studies and a date by which changes will be implemented (as soon as possible).

**Low Income Programs: Single & Multi-Family**

Page #	DOER Comment
85-90	There are no firm commitments to evaluate expanding the low income single family initiative to include households with up to 80% of AMI as recommended by the EEAC (see EEAC recommendation #29). Provide a clear justification for not evaluating this in the plan, or include such a commitment and a timeframe for doing so.
90-97	Clarify whether fully serving oil and propane heated multi-family buildings (consistent with proposed RCS regulations) is being accounted for in savings goals and budgets, and, if not, please do so and revise savings and budgets accordingly.

**C&I (Excluding Multi-Family) Comments**

***C&I: Reporting***

Page #	DOER Comment
98	The PA should mention the changes in the C&I initiatives that are being reported. This is greater granularity and should be pointed out.

***C&I: New Buildings & Major Renovations***

Page #	DOER Comment
101	Provide more detail on how the PAs "aggressively seek out and recruit owners and designers involved in the construction or major renovation of all non-residential buildings." For example, DOER recommends that the PAs access Mass Environmental Policy Act (MEPA) filings, Mass School Building Authority's funding applications, and the State Revolving Fund's application for drinking water and wastewater projects, to connect to new construction projects. If these efforts are already being taken, include in the Plan.
102	Include a timeline for implementing ZNEB strategies. DOER wants to see more specific, concrete indicators of success for Net Zero Buildings programs in the draft plan, and how this will be integrated into existing PA programs.
104	DOER fully supports the statewide approach and inclusion of the gas PAs for encouraging efficiency in small NC commercial buildings. Please include a timeframe for realizing this single, statewide and streamlined approach.
104	Explain if customized modeling is available for new construction ("NC") buildings with specialized functions, such as restaurants.
104	Sustainable Office Design was implemented in Q3 2014 for lighting, however the draft plan is not clear as to what additional enhancements are proposed. The market is very interested in this model and seeing it expanded to other areas past lighting. Expand on areas for expansion of this program, such as plug loads, submetering and energy displays. For energy displays, please confirm that customers will be shown both their own usage and the average and range of usage of their peer group as this has shown to be successful in the residential market.
106	There is no mention of the tiered approach that was recently launched for new construction, indicate if this will become a statewide approach and by when.

112	The plan cites the difficulty with identifying New Construction projects because of the nature of the market. Elaborate on actions the PAs have taken and will take in the future to become a trusted partner for developers, architects and brokers in order to get involved in NC projects sooner (EEAC recommendation 6a).
112	As noted, submetering of space is a component of passing along energy costs in a triple-net lease. Explain how the PAs will address the EEAC recommendation (#12) of exploring submetering within NC, and how it fits within SOD.
116	Provide a timeline for implementation of the new Initiatives within the NC Program. Clarify any new research that will be conducted and what, if any, deliverables to the Council based on that research.
Not Included	Submetering will logically be least expensive at the time of new construction or tenant fit-out. PAs should include if, when and how submetering will be included or evaluated for inclusion in the New Construction Program.

***C&I: Initial Purchase & End of Useful Life***

Page #	DOER Comment
103	Mention additional potential offerings to the included upstream products list of "boilers, furnaces, circulator pumps, some component motors in HVAC systems, and some commercial kitchen equipment measures" These items are only mentioned later in the plan.
115	EEAC recommendation #4 asked for New Construction reporting to be broken into separate initiatives. We applaud that the PA's have new Initiatives for New Buildings and Major Renovations and Initial Purchase & End of Useful Life. Clarify if the plan includes the upstream model entirely within Initial Purchase & End of Useful Life and if this Initiative goes beyond the upstream lighting model.
115	Explain the differences between the NC upstream efforts within both Initiatives and the Retrofit Upstream Lighting Initiative. Perhaps it makes sense to combine all Upstream into a separate Program and include all upstream purchases and products.

***C&I Retrofit: Upstream Lighting***

Page #	DOER Comment
115	Explain the differences between the NC upstream efforts within both Initiatives and the Retrofit Upstream Lighting Initiative. Perhaps it makes sense to combine all Upstream into a separate Program and include all upstream purchases and products.
150	The PAs mention that the Upstream Lighting program is likely to be expanded to include a broader list of measures. We suggest changing the name of the Initiative from Upstream Lighting to Upstream Products to allow greater flexibility and creativity. In particular, inclusion of common upstream gas products would be very relevant in this Plan.

***C&I Retrofit: Existing Building Retrofit***

Page #	DOER Comment
143	Provide timelines and more details on additions and targeted improvements of process.

### **Combined Heat and Power**

<b>Page #</b>	<b>DOER Comment</b>
108	Include CHP under the list of measures to be evaluated for upstream incentives.
132	Elaborate how the PAs plan to address uncertainties in both scheduling and cost related to the existing process to review and approve an interconnection plan for CHP.
132	Provide a timeline to complete the CHP best practices review
141	Describe the overall strategy and specific actions that the PAs will implement to more effectively market CHP, including timeframes.
141	Include CHP implementation data-based historical average realization rates and average \$/kWh saved.
142	There are no pre-packaged options mentioned for CHP; inclusion of this technology could open a whole new efficiency market and should be explored in this 3YP. Please clarify if, when and how this technology will be assessed.
Appendix	CLC is the only PA that included specific projections for CHP. The other PAs should include their projections as well. Additionally, all PAs, including CLC, should work with DOER and the EEAC consultants to understand and account for differences in CHP projections and work to include more CHP savings in the Plan.

### **Delivery and Training**

<b>Page #</b>	<b>DOER Comment</b>
108	The Commercial Real Estate Working Group (“CRE WG”) found that availability of approved TA contractors was a barrier to energy efficiency. Include information about how the PAs plan to address this barrier.
110	The existing and proposed New Construction Programs support training and a circuit rider for building code officials, design & construction. We recommend that the PAs include other areas/sectors for which the PAs would consider using a similar model to provide outreach and support (in the relevant section(s)).
123	The Building Operator Certification (“BOC”) program is proposed to continue as it currently functions. Are the claimed savings from this training sufficient to offer to cover the full cost of the training given the significant time commitment by the customer? If so, clarify in the plan.
123	The EEAC recommended in multiple places to expand training opportunities beyond BOC. We recommend the PAs provide additional education and certification opportunities developed with input from the marketplace.
124	The draft plan mentions the significant amounts of projects and savings with the public water/wastewater treatment sector. This sector used a model of peer-to-peer learning through facilitated workshops, in combination with a circuit rider, to transform its energy awareness and actions. Clarify if, when and how the PAs plan to use this model with additional hard-to-reach C&I sectors that might greatly benefit from this model, for example agriculture or manufacturing.
134	Provide more detail on what PAs are doing to increase the number, and specialization of retrofit Technical Assistance and Project Expeditor vendors
137	The draft plan provides a very positive description of the partnership with cities, towns and districts. Clarify if, when and how the PAs will utilize this model to better serve additional, prioritized market sectors.

**Strategic Energy Management (SEM), Retrocommissioning (RCx) and Submetering**

Page #	DOER Comment
112	As noted, submetering of space is a component of passing along energy costs in a triple-net lease. Explain how the PAs plan to address the EEAC recommendation (#12) of exploring submetering within NC, both within and outside of Sustainable Office Design.
120	The Plan describes the MOU/SEMP (Strategic Energy Management Plan) process for large customers. There are two significant gaps in this proposal: first, not all PAs offer the MOU/SEMP process. And second, mid-size customers will have no opportunity to utilize a SEM approach. Describe how the PAs envision providing a SEM approach to these customers falling into these gaps.
120	Provide a timeline for refining and implementing expanded SEM approaches. This is a significant source of savings in other places and should be implemented in Massachusetts.
121	Please provide more information about proposed RCx enhancement and timelines for implementation. Include commitment and timeline for development of common RCx measures and expanding training for RCx providers.
Not Included	Submetering is commonly noted as a pathway into continuous commissioning and behavioral energy savings. Elaborate if, when and how the PAs will enhance retrocommissioning opportunities to include submetering and continuous commissioning. Please also indicate whether these options will be independently able to receive incentives and the delivery format of those incentives (upfront versus pay for performance).

**Segmentation and Specific Opportunities**

Page #	DOER Comment
127	The CRE WG report is completed. Update the Plan to incorporate those recommendations as well as the EEAC recommendations on CRE.
130	In line with stated PA priority of statewide consistency (p98), address how the PAs are working together to develop statewide program approaches to market segments.
131	Provide more information and timeline to implementing new mid-size strategies
136	The PAs mention long-term engagement with large customers; provide more information on working with large customers on deeper, longer payback measures that are possible with these long term arrangements.
138	The draft plan discusses the successful collaboration between MA Department of Environmental Protection (“DEP”), DOER and the PAs to assist municipalities with reducing costs at wastewater and drinking water facilities which can represent up to a third of the energy costs in municipalities. The draft references successful training efforts that will continue which we support. However, no goals for future efforts are mentioned or a schedule for setting goals. Please discuss with DOER and DEP to set specific goals and timelines to include in the plan for this sector, including: 1. Piloting Strategic Energy Management with water and wastewater facilities; 2. Providing comprehensive, deep efficiency services to committed facilities working towards a goal of zero net energy; and, 3. Collaborating with DEP to develop a comprehensive, sector-wide approach to addressing pump system optimization, including operator training sessions, statewide pumping system screening and joint implementation planning.
141	Provide timeline to house of workshop program. Provide more detail into other non-profit sector specific efforts. The PAs may want to refer to public comments received on both of these topics.

141	There is no mention of other large segments like healthcare/hospitals, lodging, food sales, etc. Provide more information on approaches and innovations in these and other sectors.
143	The Plan proposes LED street light retrofits only for municipally-owned street lights. Given that a significant portion of the remaining statewide efficiency potential for street lighting is for utility-owned street lights, it is imperative that this potential, and its barriers, be addressed in the 3YP. Furthermore, the opportunity for controls (beyond daylighting sensors) at the time of retrofit could bring a significant additional level of efficiency gains. Furthermore, making street lighting more efficient will decrease winter peak demand, a key priority of the EEAC. Describe if, when and how the PAs plan to include LED street light controls in the plans. Also describe if, when and how the PAs plan to include utility-owned street light retrofits with LEDs in the plans.
Not Included	Include information on existing and planned efficiency efforts with data centers. Establishing best practices for data center efficiency in MA should be included in the plan.