

Distributive Justice in the Delivery of Mass Save Programs in the 2025-2027 Plan.

As we think about equity in the 2025-2027 Three Year Plan, we should be thinking about distributive justice. Distributive justice is about ensuring that everyone has fair and equal access to the benefits of Mass Save.

The 2020 Residential Nonparticipant Market Characterization and Barriers Study found out that the energy efficiency programs do not serve every customer equitably in the Commonwealth. As a result of that study the EEAC convened the Equity Working Group to identify new strategies for increasing equitable participation among underserved communities across the Commonwealth whose work continues to date. The working group prioritizes developing recommendations that address the needs of LMI customers, language isolated customers, renters, and small businesses.

I live in Lowell, and I have seen firsthand how Mass Save is falling short of distributive justice there and in other communities like it across the Commonwealth. In 2018 the City of Lowell, an EJC presented before the EEAC a proposal to serve as program administrator for its residents, among the reasons why Lowell made this proposal was because the City had been underserved by statewide programming. The proposal can be found here <https://ma-eeac.org/wp-content/uploads/City-of-Lowell-Proposal-to-Serve-as-Mass-Save-Program-Administrator-4-30....pdf> Other unofficial studies have shown that for every dollar a Lowell resident has contributed to the ratepayer fund they have lost about 30cts, receiving only 70 cents back. Other wealthier towns in Massachusetts have either been at breakeven or made at least 10cts. While the 2022-24 Mass Save Plan laid a foundation for equity in program delivery, a lot of work remains.

How do we work toward distributive justice?

- 1) In 2018 Lowell made the case that they were best suited to be the PA for the EE program was because “the City is the best delivery agent to deliver programs....” They cited the City’s uniqueness and the advantage of having local knowledge to design and enhance the programs. The CFP program brings this capacity to communities by empowering them through funding and a learning community. **This program’s budget should be increased, and more flexibility built into the program** so that cities can continue to take advantage of their own uniqueness in program delivery.
- 2) We move closer to distributive justice by **increasing the share of Mass Save dollars allocated** to the income eligible sector and equity purposes as supported by equity recommendations in the workshop. We should consider the 10% and 20% spending requirements for electric and gas respectively to be our floor, not our ceiling.
- 3) We move closer to distributive justice by **continuing to lower barriers to participation**, particularly for low- and moderate-income households, renters, and language isolated customers and small businesses.
- 4) We move closer to distributive justice by first identifying underserved communities/populations and then prioritizing those most in need of additional investment to move closer to justice faster. This should **start by reviewing the expanded criteria as set by the DPU to determine the priority in-need communities**. We need to remember that the EWG proposed municipalities in the 2022-2024 were 38 communities which then was increased to 60 utilizing the DPU’s criteria and thus, minimized the ability to take meaningful steps toward justice.
- 5) We move closer to distributive justice by resolving the data questions that are a cross cutting theme across all workshops and sectors. The role of data in driving equitable energy efficiency outcomes cannot be understated. **Better data will help in targeting communities for energy efficiency investments**.