

To: Mass EEAC

From: Steve Cowell, E4TheFuture

Subject: Public Comment

Date: 6/17/2020

I would like to make some comments on the effort that the PA's with leadership from Eversource as well as LEAN and CLEAResult have made to help put in place the protocols for getting our energy efficiency work back in the field. First, this effort has been very difficult and has taken a great deal of effort and work with the positive outcome that there are actual protocols that have been rolled out to four states. This has not been an easy task and I would like to extend my appreciation for that effort. Second, I would like to make some comments about those protocols and hope that we can continue to modify and adjust them as back to work rules evolve and added review is carried out. Specifically:

1. The requirement for N95 or better face protection is critical for certain tasks but several tasks that are classified as Level 3 (walk through assessments, for instance) should not require this level of PPE. We request that the Level 3 tasks be re-examined and those tasks that do not normally require an N95 mask be re-classified.
2. The requirement for coveralls should be reviewed. These seem unnecessary if long pants are worn, which is requirement.
3. Glove requirements seem to have evolved and double-gloving (task appropriate gloves over nitrile) is no longer required. We want to confirm that the guidance is that snug-fitting task-appropriate gloves are sufficient (or that nitrile gloves are to be worn in the task does not require gloves).
4. The QA process may be difficult to deliver without disruption and an alternative system of checklists and worker confirmations would be sufficient.
5. The cost of the PPE has been estimated at an average of \$60-\$70 per visit per worker. The PA's should consider an extra incentive to the contractor while these requirements are in place.

These thoughts and comments are not to in any way criticize the work that has been done which has produced progress and protocols for getting back into homes and businesses to deliver important services. They are just observations of places where the protocols could be relaxed or clarified as we move forward. They are also based on review of protocols developed in other states and through the efforts of the US Dept. of Energy.