



June 15, 2021

Massachusetts Energy Efficiency Advisory Council

Commissioner Patrick Woodcock, Chair  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

**RE: EEAC Recommendations for the 2022-2024 Massachusetts Three-Year Energy Efficiency Plans**

Dear Commissioner Woodcock:

Every Massachusetts ratepayer pays into Mass Save but not everyone can easily access program benefits. **For a just and resilient energy system, Mass Save must ensure equal access to low- and moderate-income households, immigrants, households not fluent in English, and renters.**

The Green Justice Coalition brings together community and environmental justice organizations representing over 100,000 ratepayers across the Commonwealth. Like the Energy Efficiency Advisory Council (EEAC), the Green Justice Coalition (GJC) recognizes the importance of equitable participation and savings in energy efficiency programs.

Wealthy communities and homeowners access the Mass Save program [six to seven times more](#) than low-income, language-isolated, and environmental justice communities. Mass Save funds its energy efficiency programs with the utility bill contributions of all customers of investor-owned utilities in Massachusetts. The overall budget for the state's most recent three-year energy efficiency plan was \$2.8 billion—a considerable sum. Nonetheless, the major utilities companies, as well as independent policy analysts, have found that [“renters, lower-income residents, and non-English speakers are less likely to benefit”](#) from the program. Low-income households contribute a greater proportion of their income to the program, and environmental justice communities bear a greater proportion of the burden of our energy system.

This is a longstanding inequity to which many stakeholders, including the Green Justice Coalition, have drawn attention for over a decade. It will not change unless the EEAC issues explicit directives and requirements upon the Program Administrators (PAs).

Toward that end, the EEAC should consider the following recommendations:

- **Target communities currently underserved by Mass Save:**
  - Increase the income eligibility threshold from 60% to 80% of state median income
  - Direct additional resources to cities underutilizing Mass Save (such as Worcester, Springfield, and Lynn), low-income communities, communities impacted by COVID, and

- language-isolated communities
  - Fund and partner with trusted community organizations to increase participation in hard-to-reach communities
  - Identify all points of contact requiring multilingual interaction and provide resources for translation, interpretation, and referral to contractors with relevant language competency
  - Develop a multilingual workforce: apply workforce development and create career ladders for high-road jobs for multilingual and English learners who are experts in their communities and can help to improve access in language-isolated communities
  - Providing funding for common pre-weatherization requirements facing low-income households, including roof repair, asbestos removal, knob and tube wiring removal, etc.
  - Customize outreach and incentives to landlords in order to serve more renters
- **Expand program to include more forms of efficiency and resilience:**
  - Include housing retrofits, switching from oil or gas to electric heat pumps, more efficient appliance standards, etc.
  - Include the installation of [electricity storage capacity](#) to increase low-income community resilience to extreme weather events
- **Ensure transparency on energy efficiency equity goals, budgets and spending:** Officials should not support this plan unless there is explicit transparency on the changes made from the last plan (2019-2021), and greater clarity in terms of the equity goals, budget allocation and the policies and practices to reach low-income and language-isolated communities.
- **Expand program targets to match the scope of the Baker Administration's Climate mandates:** The Baker-Polito Administration's Clean Energy and Climate Plan calls for a million homes to receive energy efficiency retrofits by 2030. The scope of the draft Three-Year Plan falls far short of the 100,000+ homes per year that must receive these retrofits to reach this. To center equity in this approach, EEAC and the Mass Save program must prioritize the residences of Black, brown and low-income communities as the program expands to meet this mandate.

We urge officials to put disadvantaged and underserved communities first and reject any plan that does not center their needs wholly and transparently.

Alternatives for Community & Environment  
 Boston Climate Action Network  
 Chinese Progressive Association  
 Clean Water Action  
 Coalition for Social Justice  
 Community Labor United  
 GreenRoots  
 Neighbor to Neighbor  
 New Roots AME

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*The Green Justice Coalition (GJC) is a partnership of community-based, environmental, and labor allies who lead campaigns that have a meaningful impact on working-class people and communities of color. Together, our members organize and advocate for a just transition to a sustainable economy that allows our communities to achieve environmental and economic justice. [GreenJusticeCoalition.org](https://GreenJusticeCoalition.org)*