

**COMMONWEALTH OF MASSACHUSETTS
ENERGY EFFICIENCY ADVISORY COUNCIL**

**COMMENTS ON 2022 PRIORITIES OF COUNCILLOR ELLIOTT JACOBSON,
CHAIR, LOW-INCOME ENERGY AFFORDABILITY NETWORK,
REPRESENTING LOW INCOME WEATHERIZATION AND FUEL ASSISTANCE NETWORK**

The Low Income Weatherization and Fuel Assistance Network (the Network), including the Low-Income Energy Affordability Network (LEAN), looks forward to productive conversations this year regarding a Renter Plan, Language Plan, other Equity concerns, a KPI, a Deep Energy Retrofit protocol, a Mixed Income Protocol, and Connected Solutions including storage. In the meantime, we have these concerns about the draft 2022 Priorities:

1. Re: par. 5 “The Council requests quarterly updates on the following: Update on progress to lighting phase-out for income-eligible customers ahead of the June 30, 2023 deadline.”

The Department of Public Utilities (Department or DPU) did not accept the Term Sheet or Resolution regarding low-income lighting, nor did it set any requirement for a phase-out of low-income lighting. In fact, it expressed a particular interest in a Direct Install program for renters and observed that “The Program Administrators, however, propose to continue to offer lighting incentives to income-eligible participants through Income Eligible Coordinated Delivery.” (Order at 123) It is premature, at best, to call for elimination of the one energy-saving measure most useful to low-income renters. The Department’s Order was clear that equity demands continuation of a lighting program for “renters and other hard-to-reach customers” (at 126):

the Department finds that the Program Administrators should not discontinue offering lighting measures to all residential customers.” (Order at 124) “The Department finds that these actions [terminating all lighting measures] do not further the equitable service of customers.” (125) The Program Administrators are obligated to serve renters and the Department encouraged the Program Administrators to explore and implement strategies to better reach renters. 2019-2021 Three-Year Plans Order, at 43-44, 94-95. Eliminating one of the few measures that are within a renter’s control and can provide energy savings, without first analyzing the impact on renters and other hard-to-reach customers, is inappropriate and may lead to inequitable outcomes. (Order at 125-126)

2. Re: par. 5 “The Council requests quarterly updates on the following: ... Efforts to increase installation of envelope measures, especially in the gas program.”

While the Network and LEAN have no objection to tracking envelope measures for gas customers, which are scheduled for a substantial increase and which tracking is already done, it should be acknowledged that focus should not be lost on the low-income oil- and propane-heating customers who are much more likely to switch to air source heat pump at an earlier time than are gas customers.

3. Re: par. 7. “The Council requests quarterly updates on the following: Marketing and direct install of WiFi thermostats and Connected Solutions program to IES customers.”

Similarly, the Network and LEAN have no objection to tracking wi-fi thermostat installations, and Connected Solutions subscriptions, but the existing LEAN wi-fi thermostat protocol should be acknowledged. The existing protocol, adopted by LEAN’s Low-Income Best Practices Working Group on December 9, 2019, is as follows:

Wi-fi t'stats

The decision whether to install smart thermostats in low-income residences is best resolved by on-the-ground, weatherization field specialists, in consultation with the clients they serve. Factors to be considered include whether:

- (1) broadband wifi, computer, and/or smartphone exist in the home;
- (2) clients demonstrate specific interest in advanced thermostat installation;
- (3) clients spend regular blocks of time outside of the home;
- (4) no technical issue arises that would significantly increase labor costs associated with thermostat installations as compared to less advanced thermostat models;
- (5) the client is technology savvy; and
- (6) access to critical product education information and trouble-shooting is promptly and readily available.

In addition the DPU’s admonition should be heeded that “The Department is concerned about the safety of children, the elderly, and medically compromised individuals residing in a household that is auto-enrolled in an air conditioning ADR program. Accordingly, the Department directs the Program Administrators to employ opt-in customer enrollment for all residential and income-eligible ADR programs, with no automatic enrollment upon smart thermostat purchase or installation.” (Order at 116)

FOR THESE REASONS, the Network and LEAN propose these edits to the Draft 2022 Priorities:

1. Deletion of the language in par. 5 that “The Council requests quarterly updates on the following: Update on progress to lighting phase-out for income-eligible customers ahead of the June 30, 2023 deadline.” since the Department declined to order a deadline to phase out low-income lighting.
2. Deletion of the phrase in par. 5 “especially in the gas program” with respect to low-income weatherization since low-income oil and propane customers are equally important to the effort to reduce energy use as well as to reduce greenhouse gas emissions.
3. Explicit acknowledgement in par. 7 of the existing LEAN low-income wi-fi thermostat protocol as well as the Department’s concern for “the safety of children, the elderly, and medically compromised individuals” and consequent order that the program “employ opt-in customer enrollment for all residential and income-eligible ADR programs, with no automatic enrollment upon smart thermostat purchase or installation.”

Respectfully submitted,
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March 4, 2022