



To: The Massachusetts Energy Efficiency Advisory Council (EEAC)

From: Yve Torrie and Kathryn Wright representing A Better City, and Paul Lipke of Health Care Without Harm, **submitting comments on behalf of the Boston Green Ribbon Commission Commercial Real Estate and Health Care Working Groups**

Re: Request for the EEAC 2019-2021 Plan Resolution and Plan

The Boston Green Ribbon Commission (GRC) is a group of business, institutional, and civic leaders in Boston working to develop shared strategies for fighting climate change in coordination with the City's Climate Action Plan. The GRC's membership constitutes many of the large C&I utility accounts within Eversource and National Grid territory. These comments are submitted on behalf of the Commercial Real Estate and Health Care Working Groups, led respectively by A Better City and Health Care Without Harm. Our comments constitute the Working Groups' initial feedback for the three-year planning process based on the EEAC Workshops. We anticipate submitting detailed comments upon release of the draft three-year plans in April.

We would like to thank the EEAC for the opportunity to submit written comments and offering a public listening session. We acknowledge the hard work of the Councilors and the PAs to date to develop the draft recommendations for the Three-Year Plans. Specifically, we were heartened to see the focus on deeper energy reductions through targeting net zero ready buildings, the strategic focus on combined heat and power, and the call for the development of full demand management programs in the 2019-2021 Three Year Plans. However, there are additional areas of focus that we would like to see included with Three-Year planning considerations for the C&I sector:

1. **Explore Further Savings Opportunities from Lighting** - Lighting savings constitute a significant portion of current C&I sector savings. The conversations at the EEAC workshops were highly focused on the expansion of C&I savings through linear lighting. We agree that linear lighting represents significant opportunity, but also would like to highlight the importance of continuing to pursue other paths forward to increase lighting savings and customer uptake of energy efficiency programs. For LED lighting, this could include differentiating between measure life calculations for the full lighting fixture compared to bulb-only replacement to increase the duration over which savings can be captured by PAs. We would also encourage the conversation to shift beyond in-building lighting. There has been a significant construction boom in Eastern Massachusetts. Construction sites require 24-hour lighting, and many of the lights in-use are not energy efficient, offering a significant opportunity for savings. A Better City and GRC member, Turner Construction, has conducted pilot tests on its own properties demonstrating significant savings from switching to LED construction lighting. Their success

could be investigated as a potential model for a new incentive program. We are happy to make connections to them as needed.

2. **Focus and Expand Offerings Focus on Tenant Spaces and Plug Loads** – According to the Institute for Market Transformation, tenant loads can constitute 70% of a building's energy usage. This is a significant opportunity for the C&I sector, and was subject to limited discussion during the EEAC Workshops. The Eversource and National Grid Sustainable Office Design program has been supporting tenant fit-outs for the past several years. Eversource also piloted a Tenant Energy Efficiency program for tenant retrofits. We would like to see the Council's recommendations focus on increasing energy efficiency savings from both tenant fit-outs and retrofits building on lessons learned from these programs. For tenant-focused programs to succeed, more investment is required in new types of communications strategies and marketing to bridge the landlord-tenant divide. We would like to see additional tenant-focused strategies integrated into the Council's recommendations and the three-year plans.
3. **Offer Expanded Training through Mass Save and Simplify/Streamline the Application Process** - Significant energy savings opportunities are lost due to information and knowledge gaps. For example, high performance buildings are failing to meet their energy savings targets because facilities managers and building operators struggle with new building automation controls and technologies. In addition, these same individuals are often unclear how to utilize the existing Mass Save trainings and incentive programs, lack the time and/or knowledge to complete the 'paperwork', and/or find the process cumbersome or in need of streamlining. We urge the Council and the PAs to consider increased trainings for the C&I sector on Mass Save program offerings and technologies and create an ombudsperson or similar outreach program to increase the ease of participation, especially for mid-sized customers. We are aware that the utilities are working on piloting a training program targeted at municipal customers, but other C&I customer segments have a similar need for immediate support if C&I goals are to be met.
4. **Increase Financing Support and Continue to Coordinate with Mass Development** – In the fall, draft Massachusetts PACE loan program rules were released for public comment and review. The commercial PACE model has successfully encouraged renewable and energy efficiency investments within Class B buildings in the neighboring state of Connecticut. It is likely that there will be PACE projects, which are funded during the 2019-2021 planning term. The utilities should consider the best ways to integrate the Mass Save incentives and financing with the PACE program in terms of streamlining paperwork and logistics, savings calculations for energy efficiency targets, and encouraging deeper energy efficiency investments. We would also encourage the utilities to consider other financing options, such as on-bill financing for the C&I sector to improve customer uptake of existing Mass Save loan products and program offerings. The flexibility and ease of on-bill financing is of significant interest to C&I customer pursuing major energy conservation projects.
5. **Increase Continuous Commissioning through Stronger Support for C&I Data Acquisition** including software, improved data granularity / submetering when tied to deeper, more durable savings goals, including adjustments to the M&V framework. We ask the Plan more

strongly support energy data acquisition for, and management of, high-energy use legacy equipment with long life-spans in manufacturing, processing and especially health care.

- 6. Study the Incorporation of Resilience Considerations into Efficiency Programs** - Within the City of Boston and elsewhere, power and infrastructure have begun to be integrated into conversations about energy efficiency, preparedness and resilience. In recent years, Eversource has assisted projects with elevating electrical equipment out of harm's way, often as part of enabling exceptional building energy efficiency performance. Resilience actions can reduce the need for the most expensive types of post-event utility repairs (providing NEBs), while integrated energy efficiency efforts help lower the initial costs of resilience investments. Highly efficient buildings designed or renovated for passive survivability support occupant health and safety during an emergency, and support business continuity during and after extreme weather and other disruptive incidents. The utilities have not committed programmatically to integrating discussions of resilience and efficiency. We urge the Council to direct the 2019-21 plan include study of the potential benefits of integrating energy efficiency with improved preparedness and resilience for potential inclusion within the 2022-24 plan.
- 7. Increase Savings from Utility-sponsored Demand Management Programs** based on Eversource, National Grid, and other utilities' work on a series of demand response pilots for residential, commercial, and industrial customers. Following the results of the pilots, comments and feedback, a set of market-ready demand management programs should be made available in the 2019-2021 plans.
- 8. Continue to Expand Savings from Combined Heat and Power** – Since 2018 significant contributions to C&I savings targets from CHP have been realized. However, project development cycles are long. The utilities need to commit to continuing to improve the CHP pipeline while recognizing the customer acquisition cycle for CHP projects can be a multi-year effort.

These comments are based on consensus within the commercial real estate and health care working group membership, which constitute the area's major hospitals and office building portfolios. As energy efficiency savings targets increase and lower hanging energy efficiency savings are depleted, increasing C&I sector savings will become increasingly important. We must investigate and pursue all available avenues for cost-effective strategies within the C&I sector.

Thank you for your time and attention, and we look forward to continuing to engage with you on these matters.

cc: GRC CRE HC WG membership