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## **COMMENTS TO THE EEAC on the MASS SAVE PROGRAM** ***Supplement to statement given at December 14, 2020 Listening Session***

Thank you for the opportunity to comment on the Mass Save program, and for allowing the public to participate in Listening Sessions. We recommend holding more widely publicized Listening Sessions. Though the EEAC was careful to schedule Listening Sessions at different times of day to accommodate different work schedule availabilities, general lack of awareness by the wider general public limits their ability to participate in offering feedback. Feedback of the customer experience directly from customers could be a very insightful and useful element in fine-tuning the program.

### **ADMINISTRATION OF ENERGY EFFICIENCY PROGRAMS:**

It is evident from our experiences in trying to connect members of our community most in need and trying to work with the Program Assistants that a wholesale change in the underlying structure of our state's Energy Efficiency program is warranted. It is a conflict of interest that for-profit companies selling energy are also the entities in charge of administering programs to cut energy use. Many of the examples we can provide of areas in need of improvement are based on anecdotal observations while working in our community because there is very little data actually provided from the PAs for us to conduct comprehensive analysis.

### **COMMUNICATIONS:**

Being large corporate structures, the Program Administrators do not have responsive lines of communication meant to guide large numbers of people with a wide array of life situations and experiences through a complex process. At best, the large nets the corporations cast catch some big fishes, but allow the far larger number of smaller fish to fall through the gaps. Their marketing materials are intentionally vague, for fear of liability if misunderstood, or to avoid the need for a multiplicity of specially targeted sets of materials. They are largely targeted to people connected to broadcast and social media. When we poll in low to moderate income neighborhoods in our community, 70% of folks haven't heard of Mass Save, but when we describe the incentives, about 55% of folks in the same neighborhoods are interested in participating.

There are also questions we encountered during our community outreach that PAs could not readily answer. Two of the most frequent were: is there any way signing up for Mass Save could alert ICE to a particular household; is there any way those participating in Mass Save could lose their legal green card status under the Trump administration's "public charge" policy. This is because of the often unclear nature of Mass Save. Who is behind the program? Is it a government agency? Clearer communications from the Mass Save program could help alleviate some of those concerns.

As a “Municipal Partner” during this past year, we found our own communication with community organizations was greatly restricted and delayed by the requirement that all wording used in our communications be reviewed by multiple staff members of the PAs. This process sometimes took weeks, and sometimes was only resolved by pressing for permission to move ahead after weeks of no response, sometimes even as limited time offers were coming close to ending. Questions of trust also arise when non-profits find themselves representing utility companies that have adversely impacted underserved communities with ever-higher rates, frequent shut-offs and high reconnection fees. The required use of in-program jargon by municipal partners only serves to reinforce mistrust of the program, no matter who is delivering the message.

***The corporate communication structure of the PAs lack the nimbleness and responsiveness to respond to shifting community dynamics and spontaneous opportunities, and we, by extension, were often held back in being tied to their processes.***

#### **DATA:**

The Program Administrators also either fail to collect, or too closely guard data on energy efficiency program participation. It’s daunting that even after working with representatives from the utilities for the past year, we can’t quite tell what data they don’t have or are unauthorized to share. Even under the auspices of the “Municipal Partnership” program, our organization was denied access to data that could help us determine where best to direct our efforts.

#### ***Data we could use includes:***

- What level of participation from various demographic sectors: income, race, language, age of participant, age of home structure, renter vs. owner, landlord, business by sector (service, retail, professional offices, etc.), geographic location down to zip code or street name level
- At what point do people initially interested in MassSave drop out of the process of completing the recommended work? Numbers for each step in the process, hopefully tied to the same demographic sectors mentioned above.
- Which demographic groups are most likely to complete all recommended work?
- Who are repeat customers that come back after the requisite amount of time has passed between assessments?
- Is there a registry of satisfied customers who are willing to provide comments or talk about their experience?
- What incentives are the most commonly accepted offers? Which are the least?
- What is the range of energy savings for each type of customer?  
(broken down by building type and size)
- What is the average % of energy savings for each type of incentive?
- How many Mass Save participants for each municipality?
- Information on how the program is currently marketed. This information could inform community organizations’ efforts by allowing us to look for gaps in outreach and making sure we’re not doubling efforts already made by Program Administrators.

What is also disconcerting is not knowing what other data could prove useful. We don’t really know what other information we don’t know.

## **NETWORKING BETWEEN ENTITIES:**

One of the most often cited obstacles to following through from an initial call to Mass Save and completing recommended upgrades is the need for the would-be Mass Save customer to contact a dizzying array of different entities.

It can be a daunting task for anyone working multiple jobs, a single parent already pressed for time, anyone for whom limited English proficiency becomes a barrier or anyone mistrustful of the utilities and/or banks to get and keep in touch with the many entities needed to complete a recommended Mass Save action plan.

These can include:

- Mass Save (initial intake)
- CAP Agencies
- Energy Assessment professionals
- Pre-weatherization grant application offices
- Pre-weatherization contractors
- Weatherization contractors
- Banks that can issue HEAT loans
- Retailers for recommended appliances
- Rebate process through Mass Save

There is no one contact to check back in with if questions come up, sometimes leading to a cyclical referral back and forth between parties that causes some to give up. There is also no advocate to call on if roadblocks emerge, such as a dispute over qualification for working with a CAP agency or LIHEAP, or suspected discrimination in lending.

## **A BETTER SOLUTION:**

Decoupling Mass Save or any other future energy efficiency programs from the utilities could resolve many of the issues faced by community-oriented organizations who are trying to connect those least likely to participate

Community-based, not-for-profit organizations are best suited to offer a one-stop source for guidance in dealing with all the entities necessary to complete meaningful energy efficiency upgrades. One prime example is the comprehensive services offered by the non-profit Center for EcoTechnology (CET). They offer assessments and coordination with contractors from start to finish.

A selected community-based organization with sufficient funding can interact at a personal level with members of other community organizations: houses of worship, civic groups and clubs, activist organizations, support organizations like housing, food, clothing, child services, immigration and legal & equity aid organizations.

With funds, training and support from the energy efficiency fees managed by a state regulatory agency instead of a confusing amalgamation of for-profit corporations, the entire process could be streamlined through a network of organizations already on the ground and connected to the communities they serve. More smooth and inclusive participation can be facilitated with enough funding for a few staff members to properly guide participants through the program, help them

connect with the necessary support systems, and gather data on participation, and a budget for print materials and a couple of targeted mailings. There would only be a need to focus on accuracy of the information provided and positive outcomes, instead of a focus on the preferred marketing language of multiple multi-million dollar corporate entities trying to keep customers using enough of their product to keep their business model viable.

**The importance of energy efficiency in our state's climate goals is often mentioned by DOER. It also can play a significant role in our economy and public health. It should be streamlined and optimized.**

**We realize that a complete restructure of the program would probably need to include legislative change of the program's mandate, but we recommend that the EEAC embrace this sorely needed change by recommending funding and administration of Mass Save be turned over to a network of community-based, grassroots agencies and organizations, overseen and supported by a state agency responsible for the well being of Massachusetts residents and meeting our state's climate goals, not meeting stockholder dividend expectations.**

*Respectfully submitted,*



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*Rosemary Wessel, Program Director  
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*Cc:*

*Charles Baker, Governor of the Commonwealth of Massachusetts  
Attorney General Maura Healey  
Department of Energy Resources*