



To: The Massachusetts Energy Efficiency Advisory Council (EEAC)

From: The Boston Green Ribbon Commission Commercial Real Estate Working Group

Re: Public Comments on the Draft Three Year Plans Presented at the comment period, 06.27.18 from 1-4pm.

Good afternoon,

I am providing feedback on behalf of the Boston Green Ribbon Commission Commercial Real Estate Working Group chaired by A Better City. We would like to thank the EEAC and the PAs for the opportunity to share our remarks. In addition to my comments, the Green Ribbon Commission has submitted detailed written feedback on the Three-Year Plans.

The Boston Green Ribbon Commission or GRC includes some of the largest commercial and industrial accounts in metro Boston. The Commercial Real Estate Working Group members still observe significant opportunities for energy savings in their buildings including, but not limited to opportunities from linear lighting, construction lighting, combined heat and power, and improving building operators' knowledge of advanced building management systems. Our members have also expressed significant interest in energy storage and demand management for their portfolios. Several organizations have buildings participating in the ACES program. Given this, we are dismayed by the significant decrease in the C&I savings target and the size of the demand management program, given the potential studies from the EEAC Consultants and these observations from our membership. In the next draft, **we would like to see an increase in the C&I efficiency target and a more expansive active demand management program, including both summer and winter.**

We also have concerns about the plan's lack of specificity. In the plan, the utilities shared their segmentation of the C&I sector, but offered no details on the available offerings or solutions for each segment. We also do not have a clear understanding of the performance of previous pilots and programs for the commercial real estate sector from the last plan. During the last planning cycle, A Better City represented the GRC on a statewide Commercial Real Estate Working Group, which identified the high contribution of tenants to commercial energy usage. We commended the creation of the Sustainable Office Design Program and the Eversource Tenant Energy Efficiency Program, but we, our constituents, and the Council do not have a clear understanding of how these or other program options identified during the state Commercial Real Estate Working Group process, performed. **In the next draft, we would like to see additional specificity on existing and new programs for the C&I sector, and would greatly appreciate clarity on existing and new offerings designed to address growing energy usage in tenant spaces.**

We and the other GRC Working Groups are available to discuss our concerns with the PAs prior to the submission of the next draft. In addition, we would welcome the opportunity to regularly receive updates and provide feedback on the C&I programs via a mechanism similar to the State Commercial Real Estate Working Group convened with DOER, the Council and utilities during the 2015-2017 planning cycle.

Thank you for your time and the opportunity to speak.