



May 26, 2021

Members of the Energy Efficiency Advisory Council,

We appreciate the efforts that the EEAC and the PAs have made to align the 2022-2024 plan with the climate goals of the Commonwealth, as well as the priorities of electrification, equity, and workforce development. In the interest of making this plan as effective as possible, we'd like to make some high-level suggestions.

Tracking greenhouse gas emissions alongside energy savings, and the upcoming addition of an emissions reduction goal, is encouraging, but in order for emissions to truly be an equal (or even primary) priority for the PAs, that goal must be tied to PAs' performance incentives. Please keep this in mind as performance incentives are negotiated later this year.

On some level, this plan doesn't feel as transformational as it needs to be in a time of increasing baselines and lost lighting savings. The PAs need to be doing more market transformation, along the lines of their successful appliance standards work. Advocacy for building code improvements and building performance standards should be just the first step. The PAs should look toward NYSERDA's RetrofitNY or RMI's REALIZE program, innovative models that strive to reduce the cost of deep energy retrofits by aggregating demand and coordinating the supply chain for standardized, scalable solutions, to the point where deep retrofits are competitive with a business-as-usual approach.

We're happy to see that the PAs have committed to ramping up heat pump installations and encouraging weatherization in order to make them more successful. However it doesn't seem like those installations are ramping up quickly enough to meet the state's emissions reductions goals, and it's unclear whether there's adequate tracking of electrification in custom projects. We're particularly interested in a customized electric conversion approach for income-eligible multifamily and want to make sure that the support offered there meets the need that we've seen.

Combined heat and power (CHP) continues to be a large source of savings in this plan, representing a long-term investment in large natural-gas-consuming projects. As we move toward a long-term statewide goal of net zero emissions by 2050, such investments seem increasingly short-sighted. The technical advisory group for our building emissions performance standard identified multiple models for decarbonizing district energy systems, and the PAs should be a driving force behind implementing such models in Massachusetts.

Lastly, the PAs have made great strides in setting equitable engagement goals. We hope the PAs fully embrace these goals and we see strong results from them over the next three years.

Reverend Mariama White-Hammond, Chief
Cabinet of Environment, Energy and Open Space

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