



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF  
ENERGY AND ENVIRONMENTAL AFFAIRS  
**DEPARTMENT OF ENERGY RESOURCES**  
100 CAMBRIDGE ST., SUITE 1020  
BOSTON, MA 02114  
Telephone: 617-626-7300  
Facsimile: 617-727-0030

**Charles D. Baker**  
Governor

**Matthew A. Beaton**  
Secretary

**Karyn E. Polito**  
Lt. Governor

**Judith F. Judson**  
Commissioner

October 19, 2016

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, Fifth Floor  
Boston, Massachusetts 02110

Re: Department Review of 2013-2015 Energy Efficiency Investment Plan Term Performance Reports; D.P.U. 16-120 through D.P.U. 16-130.

Dear Secretary Marini:

On behalf of the Energy Efficiency Advisory Council (“Council”), please accept the following initial comments on the 2013-2015 Massachusetts Energy Efficiency Investment Plan Term Performance Reports (“Term Reports”) of each Program Administrator (“PA”), and the Statewide Filing Materials (Appendices B +D), in order to inform the Department of Public Utilities’ (“Department”) review of the Term Reports.<sup>1</sup> The EEAC and its consultants continue to evaluate the Term Reports.

The Council recognizes and appreciates the tremendous effort that the PAs have brought to the development and implementation of the 2013-2015 Joint Statewide Three-Year Energy Efficiency Investment Plan. The Council has received the Term Reports submitted by the PAs to the Department on August 1, 2016, and congratulates the PAs for exceeding their overall lifetime

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<sup>1</sup> See generally, *Investigation by the Department of Public Utilities on its own Motion into Updating its Energy Efficiency Guidelines*, Order D.P.U. 11-120-A, Phase II (January 31, 2013)(adopting revisions to the Department’s Energy Efficiency Guidelines). “The Department will review the Energy Efficiency Three-Year Term Performance Report to determine whether the Program Administrator (a) reported its program savings, benefits, and costs accurately and reliably, and (b) implemented its Energy Efficiency Plan during the term in a manner that is consistent with its Department-approved Energy Efficiency Plan....Pursuant to the results of [the Department’s] investigation of the Energy Efficiency Three-Year Term Performance Report, the Department will approve recovery of (a) actual costs incurred during the term, (b) actual performance incentive payments earned during the term, and (c) actual lost base revenue during the term, where applicable.” *Id* at Appendix, Energy Efficiency Guidelines sections 4.1.1 & 4.1.2.

savings goals for both electric and gas. The Council also applauds the more than \$9 billion in economic benefits which the PAs achieved through implementation of the Plan. This achievement clearly demonstrates the value of energy efficiency to the Commonwealth.

The Council recognizes that the PAs, having set high targets for savings in each sector as a group, appropriately utilized the flexibility of the mid-term modification process to increase funding for residential and low-income programs, allowing them to surpass overall savings goals.

The Council looks forward to continuing to collaborate with the PAs to achieve the high goals set forth in the 2016-2018 Plans, which were set in such a way to increase the likelihood that the targets in every sector will be met or surpassed, as well as planning for the 2019-2021 Joint Statewide Energy Efficiency Investment Plan, in order to deliver cost effective energy efficiency consistent with the objectives of the Green Communities Act, the Global Warming Solutions Act, and the Massachusetts Clean Energy and Climate Plan.

Respectfully submitted,

On behalf of the Energy Efficiency Advisory Council,

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF ENERGY RESOURCES**

By its attorney, [NAME]

Steven I. Venezia  
Deputy General Counsel