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COMMENTS TO THE EEAC on the 2019-2021 ENERGY EFFICIENCY PLAN DRAFT

Please accept the following comments from Berkshire Environmental Action Team, Inc. (BEAT) whose mission is to protect the environment for wildlife in support of the natural world that sustains us all, and No Fracked Gas in Mass whose mission is to stop the expansion of fossil fuel infrastructure in the Northeast states and to promote energy efficiency and sustainable, renewable sources of energy and local, permanent jobs in a clean energy economy.

- **Performance incentives – more money paid to the Program Administrators (PAs) for achieving lower goals is unacceptable.** The plan, as drafted, proposes increased performance incentives, but delivers significantly less in total benefits without explanation as to why.
- **Enhanced incentives offered for gas conversion are not acceptable.** Energy Efficiency dollars should be invested in ways that drive conversion to beneficial electrification, NOT conversion from oil/propane to gas, and not biomass. This should include incentives for swift and widespread adoption of high-efficiency cold weather heat pumps, tankless electric water heaters and induction cooktops.
- **Beneficial electrification needs to be the core feature of any modern energy efficiency plan.** This would allow fuel switching to high-efficiency electric heating, hot water and cooking.

Among other solutions, one means to driving conversion to electrification could be to extend the [Solar Access pilot program](#) statewide to allow customers to access incentives for adding high-efficiency cold weather heat pumps and the solar panels to run them. This program allows households to drastically cut or eliminate their need for fossil fuels, helping drive compliance with the [Global Warming Solutions Act \(GWSA\)](#). It also requires customers to have a Mass Save Energy Audit, which is the key to accessing many incentives for boosting energy efficiency.

Beneficial electrification should be a priority focus for cases where starting new energy systems from scratch becomes necessary, as in the homes and businesses affected by the [Columbia Gas system failure in the Merrimack Valley](#), or in any new construction or renovation where replacement of energy systems is required.

See comments on including community partners in outreach implementation below.

• **Incentives for landlords & renters** - Aside from continuation of the 90% incentive for landlords, the current draft of the Energy Efficiency Plan does not clearly outline incentives for renters and landlords. What provisions are there for renters whose landlords are reluctant to participate? How can landlords be incentivised to participate even if their renters pay their own utility bills? With over a third of all household in the state being renters, full access to energy efficiency programs by this underserved segment of the population could go a long way to helping the state reach its Global Warming Solutions Act goals.

• **Outreach for energy efficiency and energy conversion programs needs to be partnered with trusted community assistance groups.** Community aid organizations have a first-hand knowledge of the barriers that low income, communities of color and non-english-speaking residents may face and can help bridge the gap, making benefits of existing programs accessible and implementable for a significantly larger portion of the population. Many, such as the Berkshire Community Action Center, also help with gap coverage for households that can't afford to pay their percentage of energy efficiency measures. Giving these organizations a voice when determining how to craft and implement these programs should be standard practice.

• **Data transparency** - Data transparency is essential to decision making by the Council and accountability to the public, who are paying for these programs through their utility bills. The basic questions of where the dollars are going, how being used, and are they being efficiently used need to be readily answerable to consumers and community assistance groups.

Thank you for considering our comments.

Sincerely,



Berkshire Environmental Action Team
Jane Winn, Executive Director



No Fracked Gas in Mass
Rosemary Wessel, Program Director