

My name is Kai Palmer-Dunning and I am submitting a comment on behalf of Massachusetts Climate Action Network . Thank you to the Council and to the Program Administrators for taking our comments

MCAN works with our 50+ chapters and thousands of members across Massachusetts to implement climate solutions in their communities. Many of our chapters are very interested in doing local outreach and programs for energy efficiency with renters and moderate income residents, however they are limited by what Mass Save has to offer. Additionally they are interested in net zero planning and want to see enhanced beneficial electrification and to further address barriers to passive house building standards.

We have reviewed the draft plan and have some serious concerns that need to be addressed. MCAN representatives have been attending these council meetings for the past 6 months and we have given comments throughout the process.

1. First, I want to lift up all of the Green Justice Coalition's concern and say that we agree. The moderate income no-cost weatherization plan needs more detail, namely a definition of moderate income, addressing the barrier of verification, and an implementation timeline. For languages, french/french creole should be prioritized, and for renters there should be additional measures described to increase the landlord conversion rate and the renter's participation.
2. The savings goals need to *at least* match the consultant's recommendation. The recommended goals were extensively studied and there's no reason to go lower. The plan should be amended to at least meet the 2.9% savings for electric and the 1.25% savings for gas sales as recommended.
3. Performance incentives should be given only when the benefits are aligned with substantial goals. Additionally the incentives still need to be tied to improvements for the three populations, moderate income, renters, and non-english speakers, who have been failed in the past.
4. Eliminate the enhanced incentives for gas conversion and replace them with beneficial electrification incentives. Enhancing incentives for gas conversion is not acceptable, gas incentives go against the EEAC's own policy statement, so to vote yes on expanding those would be to vote against your own policy platform.
5. And finally, we thank the program administrators for incorporating training for passive house building standards but we believe the goals should be more robust. The scale of the problem should fit the scale of the solution so we would like to see a higher goal for the number of trained professionals, and more specifics for who will provide training and how much funding will be allocated.