

MA EEAC / Three Year Plan Review Comments

Eric Beaton / DHCD

Specific Thoughts:

- 1) Page 11 / I am OK with the new proposed concept of Energy Optimization if: A) Customers receive the benefits of PA's addressing all applicable fuel energy savings in kind of a "one stop shopping" program while at the residence, and B) The PA's will still be able to break out electric, gas, fuel oil, etc. savings (as noted on page 12) for the Council and not just a sole MMBTU savings figure.
- 2) Page 28 / The "customer-centric approach" is discussed. Will prospective customers have a dedicated "account executive" employee assigned to them or will it be different contacts throughout the process like a call-center approach? I'd like to see the former in place. Will the personal approach be truly personal? Please clarify.
- 3) Page 30 / It notes that various entities will be able to say "yes" to customers, but how will all these various entities become knowledgeable about the variety of offerings? Will there be trainings? Please elaborate.....
- 4) Page 32 / I believe that designers/architects should be listed here as well as the listed builders and customers. Builders, if not the designers themselves, build to the specs. of the designers. It is critical for the PA's to find a way to educate the design community as to the incentive/customized programs available. How will the PA's educate out-of-state designers doing projects in Massachusetts? How can the PA's get to out-of-state firms early on in the process?
- 5) Page 32 / I support the initiative for additions and renovations.
- 6) Page 40 / Regarding the section on serving all customers, PA's might consider utilizing native speakers (i.e. Spanish, Chinese, French, etc.) through a translation services company for presenting energy efficiency concepts to different populations? A "Speaker's Bureau" concept where trained trainers could go out to community groups and speak about energy efficiency programs along with a PA staffer to answer questions. It may be less threatening to have a presentation by a native language speaker. This might help address the many comment by Public Commenters who have expressed concern that various ethnic groups have low participation in the programs. Could be a good strategic enhancement addition to Page 43.....
- 7) Page 48, 49 / The HEARTWAP program name is incorrectly noted. The correct name is: "Heating Emergency Assistance Retrofit Task Weatherization Assistance Program".
- 8) Page 49 / This is a concern to DHCD: It notes that "federal money will primarily be used to address H&S issues as well as repairs". If federal WAP dollars through DHCD are being used for H&S and/or repair work, DHCD and WAP (not the PA's) must claim the energy savings for certain (not all) measures related to the repairs for which were paid. The current wording does not indicate this to be true. If the PA's pay for major H&S

and/or repairs, then the PA's (not WAP) should be able to claim the energy savings from certain (not all) installed measures. Contact me if you need further clarity.

- 9) Page 49 / It is noted that "DHCD performs another level of visual inspection for 20 percent of all DOE-funded projects." This sentence should be changed and have an addition to it that reads, "DHCD Technical Field Monitors perform another level of visual inspection for 20 percent of all DOE-funded projects; 10 percent of these total units also receive a full Quality Control Inspection (QCI) that includes complete testing on the dwelling (i.e. blower door, CAZ, etc.)."
- 10) Page 53 / Under Existing Buildings C&I program, mention is made of retro-commissioning. Under the New Buildings program, is there a plan to do commissioning to ensure the building is operating in the first year+ as it is supposed to be operating?
- 11) Page 53 / I like the approach here.....things like targeting franchises, expanding upstream, etc.
- 12) Page 55, 56 / It is discussed that the PA's will try to engage designers as early in the process as possible. What will be the median to do this? Will contact data be tracked?
- 13) Page 57 / For Codes and Standards, are the PA's directly working with DOER on appliance standards currently or plan to during 2019-2021? If there will be collaboration with DOER, it should be noted here for the record (like such collaboration is noted on page 71 under "municipal"). Appliance standards remain a largely untapped means of statewide savings.
- 14) Page 65 / I support the "Main Street" effort for small and very small businesses. Working with and having support from a city/town official (like an Energy Manager, Business Manager, etc.) should help promote the effort. "Word-of-mouth" amongst businesses might be key to success as well.
- 15) Page 77 / I highly encourage the translation of the Mass-Save website into additional languages (i.e. French, Russian, Chinese, Creole, Khmer, etc.).
- 16) Page 86 / The Plan indicates no pilot projects are planned. Given the Plan's earlier mention of passive house efforts, and given that passive house is a newer concept/type of building effort, would it not make sense to fund a pilot project for passive house? What is the PA's rationale for supporting no pilot projects? I'd be in favor of pilot projects to show replicable savings potential of various housing types.

Overall Thoughts:

1. I was pleased to see some new approaches to energy savings (i.e. comments 5, 11, etc. from above) noted throughout the plan. Trying to get at savings by doing things a bit differently could be good (or not), but with savings becoming harder to find, new approaches and methods are certainly worth trying.
2. The Plan, however, often seemed to lack specifics regarding implementation efforts for various initiatives. This makes me leery. I'd like to see greater detail throughout the Plan with specifics on how concepts will actually be implemented (understanding that specifics may need to change throughout the Plan period).