



43 Equity Working Group noted that the April Draft Plan lacked necessary programmatic details and specific  
44 budget commitments.<sup>4</sup>

45 On September 17, 2021 the PAs submitted updated data tables and a presentation of program  
46 enhancements that reflected changes to the April Draft Plan, and on October 6, 2021, the PAs submitted  
47 an updated Plan narrative (collectively, October Draft Plan). The Council offers its comments based on  
48 the October Draft Plan, with the expectation that the PAs will file final Statewide Plans with DPU on  
49 November 1, 2021 that are fully consistent with the content of these materials provided to the Council  
50 throughout October:

- 51 1. Draft joint statewide plans dated October 6, 2021;
- 52 2. Term Sheet dated October 24, 2021; and
- 53 3. Revised data tables dated October 24, 2021

54

### 55 **Overall Plan Comments**

56 The Council recognizes and appreciates the significant contributions of PA staff, the Council consultant  
57 team, the Equity Working Group, Councilors, the Low-Income Energy Affordability Network (LEAN)  
58 and stakeholders in preparing the energy efficiency plans. The development of the 2022-2024 Statewide  
59 Plans represents a transformation of energy efficiency programs in Massachusetts to better align with the  
60 Commonwealth’s greenhouse gas and environmental justice goals. The Council commends the  
61 prioritization of electrification, deeper building retrofits, increased weatherization goals and incentives,  
62 workforce development and enhancing support for historically underserved communities and customers.  
63 The Council also commends the PAs on their efforts between the April Draft and the October Draft Plan  
64 to reorient and expand the Plans to achieve EEA Secretary Theoharides’ GHG emissions reduction goals  
65 for the 2022-2024 term. The development of the 2022-2024 Statewide Plans reflects significant  
66 collaboration across PAs and among members of the Council, DOER, the AGO, and stakeholders. These  
67 comments of the Council are based on its review of the October Draft Plan:

- 68 • The Council supports the proposed \$3.94 Billion investment to deliver over \$13 Billion in  
69 benefits to ratepayers.
- 70 • The Council supports the greenhouse gas and energy savings goals in alignment with the Term  
71 Sheet. This includes achieving the aggregate electric and gas combined goals, with at least 94%  
72 of the Secretary’s electric goal. The remaining 6% of the electric goal will be met through  
73 overachieving on the gas goal and, specifically through conversions of natural gas equipment to  
74 highly efficient electric equipment.
- 75 • The Council commends the PAs on their collaboration with the EWG throughout the planning  
76 process and supports the equity goals set forth in the October Draft Plan as a first step in the  
77 equitable delivery of energy efficiency in the Commonwealth. The Council looks forward to  
78 regular updates and reporting on the PA commitments to increase investments in EJ  
79 municipalities and more equitably serve historically underserved populations. The Council  
80 expects the PAs to continue to engage with the EWG during development of new initiatives and  
81 design and implementation of EWG recommendations as well as Plan implementation, with a  
82 focus in 2022 on strategic and innovative renter/landlord engagement and moderate-income  
83 program design.
- 84 • The Council acknowledges the PAs proposed increase in workforce development investments for  
85 the 2022-2024 Plan term and emphasizes the importance of equitably growing the workforce to  
86 achieve the Commonwealth’s climate goals, continuing to increase the PAs’ equitable workforce  
87 development investments, and coordinating with the Massachusetts Clean Energy Center to  
88 maximize our collective interests.

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<sup>4</sup> [https://ma-eeac.org/wp-content/uploads/FINAL-July-Resolution\\_Adopted-7.28.21.pdf](https://ma-eeac.org/wp-content/uploads/FINAL-July-Resolution_Adopted-7.28.21.pdf)

- 89 • The Council expects that the individual PA Plans will remain fully consistent with the October  
90 Draft Plan.
- 91 • The Council recognizes that performance incentives are an integral part of the planning and  
92 implementation of the energy efficiency programs. The Council accepts, consistent with the  
93 DPU’s Energy Efficiency Guidelines at Section 3.6, the performance incentives set forth in the  
94 October Draft Plan. The new performance incentive mechanism includes components and  
95 individual thresholds for core energy efficiency, energy efficiency and electrification for EJ  
96 municipalities, and electrification. The Council also accepts the removal of the value component  
97 in the 2022-2024 Plan Term to ensure the PI mechanism is fully aligned with the EEAC’s equity,  
98 electrification, and workforce development priorities.
- 99 • The Council, Council consultants, and PAs will continue to work collaboratively and  
100 transparently throughout the three-year roll-out of the individual Plans, in accordance with the  
101 GCA, through continued quarterly reports, monthly data dashboards, and specific updates at  
102 Council meetings that focus on topics requested by the Council. We expect the PAs to  
103 consistently engage with the Council and its consultants proactively to analyze new lessons  
104 learned (especially around equity, workforce development and electrification), develop  
105 adjustments, and put them into practice. The Council also looks forward to engagement and  
106 updates on the newly formed Commercial and Industrial Customer Working Group starting in  
107 2022.

108  
109 **Council Comment on Priorities**

110 In its March Resolution, the Council set specific priorities for the 2022-2024 Plan that support continued  
111 robust energy efficiency and GHG mitigation, while ensuring that goals are met equitably and cost-  
112 effectively.<sup>5</sup> The Council urged the PAs to develop a plan that includes aggressive GHG emissions  
113 reductions to support the Commonwealth’s goals, through a strong focus on weatherization and  
114 electrification, with significant expansion of heat pump targets, and investments in market transformation  
115 and workforce development. The Council also indicated that the Final Plan should include a strong  
116 commitment and investment in equitable program delivery by increasing participation from  
117 renters/landlords, moderate-income customers, language-isolated customers, Environmental Justice (EJ)  
118 municipalities, and small businesses. The Council requested that the Final Plans, both narrative and data,  
119 support these three foundational principles of GHG emissions reductions, equitable program delivery, and  
120 workforce development. The Council provides its comments on these priorities below.

121  
122 ***Greenhouse Gas Emissions Reductions***

123 Throughout the 2022-2024 Three-Year planning process, including ambitious GHG emissions reductions  
124 has been a top priority of the Council. Specifically, the Council urged the PAs to align the Plan with the  
125 Commonwealth’s GHG reduction goals through a strong focus on weatherization and electrification, with  
126 a significant expansion of the heat pump targets, focus on deep retrofits, reduction in incentives for fossil  
127 fuel equipment, and an investment in market transformation and workforce development. This priority  
128 was underscored by the Climate Act and formalized by Secretary Theoharides’ letter setting GHG  
129 reduction goals for the 2022-2024 Plan.

130  
131 The Council acknowledges and appreciates the PAs’ efforts to meet the Secretary’s GHG goal to ensure  
132 2022-2024 investments are aligned with the Commonwealth’s GHG goals. The Council also recognizes  
133 the increased commitment to electrification and weatherization in the October Draft Plan. Based on the  
134 October data, and in alignment with the Term Sheet, the Council supports the PAs GHG goals and  
135 commends the following commitments:

- 136 • Commitment to heat pump installations with:

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<sup>5</sup> [https://ma-eeac.org/wp-content/uploads/FINAL-EEAC-Priorities-Resolution\\_Adopted-3.24.2021.pdf](https://ma-eeac.org/wp-content/uploads/FINAL-EEAC-Priorities-Resolution_Adopted-3.24.2021.pdf)

- 137 ○ Electric Plan: Approximately 54,000 planned in the Residential sector, 6,650 in the  
138 Income Eligible sector and 32.8 million square feet in Commercial & Industrial (C&I)  
139 sector.
- 140 ○ Gas Plan: Approximately 1,700 planned in the residential sector and 18.9 million square  
141 feet in the C&I sector.
- 142 ● Increase commitment to weatherization.
  - 143 ○ \$xx million for residential
  - 144 ○ \$xx for moderate income
  - 145 ○ \$xx for low income eligible
- 146 ● Addition of an affordable housing multi-family decarbonization retrofit program and C&I deep  
147 energy retrofit offering to be launched in 2022.
- 148 ● Commitment to adding all-electric new construction offerings in both residential and C&I sectors.  
149

### 150 *Equity*

151 Since the early stages of the planning process for the 2019-2021 term, it has been a priority of the Council  
152 to increase participation by, and savings from, historically underserved populations. The Council chose  
153 equity as a priority in an effort to respond to stakeholders and results of the non-participant study  
154 completed in 2019. Two non-participant studies completed in 2020 analyzed existing data and collected  
155 new data to evaluate participation levels and potential unaddressed barriers for residential customers.<sup>6</sup>  
156 This effort was part of a special focus on renters, moderate income, and English-isolated customers. The  
157 studies confirmed that certain identifiable populations participate at lower rates compared to other  
158 populations. For the last year and a half, the EWG has worked to receive feedback and develop solutions  
159 to the unique barriers that hinder moderate-income customers, renters and landlords, English-isolated  
160 populations, and small businesses from fully participating in programs and accessing all program  
161 benefits.<sup>7</sup>  
162

163 Through its efforts, the EWG has worked collaboratively with the PAs and stakeholders representing  
164 Environmental Justice (EJ) communities to develop comprehensive recommendations that seek to address  
165 lower than average participation from these key customer groups. The EWG commends the progress that  
166 the PAs have made since their April Draft Plan to include more of these recommendations. The EWG  
167 would also like to recognize the effort the PAs have made to provide more detailed commitments  
168 regarding the equity-specific investments they will be making over the next three years. Undergirding  
169 these investments is the creation of a new performance incentive mechanism that focuses on accruing  
170 greater program benefits in 38 cities and towns which have higher numbers of EJ populations and lower  
171 energy efficiency program participation. With this new performance incentive mechanism, the PAs will  
172 be incentivized to significantly increase investments in EJ municipalities and underserved populations.  
173 The EWG expects investments in EJ municipalities to increase at a minimum 30% over current baselines.  
174 The EWG agrees that greater benefits delivered to these communities and residents are necessary not only  
175 to better reach those who have been historically underserved, but also to address inequities accrued over  
176 many years. To track progress towards these goals and as further described below, the EWG has  
177 collaborated with the PAs to develop equity-specific targets, with metrics for each of the underserved

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<sup>6</sup> [https://ma-eeac.org/wp-content/uploads/MA19R04-A-NP-Nonpart-MarketBarriersStudy\\_Final.pdf](https://ma-eeac.org/wp-content/uploads/MA19R04-A-NP-Nonpart-MarketBarriersStudy_Final.pdf) and [https://ma-eeac.org/wp-content/uploads/MA19X06-B-RESNONPART\\_Report\\_FINAL\\_v20200228.pdf](https://ma-eeac.org/wp-content/uploads/MA19X06-B-RESNONPART_Report_FINAL_v20200228.pdf)

<sup>7</sup> Separately a C&I non-participant study was conducted in 2020, which identified small businesses and micro-businesses as participating at lower than average rates compared to larger C&I customers ([https://ma-eeac.org/wp-content/uploads/Final-MA19X11\\_B\\_SBNONPART-Report-20200415-1.pdf](https://ma-eeac.org/wp-content/uploads/Final-MA19X11_B_SBNONPART-Report-20200415-1.pdf)).

178 populations in addition to specific metrics focused on EJ Municipalities,<sup>8</sup> community partnerships, and  
179 workforce development.

180  
181 While the EWG supports many of the changes to date, the EWG expects that the PAs will continue to  
182 work cooperatively and proactively with the EWG throughout the implementation of the plan.

- 183 • The Council supports the PAs’ commitment to community partnerships, including the expanded  
184 definition of partnerships and \$7.5 million dedicated to support partnerships with Community-  
185 Based Organization and municipalities.
- 186 • The Council supports the PAs’ commitment to workforce development including their  
187 comprehensive Clean Energy Pathways Program, designed to train and deploy a more diverse  
188 workforce. While this effort is impressive, the Council would like to see this program focus on  
189 the future of the industry, by training candidates primarily for electrification roles and emphasize  
190 job retention and placement in the internship program, especially for people historically  
191 underrepresented in the industry. The Council would also like to see a significant increase in  
192 minority and women owned contractors in Mass Save programming. The Council recognizes that  
193 the PAs will be collaborating extensively with the Massachusetts Clean Energy Center  
194 (MassCEC) on other workforce development efforts and expects that the PAs will commit to full  
195 transparency on these efforts including regular opportunities for input and updates to the Council.
- 196 • The Council expects a more robust and detailed strategy for serving renters and landlords, as well  
197 as significantly higher levels of investment. The October Draft Plan lacks the detail and specific,  
198 new strategies that will be deployed to engage landlords and retrofit rental units. The Council  
199 appreciates the PAs’ commitment to develop a more detailed strategy for serving rental units.  
200 Furthermore, the Council expects the PAs to coordinate and collaborate with the EWG and pilot,  
201 starting in 2022, multiple renter-specific recommendations provided earlier this year by the EWG  
202 and its stakeholders including, but not limited to, referrals, openers and closers, and other  
203 innovative ideas.
- 204 • The Council commends the PAs’ \$136 million investment in and enhanced incentives for  
205 moderate income customers.<sup>9</sup> To ensure these ambitious increases in program participation are  
206 met, the Council expects the PAs to work earnestly to reduce barriers to participation for  
207 moderate-income customers.
  - 208 ○ More specifically the Council insists that the PAs commit to streamlining and simplifying  
209 income verification. The PAs should actively and transparently involve the EWG in the  
210 development and implementation of this process.
  - 211 ○ In addition, the Council requests the PAs to continue working with the EWG to assess  
212 whether the proposed weatherization requirement for moderate-income customers is  
213 appropriate, and consider delaying implementation of the requirement until a  
214 comprehensive delivery model is established. Simplified access to the new moderate-  
215 income offerings is needed not only to address equity issues, but to also meet the  
216 ambitious goals of the Plan.
  - 217 ○ A comprehensive delivery model can ensure that moderate-income customers are not  
218 burdened with the additional responsibility of coordinating with multiple contractors to  
219 complete weatherization prior to HVAC installation, which is a requirement not placed

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<sup>8</sup> Communities selected for EJ Initiatives and the Equity Component of the Performance Incentive meet the following criteria. At least one census block group meets the income criteria and at least one additional criterion (e.g., minority or English isolation); Greater than 33% of the population resides in an environmental justice block group; Consumption weighted location participation rate from the Residential Non-Participant Customer Profile Study does not exceed 32%; Median household income is less than 100% of state median household income; and Municipalities not served by PAs for either electric or gas are excluded.

<sup>9</sup> The PAs note that there will be some overlap of moderate-income, renter and landlord, and pre-weatherization incentives.

- 220 on other residential customers. The EWG recognizes the benefits of a comprehensive  
221 delivery model and urges the PAs to develop one, so that customers can benefit from  
222 appropriately sized HVAC equipment.
- 223 ○ Moreover, the Council requests that the PAs continue to work with the EWG to refine  
224 incentives for HVAC equipment. The moderate-income incentives should be designed to  
225 provide a greater upfront economic advantage to advance electrification over fossil fuel  
226 equipment.
  - 227 ● The Council supports the PAs’ commitment to addressing customer language barriers by  
228 developing a Language Access Plan as expediently as possible. The Council encourages the PAs’  
229 to continue developing language access supports for language-isolated populations that do not  
230 speak the most commonly spoken languages in Massachusetts—Spanish, Portuguese, and  
231 Mandarin.
  - 232 ● The Council commends the PAs’ commitment to 2,100 small business weatherization projects  
233 throughout the Plan term. The Council requests that the PAs continue to work with the EWG on  
234 implementation details to support streamlined participation by small businesses. The Council also  
235 supports the PAs’ targeted efforts to host Main Streets events in Environmental Justice  
236 neighborhoods.

237  
238  
239 ***Workforce Development***

240 The Council recognizes the need for workforce development efforts to focus on cultivating a diverse and  
241 highly skilled workforce to meet aggressive energy savings goals in the upcoming three-year term. The  
242 PAs’ initiatives are primarily focused on recruiting and training diverse new entrants to the field, while  
243 also facilitating upskilling opportunities for existing workers. In addition to their own initiatives through  
244 Mass Save®, the PAs will allocate an annual investment of \$12 million to the Massachusetts Clean  
245 Energy Center (MassCEC) for their own workforce development initiatives as required by the Climate  
246 Act. More specifically the Council supports the PA’s commitment to the following:

- 247 ● Developing the Clean Energy Pathways (CEP) internship program which focuses on attracting,  
248 training, and placing in clean energy jobs young adults who have been historically  
249 underrepresented in the energy efficiency field including women, people of color, multi-lingual  
250 speakers, and residents residing in EJ neighborhoods.
- 251 ● Diversifying the PA pool of business partners through commitments to increasing contracting and  
252 subcontracting opportunities with minority-owned businesses, women-owned businesses, and  
253 veteran-owned businesses (collectively referred to as diverse business enterprises).
- 254 ● Building electrification market capacity by developing heat pump specific trainings for HVAC  
255 contractors and recruiting contractors to participate in a heat pump installer network.
- 256 ● Ongoing collaboration with MassCEC on workforce development efforts.
- 257 ● Funding efforts that grow the field of qualified building automation system technicians and  
258 commissioning specialists, and train customer building operators to ensure that investments made  
259 in controls technologies in large, complex buildings deliver on their full savings potential.

260 To achieve the transformative climate and equity goals in the 2022-2024 Plan, the Council requests that  
261 the PAs commit to the following over the coming term:

- 262 ● Emphasize retention through ongoing support and mentorship and track retention of participating  
263 individuals and contractors in the CEP program.
- 264 ● Evaluate the performance of the CEP internship program and use the findings to help scale the  
265 program over time to train and place more individuals through the program.

- 266 • Continue to establish robust workforce development efforts, with commensurate investment,  
267 outside of the CEP internship program.
- 268 • Provide details regarding ongoing collaboration efforts and strategies with MassCEC to avoid  
269 gaps and overlap in implementation of workforce programs.
- 270 • Grow commercial weatherization in the turnkey small business program, by providing contractor  
271 training for qualified residential contractors to work on C&I buildings.
- 272 • Increase funding for Income-Eligible Sector-specific trainings to a level that is proportional to the  
273 program investment in the Income-Eligible Sector.
- 274 • Set targets, measure progress, and evaluate the success of cross-sector workforce priorities.

275  
276

## 277 **Topic Areas**

278

### 279 ***Residential Sector***

280 The October Draft Plan shows significant progress from April Draft Plan in addressing the Council’s  
281 priorities, particularly in emphasizing electrification and weatherization in the residential sector and will  
282 help achieve the Commonwealth’s GHG goals. To ensure that these ambitious and important goals are  
283 met, the Council requests that the PAs focus on the following programmatic and implementation  
284 strategies over the 2022-2024 Term:

- 285 • Develop a framework for successful achievement of the heat pump numerical goals, in the form  
286 of a comprehensive market transformation plan that includes ground-source, cold-climate air  
287 source and water heating heat pumps, customer education and support, near- and long-term  
288 planning to convert from fossil fuel systems, encompassing all levels of the supply chain and  
289 focusing strongly on education and customer cost management.
- 290 • As part of the expansion in weatherization, coordinate with contractors and update the Council on  
291 insulation contractor pricing in light of variations in materials and labor costs.
- 292 • Implement additional methods for co-delivery of weatherization and heat pumps, including  
293 creating a whole-home, performance-based retrofit program modeled after DOER’s Home MVP  
294 pilot, that goes beyond enhanced incentives to encourage an integrated program to deliver  
295 weatherization and heat pumps for space and water heating, as well as supporting customer entry  
296 through both the Residential Coordinated Delivery and Retail Initiatives.
- 297 • Integrate home energy scorecards into home energy assessments and effectively leverage them to  
298 inform customers about potential impacts of fuel conversions.
- 299 • Implement a fully formed all-electric new construction offer for the 1-4 unit market segment,  
300 with aggressive unit goals to capture higher share of new homes that would otherwise use fossil  
301 fuels.
- 302 • Build on the PAs’ success in 2019-2021 and maintain a robust incentive, technical support and  
303 training infrastructure to promote the continued growth of Passivehouse in multi-family new  
304 construction.
- 305 • Include the Cape Light Compact’s enhanced incentives for income-eligible and moderate-income  
306 new construction, recognizing that the incentives will support equitable service to low-and  
307 moderate-income new construction projects on the Cape & Vineyard and promote strategic  
308 electrification in new construction for these customers and serve to reduce greenhouse gas  
309 emissions.

### 310 ***Income Eligible***

311 The Council strongly supports improvements that have been made in several key areas since the April  
312 Draft Plan, including: 1) increases in the heat pump budget and installation goals for heat pumps (for both  
313 space and water heating), wi-fi thermostats, and envelope measures; 2) reduction in the lighting budget  
314 and installations; and 3) the PAs and LEAN commitments to developing a pay-for-savings offering for  
315 Affordable Multi-Family Deep-Energy Retrofits. The Council expects the Final Plan to ensure equitable  
316 decarbonization such that low-income residents are not left behind, but rather supported, in the transition  
317 to electrification. Over the 2022-2024 term, the Council expects the PAs and LEAN to prioritize  
318 electrification over fossil fuel systems and to limit delivered fuel heating systems, commit to a timeline  
319 for phase out lighting incentives, support uptake of active demand management measures in addition to  
320 wi-fi thermostats, and improve reporting to provide greater transparency around electrification,  
321 comprehensiveness, and equity. More specifically, the Council expects the PAs and LEAN to:

- 322 • Prioritize installation of heat pumps over fossil fuel HVAC and hot water systems, and to  
323 develop and implement supporting strategies, including for heat pump water heaters. For  
324 example, heat pump water heater installation guidelines should identify opportunities and achieve  
325 successful outcomes, provide enhanced workforce training, and prepare and launch customer  
326 education strategies.
- 327 • Prioritize installation of envelope measures in the gas program and reduce reliance on achieving  
328 savings through installation of gas HVAC equipment.
- 329 • Better integrate active demand strategies into the Income Eligible program, including increased  
330 battery storage and EV charging.
- 331 • Provide more detail to the Council on the enhanced strategy for serving small multi-family  
332 buildings, including “naturally occurring” low-income housing.
- 333 • Implement the mixed income protocol for 3- and 4-unit buildings, as well as other strategies to  
334 ensure that customers living in small multifamily buildings are equally and comprehensively  
335 served.
- 336 • Include a commitment to a new KPI that improves transparency by providing information on  
337 comprehensiveness of service broken out by existing fuel and by CAP agency such that progress  
338 can be easily monitored and to facilitate program improvements, such as consistent service across  
339 CAP agency territories.
- 340 • Develop and implement a statewide computerized audit tool by the third quarter of 2022 that can  
341 provide regular, timely, and consistent information to support identification of best practices and  
342 needed continuous improvement as well as reporting to the Council and providing data for  
343 EM&V.

344 ***Commercial and Industrial***

345 The Council supports the increased budget and GHG emissions reductions for the C&I sector from the  
346 April Draft Plan. The Council commends the inclusion of an outline for a deep energy retrofit program  
347 and commitment to launch in 2022. The Council emphasizes the need for a C&I stakeholder and customer  
348 working group as the commercial programs transition and expand and is pleased to see commitment by  
349 DOER and the PAs to co-lead a C&I stakeholder working group beginning in 2022. The Council looks  
350 forward to regular updates on progress of the working group, feedback received, and solutions  
351 implemented. The Council appreciates the reduction in the lighting budget since the April draft plan and  
352 emphasizes the importance of phasing out support for these measures in 2022-2024.

353  
354 The Council expects to continue working with the PAs in the following areas of the C&I programs:

- 355 • Coordinate closely with the Council and the C&I Working Group to provide greater detail on  
356 implementation including strategy, budgets and incentives to achieve energy efficiency and  
357 electrification goals, and opportunities to achieve goals at a lower cost.

- 358 • Increase savings delivered through electric HVAC efficiency including retro-commissioning and  
359 integrated controls as these are effective measures that result in significant savings for existing  
360 buildings.
- 361 • Reduce reliance on fossil-fuel equipment incentives.
- 362 • Implement dedicated strategies for municipal building participation in deep energy retrofit  
363 offering with an appropriate setting of a baseline since these buildings have unique uses and are  
364 frequently repurposed.
- 365 • Include the Cape Light Compact’s (“Compact”) C&I enhancements of up to 100% for target  
366 markets such as municipalities, non-profits, renters and small businesses (including  
367 microbusinesses), recognizing that: (a) the Compact has offered these enhanced incentives as part  
368 of its past program design as a municipal aggregator, which have been deemed reasonable and  
369 appropriate by the DPU for the 2019-2021 Plan; and (b) a statewide evaluation is nearing  
370 completion to provide additional analysis as to whether these incentive levels continue to be  
371 warranted and whether they should be more widely adopted.

372  
373 ***Active Demand Management***

374 The Council supports continuation of the successful Active Demand Management (ADM) programs while  
375 increasing overall demand savings. The Council supports continued increase of storage incentives,  
376 increased participation of direct load control programs, and is pleased to see the commitment to a  
377 statewide offering for electric vehicle charging in Connected Solutions. The Council also expects the  
378 following:

- 379 • Increase participation and reporting of low income ADM offerings.
- 380 • Co-deliver ADM with traditional energy efficiency programs to increase demand savings.
- 381 • Increase participation in direct load control and load curtailment offerings.
- 382 • The Council expects current electric-vehicle charging offerings to continue until the programs  
383 shift to statewide offerings in 2022.
- 384 • PAs should work with ADM vendors on ongoing program changes, soliciting feedback from  
385 industry prior to implementation changes.
- 386 • PAs should continue to focus on storage incentives including continuation of the guaranteed 5-  
387 year performance term.

388  
389 ***Reporting***

390 Transparency and reporting are critical components to assess progress toward the transformational  
391 objectives of the 2022-2024 Plan. The Council supports and appreciates the reporting commitments in the  
392 Term Sheet, including reporting on Equity Targets and Budgets (Term Sheet Attachments A and B) and  
393 Bi-annual reporting on the performance incentive components. The Council looks forward to quarterly  
394 updates on electrification market transformation including heat pump installations by sector, existing fuel  
395 type, and installed system type. The Council looks forward to continuing to receive quarterly reporting on  
396 Key Performance Indicators (“KPIs”) and bi-annual reporting metrics. Additionally, the Council supports  
397 and looks forward to coordinating on development of an income-eligible specific KPI to begin reporting  
398 in Q1 2022.

399  
400 Throughout the planning process, the importance of data transparency has been discussed by the Council  
401 and stakeholders. The Council looks forward to coordinating with the PAs to track achievement  
402 throughout the 2022-2024 Plan term and request regular updates on multi-family savings, participation,  
403 and spending, and regular updates on new initiatives such as the residential and commercial deep energy  
404 retrofit offerings.

405  
406 **Council Decision on Draft Plan**

407 Based on its review described above, the Energy Efficiency Advisory Council respectfully requests the  
408 Department of Public Utilities approve the 2022-2024 Massachusetts Joint Statewide Three-Year Electric  
409 and Gas Energy Efficiency Investment Plans and the individual plans of the Program Administrators, to  
410 the degree that the final filed plans are fully consistent with the Statewide Plans and to the degree that the  
411 final filed plans are fully consistent with the information available to the Council at this time. We further  
412 request that the DPU embrace and reflect the comments above.