Massachusetts Energy Efficiency Advisory Council
Resolution Regarding the 2022-2024 Massachusetts Joint Statewide
Three-Year Electric and Gas Energy Efficiency Investment Plans

October 27, 2021

BE IT RESOLVED THAT:

Pursuant to G.L. c 25, §21, the Energy Efficiency Advisory Council (Council or EEAC) presents the following comments to the Department of Public Utilities (DPU) regarding the 2022-2024 Massachusetts Joint Statewide Three-Year Electric and Gas Energy Efficiency Investment Plans. The Green Communities Act, as set forth in G.L. c 25, §21, directs the Council to review the draft 2022-2024 Massachusetts Joint Statewide Three-Year Electric and Gas Energy Efficiency Plans (Statewide Plans) submitted to the Council on April 30th by the Program Administrators (PAs) (April Draft Plan). The PAs are then directed to incorporate any changes or revisions to reflect the input of the Council into their submittal of the Statewide Plans to the DPU on or before October 31, 2021.

On March 26, 2021, Governor Charlie Baker signed into law An Act Creating a Next-Generation Roadmap For Massachusetts Climate Policy (the Climate Act) which codified the Baker-Polito Administration’s commitment to achieve Net Zero emissions by 2050 and furthers the Commonwealth’s nation-leading efforts to combat climate change and protect vulnerable communities. The Climate Act made significant changes to the Green Communities Act and the Global Warming Solutions Act (the GWSA) including requiring the Secretary of Energy and Environmental Affairs (EEA) to set a goal, expressed in tons of carbon dioxide equivalent, every three years for the succeeding Statewide Plans’ necessary contribution to meeting each statewide greenhouse gas (GHG) limit and sublimit adopted under the GWSA. On July 15, 2021, EEA Secretary Kathleen Theoharides submitted a letter to the PAs detailing the GHG reduction goals for the 2022-2024 Statewide Plans. Since these new GHG reduction goals were issued after the April Draft Plan, the PAs revised the Statewide Plans to meet these new GHG reduction goals (October Draft Plan).

In developing its input on the 2022-2024 Statewide Plans, the Council undertook a comprehensive stakeholder engagement process, starting with six planning workshops as well as six public comment sessions between October 7, 2020 and January 20, 2021. The planning workshops featured in-depth discussion between the Council, PAs and the EEAC Consultants. In addition, the public comment sessions highlighted stakeholder priorities for the 2022-2024 Statewide Plans. The Council also established an Equity Working Group in early 2020, specifically to address issues of equity in the delivery of energy efficiency programs. The workshops and public comment sessions informed the Council’s March 24, 2021 resolution that set forth Council priorities and recommendations for the Statewide Plans, with the highest priorities being electrification and GHG reductions, equity, and workforce development. Lastly, three additional public comment sessions were held in June 2021 to receive stakeholder feedback on the April Draft Plan.

The Council detailed its comments, including the Equity Working Group recommendations, on the April Draft Plan in its July 28, 2021 EEAC resolution to the PAs. The Council was pleased the PAs adopted electrification, equity, and workforce development as key priorities and themes of the narrative. However, the Council noted, in part, that the April Draft Plan lacked detail on program design and evidence of the Council priorities reflected in the proposed budgets, savings goals and benefit cost models. With regard to

---

equity, the Council noted that the April Draft Plan lacked necessary programmatic details and specific 
budget commitments.  

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

1. Draft joint statewide plans dated October 6, 2021; 
2. Term Sheet dated October 25, 2021; and 
3. Revised data tables dated October 25, 2021 

Overall Plan Comments

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

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

---

• Additional, non-ratepayer funding will be an essential tool in 2022-2024 to reduce or offset costs to electric and gas customers. The Council agrees to support the PAs in identifying and seeking out those additional funding sources.
• The Council expects that the individual PA Plans will remain fully consistent with the October Draft Plan.
• The Council recognizes that performance incentives are an integral part of the planning and implementation of the energy efficiency programs. The Council accepts, consistent with the DPU’s Energy Efficiency Guidelines at Section 3.6, the performance incentives set forth in the October Draft Plan. The new performance incentive mechanism includes components and individual thresholds for core energy efficiency, energy efficiency and electrification for EJ municipalities, and electrification. The Council also accepts the removal of the value component in the 2022-2024 Plan Term to ensure the PI mechanism is fully aligned with the EEAC’s equity, electrification, and workforce development priorities.
• The Council, Council consultants, and PAs will continue to work collaboratively and transparently throughout the three-year roll-out of the individual Plans, in accordance with the GCA, through continued quarterly reports, monthly data dashboards, and specific updates at Council meetings that focus on topics requested by the Council. We expect the PAs to consistently engage with the Council and its consultants proactively to analyze new lessons learned (especially around equity, workforce development and electrification), develop adjustments, and put them into practice. The Council also looks forward to engagement and updates on the newly formed Commercial and Industrial Customer Working Group starting in 2022.

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

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

The Council acknowledges and appreciates the PAs’ efforts to meet the Secretary’s GHG goal to ensure 2022-2024 investments are aligned with the Commonwealth’s GHG goals. The Council also recognizes the increased commitment to electrification and weatherization in the October Draft Plan. Based on the

October data, and in alignment with the Term Sheet, the Council supports the PAs GHG goals and commends the following commitments:

- Commitment to heat pump installations with:
  - Electric Plan: Approximately 54,000 planned in the Residential sector, 6,650 in the Income Eligible sector and 34.1 million square feet in Commercial & Industrial (C&I) sector.
  - Gas Plan: Approximately 1,700 planned in the residential sector and 18.5 million square feet in the C&I sector.
- Increase commitment to weatherization.
  - Residential Electric: $257,216,800
  - Income Eligible Electric: $39,816,337
  - Residential Gas: $275,596,773
  - Income Eligible Gas: $66,684,898
- Addition of an affordable housing multi-family decarbonization retrofit program and C&I deep energy retrofit offering to be launched in 2022.
- Commitment to adding all-electric new construction offerings in both residential and C&I sectors.

**Equity**

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

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

---


\(^7\) 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)).
populations in addition to specific metrics focused on EJ Municipalities,\(^8\) community partnerships, and workforce development.

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

- The Council supports the PAs’ commitment to community partnerships, including $6 million dedicated to the Municipal and Community Partnerships program through which the PAs commit to partner with at least 20 qualified Community-Based Organization (“CBO”) teams across at least 30 municipalities to harness their expertise and knowledge of their communities. The Council expects the PAs to engage with community organizations and community leaders in the program design to ensure programs meet community-specific needs.
  - The Council appreciates the PAs additional commitment of $1.5 million new “Open Doors” offering to work with CBOs on residential education efforts for school-age children. However, the Council and EWG expect these partnerships to be additional to the partnership commitment above.

- The Council supports the PAs’ commitment to workforce development including their comprehensive Clean Energy Pathways Program, designed to train and deploy a more diverse workforce. While this effort is impressive, the Council would like to see this program focus on the future of the industry, by training candidates primarily for electrification roles and emphasize job retention and placement in the internship program, especially for people historically underrepresented in the industry. The Council would also like to see a significant increase in minority and women owned contractors in Mass Save programming. The Council recognizes that the PAs will be collaborating extensively with the Massachusetts Clean Energy Center (MassCEC) on other workforce development efforts and its stakeholders including, but not limited to, referrals, openers and closers, and other innovative ideas.

- The Council commends the PAs’ $136 million investment in and enhanced incentives for moderate income customers.\(^9\) To ensure these ambitious increases in program participation are met, the Council expects the PAs to work earnestly to reduce barriers to participation for moderate-income customers.
  - More specifically the Council insists that the PAs commit to streamlining and simplifying income verification. The PAs should actively and transparently involve the EWG in the development and implementation of this process.
  - The Council expects the PAs to coordinate with the EWG during program delivery and emphasize design and implementation including sharing a draft program design of the

\(^8\) 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.

\(^9\) The PAs note that there will be some overlap of moderate-income, renter and landlord, and pre-weatherization incentives.
The Council supports the PAs’ commitment to addressing customer language barriers by developing a Language Access Plan as expeditiously as possible. The Council encourages the PAs’ to continue developing language access supports for language-isolated populations that do not speak the most commonly spoken non-English languages in Massachusetts—beyond Spanish, Portuguese, and Mandarin.

The Council commends the PAs’ commitment to 2,100 small business weatherization projects throughout the Plan term. The Council requests that the PAs continue to work with the EWG on implementation details to support streamlined participation by small businesses. The Council also supports the PAs’ targeted efforts to host Main Streets events in Environmental Justice neighborhoods.

**Workforce Development**

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

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

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

• Emphasize retention through ongoing support and mentorship and track retention of participating individuals and contractors in the CEP program.
• Evaluate the performance of the CEP internship program and use the findings to help scale the program over time to train and place more individuals through the program.
• Continue to establish robust workforce development efforts, with commensurate investment, outside of the CEP internship program.
• Provide details regarding ongoing collaboration efforts and strategies with MassCEC to avoid gaps and overlap in implementation of workforce programs.
• Grow commercial weatherization in the turnkey small business program, by providing contractor training for qualified residential contractors to work on C&I buildings.
• Increase funding for Income-Eligible Sector-specific trainings to a level that is proportional to the program investment in the Income-Eligible Sector.
• Set targets, measure progress, and evaluate the success of cross-sector workforce priorities.

Topic Areas

Residential Sector

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

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

**Income Eligible**
The Council strongly supports improvements that have been made in several key areas since the April Draft Plan, including: 1) increases in the heat pump budget and installation goals for heat pumps (for both space and water heating), wi-fi thermostats, and envelope measures; 2) reduction in the lighting budget and installations; and 3) the PAs and LEAN commitments to developing a customized, flexible offering for Affordable Multi-Family Deep-Energy Retrofits. The Council supports the Cape and Vineyard Electrification Offering (CVEO) recognizing its innovate approach to serving low- and moderate-income residents with a package of clean energy technologies to reduce GHG emissions through electrification.

The Council expects the Final Plan to ensure equitable decarbonization such that low-income residents are not left behind, but rather supported, in the transition to electrification. Over the 2022-2024 term, the Council expects the PAs and LEAN to prioritize electrification over fossil fuel systems and to limit delivered fuel heating systems, commit to a timeline for phase out lighting incentives, support uptake of active demand management measures in addition to wi-fi thermostats, and improve reporting to provide greater transparency around electrification, comprehensiveness, and equity. More specifically, the Council expects the PAs and LEAN to:

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

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

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

- Coordinate closely with the Council and the C&I Working Group to provide greater detail on implementation including strategy, budgets and incentives to achieve energy efficiency and electrification goals, and opportunities to achieve goals at a lower cost. The Council expects DOER and the PAs to consult with the Working Group once established to determine if meeting more than once per quarter will be needed to ensure productive outcomes.
- Increase savings delivered through electric HVAC efficiency including retro-commissioning and integrated controls as these are effective measures that result in significant savings for existing buildings.
- Reduce fossil-fuel equipment incentives.
- Implement dedicated strategies for municipal building participation in deep energy retrofit offering with an appropriate setting of a baseline since these buildings have unique uses and are frequently repurposed.
- Include the Cape Light Compact’s (“Compact”) C&I enhancements of up to 100% for target markets such as municipalities, non-profits, renters and small businesses (including microbusinesses), recognizing that: (a) the Compact has offered these enhanced incentives as part of its past program design as a municipal aggregator, which have been deemed reasonable and appropriate by the DPU for the 2019-2021 Plan; and (b) a statewide evaluation is nearing completion to provide additional analysis as to whether these incentive levels continue to be warranted and whether they should be more widely adopted.

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

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

Transparency and reporting are critical components to assess progress toward the transformational objectives of the 2022-2024 Plan. The Council supports and appreciates the reporting commitments in the Term Sheet, including reporting on Equity Targets and Budgets (Term Sheet Attachments B and C) and Bi-annual reporting on the performance incentive components. The Council looks forward to quarterly updates on electrification market transformation including heat pump installations by sector, existing fuel type, and installed system type and may seek additional reporting frequency and heat pump performance metrics as necessary to ensure alignment with the goals of the Plan. The Council looks forward to continuing to receive quarterly reporting on Key Performance Indicators (“KPIs”) and bi-annual reporting metrics. Additionally, the Council supports and looks forward to coordinating on development of an income-eligible specific KPI to begin reporting in Q1 2022.

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

Council Decision on Draft Plan

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