



July 29, 2021

Massachusetts Energy Efficiency Advisory Council

Commissioner Patrick Woodcock, Chair
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Commissioner Woodcock:

For a just and resilient energy system, Mass Save must ensure equal access to low- and moderate-income households, immigrants, households not fluent in English, and renters.

The Green Justice Coalition brings together community and environmental justice organizations representing over 100,000 ratepayers across the Commonwealth. Like the Energy Efficiency Advisory Council (EEAC), the Green Justice Coalition (GJC) recognizes the importance of equitable participation and savings in energy efficiency programs.

Low- and moderate-income, language-isolated, and environmental justice (EJ) communities represent a significant part of the state's residents and haven't yet been able to participate in the state's energy efficiency programs in a significant way. We see the effort that EEAC—and particularly the Equity Working Group (EWG)—has made to build access for these communities, but greater adoption of energy efficiency among these communities still remains to be seen.

This is a longstanding inequity to which many stakeholders, including GJC, have drawn attention for over a decade. It will not change unless the EEAC issues explicit directives and requirements upon the Program Administrators (PAs).

Toward that end, we reiterate our previous demands to the EEAC:

- **Target communities currently underserved by Mass Save:**
 - Increase the income eligibility threshold from 60% to 80% of state median income
 - Direct additional resources to cities underutilizing Mass Save, including low-income communities, communities impacted by COVID, and language-isolated communities
 - Fund and partner with trusted community organizations to increase participation
 - Identify all points of contact requiring multilingual interaction and provide resources for translation, interpretation, and referral to contractors with relevant language competency
 - Develop a multilingual workforce: apply workforce development and create career ladders for good jobs for multilingual and English learners who are experts in their communities and can help to improve access in language-isolated communities

- Provide funding for common pre-weatherization requirements facing low-income households, including roof repair, asbestos removal, knob and tube wiring removal, etc.
- Customize outreach and incentives to landlords in order to serve more renters
- **Expand program to include more forms of efficiency and resilience:**
 - Include housing retrofits, switching from oil or gas to electric heat pumps, more efficient appliance standards, etc.
 - Include the installation of [electricity storage capacity](#) to increase low-income community resilience to extreme weather events
- **Ensure transparency on energy efficiency equity goals, budgets and spending:** Officials should not support this plan unless there is explicit transparency on the changes made from the last plan (2019-2021), and greater clarity in terms of the equity goals, budget allocation and the policies and practices to reach low-income and language-isolated communities.
- **Expand program targets to match the scope of the Baker Administration’s Climate mandates:** The Baker-Polito Administration’s Clean Energy and Climate Plan calls for a million homes to receive energy efficiency retrofits by 2030. In order to center equity in reaching the 100,000+ retrofits per year needed to meet this mandate, EEAC and the Mass Save program must prioritize the residences of EJ communities.

GJC appreciates the work that the EWG has done to align its list of recommendations with the demands to increase participation for moderate income, language-isolated, environmental justice and renter communities. The Three-Year Plan needs more specific budget commitment and measurable targets in these areas, however. We call upon the EEAC to adopt the EWG’s recommendations for the Three-Year Plan to target investment to EJ communities, to increase the amount from previous plan levels, to monitor utilities’ compliance in meeting these targets, and to ensure greater transparency.

While we demand greater investment in energy efficiency in environmental justice communities, we urge the EEAC to consider the impacts that this investment will have on property values and work to ensure that there are robust protections for vulnerable tenants from this form of “green gentrification,” so that the people we mean to serve do not bear the costs of these improvements. We recommend rent stabilization and facilitating the formation of tenants unions as some key approaches.

Finally, the Green Justice Coalition acknowledges the commitment we share with the Equity Working Group and with the Department of Energy Resources to ensure these demands to improve equity in the state’s energy efficiency programs get adopted by the Department of Public Utilities as part of the final EEAC Three-Year Plan for 2022-2024. We look forward to working together to see these changes through.

Alternatives for Community & Environment
 Chinese Progressive Association
 Coalition for Social Justice
 GreenRoots
 New Roots AME

Boston Climate Action Network
 Clean Water Action
 Community Labor United
 Neighbor to Neighbor

The Green Justice Coalition (GJC) is a partnership of community-based, environmental, and labor allies who lead campaigns that have a meaningful impact on working-class people and communities of color. Together, our members organize and advocate for a just transition to a sustainable economy that allows our communities to achieve environmental and economic justice. [GreenJusticeCoalition.org](https://www.GreenJusticeCoalition.org)