



Energy Efficiency Advisory Council
C/o Judith Judson, Chair/Commissioner
MA Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston MA 02114

February 21, 2019

Green Justice Coalition comments re: 2019-21 Three-Year Energy Efficiency Investment Plan

To all EEAC Councilors:

We have asserted to you before that the untenable situation facing a significant portion of Massachusetts ratepayers, primarily renters, moderate-income homeowners and non-English speakers, is a clear example of **structural racism and class discrimination** in our state energy efficiency program. Over the decade during which they have been advocating for change, these stakeholders directly and through advocacy organizations like members of the Green Justice Coalition (GJC) have laid bare time and again their many barriers to participation and to an equitable share of this program's promised benefits.

These concerns- voiced along with original research, good faith collaboration on programmatic innovations and extremely patient engagement in the formal planning and program development processes- frequently have been met with, after 10 years, what we can only call lame excuses that cement in place a racist and classist system. Oh, we need another study before we can develop an initiative. Well... providing data might risk violating customer privacy. Sorry, there isn't sufficient time to do that- maybe next time around. The result is that for a decade, marginalized groups have continuously been excluded from a system meant to benefit all ratepayers.

We appreciate the efforts of Councilors who worked with us over the recent planning process to develop the promising renter metric and the unprecedented agreement to reserve a portion of the PA performance incentive to actually incentivize performance on renter participation. The Council's unanimous support of the final Plan draft spoke to us as a sign of intent by all stakeholders to move finally towards some measure of equity in the program, and we were fully prepared to sing the state's praises as a national leader. It would be an understatement then, to call 'disappointing' the mean-spirited excision by the Department of Public Utilities (DPU) of relevant language from the Plan as it

was ultimately approved. We can see no good reason for this action and point to it as further proof of structural barriers that reinforce historical patterns of discrimination.

This outcome also brings into stark relief the EEAC's **lack of agency** in guiding the program according to its considered viewpoint. Your strategic investment of time and effort in reaching consensus on a difficult issue has been wasted, in favor of continued domination of the system by a narrow set of interests. In other words, this problem is structural: the design of this program in the enabling statute allows for one person or a small number of actors to subvert the deliberations of the body that is meant to provide oversight and accountability over the program.

Nevertheless, your decision remains. Regardless of re-interpretation by a corrupt DPU, the rationale for the original draft Plan still stands and its logic is fundamentally still sound. Rest assured GJC will continue to use whatever means are at our disposal to ensure these problems are resolved. Meanwhile, we reiterate that everyone on the Council who opposes racism and class discrimination in our society bears an obligation to use their role as a lever to develop and promote structural changes that deliver an equitable program as soon as possible. It is insufficient to rest on ACEEE laurels and accept a flawed program design as 'the best we could do', because fundamental underlying contradictions have not been resolved. We look forward to working with any parties willing to deal in good faith to resolve the serious problems we and others have laid out, in the EEAC and in any other forum that brings us towards justice in these matters.

On behalf of the Green Justice Coalition,

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