

Greetings:

I attended the 5/13/2024 public comment session on the 2025-2027 three-year plan, but did not comment. I am not an expert in this area but am a thoughtful citizen with serious concerns about the world we are leaving to our grandchildren and the conditions of life in low income households right now. Here are my thoughts:

Overall, the plan seems good. There are, however, some areas that I feel could be improved.

Amount of work in low income neighborhoods:

The amount of work done on energy improvements and improved weatherization conducted in neighborhoods with low income residents should be substantially increased by stipulating a minimum percentage of dwellings involved commensurate with the need. Otherwise, the imbalance between low and upper income households will continue or even increase. I realize it is more difficult for the utilities to conduct work in those areas and support the suggestion that they work through community groups that know the residents and have their trust. Trust is key and can provide the breakthrough. The community approach can't be required in the plan but could be included as a recommendation. Hopefully, the utility companies could provide a way for the community groups to address households with recommended criteria for upgrading to facilitate the process.

Amount of work to be accomplished overall:

While I am not sure what the specific requirements by 2028 are, I understand they are seriously below what is required to meet the Massachusetts goals for 2030 in terms of energy transition from fossil fuels to electricity. Consider requiring higher rates of transition and be willing to include units with partial as well as 100% transition or, for example, with improved weatherization but not heat pumps.

Clean heat standard:

A clean heat standard needs to be part of the plan. If a standard has not been finalized when this plan goes into effect in 2025, the wording should be such that it will apply once it is in place. A standard strikes me as the most effective way for utilities to be held accountable for fulfilling the energy transition needs for Massachusetts.

Transparency:

There should be overall transparency on the part of the utilities with respect to this plan by having reports at least annually with updates on what has been accomplished. The report should require a breakout of types of improvements and location by geography, income level and whether property is owner-occupied or rented. (I am sure there is some reporting mechanism but I'm not convinced it is sufficiently clear with respect to these items.)

I hope you will consider my thoughts during your deliberations.

Sincerely,
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