



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

10/2/15

Dear Council Members:

We submit here more specific recommended changes to the September 25 draft Plan, following our oral comments at the September 30 Council meeting. As noted earlier, the Green Justice Coalition has a long history of advocacy and collaboration with the Council and Program Administrators to build an efficiency program that delivers benefits to all stakeholders. Indeed, it seems fair to say that nearly all changes made since 2009 that positively influenced program equity originated with the GJC- from responsible employer standards, to the raised profile of renter and moderate-income customer segments, to advances on program transparency through data, to improvements in language access.

Our membership, encompassing over 100,000 ratepayers across the Commonwealth, has been increasingly frustrated by a perceived loss of momentum with regard to savings targets and outstanding barriers to access. As recently as last week, we were leaning towards direct action to emphasize the urgent need for serious remedial action. However, following the release of the PAs latest Plan draft, we were encouraged by improvements and decided to continue engaging in a collegial manner. We eagerly await signs of reciprocation from the PAs and urge steadfast support from the Council on our priorities outlined below, and look forward to an updated Plan draft.

1. Maintain a steady focus on equitable access via a combined approach, with the following three aspects:

A. Current rebate structures should be adjusted with an eye towards equity. In the current Plan draft, the Green Justice Coalition notes the PAs' willingness to address specific needs of a moderate-income customer segment. Notwithstanding a lack of clarity about why Efficient Neighborhoods Plus was not simply improved upon, it makes sense for this new initiative to be carried out with LEAN, provided appropriate funding levels are assured. However, the draft fails to address the 80-120% SMI segment, contrary to sustained GJC recommendations and the Council's recent resolution. GJC is happy to work with the PAs to develop a sliding scale or tiered rebate structure allowing ratepayers at 80-120% of SMI to access larger incentives so they can afford to participate in the program. Additionally, income qualification poses a new barrier; in our experience, best practices in this regard involve automatic qualification within a particular geography. Consider for instance, the impact of income qualification on typical immigrant families, or many others with complex household finances: income qualification acts to prevent access rather than encourage it. We recommend

continuing with a method similar to that used in EN+. It would be truly a wasted opportunity if the result here is a half-hearted pilot- we hope to see an earnest effort to build a long-term solution.

B. Ensure the renter initiative is viable from the start. Both the renter and moderate-income initiatives should fold in the successful pre-weatherization funds from EN+, which our members have described as useful. In addition, ISMs available through these initiatives should allow for replacing refrigerators and air conditioners, major drivers of energy consumption in moderate-income and renter homes. Developing standardized materials targeting landlord participation across all PA territories is crucial to success. Transparency on budgets for these initiatives is important, and synchronized rollout by PAs will avoid confusion seen in EN+. Finally, while engaging some renters will be a good step forward, it is not a solution: we urge the PAs to set benchmarks towards a goal of serving all renters, and to continue developing innovations that address the split incentive issue until all renters have access to the full range of services available to other households.

C. Make a firm commitment to language access. Produce program hard copy materials in a variety of languages, or at least make translated information available online in a full range of languages predominant in Massachusetts. Consumer usage should be tracked and further collateral developed to serve the communities with demonstrated need. As part of the stated Plan goal of improving the customer experience, develop capacity of customer service staff to assist non-English speakers through this inherently complex process.

2. Reach for savings levels that will make us all truly proud. While “best in the nation” is a fine trophy, the bar we should use for the program is the one required by the enabling statute: all cost-effective efficiency. We see no rational justification for declining goals over the Plan years, a course that would call into question our national leadership going forward. The PAs should explain why assumptions underlying the EEAC consultants’ assessment of potential are not feasible, or the consultants should agree with those underlying the PAs’ projections. In any case, DOER and AGO efforts to improve on the April draft do not preclude further improvement, and the AGO, as a primary EEAC ratepayer advocate, must be zealous on this point.

3. Marketing programs should be more community-driven. Drawing from the positive lessons in GJC’s Community Mobilization Initiatives, the next Plan should allow marketing budgets and policies to reflect a proven outreach strategy: collaboration with trusted community-based organizations on the ground, particularly for working with “hard-to-reach/hard-to-serve” communities, including tenants. This tactic could be adjusted and replicated in the small C&I sector as well.

4. Unleash the data. The glaring lack of a statewide program database with zipcode-level or other neighborhood-scale data, as the December 2014 DPU ruling required, cannot be overstated. It would help us understand which communities are being served and where there are gaps. Data that are up-to-date, consistent across PAs and accessible are absolutely crucial to ensuring ratepayer funds are being used in the most efficient and equitable way. As the Council has said clearly, MassSaveData.com is simply not a sufficient substitute. We look forward to an implementation timeline from the PAs.

We thank you all for your efforts to ensure that this Plan is informed by stakeholders. Please feel free to reach us with any further questions or thoughts on these matters. Best wishes for success over the coming month!

The Green Justice Coalition

contact: Darlene Lombos, darlene@massclu.org, 617-723-2639
Alex Papali, apapali@cleanwater.org, 617-338-8131 x212