

March 24, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
ma-eeac@mass.gov

Re: Equity recommendations for the 2022-2024 Three-Year Energy Efficiency Plan

Dear Commissioner Woodcock and members of the Massachusetts Energy Efficiency Advisory Council:

The Massachusetts program administrators (PA) are in the early stages of drafting their **fifth** Three-Year Electric & Gas Efficiency Plans. In the years since the first plans were developed and implemented, the PAs have demonstrated an ability to deliver nation-leading, energy saving measures to residents and businesses in the state. However, year after year, plan after plan, renters, moderate income households, and non-English speaking residents have been largely excluded from the benefits of the Mass Save program. This critique, levied by environmental justice and equity advocates for more than a decade, was affirmed in February 2020 by both the [Residential Nonparticipant Customer Profile Study](#) and the [Residential Nonparticipant Market Characterization and Barriers Study](#).

It is long past time that the Massachusetts Three-Year Energy Efficiency Plans begin to redress the racial, language, and income inequalities that barriers to access result from and help to perpetuate.

With this in mind, the undersigned organizations, many of which are members of the Global Warming Solutions Act (GWSA) Implementation Advisory Committee (IAC) Climate Justice Working Group (CJWG) and the Green Justice Coalition (GJC) write in support of the equity priority included in the draft resolution to be voted on by the EEAC at the March 24, 2021 meeting.

We also expect the April draft plan to include stringent savings goals that reflect the role that energy efficiency plays in Massachusetts' decarbonization efforts and GWSA compliance, targeted outreach and program delivery to renters, measures taken to address language isolation, and commitments to diversifying workforce. The plan must also include metrics to assess progress towards meeting equity, climate compliance, and workforce development goals. Any plan that lacks meaningful measures of accountability will be incomplete and should not be voted favorably by members of the EEAC.

In addition to these priorities, we offer strong support for including in the 2022-2024 plan a full extension of services and no-cost electrification upgrades for moderate-income households and a simplified approach to income verification that makes those incentives accessible to the intended customer segment.

Enhanced incentives for eligible customers will help drive increased investment in efficiency measures and system upgrades, particularly for those who may not qualify for the low-income program, but who have limited disposable income. We support a full extension of services and no-cost electrification upgrades for the 61-80% moderate income segment and urge the council and the PAs to consider a sliding

scale incentive for 81-120%, OR full incentives for up to 100% median income for the first year of the plan and report back to the council at the end of Year 1 on successes, challenges, and process required to serve the 81-100% segment in this way.

The PAs should take steps to ensure that income verification processes reduce rather than exacerbate barriers to utilization of those services. Eligible customer identification could include automatic eligibility for any ratepayer in certain census block groups such as environmental justice populations, consistent with the definition established in S.9. Alternative approaches to income verification are possible, including self-declaration in partnership with a third-party, trusted community organization contracted by the PAs using marketing funds to review the self-declaration materials to determine eligibility. Some concerns about cost/rate impacts or the risk of free ridership raised during EEAC discussion on this topic have yet to be substantiated and should not preclude consideration of or preliminary piloting of simplified approaches, including self-declaration. In fact, it should be noted that self-declaration for Mass Save services was considered more desirable than tax return verification and was utilized by Green Energy Consumers Alliance at the direction of the City of Boston in the earliest iterations of Renew Boston.¹

Working to ensure equitable access to utility-administered energy efficiency programs is a goal we are all committed to and must be the foundation upon which the 2022-2024 efficiency plan is built. We thank you for your time and consideration of these comments.

For questions, please contact Andrea Nyamekye, Co-Executive Director, Neighbor to Neighbor Massachusetts, andrea@n2nma.org or Cindy Luppi, New England Director, Clean Water Action, cluppi@cleanwater.org.

Best regards,

Alternatives for Community & Environment
Clean Water Action
Community Action Works
Conservation Law Foundation
Green Energy Consumers Alliance
GreenRoots, Inc.

Health Care Without Harm
Massachusetts Climate Action Network
Neighbor to Neighbor
Unitarian Universalist Mass Action
Union of Concerned Scientists

cc: Maggie McCarey, Director, Energy Efficiency Division, DOER
Alexis Washburn, Climate & Buildings Analyst, DOER
Members of the EEAC

¹ In 2009-2010, Green Energy Consumers Alliance relied on a self-verification process similar to this when it was first administering Renew Boston. Initially, eligibility was verified using tax returns, but concerns that this approach discouraged participation and slowed the process resulted in a switch to self-declaration. Prior to switching to self-declaration, however, Green Energy Consumers Alliance also conducted a large random sample that revealed a strong correlation between income and assessed home value. Ultimately, however, the city's preferred approach at that time was self-declaration.