MAPC EEAC Meeting Public Comment – CFP Program Municipal Requirements
Wednesday, January 28, 2026

Good afternoon. My name is Julie Curti and I am the Director of Clean Energy at the Metropolitan Area Planning Council, or MAPC. MAPC is the regional planning agency for the 101 cities and towns of Greater Boston.

I'm speaking today to raise concerns about the ongoing challenges with the Community First Partnership program rollout for municipalities. After applying for and being accepted into the program for this three-year plan cycle, municipalities were presented by the PAs with new contractual data sharing agreements and MOAs that were not shared beforehand. These agreements have presented a major obstacle to municipalities, with the contractual language exceeding the capabilities of many municipal IT systems and municipal data retention requirements. It has taken nearly a year for most municipalities to navigate these contracts with their legal departments, representing a significant investment of staff time and resources, a loss of pay and in some cases positions for CFP Energy Advocates, and importantly, a loss of outreach capacity and support for customers in historically underserved environmental justice communities.

At this stage, we are aware of at least five communities that are still trying to navigate these data sharing agreements and MOAs. These communities recently received word from the PAs that they will lose their CFP funding if the contracts are not signed, or if significant progress toward resolving issues is not complete by mid-February. This is the wrong approach for the PAs to take. We strongly feel that communities who were awarded CFP funding should still be able to participate in the program without the data sharing agreements. Indeed, under the 2022-2024 plan, there were no data sharing agreements of this type in place and CFP municipalities engaged in effective outreach, such that the PAs expanded the program in the current plan. Many of these municipalities work successfully with Home Performance Contractors who can provide important follow-up support in lieu of the CFP's Salesforce platform.

We recognize the DPU has encouraged the PAs to ensure consistency in IT and data security protocols, but data sharing requirements add a major burden that is not realistic for many municipalities to overcome in the near term. Municipalities and utilities operate under different legal requirements, and we believe alternative options are available that balance customer data protection with the realities of municipal systems.

We sincerely hope that the PAs will offer municipalities flexibility to ensure that we are truly serving the low-income residents the CFP program is intended to support. It would be a terrible loss for some of the largest and longest-serving CFP municipalities to be excluded from the program because of the new data sharing requirements.

We also strongly encourage the PAs to discuss potential future changes with municipalities before making unilateral program decisions that do not work for municipalities. MAPC is happy to help support convening this table for municipalities and the PAs. Many of the disruptions to the CFP program could have been mitigated by more proactive engagement and discussion rather than surprising community partners with new requirements that don't easily work.