

July 13, 2021

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

Dear Commissioner Woodcock and members of the Energy Efficiency Advisory Council,

We have reached the critical point in the 3-Year Planning process because by July 31st the Council is required to adopt a resolution regarding assessments of and comments on the Draft 2022 – 2024 Plan. The public comments have been extensive, including repeated requests for energy saving programs that would be dramatically more aggressive and expensive than the Mass Save Programs to date. There is a new sense of urgency because the goals of the Draft CECP for 2030 and the requirements of the Climate Bill are ambitious and clear. This 3-Year Plan ends in 2025 – a critical time period half-way to the 2030 milestone. If this Plan is not ambitious enough, the critical GHG emission reduction requirements will never be met.

The Draft CECP calls for 20% of the state's building stock to receive deep energy retrofits (DERs) by 2030. Prorated over 8 years from 2022-2030, that is 50,000 buildings per year! This will not be possible without aggressive and generous Mass Save programs to kick-start the market transformation required. The Draft 3-Year Plan outlines an overly complex RDC Initiative for the rehab of existing buildings with no indication as to how much funding it will provide – how much/unit or how much/SF? We have proposed DER programs funding up to \$35,000/unit, as NYSERDA has done. We have heard that the PA's may consider \$5,000/unit as the maximum – a number that we believe will result in an ineffective, embarrassing failure during these critical three years.

The Cost Effectiveness equation may be reason that the EEAC feels it cannot allocate adequate funding to DER Programs. The EEAC needs to present this equation to the public with clear calculations and explanations. We have heard that the EEAC has taken a first pass at modifying the Cost Effectiveness equation to comply with the Climate Bill, but at \$128/ton it is only \$3/ton more than it was before the Climate Bill. If this is the case, the EEAC needs to critically re-examine these calculations. The CECP estimates significant savings in healthcare costs alone, up to \$100M/year by 2030. We do not understand the details of these calculations and feel that it is critical the EEAC's Resolution explain them.

Throughout this public comment process, we have continually pushed for the EEAC to use the well-established and well-understood metrics and quality control procedures available through Passive House Certification. The existing Mass Save Passive House Incentive Program has proven its effectiveness. We strongly suggest that you allow Passive House Certification as an approved alternative pathway for the LEAN Program, the RDC Initiative and the Path to Zero Program.

We hope that the EEAC can draft and approve a Resolution this month that puts this 3-Year Plan on track to accomplish the goals and requirements of the CECP and Climate Bill.

Thank you,

Hank Keating, AIA, President, Passive House Massachusetts