This is the Comment of the Low-Income Energy Affordabilty Network (LEAN) on the July 2 draft of the Energy Efficiency Advisory Coucil (EEAC) Resolution regarding the April 30, 2015 draft of the 2016-2018 Energy Efficiency Plan, to be considered by the EEAC Executive Committee on July 8, 2015. LEAN is the network of community agencies that implement the statewide low-income energy efficiency (EE) programs pursuant to the Green Communities Act, coordinated with their implementation of the US Department of Energy (DOE) Weatherization Assistance Program (WAP). LEAN agencies also implement other energy-related low-income programs, including Fuel Assistance.

LEAN appreciates the support for the excellence of the Council-supported energy efficiency (EE) programs in general and for low-income programs in particular. We appreciate the support for improvement in the EE programs that LEAN is privileged to implement.

With that in mind, we propose these two modifications to the draft resolution:

1. We appreciate the concern for the potentially adverse impact of advanced metering on low-income and other vulnerable customers (Sec. II, Crosscutting sec. b.2.). Among those potentially adverse impacts is the potential for rate design changes, such as time varying rates (TVR), that could have adverse impacts on some customer segments, so we propose that this be explictly recognized in the following way (proposed additions underlined, proposed deletions in brackets):

"iv. Present to the EEAC a [joint] report <u>in consultation</u>
with EEAC consultants on the impacts, opportunities and challenges of time varying rates on the energy efficiency programs, within 3 months of the Department's order approving such rates. Such report shall also include an analysis of incorporation of technologies like advanced metering in the efficiency progra ms, including demand response offerings and potential adverse impacts <u>of new technologies and changes in rate designs</u> on particular customer segments, such as low-income."

2. Zero-interest HEAT loans have been an effective way to encourage residential adoption of capital-intensive energy efficiency measures. Our only concern is that there be continued sensitivity about those moderate-income customers who are not in a good position to take on any debt, even at zero interest. For those customers, we are very supportive of the effort to develop a program that removes the need for capital contributions by customers who cannot readily afford them. Accordingly, we propose the following amendment in Sec. II, Residential sec. a (proposed additions underlined, proposed deletions in brackets):

"In the Plan, the PAs should include:
a. <u>Planned assessment</u>
<u>of</u> [Strategy, dates, and milestones to assess] how moderate income customers are currently served and could be better served by the HEAT Loan program, including through a loan loss reserve, <u>taking due account for the economic vulnerability of some customers</u>."

We are pleased to be part of the success of the Massachusetts programs.

Respectfully submitted,
Low-Income Energy Affordability Network,
by its attorney,

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Democracy And Regulation