

# LISC BOSTON

**To: Massachusetts Energy Efficiency Advisory Council**

**From: LISC Boston**

**RE: EEAC Three-Year Plan 2022-2024**

**Date: January 27, 2021**

**Mass Save and the LEAN program in particular is a critical resource for affordable housing owners** who operate in highly resource-constrained environments. We ask the EEAC to consider recommendations in the four categories of (1) high-performance new construction, (2) deep energy retrofits, (3) strategic building electrification, and (4) equitable workforce development. Collectively, these measures will drive down carbon emissions in the affordable housing sector and help us achieve our collective climate goals.

**First, in the category of high-performance new construction,** we applaud Mass Save for its successful Passive House Incentive and Training Programs. We recommend continuation of these programs as well as development of an equivalent and adequately funded Passive House Incentive Program for 1-4 Units as outlined by Passive House Massachusetts (PHMass).

**Second, in the category of deep energy retrofits,** we urge the EEAC to request development of a Passive House Retrofit Incentive Program, along with revising the LEAN program to accommodate deep energy retrofits in the ballpark of \$40,000 per unit as part of a whole building solution similar to NYSERDA's RetrofitNY program. We know Passive House retrofits are very challenging, but the certification process brings with it confidence that the results will be durable, healthy, and resilient. The amount of deep energy retrofitting that the 2030 Clean Energy and Climate Plan calls for is massive. It will not be possible without Mass Save deep energy retrofit programs to bring about market transformation.

**Third, in the category of strategic building electrification,** we support PHMA's recommended creation of an incentive program for central electric hot water systems for multifamily housing. While the technology exists, the installation cost premiums range up to 100% and operating cost premiums range up to 300% more than central gas fired systems. Many developers doing multifamily Passive House projects would like to go all-electric, but these cost premiums, especially the ongoing ones, make it financially difficult.

**Fourth and finally, in the category of workforce development,** we ask the EEAC to support significant investment in the people that are and will be doing this work. At least \$12 million per year should be allocated to provide workforce training, educational and professional development, job placement, startup opportunities and grants promoting participation in the energy efficiency and clean energy industries to minority-owned and women-owned small businesses; residents of environmental justice communities; and workers from the fossil fuel industry.

Undergirding all of these recommendations is the recognition that to achieve our net-zero imperative, **Mass Save must transition from its current cost-benefit analysis to a new calculation that incorporates the full "social value of greenhouse gas emissions reductions", and the cost of Global Warming Solutions Act non-compliance.**

Together, these recommendations will support the Commonwealth in achieving its ambitious goals while ensuring affordable housing communities lead and benefit from the decarbonization movement. Thank you for your consideration.

Sincerely,



Emily Jones, Senior Program Officer  
Local Initiatives Support Corporation (LISC) Boston