LISC MASSACHUSETTS

May 21, 2025

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

Re: LISC Massachusetts Public Comments on Low-Income Multifamily Deep Energy Retrofit Incentive

Dear Commissioner Mahony and members of the Energy Efficiency Advisory Council:

LISC Massachusetts supports multifamily affordable housing owners across Massachusetts in decarbonizing their properties through education, technical assistance, investment, and advocacy.

LISC and our partners have been tracking early-stage affordable housing deep energy retrofits in Massachusetts, and we see that the cost to decarbonize is typically $100K-$150K more per unit than a business-as-usual retrofit. Scaled up to over 200,000 units of subsidized multifamily affordable housing in MA translates to at least $10B-$30B of investment that will be needed for the affordable housing sector alone to meet our state's climate goals by 2050.

So far, the state has invested in 24 decarbonization projects through DOER's Affordable Housing Decarbonization Grant Program and EOHLC's Climate Ready Housing Program, which combined have provided approximately $64K/unit to awardee projects.

Given that the average incremental cost of these projects is currently in the $100K/unit range, this leaves us with a gap of at least $36K/unit.

Mass Save's Low-Income Multifamily Deep Energy Retrofit Incentive Pathway has been in existence for 2.5 years and for the 4 projects that have been approved to date, the average award amount is only $17K/unit. We desperately need this amount to be doubled for projects to be able to move forward.

If doubled from its current calculation of $350/MMBtu to $700/MMBtu, the Low-Income Multifamily Deep Energy Retrofit incentive could close the gap, unlocking dozens of decarbonization projects that are currently delayed due to lack of available resources, further driving our carbon emissions reduction goals as a Commonwealth.

We urge the EEAC to consider doubling the Low-Income Multifamily Deep Energy Retrofit incentive so the affordable housing sector can scale up this critical work.

Thank you for your consideration and commitment to equitable building decarbonization.

Sincerely,

Emily Jones, Deputy Director
LISC Massachusetts
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