



December 17, 2020

To: Massachusetts Energy Efficiency Advisory Council (EEAC)

From: Michael Ferrante | Massachusetts Energy Marketers Association

Subject: Initial Opposition Comments to:
Recommendations to EEAC on Residential Existing Buildings

As a non-voting member of the EEAC, I voiced opposition to recommendations presented to the EEAC on December 15, 2020 by the Program Administrators (PAs) regarding residential existing buildings. For the record, I submit the following letter of opposition in support of my brief comments made during that virtual meeting.

On behalf of over 800,000 homeowners currently using heating oil and propane for space heating and hot water production statewide, and the heating oil and propane industry in Massachusetts, our association is strongly opposed to the recommendations outlined in the **Consultant Team Residential Existing Buildings Workshop Brief** for the following reasons.

The PAs recommendations to the EEAC aim to use electric rate payer energy efficiency funds to erode the heating oil and propane industry in Massachusetts by limiting and eventually phasing out Mass Save “support for oil-fired equipment as of January 2022”¹ and redirecting those incentives to convert heating oil and propane heated homes to electric heat pump technology.

Despite the existence of the 2008 Global Warming Solutions Act and Green Communities Act, these recommendations are an abuse of authority by the PAs, a restraint of trade in the Commonwealth, a misuse of electric rate payer funds paid by heating oil and propane users, and a clear attempt to remove a consumers’ right to choose the heating source for their home and family.

The PAs recommendations also call for ceasing “Heat Loans for oil and propane water heating equipment by 2023.”² This recommendation is unfair and discriminatory and will have a significant impact of low to moderate income households.

¹ Consultant Team Residential Existing Buildings Workshop Brief, December 15, 2020

² Consultant Team Residential Existing Buildings Workshop Brief, December 15, 2020

The PAs and the EEAC continue to embrace and disseminate a false narrative about the efficiency, performance and environmental benefits of electric heat pump equipment versus heating oil equipment. Current available data indicates that air source electric heat pumps are very expensive to install, are typically installed only as a supplemental source for heat, perform poorly in cold climate conditions and do not mitigate the impact of climate change.

Research conducted by Kearney Consulting's indicated that, "Proponents of electrification tout air-source heat pumps as a low carbon solution for the home energy sector. However, while air-source heat pumps (using an average electricity mix) release lower CO2 per unit of heat delivered to the household (only 57 kg of CO2), almost all of this (56 kg) consists of abiogenic (non-renewable) emissions that in fact contribute to climate change."³

The PAs recommendations snub the collaborative work the heating oil industry has done over the years with the Mass Save and HEAT Loan programs to improve energy efficiency in thousands of customer's homes across the state with the installation of new, high efficiency heating equipment.

The heating oil industry in Massachusetts is committed to being a partner with state energy officials to help mitigate the impact of climate change. The industry has made and continues to make great progress in reducing carbon emissions by delivering renewable liquid Bioheat® fuel to homes and businesses statewide.

Bioheat® fuel is the only home energy source that is currently having an immediate impact on reducing greenhouse gas emissions in Massachusetts. Bioheat® fuel is a drop-in, turn-key fuel that is currently being delivered at blends as high as 50% (B50). This renewable fuel is not exhibiting any operational issues with heating oil customers, requires no heating system modifications and can be as economical as traditional heating oil.

Instead of stating that "the timing is ripe"⁴ to further erode the heating oil industry using the Mass Save and HEAT Loan programs as cudgels, the PAs and the EEAC should be working cooperatively with the heating oil industry to find the most immediate, cost effective and fair methods to improve energy efficiency.

The Massachusetts Energy Marketers Association will be submitting more extensive comments to the EEAC moving into 2021.

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³ Roadmap to Success: Achieving a Net-Zero Future by 2050, Kearney Consulting & NEFI, October 2020

⁴ Consultant Team Residential Existing Buildings Workshop Brief, December 15, 2020