October 22, 2026

To: The Electric and Gas Program Administrators of Massachusetts and Members of the Energy Efficiency Advisory Council
From: Julie Curti, Director of Clean Energy, MAPC
Re: Metropolitan Area Planning Council's Recommendations for the Community First Partnership in the 2028-2030 Three-Year Energy Efficiency Plan

Introduction

Thank you for your continued hard work and leadership on delivering Massachusetts' nation-leading energy efficiency programs and growing decarbonization offerings. Mass Save is central to supporting residents, businesses, and municipalities in implementing critical energy and cost-saving measures and in helping the Commonwealth achieve its climate goals.

The Metropolitan Area Planning Council (MAPC) is the regional planning agency serving the people who live and work in the 101 cities and towns of Metropolitan Boston. Representatives of MAPC served on the Energy Efficiency Advisory Council (EEAC) representing Commonwealth cities and towns from late 2017 to mid-June 2024. During this time, MAPC also co-chaired the EEAC Equity Working Group (EWG). MAPC also recently served on the Commission on Energy Infrastructure Siting and Permitting and is active in the Grid Modernization Advisory Council and other legislative and regulatory discussions at the state level.

The communities we serve rely on Mass Save programs as a critical component of their long-term efforts to meet local climate goals and deliver energy and cost savings and public health benefits to residents and businesses. In particular, the Community First Partnership (CFP) has proven to be a central tool for advancing equity within Mass Save by reaching and better serving historically underserved customers and building trust among residents. CFP empowers trusted representatives of municipalities and community-based organizations to lead targeted and intentional Mass Save outreach focused on reaching low- and moderate-income residents. Since 2022, CFP has funded local staff capacity to successfully broaden Mass Save education and participation in a cost-effective and equitable manner. Under the 2025-2027 Plan, the PAs committed to "significantly [strengthening]" commitments to CFP through increasing budget and flexibility for Community First Partners and improving data sharing to enhance outreach efforts.

To support coordination among CFP municipalities, MAPC regularly engages with municipal staff and energy advocates from over 26 municipalities and one Regional Planning Agency participating in a CFP Municipal Roundtable. Through these meetings, municipalities have shared feedback on the current plan rooted in their real-world experience with the CFP program and discussed opportunities to continue

improving the CFP program. We invite the PAs to join our CFP Municipal Roundtable to gather more feedback to collaboratively shape what an effective program will look like in the next plan term.

MAPC also gathered feedback from some of these communities about the new 2028-2030 CFP Straw Proposal introduced in October and is concerned that this proposal could reinforce some of the challenges we are already seeing in this current plan term, including creating a higher municipal administrative burden and lack of flexibility, limiting crucial data access, curtailing programmatic funding, and limiting CBO leadership and greater municipal participation in the program. On the whole, the straw proposal appears to roll back the current CFP program in ways that will limit the program's reach and effectiveness.

The comments and recommendations outlined in this memo were developed with input from these stakeholders.

In sum:

1. **Collaborative Governance:** We continue to strongly recommend that the EEAC establish a formal representative governance body or working group for PAs and CFP communities to communicate directly ahead of and throughout the 2028-2030 Three-Year Plan. This group would help to address many of the challenges shared in this memo by providing a productive space for PAs and CFP communities to proactively problem solve and co-develop approaches that work for municipalities and community-based organizations.
2. **Maintain and Grow What Works:** In the 2028-2030 plan, we encourage the PAs to maintain or expand the CFP budget and expand CFP eligibility to include community-based organizations in what is currently proposed as Tier 1. The two tiers proposed in the 2028-2030 CFP straw proposal appear to represent a significant reduction in support for communities and we have major concerns with many elements of the proposed approach.
3. **Increase Programmatic Adaptability:** We recommend that the PAs provide more flexibility for marketing and administrative requirements to lift up local knowledge and enable creativity in communications and outreach. Communities have reported waiting months and months to get sign off on outreach flyers and spend a disproportionate amount of their time on programmatic paperwork instead of on-the-ground navigation support.
4. **Improve Data Sharing:** We ask that the PAs establish a clear process and set of expectations for data sharing agreements. While we recognize the PAs have made efforts to improve data transparency and sharing opportunities in the 2025-2027 Three-Year Plan, our communities report that data provided so far continues to be of limited use for supporting outreach. Additionally, we have heard serious challenges about the rollout of data sharing agreements at the beginning of the 2025 plan term that required significant municipal capacity, legal review costs, and countless hours to address and impacted program performance and, in some cases, resulted in communities dropping out of the program. This needs to be fixed to work with municipal law and IT requirements before the next plan term.
5. **Consult with Municipalities on Tool Development:** We ask the PAs to consult CFP communities, through the proposed governance body or working group, to ensure new programmatic tools are appropriate and respond to on-the-ground municipal and community partner needs.

We further outline and describe these five priority recommendations from municipalities below.

1. Establish a Formal Governance Body or Working Group for CFP Communities and PA Collaboration

CFP municipalities report frustrations with the lack of transparency into PA decision-making and the lack of opportunity to engage with PAs and provide proactive input on programmatic improvements before they are rolled out. Many of the disruptions to the CFP program experienced in this current 2025-2027 Plan could have been mitigated by more proactive engagement and discussion rather than unilaterally introducing new requirements that don't easily work for municipal governments and CBOs. The recent 2028-2030 straw proposal illustrates the need for new communications channels. While CFP in its current form has supported effective on-the-ground outreach in many communities, there are opportunities for continued improvement through ensuring the programmatic structure is aligned with its name: a true, collaborative partnership between communities and PAs. We strongly recommend the next plan 1) mandate a formal governance body or working group with members of CFP municipalities and PA staff and 2) outline clear protocols and pathways for CFP communities to escalate questions about specific cases as they arise.

This governance body would serve as an avenue for direct communication between CFPs and municipalities and streamline improvements throughout the plan implementation instead of only sharing input through intermediaries or waiting for the next plan. This group could discuss contracting and administrative requirements, application process and timeline, and new documents (e.g. the Directives Report) developed by the PAs and offer a space to provide direct training to Energy Advocates on topics such as data sharing. Such a group would help the PAs avoid disruptions such as those caused by the surprise delivery of non-disclosure agreements at the beginning of the most recent CFP cycle. The CFP program has become a central tool for reaching underserved communities, and, in the long-term, a governance body would prevent program rollout delays and ensure resources are being used as effectively and efficiently as possible. This group is also uniquely positioned to provide important feedback on other elements of Mass Save program (e.g. where people are getting stuck in the income-eligible process, what parts of the incentives they find confusing).

We recommend that the group convene quarterly and follow a similar structure to the EEAC's Equity Working Group, with representation from PAs, CFP municipalities and community-based organizations, and EEAC councilors, and professional facilitation by EEAC consultants or another party.

Separately, the PAs should develop and communicate a clear and easy process for Energy Advocates to communicate directly with relevant Mass Save staff for pressing or time-sensitive customer cases. Communities shared that they try to help residents with specific questions but can be left waiting months to get responses from the PAs.

2. Maintain Funding for the CFP Program and Ensure CFP Eligibility Includes Community-Based Organizations

For the 2025-2027 Plan, the PAs increased funding for CFP programs, which increased hourly pay for Energy Advocates and gave municipalities the option to hire full-time Energy Advocatess. We thank the PAs for responding to community needs and on-the-ground experience.

However, we are very concerned that the two-tier model outlined in the 2028-2030 CFP Straw Proposal will reduce essential support for communities to conduct outreach, while not addressing existing challenges.

While we support the effort to streamline redundant elements of the Community Education and CFP grants, we believe there are better approaches that would allow for more flexible, locally tailored initiatives. The 2025-2027 Plan is supporting 58 CFP communities, and, in 2025, 26 municipalities and CBOs were awarded Community Education grants (with more grants to be awarded on a rolling basis in 2026 and 2027). The proposed 2028-2030 Plan would only support 50 communities total and most of these communities would be receiving lower levels of support through the program, with the amount of support not clearly defined in the straw proposal, making it hard to evaluate.

We do not support limiting Tier 1 to only 20 communities as compared to the 58 served now. This would represent a significant and harmful rollback of the CFP program's reach and impact. Our municipalities are also concerned that the proposed structure of Tier 1 will only work well for communities with very significant staff capacity already. In a time of severely constrained budgets, smaller and less-resourced municipalities will likely not have their own matching funds to bring to these positions as proposed in Tier 1. We also caution against a Tier 1 structure that would significantly increase the administrative burden of the program for municipalities. Any reporting requirements should be co-designed with municipalities, realistic, outcomes-based, and in support of the residents we are trying to reach.

We also do not support cutting CBOs as the lead organization from Tier 1. For the 2025-2027 CFP program, nine community-based organizations were awarded funding to support one or more communities in outreach efforts. MAPC recommends that, if a tiered approach is taken, community partners with proven grassroots track records be eligible to apply to all tiers. In some communities, especially those with less municipal capacity, these partners have the strongest relationships with residents are the most effective messengers. While municipalities can work with CBOs in their outreach, CFP participants have shared that municipal procurement and policies related to CBO legal documentation and 501c3 status make it very onerous to subcontract this funding to the community partners that are best situated to do the engagement, and that direct funding to CBOs from the PAs needs to be maintained as an option across both tiers.

We are also concerned that as proposed, Tier 2 will be a significant reduction in support for communities. It is unclear what amount of funding the tier would provide and whether it would fund at least a 0.5 FTE staff member. Many smaller and less resources communities won't be able to use funding for outreach if they are not able to hire a staff person to support this work. Some of our Roundtable communities also noted concern that Tier 2 does not include any scope for customer support, which they have found to be their most valuable role in conducting outreach. Without a customer support scope, data access, or marketing flexibility, as proposed, we are concerned that Tier 2 will position participating communities as local franchisees of Mass Save rather than a true municipal program supporting holistic energy access and affordability for residents.

To allow MAPC and other partners to comprehensively assess the two-tiered approach, the PAs must provide more detail about the proposed funding amounts, data access, CBO eligibility, and more. We invite the PAs to join our CFP Municipal Roundtable to gather more feedback to collaboratively shape what an effective program will look like in the next plan term.

3. Provide More Adaptability for Marketing and Reporting Requirements

Communities already report feeling burdened by strict and changing reporting requirements and long processes for getting marketing materials approved. The approach proposed in the 2028-2030 CFP straw proposal could reinforce these challenges if not appropriately implemented.

The straw proposal states that Tier 1 communities would be required to meet "greater community obligations." While metrics are important to demonstrate the importance of the program, they should be developed collaboratively with CFP communities, be focused on outcome milestones for residents, and not serve as an unnecessary administrative burden. The PAs should acknowledge that meeting metrics is also highly dependent on factors outside of EA's control. These KPIs and goals are subject to broader programmatic trends. Further, municipalities are receiving differing levels of support and funding from CAP agencies. One participant noted, "Many EAs too often feel like they are working against the tide — trying hard to help people in their communities, but being expected to personally compensate for structures that are not working well."

Further, while it would be helpful for communities to have additional templates and support for marketing and outreach, the bigger challenges communities have shared is the months-long timeline for getting materials approved and the multiple rounds of edits. Instead, communities need more flexibility to customize materials without strict PA review procedures. The proposed Tier 1 also requires communities to provide bilingual support, which we generally support if appropriate resources from the PAs are also provided to meet community language access needs. Some communities may face challenges providing bilingual support and, as All In Energy heard in their listening sessions, communities need more virtual and on-demand translation support from PAs when there is no in-house capacity.

4. Improve Data Sharing Agreements for Municipalities and Community Partners

We appreciate the commitments the PAs made to improving data transparency during the 2025-2027 plan. With better insights, CFP communities can better target and reach Environmental Justice Populations and ensure time spent by CFP communities is used efficiently.

However, during the current 2025-2027 Plan, after applying for and being accepted into the program, the PAs presented municipalities with new Non-Disclosure Agreements (NDAs) and Memoranda of Agreements (MOAs), with contractual requirements exceeding the capabilities of many municipal IT systems and municipal data retention requirements. These agreements included boilerplate language and were not tailored to municipalities or the CFP program. For many communities, they were un-signable as initially drafted and required months and months of re-negotiation. While expanding data sharing was an explicit goal and DPU directive for the 2025-2027 plan, these challenges led to many months of delays for CFP communities, with several being forced to lay off experienced Energy Advocates or withdraw from the program entirely.

In the 2028-2030 plan, we ask that the PAs incorporate the lessons learned from this turbulent program launch and create a much smoother and more transparent program onboarding process, while continuing to advance its goals to enhance data sharing with Community First Partners. Any data sharing approach must be designed to meet the unique needs and circumstances of municipal governments and community partners (e.g. realistic data security requirements, integration with existing municipal tracking systems). Requirements of program participants should be made clear at the time of application, not after grants have already been awarded, and documents related to data sharing should be shared immediately upon grant award. We also question why data sharing is not an opt-in choice for communities in Tier 2. Given the proposed much smaller size of Tier 1, some Tier 2 communities will also want data access to pursue outreach more effectively.

The EEAC's guiding principles for the 2028-2030 Three-Year Plan include continued support for equitable distribution of investment and outcomes for customers and communities. To be successful, communities must be able to measure whether their investments in affordability, equity, and outreach are reaching the households we most want to serve. The PAs must treat community advocates and municipalities as partners instead of developing restrictive IT and data sharing agreements that treat municipal staff and community partners with suspicion.

Specifically, ahead of and during the 2028-2030 Three-Year Plan, the PAs should:

- Start working with CFP communities (including both municipalities and community-based organizations) *now* to document the challenges encountered with data sharing agreements in the current plan, better understand what local systems and processes municipalities currently use for tracking outreach, learn how new systems can or can't complement these internal tracking platforms, and evaluate alternative arrangements such as outsourcing data tracking to PAs or Home Performance Contractors for municipalities that need a different solution.
- Use lessons learned from the current process to inform the proactive development of clear MOAs, NDAs, and Individual Data Use Agreements (DUA), designed specifically for municipalities and community partners and allowing for the safe use of modern productivity and AI field tools. Municipalities, community partners, and utilities all operate under different legal and procurement requirements and agreements should be designed to balance customer data protection with the realities of municipal and community partner systems. The PAs could develop several flexible tiers of agreements to fit varying community contexts. Instead of mandating required security systems to receive data, agreements should include a section for municipalities to share what systems they have in place. It is unrealistic to expect municipalities to comprehensively update their IT arrangements on the timeline of this grant.
- Provide ample time for CFP communities to begin planning how to accommodate requirements. The application should explicitly detail what communities will be required to sign and submit in order to participate.
- Clearly and early on outline the types of data communities will gain by signing the MOA, NDA, and DUA. As proposed, Tier 1 communities would have access to customer journey data. How will this differ from the data shared during the current plan? Being transparent about what data will be shared will allow communities to integrate the additional data shared into their outreach strategies from the start of the three-year period, without delays. Many current CFP communities didn't know what data they would be receiving, making it difficult to make a strong case to their legal teams that the time, effort, and money would be worth it.
- Prioritize providing clear data on which properties (single family, multifamily, and commercial) have received HEAs in recent years, the recommendations they received, and any weatherization or electrification work completed, and Mass Save incentives received as a result. Start exploring alternative Customer Relationship Management Systems (CRMs) if Salesforce is not a good fit for municipalities.

5. Ensure CFP Tools are Helping Outreach Efforts

The PAs have developed a number of tools intended to help CFP communities conduct and track outreach. Communities are appreciative, but have found that without input from CFP communities, some of the

tools do not support their outreach in practice. For example, communities have reported numerous challenges with RingDNA and Natter Box that may have been avoided if shared with the CFP communities first. We recommend the PAs test out the tools with CFP communities before rolling them out. The dedicated governance body or working group in Recommendation 1 above would provide a very helpful and productive avenue for gathering direct feedback early on in tool development. For example, some communities have faced challenges integrating the Salesforce platform with their own internal systems. Upfront consultation with CFP participants could save time and ensure limited municipal and PA staff time is spent directly engaging residents.

Conclusion

Thank you for this opportunity to provide feedback and recommendations on the next iteration of the CFP Program for the 2028-2030 Plan and specifically respond to the 2028-2030 CFP Straw Proposal. CFO is a keystone and impactful equity initiative within Mass Save, and we hope to see the program expand and improve in the next plan, with a strong focus on real collaboration with municipalities and community-based organizations to ensure effective program development and delivery.

More broadly, we have seen overwhelming demand for the Mass Save low-income programs and within the Designated Equity Community Program, as well as substantial grown in the moderate-income program. This demonstrates the critical need for Mass Save to continue building on the overwhelming success of its equity commitments in the 2025-2027 plan. MAPC is available to meet with PAs, EEAC councilors, or other parties to discuss these recommendations further.

Sincerely,

Julie Curti
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Metropolitan Area Planning Council