



July 14, 2021

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

Re: MA Joint Statewide Electric and Gas Three-Year Energy Efficiency Plan

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

I appreciate the opportunity to offer comments regarding to the development of the 2022-2024 Three Year Plan. I'd like to share how businesses like ours have delivered results on behalf of the ratepayers which have led to the program success through the existing, flexible, and market driven delivery framework.

Since 2010, Paradigm Energy Services has provided turnkey energy efficiency services in partnership with the Efficiency Program Administrators (PAs) and the Lead Vendors of their efficiency programs. In that period we have served hundreds of buildings, reduced energy consumption by over 20mm KWhr annually, avoided 14,000 metric tons of greenhouse gasses, and impacted the spaces used by over 250,000 rate payers.

We are a small business. We focus on bringing value at the point in the value chain that matters most in any type of construction project, where a contractor installs something in a building. As we deliver solutions to our clients, who own and operate buildings of many types, the things that matter most are: **Program Access and Consistency, Flexibility in Solutions, and Repeatability.**

Program Access and Consistency– Upon developing an efficiency opportunity, we have found accessing the various, well established programs (for example large C&I, small C&I, Multifamily, Small Business) extremely easy. We have completed projects with over a half dozen lead vendors and directly for the PAs. Navigating where to take a specific project is easy and we have found all stakeholders moving us in the right direction quickly. All programs, whether delivered by a Lead Vendor or directly by the PA, have well established, clearly defined processes. They are structured in a way that a small business can understand and cause a building owner to understand. Access and Consistency allow a small business to build customer confidence and deliver on the expectations we set. We are only as good as our last project and our ability to deliver on our word.

From the desk of Mike Hogan
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Flexibility in Solutions – A business like ours aims to be a partner with a building owner for years and be a solution provider that can continually bring value to that owner and their building. The existing program delivery has demonstrated extensive flexibility in allowing proposals with new technologies, new applications of existing measures, and creative ways to evaluate these solutions. We have successfully deployed technologies including heat storage, integrated apartment controls, electrified heating using solar PV, air to water heat pumps, and new air sealing applications that have pushed the envelope of the traditional measure set. While all attempts don't lead to a scalable measure, we have found the PAs and the Lead Vendors excited to explore new approaches to efficiency and open to have collaborative development and engineering discussions that provide a real opportunity for success.

Repeatability – This is what a small business thrives on. Knowing that a market is set up in way that allows us to pursue similar opportunities, with similar clients, over an extended period of time, allows us to act as a responsible corporate citizen, while being able to deliver a quality service to a customer. During the pandemic, we avoided layoffs and furloughs for all of our 30 pay rolled employees, in part because we had confidence in the industry and the manner with which efficiency work is delivered. The programs have been set up in a way that has brought two great benefits, energy efficiency for ratepayers and a safe industry for the growth of small businesses and green collar jobs. Neither of these would be possible without the project repeatability the program delivery provides.

We are excited about the future of this industry in Massachusetts and new goals that will be achieved for all citizens of the Commonwealth. We are excited to be part of delivering new solutions to clients and plan to be in this space. Change is inevitable and we welcome it!

Changes to how the program is delivered and diversion of resources away from the establish delivery methods, especially when done quickly and without a proper understanding of how it impacts the entire value chain, is a risk to small business in the industry, green collar jobs, and the implementation of measures into buildings.

Best regard,

Michael F Hogan, CEO