

Subject: comment for Mass Save Program

Please accept my comments about Mass Save Energy. I would like to see the following points addressed by Mass Save:

1. **Accountability.** Overall energy efficiency goals for the program must increase annually and be aggressive and science-based.
2. **Real savings.** There needs to be evaluation of **measured results** – energy saved – rather than reports based on model-estimated savings per measure. Performance incentives must be based on measured and verified fulfillment of those goals and there should be penalties for the utilities' program administrators for not reaching them.
3. **Serving those in need.** Better outreach must be made to low income and non-English-speaking households, households with disabled, elderly and people of color. This should be coupled with transparency about the services that these households are actually receiving from Mass Save. There should be an "opt-out" policy assigning audits to all those low income customers who qualify for LIHEAP and discount rate and reporting of results of the audits and actions taken.
4. **Expansion of coverage.** More moderate income people (up to 120% of median income) should qualify for subsidies of all energy saving measures.
5. **Better serving renters.** Mass Save should publicly engage landlords in discussion of the benefits of energy efficiency and grant rights to energy efficiency measures for those renters who must pay their own utilities. We suggest that the utility could prepay for improvements and could be repaid through their utility bill.
6. **Redefine cost-effectiveness.** Energy assessments and subsidized measures must be more comprehensive and science-based than the limited ones now provided. EE measures should be included that may take more than seven years to pay back in cost savings or that provide health benefits to the household and neighborhood. Contractors should be given some leeway to expand their work once on the site, according to their determination of what EE measures would have continuing benefit. Additionally, energy efficiency measures that **reduce peak demand** (and thus lower demand for the dirtiest, highest cost electricity) should be considered cost effective with reference to the spot prices for electricity and natural gas during peak demand hours.
7. **Transparency.** Communities should know how many households have been served each year, how many low and moderate income households were served, how many households were served in which English is not a primary language, and what services were provided. In addition, customers should be surveyed about their satisfaction with the services, and the broader population should be surveyed to determine barriers to using the Mass Save program.
8. **Air source heat pumps.** Energy efficient air source heat pumps should be available for those houses already benefiting from energy efficiency measures, including those households presently using gas for heat.

Thank you very much for following the above recommendations. We have used the Mass Save program to increase our home's efficiency and appreciate the program's goal of making homes more efficient for the benefits of all. Mike and Miriam Kurland