



MASSACHUSETTS

June 10, 2021

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

Re: 2022-2024 Three-Year Energy Efficiency Plan - Comments from Mothers Out Front Massachusetts

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

Thank you for the opportunity to comment on the Massachusetts Joint Statewide Electric and Gas Three-Year Energy Efficiency Plan. Mothers Out Front is a non-profit organization of mothers and other concerned citizens inspired by the urgent need to act meaningfully on climate. In Massachusetts, we are 5,000 volunteers working toward a healthy, sustainable planet with a livable climate for all children and future generations. We are submitting these comments on the Three-Year Energy Efficiency Plan with two purposes: first, to amplify and emphasize the March 24th equity recommendations submitted by Neighbor to Neighbor, Clean Water Action, and other environmental justice-focused organizations. Second, to request a full alignment of this plan with the Next Generation Roadmap and the urgent need to reorient every state plan and budget to meet the urgency of the climate crisis.

Equity must be fully centered in every aspect of the MassSave program. Mothers Out Front Massachusetts wishes to support and amplify the equity-focused comments on the Plan jointly

submitted by eleven organizations on March 24th, 2021.¹ It is a well-documented fact that MassSave has not equally benefited renters, moderate-income households, and non-English speaking residents, or adequately addressed the barriers to access faced by these groups. The current draft Plan lacks accountability measures and metrics to ensure that equity-focused goals are met. Specifically, the Plan includes no specific budget, participation, or savings metrics for renters and landlords, English-isolated populations, or partnership goals - and only partial information for small business, workforce, and moderate-income customers. Members of the EEAC should not favorably vote on a Plan without equity-centered, specific goals and budgets or a Plan that does not address MassSave's historic failure to reach underserved communities and populations.

The MassSave program must be fully reimagined to meet the urgency of the climate crisis. The depth and tragedy of the climate crisis cannot be answered with the incrementalism reflected in the Plan's approach. By 2050 at the absolute latest, all of Massachusetts' two million buildings must achieve net zero emissions. By 2030, at least half of our buildings must achieve net zero emissions - and MassSave has a critical role in ensuring that happens. Furnaces and boilers are replaced only once every 15 to 30 years.² Under this draft Plan, MassSave will continue pouring ratepayer money into new fossil fuel systems long past when they are needed, at the brink of too late. In May 2021, the International Energy Agency (IEA) published a report outlining pathways to net zero emissions by 2050. The IEA report calls for *prohibiting* the use of fossil fuel appliances in buildings by 2025.³ Meanwhile, the current Three-Year Plan *incentivizes* the installation of new fossil fuel equipment straight through 2024. The equitable transformation of our building stock and workforce will be a herculean undertaking requiring innovation, creativity, and the full weight of every MassSave penny and policy. At this moment, the impractical and unrealistic choice is to continue to use ratepayer dollars to incentivize new fossil fuel systems. These incentives must stop.

The MassSave program must align with the Commonwealth's legally binding 2030 and 2050 emissions targets. The current Plan contains no budgets, targets, or data to explain its compliance with Massachusetts plans and law. The Plan, as written, does not align with the 2030 Clean Energy and Climate Plan goals (which themselves were already insufficiently ambitious and not aligned with the recent Next Generation Roadmap legislation). The 2030 Clean Energy and Climate Plan calls for 1,000,000 heat pump retrofits by 2030. The current Three-Year Plan proposes nowhere near the number of heat pumps needed to reach this goal. As noted in CLF's April 2021 comment letter: "the PAs have not explained whether the limited deployment of heat pumps, combined with the continued incentivizing of fossil fuel equipment, will place the Plan in

¹ <https://ma-eeac.org/wp-content/uploads/Joint-Comments-Re-EEAC-Equity-Recs-032421.pdf>

² <https://www.mass.gov/doc/ma-2050-decarbonization-roadmap/download>

³ Plumber, B. (2021, May 18). Nations Must Drop Fossil Fuels, Fast, World Energy Body Warns. *The New York Times*. <https://www.nytimes.com/2021/05/18/climate/climate-change-emissions-IEA.html>

compliance with the GCA, GWSA, and Roadmap Law... the Plan's lack of dedicated budgets, measurable targets, and tracking data also obscures its level of compliance with these statutes."⁴

It is past time to rise to the challenge of this moment. We urge you to put MassSave's funding and efforts towards prioritizing the communities and populations most underserved and at-risk, towards building decarbonization and electrification, towards workforce development creating a diverse labor force with future-ready skills, and towards innovative pilots and programs solving for the immense challenges ahead.

Thank you for your consideration of these comments. Our team can be reached at info.ma.clean.heat.clean.air@mothersoutfront.org with any questions or responses. We look forward to building an equitable, sustainable future with your support.

Sincerely,



Kathleen Scanlon and Anne Wright
Co-Coordinator of the Clean Heat, Clean Air Campaign
Mothers Out Front Massachusetts

⁴ <https://ma-eeac.org/wp-content/uploads/CLF-EEAC-Comments-April-Draft-Plan-052621.pdf>