



**NEW ENGLAND GEOTHERMAL PROFESSIONAL ASSOCIATION**

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[NEGPA](http://www.negpa.org)

TO: EEAC  
FROM: William Stevens, Esq. - FOR NEGPA  
RE: NEGPA COMMENTS ON REVISED JOINT EE PLAN  
DATE: October 13, 2021

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On October 6, 2021, the Program Administrators (“PAs”) submitted for the Energy Efficiency Advisory Council review and comment, its Revised Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plan (“Revised Joint Plan”). NEGPA is encouraged that the PA’s have included ground source heat pumps in this revised version, and thanks the EEAC and PAs for this revision. The PAs have met with NEGPA during the development period, and the Revised Joint Plan reflects this co-operative collaboration and hopes that it will continue.

It appears that the PA’s have not yet revised its [2022-2024 Strategic Evaluation Plan](#) (“Strategic Evaluation Plan) submitted on April 30, 2021. If a later version exists - NEGPA has not had the opportunity to review it.

The April Strategic Evaluation Plan does not include any load studies or cost benefit analysis on avoided electric capacity and energy costs, nor does the plan include an analysis of the demand reduction induced price effects (“DRIPE”) of ground source heat pumps. NEGPA requests that the EEAC recommend that the PA’s amend the Strategic Evaluation Plan to be consistent with the Revised Joint Plan, the new requirements of the Climate Act, and the most recent [Energy Efficiency Guidelines, D.P.U. 20-150-A](#).

The current [Technical Reference Manual](#) (“TRM”) – noted in both the Revised Joint Plan and Strategic Evaluation Plans - uses inaccurate information relative to the calculation of the economic and environmental benefits of GSHPs, and is inconsistent with: the Climate Act; the requirements established in D.P.U. 20-150-A; TRMs in other jurisdictions; and industry best practices. As a result, the TRM harms ratepayers because they are not receiving the full benefits of MassSave sponsored programs

Since April 2020, NEGPA has been in discussions with the PA’s with respect updating the TRM. In March 2021, the PA’s consultants, DNV GL, issued, [Final Report eTRM Measure Review MA20C15-B-GSHP](#). NEGPA supports the conclusions in the eTRM Measure Review and requests that the EEAC recommend the PAs and Mass Save, Inc. to apply these changes to the TRM as soon as possible - and that these changes will apply to both the 2022-2024 Three Year Energy Efficiency and Strategic Evaluation Plans.