

**THE NEW ENGLAND GEOTHERMAL PROFESSIONAL  
ASSOCIATION, INC.**

Good morning. I am Attorney Bill Stevens, and I represent the New England Geothermal Professional Association, Inc. (“NEGPA”).

On April 30, 2021, the Program Administrators (“PAs”) submitted for the Energy Efficiency Advisory Council review and comment, the *Massachusetts Joint Statewide Electric and Gas Three Year Energy Efficiency Plan (2022-2024)* (“Joint Plan”).

The Joint Plan mentions “heat pumps” 145 times, and air source heat pumps four times. The Joint Plan does not mention “ground source heat pumps (GSHPs)” or “geothermal heat pumps.”

Massachusetts is a national leader in energy efficiency programs. The Joint Plan is readily accessible to the public, other states, and other countries. To promote innovative, cost-effective and environmentally beneficial energy efficiency models to other states, the Joint Plan should include specific language identifying GSHPs.

On March 26, 2021, the Governor signed into law An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy, St. 2021, c. 8 (“Climate Act of 2021”). The Climate Act of 2021 mandates numerical benchmarks and tracking the adoption of Ground Source Heat Pumps. The Joint Plan makes no mention benchmarks or tracking for ground source heat pumps.

NEGPA recommends that the Joint Plan note that the PAs have established benchmarks and adoption levels specific to ground source heat pumps - as newly required by the Climate Act of 2021.

The Joint Plan does not respond to the EEAC consultant’s recommendation to establish separate, higher, ground source heat pump unit

goals. NEGPA requests that the Joint Plan include language that establishes these goals.

The Joint Plan is silent on the EEAC recommendation to actively promote electrification projects that include conversions to ground-source heat pump systems. As Massachusetts prepares to reduce carbon emissions from buildings through electrification, GSHPs have the benefit of reducing the summer and winter peak loads while having the lowest impact on the electric grid of all heat pump technologies.

Third, the Joint Plan does not address the EEAC's recommendation to add incentives and HEAT Loan eligibility for ground-source heat pumps by January 2022. Including such language in the Joint Plan could encourage other states to offer such incentives.

NEGPA will submit comments that further support NEGPA's request that the Joint Plan include specific provisions for ground source heat pumps.

Respectfully Submitted,

*Bill Stevens*

Bill Stevens, Esq.

Dated: May 26, 2021