



[NEGPA](#)

TO: Energy Efficiency Advisory Committee
FROM: William Stevens, Esq. for NEGPA *Bill Stevens*
RE: NEGPA Comments on Joint Three-Year Plan
DATE: July 28, 2021
Atts. *NY Clean Heating Program Manual; NY Heat Pump Implementation Manual (2021)*
FINAL REPORT Ground Source Heat Pump eTRM Measure Review MA20C15-B-GSHP,
(DNV-GL (2021))
CC: Commissioner Woodcock; Deputy Commissioner Tosches; Maggie McCarey (DOER); JoAnn Bodemer; Don Boecke (AGO); Lawrence Lessard; Amanda Schneck; Matt Orio; Martin Orio; Carl Orio; Ryan Dougherty (NEGPA)

NEGPA requests that the EEAC, PAs and Mass Save, Inc. incorporate other states' approaches as a model for including air and ground source heat pumps (GSHPs) in the 2022-2024 Joint Energy Efficiency Plan. NEGPA recommends that the EEAC consider: *The NYS Clean Heat Statewide Heat Pump Program Implementation Plan* and the *NYS Clean Heat Program Manual* (attached).

The current Technical Resource Manual (TRM) uses inaccurate information relative to the calculation of the economic and environmental benefits of GSHPs. Since April 2020, NEGPA has had discussions with the PA's with respect updating the TRM. Subsequently, DNV GL carried out a study behalf of the PAs and EEAC Consultants. In March 2021, DNV GL issued, *FINAL REPORT Ground Source Heat Pump eTRM Measure Review MA20C15-B-GSHP* (attached). NEGPA supports this study. However, as of the date of these comments, the TRM remains unchanged. NEGPA requests that the DNV GL recommended changes to the TRM take effect immediately, and for the PAs and Mass Save, Inc. to include these changes in the subsequent revision to the joint three-year plans and TRM.

Finally, NEGPA would like to make some suggestions that are consistent with other jurisdictions:

- Increase the 7.5 tons cooling cap, to 25 tons residentially to help drive adoption of multi-family units;
- Expand the incentive offering to new construction;
- Offer a prescriptive incentive for domestic hot water pre-heat, and GSHP water heaters;
- Increase the MassSave financing amount for GSHPs to \$50k.

NEGPA requests that the EEAC act favorably upon these suggestions. The format of the EEAC listening and comment sessions has precluded NEGPA from sharing detailed technical information on the costs and benefits of ground source heat pumps. NEGPA is willing to meet with the EEAC consultants and share further information.