



**City of Northampton, Massachusetts**  
**Central Services**  
**Memorial Hall, 240 Main Street**  
**Northampton, MA 01060**  
**(413) 587-1238 Fax: (413) 587-1248**

**David Pomerantz**  
**Director of Central Services**

---

June 29, 2021

Patrick Woodcock, Commissioner  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Comments submitted by email to: [ma-eeac@mass.gov](mailto:ma-eeac@mass.gov)

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

The Northampton Energy and Sustainability Commission (NESC) is pleased to see that the *EEAC Three-Year Energy Efficiency Plan 2022-2024* (the Plan) released on April 30, 2021 recognizes the Commonwealth's policy focus on greenhouse gas (GHG) emissions reductions from the energy sector and states that the Massachusetts Program Administrators "fully support the Commonwealth's ambitious goal of net zero GHG emissions by 2050." We are, however, extremely disappointed to note that the current form of the Plan does not list or treat GHG emissions reductions as a top priority.

Instead, the Plan lists three strategies: electrification, equity, and workforce development as being of the highest priority. These strategies are highly commendable and will result in GHG emission reductions. However, by endeavoring to apply these strategies without a clear target in mind the Plan often forsakes – or works against – what the Plan claims to support, "net zero GHG emissions by 2050."

In order to reach this state-wide goal, it is imperative that we stop incentivizing carbon-dependent technologies and start incentivizing measures that will achieve GHG emission reductions. To do this, every action called for in the Plan needs to meet a cost effectiveness test that (1) includes the social cost of carbon (as determined by the EPA); (2) uses a 2.2% discount rate; and (3) includes emissions from the point of resource extraction to end use (e.g., well-to-meter emissions).

The following pages provide specific comments on the draft Plan put forward by commissioners on the NESC, with the goal of helping the EEAC better align the Plan with the Commonwealth's highest and most difficult goal: reaching net zero GHG emissions by 2050. We respectfully submit our recommendations for consideration and inclusion in the next draft of the *Three-year Energy Efficiency Plan 2022-2024*.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Mason".

Chris Mason  
Energy & Sustainability Officer, City of Northampton

## **Comments on EEAC 3-year Energy Efficiency Plan 2022-2024 from the Northampton Energy & Sustainability Commission**

- Make GHG reductions a top priority (or better yet, a goal) and adjust the three-year plan to take this into account.
  - E.g., “The RCD Initiative is designed to promote and facilitate the implementation of energy efficiency upgrades in existing homes to help customers reduce their overall, whole-home energy usage,” (p 80, Overview). This language needs updating to reflect goal of reducing a home’s carbon footprint.
- Make mandatory inspection of electric panel with all MassSAVE audits. I.e., is the service enough to support heating electrification and EV charging?
- Incentivize electric panel upgrades and add them to the list of incentivized pre-weatherization measures.
- Add incentives for residential radiant electric and induction stoves.
- Add incentives for commercial radiant electric and induction stoves.
- Add incentives for ground source heat pumps for new housing.
- Immediately phase out of the incentive for cooling only central air conditioners.
- Eliminate incentives for all residential oil furnaces.
- Eliminate incentives for all residential propane and natural gas fired space heating equipment.
- Immediately provide consistent incentives for fuel-switching to heat pumps regardless of current fuel use.
- Extend incentives for roadblock remediation (such as knob and tube wiring and vermiculite remediation) to any household in census blocks with historically low participation rates in Mass Save.
- Provide an explicit carve-out for roadblock remediation for C&I customers.
- Provide incentives for ground-source heat pumps for new housing developments and commercial buildings.
- Include greenhouse gas emissions from methane leakage during extraction and transportation of fossil fuels as a basis for all statements referring to the impacts of each fuel-type on GHG emissions.
  - E.g., suggest deleting: “Switching heating from oil to heat pumps also produces greater GHG emissions reductions than switching from natural gas to electricity, further supporting a strategy of switching delivered fuel customers first,” (p 13, paragraph 2). This statement is misleading given that the total lifecycle emissions of natural gas—in particular methane leaks in the distribution network—render natural gas an equally urgent fossil fuel to eliminate.
  - I.e., the rationale for continuing to incentivize upgrading fossil fuel furnaces to more efficient fossil fuel furnaces is weak. The full life-time pollution of ‘natural’ gas - including drilling, transport, and leakage of methane into the atmosphere - is compelling enough to prohibit any incentivizing of the use of ‘natural’ gas. Furthermore, ratepayer dollars should not be used to promote the use of fossil fuel fired heating systems that are expected to be in use for many years, thus working against our state’s goals of rapid and continued reductions in emissions.
- The workforce development sections of the plan should include retraining gas industry workers for a future without reliance on gas.
- The plan should include measurable goals throughout, with suitable record keeping for robust evaluation of the Plan’s successes and failures so that midcourse corrections can be made. This should include efforts

to increase equity.

- Budgets are poorly specified for crucial expenditures to expand equity, such as for outreach to renters and landlords, or for CBOs to engage in supportive activities, etc.
- Incentives for landlords to have audits completed, participate in energy efficiency upgrades and other programs will need to be robust to have a chance of being effective.
- Funding for C&I measures appear to have been substantially reduced from the prior 3-year plan with no justification provided.
- Energy storage targets should be specified under the Active Demand Response category for C&I.
- Incentives for deep energy retrofits should be included in the Plan.
- Define the goal of “weatherization” to mean reducing a building’s peak energy use intensity (BTU/hr-sf) to a level that will allow it to be heated and cooled with a heat pump.
- Covid has created an increased need for ventilation and this three year plan should respond by strongly incentivizing energy recovery ventilation.
- Consider updating the Plan’s name to Three-Year Energy Efficiency & Electrification Plan.
- The statement, “new technology may make a fully all-electric home more achievable” (p 69, paragraph 3) is misleading given that the technology already exists for comfortable and cost-effective electric homes. Suggest deleting.
- “The RCD Initiative promotes and helps to support customers’ efforts to complete comprehensive home energy efficiency solutions, with a primary focus on identifying and installing weatherization and identifying opportunities for high-efficiency HVAC systems,” (p 83, Design and Delivery). Language should be updated to reflect electrification goals.
- With reference to the role of the PA CSR, the Plan states, “The PA Customer Service Representative (CSR) fulfills the customer’s immediate need at the initial phone call, chat, or email inquiry and no further immediate action is needed. Examples include: providing information on available rebates where no HEA is required (e.g., HVAC rebates)...” (p 85, first bullet). We encourage requiring an HEA for HVAC rebates to capture opportunities to combine HVAC upgrades with weatherization.
- The bill signed into law by the Governor explicitly calls for a net zero stretch code, not a high-performance stretch code (page 23, 3rd paragraph). The language in the plan should be revised accordingly.
- Quickly roll out a 'Path to Zero' 1-4 unit incentive program to shift the market toward electrification and high performance construction. This program should heavily incentivize builders to target HERS ratings that are 30-50% better than code requirements.
- Expand the Mass Save Renovation & Addition rebate program to offer incentives to existing building stock undergoing major renovations and additions. Outreach and awareness can be streamlined through innovative coordination with local building departments. There is huge lack of awareness of this program that currently provides up to \$10k for major 1-4 unit renovations.