



June 15, 2021

To: The Massachusetts Energy Efficiency Advisory Council (EEAC)

From: PowerOptions

Re: Comments on 2022-2024 Draft Energy Efficiency Plan

[PowerOptions](#) is a non-profit energy consortium whose Members include more than 400 non-profits and public entities across Massachusetts. More than 50% of these Members are organizations that are underserved communities in the energy savings achieved by the Mass Save program offerings: low-income housing, senior living, community health centers, municipalities with a high percentage of environmental justice communities, and small business-size energy users. On behalf of our Members, we wish to thank the EEAC and the Program Administrators (PAs) for the diligence and work that led to this 2022-2024 Draft Plan, and recognize the prioritization of equity, workforce development, and electrification. PowerOptions previously [submitted comments on the priorities](#) for the plan and are pleased with the PAs intentional inclusion of many of these areas. However, as the Consultants and others have noted, there is significant detail missing and areas of concern we believe still needs to be addressed.

This plan is **our opportunity in the Commonwealth to set the stage** for achieving the now-legislated energy savings goals in Senate Bill 9, An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy (MA Climate Roadmap Law). Without the right priorities in this plan, we will miss the opportunity to achieve these **energy and carbon savings required in the MA Climate Roadmap Law** and we will need to find them with other ratepayer dollars, which is of particular concern to our Members.

Commercial and Industrial Budget, Electrification and Deep Retrofits

We disagree with the substantial budget cuts and related savings reductions. While we support and understand the importance of additional funding and focus on reaching the residential sector, the plan also needs to address the MA Climate Roadmap Law goals for the C&I sector. There is the greatest potential in this sector to achieve those goals, where the scale of the savings opportunities is most significant. There needs to be innovative financing mechanisms, improvements in the project evaluation process, and new solutions to fill the gap of the lost lighting savings. The C&I programs need to structure the programs to achieve **deep energy savings and electrification in this sector**, which is vital to support the MA Climate Roadmap Law. Rather than just systems upgrades, the programs must allow for alternative replacements for technologies like air and ground source heatpumps, and grid infrastructure upgrades that are needed to see electrification at large C&I facilities.

Partnerships and Equity

While we note the improved focus on equitable participation by underserved communities and segments in the Mass Save programs through partnerships, we continue to be disappointed in the rigor of detail included in the plan, which gives us continued concern about the achievable results. As an organization that had experience in the 2019-2021 3-Year program partnering with the Program Administrators (PAs), we learned first-hand the need for more guidelines and resources for partners, if the partnerships are expected to be successful. The plan needs to include more quantitative and specific detail on the support that will be provided to community partners, including: 1) financial, 2) data access, 3) process.

Clarity of Program Eligibility and Incentives for Small Business

We continue to see a lack of details, clarity, and transparency in the program details. This is core to lack of participation, especially amongst the small business segment, which has been a challenge for PAs to reach. We continue to operate with highly complicated and vague incentive programs that change by the month and at individual discretion. The plan must outline and allow partners and customers to understand:

1. Eligibility for programs targeted to underserved communities
2. Funding available (incentive levels, by measure, time period, 3rd party funding source, etc.) for programs, and as they may differ for underserved communities
3. Process and timeline to access the programs, incentives, and funding

Active Demand Management

The current Active Demand program has proven to be sophisticated and successful and provides revenue stream needed for long term contracts to meet the desired demand reduction goals. But there needs to be a transparent and public process for any mid program changes that could impact program participants. The existing program structure needs to be modified to result in continuous participation. Currently, many projects are intentionally delayed in the last year of the plan period, while they wait for the next plan's approval. This results in lost opportunity to meet the goals of the Program. Some form of a rolling application process with reservation periods is needed to improve continuous program participation. Additionally, if the C&I sector represent a higher proportion of kW reduction, the budget for incentives should be allocated accordingly. We support the piloting of EV charging as an Active Demand offering for C&I. We have no time to waste in achieving decarbonization of the transportation sector, and we appreciate the inclusion in this plan cycle.



PowerOptions thanks the EEAC for the opportunity to provide comments for your consideration and we look forward to continuing to work with the EEAC and the PAs to improve the design of the 2022-2024 Energy Efficiency Plan, to meet the goals of the Commonwealth and of our Members contribution to those goals.

Sincerely,

A handwritten signature in blue ink, appearing to read "Heather Takle".

Heather Takle
President & CEO
PowerOptions

A handwritten signature in blue ink, appearing to read "Kristen Patneaude".

Kristen Patneaude
Energy Efficiency Program Manager
PowerOptions