

Thank you for the opportunity to comment. CLF first wants to reinforce the message from the Equity Working Group as a whole that this plan needs to shift resources away from the areas where Mass Save has already transformed the market, like lighting, to areas that really need strategic investment like renters, fuel switching for moderate income, workforce development, small and micro businesses, and bolstering the income eligible program budget.

It would be a major missed opportunity if this Plan continued to nibble around the edges of systemic transformation rather than leading the way with forward looking pieces like deep energy retrofits and workforce development to ensure that our contractor fleet really understands what alternative heating systems are capable of.

I want to highlight the results of MassCEC's Whole Home Heat Pump Pilot Program, which demonstrated that strategic weatherization and heat pumps equal a full heating and cooling solution for homes, with no fossil backup needed. I personally have a 130 year old house that hasn't burned a drop of oil over the last two winters thanks to our whole house heat pump (very similar setup to the 1880s house case study).

We also want to encourage further development of ground-up community-based partnerships. We are seeing recommendations from the EWG and our groups over the last few years coming through in this plan in the partnerships area, which is great. The community-first partnership has a lot of promise but it's still a small program and needs to scale across the state.

Finally, we hope it's clear to the Council and PAs that the legislature and other external parties are paying closer attention to Mass Save now than ever before, and appetite is growing to transition the model away from utility PAs. This plan is the opportunity to show that the current Mass Save model can be leveraged to bend the curve toward meeting our 2030 and 2050 electrification and decarbonizing goals, or whether it is a barrier to progress.

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