

## MassSave 2022-2024 Plan Comments

Michael Duclos – 6/15/21

Thank you for the opportunity to offer my comments as an individual on the tremendous amount of work that has gone into the MassSave 2022–2024 Plan.

I understand the Energy Efficiency Advisory Council to be responsible for guiding, reviewing and approving this Plan.

I request that EEAC in conjunction with DOER clearly indicate the contribution of the MassSave plan to the interim 2030 CECP goals, as well as clearly defining how DOER intends to make up the difference, and how the emissions reduction is to be verified. I realize this is a big ‘ask,’ but I think this is important.

I also request that EEAC and DOER clearly and unambiguously explain the reasoning behind continuing gas heating incentives.

I request this clarity because I’m not understanding the meaning of two sentences at the bottom of page 69 of the Plan, the first:

“While there may be a higher savings potential in switching from these delivered fuels to a heat pump, moving customers to the higher efficiency fossil-based system also delivers short-term carbon benefits that contribute toward state policy goals.

This logic escapes me. With today’s grid emissions factor, and conservative heat pump COP, heat pumps have lower emissions than high efficiency gas heating. So what exactly are these claimed ‘short term carbon benefits’ ?

The second sentence follows:

“There will be opportunities to replace these systems again in coming years, at a point when the grid will be further decarbonized, and the carbon benefits of electrification will be even greater.”

A replacement gas heating system will likely remain in service for 20+ years, emitting more CO<sub>2</sub> each year than would a heat pump replacement, which has lower emissions BEFORE accounting for a grid decarbonized over time.

Also, greater emissions at the start of that 20 years has greater heat trapping impact, since those emissions reside in the atmosphere for longer.

Further, the 2030 CECP indicates that replacement of combustion heating equipment at 'end of life' with heat pumps is a key strategy in achieving a more cost effective transition of 1,000,000 homes to electric heating by 2030.

I ask the EEAC and DOER to clearly and unambiguously illustrate with quantitative, real world examples of why, from an emissions perspective, it is clearly beneficial to replace gas heating with gas heating, rather than with a heat pump as stated. Exactly how does the MassSave Plan support achieving the 2030 CECP ?

If the issue is higher fuel cost, then clearly state that, along with the remedies to the points I've outlined above to achieve Mass. legally mandated emissions reductions.

Thank you for this opportunity to comment on this very important plan.