

August 16, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
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Dear Commissioner Woodcock and members of the Energy Efficiency Advisory Council,

We have reviewed the EEAC's Final Resolution regarding the April 30th Draft of the 2022-2024 Energy Efficiency Plan along with the Attachment A submitted by the Equity Working Group. We applaud the emphasis on "...an innovative and forward-looking plan, with a focus on alignment with GHG emission reduction and electrification goals, equitable program delivery and participation, and workforce development investment." At the same time, we agree that the Draft Plan does not contain sufficient detail on program design to assess whether the programs will achieve these priorities. We've made this same point in previous comments – the program descriptions are simply too general, lacking the detail needed to offer meaningful comments. We do not understand why this is? This planning process is early enough and long enough to require more detailed program descriptions. It looks as if this Plan will be finalized and put before the DPU without the level of detail needed and many program details will not emerge until late this year and into 2022. We saw this with the Passive House Incentive Plan in the current Three-Year Plan – it was not fleshed out until halfway through 2019, so it's actually a 2 ½ year plan.

Beginning in the spring we have submitted several detailed program proposals and hope that the EEAC and PAs will look back to them for suggestions as you flesh out program details. The single most important common theme is that to meet the requirements of the Climate Bill we need thousands of Deep Energy Retrofits with electrification. This will not be achievable without dramatically increasing funding incentives, probably by a factor of up to ten.

The Resolution calls for the support of heat pump equipment "where such equipment is technically feasible and will not cause a material increase to a customer's energy burden". There are very few existing properties which can switch to heat pumps and meet these constraints without deep energy level retrofits. The Resolution suggests building on the success of the Passive house Incentive Program with "a framework to facilitate deep retrofits that supports leveraging of outside resources". Without details, this sounds like an excuse for under-funding and hoping for others to step up with the funding programs required.

All of the program details required for success become all the more difficult when applied to programs to insure equity for renters/landlords, low and moderate-income customers and English-isolated families. The complexities involved here are significant. One aspect that comes up over and over again is that of income verification. There is talk of "simplifying, improving, and streamlining" this process. We think that you ought to seriously consider eliminating it. It's invasive for some, frightening for others, confusing (what happens if I get a new job?) and it makes Mass save look like the "government" to many. How much would it cost to simply eliminate the requirement? How much cheating are we really worried about?

With regard to equity as applied to workforce development, we think that the Climate Bill's requirement for the Mass Save Program to fund MassCEC \$12M every year for workforce and market development is great. We look forward to detailed program proposals from MasCEC. To meet the requirements of the Climate Bill we need to train / re-train thousands of workers to complete DERs, weatherization, heat pump, electrification and renewable energy projects. The EWG suggests that at least 120 people will complete trainings – we hope this is a typo! During this Three-Year Plan it ought to be at least 1200 and the need is probably double that.

We hope that the PA's will be able to deliver a Revised Plan with benefit-cost models by September 1st leading to the Final Plan submission to DPU in October. Our fear is that this schedule does not allow for the development and review of significant program details.

Hank Keating, AIA, President, Passive House Massachusetts

CC Senator Michael Barrett