

December 16, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1021
Boston MA 02114

ma-eeac@mass.gov

Dear Commissioner Woodcock and members of the Energy Efficiency Advisory Council,

Passive House Massachusetts (PHMA) has been actively involved in advocating before the EEAC during the development of the 2022-2024 Energy Efficiency Plan (the Plan). We think the Plan includes some important and positive steps forward but, as we have stressed in the past, we believe that in many areas it still lacks enough detail to evaluate its projected effectiveness.

We have concerns because many of the Plan's commitments are to make plans for specific programs.

- For example, the Plan includes a commitment to prepare a strategic plan for serving renters and landlords by Q3 2022. If the Q3 commitment is met and implementation begins, 1/3rd of the Three-Year Plan will have passed. The same can be said for the details of "streamlined income verification" procedures for low and moderate income programs and the development of a language access plan to be implemented by 2023. We urge the EEAC to hold public hearings to present the details of these programs as they are developed.
- The Plan commits to launch Deep Energy Retrofit (DER) offerings for commercial and affordable multi-family projects in 2022. These programs need to be developed ASAP to take advantage of as many months of the Three Year Plan as possible. We urge the EEAC to hold public hearings to present the details of these programs as they are developed. DER's are an absolutely critical component of the States ability to meet the goals 2030 CECP. This Plan should include very aggressive pilot programs for such projects. We, among other advocates, have suggested that a pilot program offering up to \$35,000 / unit ought to be implemented immediately. We pointed to the NYSREDA retrofit program as a model.
- Aggressive weatherization and heat pump installations must go hand in hand. The Plan recognizes this at times, but so much work needs to be done to bend the curve of installing heat pumps without adequate weatherization first or telling customers to install heat pumps as back-up systems to their existing fossil fuel systems. The 2030 CECP calls for the installation of over a million heat pumps – we need to get this right to avoid very unhappy rate payers.
- The Climate Act has largely shifted the Workforce Development goals of this Plan to over to the MassCEC for implementation. At this point there are no detailed plans for these very aggressive and necessary programs. The EEAC needs to set time parameters on the development of these programs. Once again they are needed ASAP.

This is a very good Plan but its ultimate success depends on getting these details of these critical programs right and in place quickly.

Thank you

Hank Keating AIA President Passive House Massachusetts