



Comments:

To: EEAC

From: Lexington Global Warming Action Coalition

The Global Warming Action Coalition of Lexington (GWAC), a group of concerned citizens dedicated to education, raising awareness about climate change and promoting actions that will reduce greenhouse gas emissions and safeguard the health of our planet for future generations welcomes the opportunity to comment on the Massachusetts Joint Statewide Efficiency Plan for 2022-24 (Plan).

We applaud the steps outlined to advance programs in the areas of electrification, equity and workforce development, however we suggest that the programs outlined in the Plan do not go far enough to meet the challenge imposed by the recently enacted *Next Generation Roadmap for Massachusetts Climate Policy* of achieving net-zero greenhouse gas emissions by 2050. To meet the goal of the *Roadmap*, net zero by 2050, the Commonwealth must stop investment in fossil fuel for heating and cooling now.

Electrification: Stop subsidizing fossil fuel heating in all buildings, both residential, commercial and industrial. Subsidize all electric systems in new construction as well as retrofits. Continued placement of fossil fuel burning furnaces will result in stranded assets, that will need to be replaced by heat pumps prior to the end of their useful lifetime.

The Roadmap legislation requires that the “calculation of program benefits shall include calculations of the social value of greenhouse gas emissions reductions”. Proper accounting for the methane leaks associated with natural gas production and deployment cannot possibly result in cost effective outcomes for continued fossil fuel installations.

The Plan ignores the impacts of large new commercial and industrial buildings. Recent estimates of the impacts of new lab buildings in Lexington suggest that a 200,000 sq. ft. lab/office bldg. could contribute as much ghg emission as 6% of our total residential stock, an intolerable outcome if we are to reach net zero ghg emissions by 2050.

Workforce development

The Plan Administrators (PA) acknowledge the shortage of weatherization installers, HVAC technicians, and plumbers, trades critical to the installation of heat pumps. We suggest the PA’s recognize the importance of the states’ vocational-education system in encouraging workers to enter these fields and to work with advocacy organization such as the Alliance for Vocational Technical Education to seek more capacity in the Commonwealths’ career and technical system.

Given the shift in employment that will occur as the commonwealth electrifies, more emphasis should be placed on the transition training of workers in the gas industry.

Equity The strategic initiatives on achieving equity goals outlined in Section 2 should be quantified and reported on at frequent intervals. By measuring and reporting the effectiveness of these programs, modifications, if necessary, can be introduced to ensure that underserved communities are being reached and their needs met.