



June 15, 2021

To: Energy Efficiency Advisory Council

Massachusetts Sierra Club comments on 2022-2024 draft plan

Thank you for the opportunity to provide comments on the 2022-2024 draft plan. On behalf of our 100,000 members and supporters we ask that you, and by extension, the DPU, demand major and significant revisions to the draft plan, and failing this, to reject the plan.

Over 80 organizations recently wrote to the Eversource Board of Directors and leadership calling out the company for recent examples of its efforts to resist clean energy: The CEO has insisted that despite state climate laws to the contrary, the company still plans to renew long-term gas contracts and spend billions of dollars upgrading gas infrastructure. Second, Eversource is a leader in a coalition meant to stymie building electrification. And Eversource-branded pro-fossil-fuel propaganda has been distributed to elementary school kids.

The draft plan before you is a consequential example of the gas utilities resistance to electrification and equity. In the past, there was a compelling business interest in their ability to use ratepayer fees for incentives to take customers away from oil distributors and add them to a gas company ledger in the interest of emissions reductions, and there was no meaningful mandate to break down barriers that prevent low income and marginalized residents from participating in conversions or energy efficiency.

Times are different now. The EEAC and the DPU are newly empowered and legally required to act in the interest of net zero emissions by 2050 and to ensure a just and equitable transition in doing so. This creates an obvious tension with the gas utilities. By actively investing in electrification they will reduce their gas customer base and need for transmission infrastructure. And prioritizing investments in low income and marginalized communities presents new challenges where achieving performance goals will involve developing new outreach materials and strategies.

Given this tension, you and the DPU are called upon to embrace your expanded obligations and use your powers to the fullest extent to ensure that the state's legal mandates are carried out by the PAs and not compromised by the utilities' outdated and parochial interests.

Three specific points:

- You must ensure that the plan adopts the Equity Working Group recommendations.
- You must ensure that the plan eliminates all incentives for fossil fuel conversions.
- You must ensure that the plan identifies results-oriented numeric goals, transparently tracks performance and that the rewards are tied to this performance. Chapter 8 of the Acts of 2021 requires EEAC to demonstrate that it's taken the social value of greenhouse gas emissions into account in its comments and approval decisions.

Thank you. The Sierra Club looks forward to a revised plan.

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