

June 22, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
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Dear Commissioner Woodcock and members of the Energy Efficiency Advisory Council,

As the President of Passive House Massachusetts I have attended and offered comments at every Public Listening Session regarding the draft 3-Year Plan. In our comments, we have referred to the recently signed Climate Bill several times specifically regarding the re-definition of “cost effectiveness”. We proposed several new Passive House Incentive Programs including for 1-4 Units of new construction and Rehab programs for both 1-4 units and 5+ units. We pointed out that these programs would most likely not “pass” the current cost effectiveness calculations but that the Climate Bill re-definition of this formula to include the “social value of greenhouse gas emissions reductions.” should be used to justify these more expensive programs. In subsequent comments we pointed out that we could find no reference to this new definition of cost effectiveness anywhere in the Draft 3-Year Plan. We heard some people say that the PAs had already modified the cost effectiveness formula and that it did not dramatically change the potential program funding amounts. It is extremely hard to comprehend such a result, especially without any explanation.

Our perception of this situation changed dramatically when we heard the comments of Senator Barrett and Mark Dyen of 350.org Massachusetts at the Public Listening Session on last Tuesday, the 15th. Both pointed out in no uncertain terms that the Climate Bill becomes current law on June 25th and that the Draft 3-Year Plan appears to not reflect the requirements of the bill. Senator Barrett pointed out that the EEAC and the DPU will be among the first state agencies that will have to use the provisions of the Climate Bill as they evaluate the Mass Save Program proposed for 2022-2024. Mark Dyen made the same points but went on to propose that the entire draft 3-Year Plan be withdrawn and re-written over the next year to comply with the requirements of the Climate Bill. In our comments on the 15th, we made the point that this 2022-2024 Plan could well be the most crucial 3-Year Plan of this decade: ending in 2024 it is almost halfway through the timeframe required to reduce GHG emissions by 50% by 2030.

Finally, over the course of the Listening Sessions several commentators including us observed that the Plan’s descriptions of proposed programs lacked enough detail for serious evaluation and comment. For example, the Plan proposes the continuation of the 5+ unit NC Passive House Incentive Program, but it does not say if the incentive amounts will be the same or different – this makes it hard to comment with other than general support and questions. The Plan proposes a “Path to Zero 1-4 Initiative” including “a specific check list of advanced construction standards”, “expected to achieve savings in the 50-60% range”, “similar ...to Passive House”. The Initiative “may include design incentives....and specific incentives for achieving the checklist of performance criteria”. There is no indication as to the origin of the checklist – does it exist? There is no indication as to how much incentive money a typical project

might qualify for – how are we supposed to evaluate and comment on such a proposed program? We proposed a Passive House Incentive Program for 1-4 units with specific incentive amounts. How can we compare this proposal to an unknown checklist with no incentive amounts attached? We think that it would be much simpler for the Plan to incentivize Passive House certification because the design and performance metrics are available and clear and the built-in QA / QC will insure that the resulting buildings will perform as predicted and be durable.

The Residential Coordinated Delivery Initiative (RDC Initiative) for the rehab of existing buildings has similar problems – very complex qualifications, procedures, metrics and undefined incentives. For some types of projects this may be unavoidable, but for projects committed to Deep Energy Retrofits and/ or Passive house Certified rehabs, it would be much more streamlined to offer pre-defined, significant incentives to avoid a complicated, piecemeal incentives for every different type of energy saving strategy or device.

It seems as if this Draft 3-Year Plan needs significant revisions to comply with the intent of the Climate Bill. Simple and straight forward but aggressive programs need to be pulled together quickly to stay on schedule to deploy an active 3-Year Plan in January 2022. We believe that it makes the most sense to take advantage of the well defined and proven Passive House Certification Programs wherever possible rather than attempting to develop and deploy new and detailed Mass Save Programs where the end goals are the same level of deep energy reductions. This approach has worked very well for the existing Passive House Incentive Program and this success should be built on, not ignored.

We look forward to helping work out the details of such programs in any way that we can.

Passive House Massachusetts