

As participating Contractors in the Mass Save Program, we all appreciate the opportunity to attend the EEAC meetings and provide our insight and opinions. We are but a few of the nearly 100 IIC's who participate in the Mass Save RES program. We also serve on the Best Practice Working Group and work alongside the other HPC's, Lead Venders and Program Administrators.

We are here today because the HPC's who participate in the BPWG have issued a letter looking to make significant changes to the HES Program that have significant impact to customers and all Stakeholders. These types of changes have always been collaboratively developed as part of the BPWG process. This is the first situation where a group of Contractors have sought major changes through by-passing the BPWG.

As you all know, there are two options for contractors that want to participate in the program. In the IIC path contractors receive work directly from the LV's based on a customer directly calling the Mass Save 800 number. This path also allows contractors to bring their own customers in the program by submitting a PCR. During 2014 over 1,000 customers were brought into the program through the marketing efforts of IIC's

The HPC path allows Contractors to do their own marketing and bring their own customers through the HES Program. The HPC's perform their own energy assessments, sell the projects and then either install the project with their own their crews or subcontract the work to other IIC's that they have developed relationships with. This path allows qualified contractors to bring their own customers through the program and has the benefit of expanding the reach of the HES program.

The current HES program was designed with consistent oversight for the IIC's and HPC's equally. All contractor's participating in the program, contract with and report directly to the LV. All inspections for both IIC's and HPC's are completed by the same LV. This ensures that all contractors, regardless if they are HPC's or IIC's are held to the same standard and are accountable in the exact same way.

We are here to address a letter that the HPC community submitted to the EEAC last week. This letter includes 4 initiatives that the HPC's are asking to be implemented in the next 3 year plan. These initiatives directly impact Customers as well as the IIC contractor community. We were not made aware of this letter until this past week.

As a result of these changes, we have reached out to the greater IIC contractor community to alert them to the changes that are being requested. We sent out a 3 question survey asking the IIC's to provide their feedback. More than 85% of the IIC's participated in the survey. This is the highest participation level we have experienced and shows the importance of this issue.

We asked a total of 3 questions:

Question 1: Do you feel the HPC's should be able to contract directly with the PA's.

YES: 32%

NO: 68%

Question 2: Do you feel the HPC's should be allowed to receive leads that come into the 800 Mass Save Line?

YES: 25%

NO: 75%

Question 3: Do you feel the HPC's should be exempt from LV inspections?

YES: 25%

NO: 75%

As you can see this is an overwhelming response from the IIC community and clearly does not support the HPC initiatives.

The fourth initiative requests the creation of a position for an HPC on the Residential Management Committee. While we are not in a position to respond as to the appropriateness of this request, we feel that there should be opportunities for IIC's, HPC's and LV alike to serve on this committee.

It is also unclear how many HPC's actually support these initiatives. We feel it is important to know if there is broad HPC support for these initiatives, especially in light of the low IIC support.

How many HPC's support this letter and has the DOER requested feedback from the PA's about their experience with the HPC'S?

Lastly, the Current HES model has been extremely successful. We don't feel it make sense to make changes to the HES program that will likely decrease consistency and lower oversight for a group of contractors.

We respectfully request that the EEAC reject the initiatives outlined in the HPC proposal until we hold further in-depth and collaborative discussions. The proposals are very broach reaching and have the real potential for negative impacts to the customer experience and overall program goals. We ask that these initiatives not be implemented into the three year plan.

Regards,

The IIC Community

