



September 30, 2021

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
ma-eeac@mass.gov

RE: Mass Save 2022-2024 Three-Year Plan written comments, RMI

Dear Commissioner Woodcock and the Energy Efficiency Advisor Council:

We look forward to reviewing the Program Administrator's (PAs) updated Three-Year Plans, drafted to align with Greenhouse Gas Emissions Reduction Goals released by the Baker Administration on July 15th, 2021.¹ It is incumbent that the finalized plans match the level of ambition required to meet state decarbonization and equity goals for the built environment.

Specifically, these plans must set the Commonwealth on a path not just to aspire to meet but achieve the terms of the Massachusetts 2050 Decarbonization Roadmap, the Interim 2030 Clean Energy and Climate Plan (CECP), and The Next Generation Climate Roadmap Act of 2021. These goals are ambitious and imperative.

By statute, the Commonwealth is now required to reduce greenhouse gas (GHG) emissions by 50 percent below the 1990 baseline level by 2030 and to achieve net zero GHG emissions by 2050; it requires that this transition occur equitably; and it requires three-year energy efficiency plans to comply with 2050 goals and prioritize GHG reductions. This aligns with the administration's assertion in the Interim CECP that by 2030, one million homes and 300 to 400 million square feet of commercial real estate will be electrified, twenty percent of the Commonwealth's building stock will undergo a deep energy retrofit, and these climate goals will be achieved in a way that does not leaving the Commonwealth's most vulnerable community members behind.

Against this backdrop, it is critical that the \$4 billion ratepayer investment in Mass Save be deployed in support of this effort.

¹ Greenhouse Gas Emissions Reduction Goals for Mass Save. Executive Office of Energy and Environmental Affairs. July 15, 2021. <https://www.mass.gov/doc/greenhouse-gas-emissions-reduction-goal-for-mass-save/download>

Eliminate incentives for fossil fuel equipment and transform gas efficiency investments

A critical step to addressing the climate crisis, jump-starting electrification, and decarbonizing our built environment is eliminating incentives that actively encourage continued fossil fuel usage, such as for gas furnaces, boilers, and water heaters. This extends beyond appliance incentives, to low-or zero-interest financing for fossil fuel equipment or other incentives structures that allow it. Gas efficiency programs need to shift away from appliance-focused incentives that lock customers into 20 years of fossil fuel combustion in their homes and businesses, and to weatherization and electrification. These alternative measures reduce gas demand, lower bills, and improve resilience, all while setting the stage for a household to transition off fossil fuels.

Support the creation of a Deep Energy Retrofit Transformation Program

In addition to electrification, the Interim CECP highlights the significant role deep energy retrofits will play in achieving Massachusetts 2030 climate goals. We have proposed a Deep Energy Retrofit program funding up to \$35,000 per unit², akin to the program currently offered by NYSERDA in New York.³ Such program would radically cut carbon and the associated energy consumption in existing buildings that enroll. This is a market transformation program that will trigger significant cost compression in the marketplace, making deep energy retrofits more affordable for all.

Adopt the recommendations of the EEAC Equity Working Group

The EEAC Equity Working Group (EWG) developed multi-sector recommendations^{4,5} through a process that involved intensive stakeholder input, including from the program administrators, to guide the development of a 2022-2024 Plan that centers equity. We urge the Council to reiterate its support for and request that the PAs implement EWG recommendations, including improved reporting, workforce diversification and development, expand eligibility for moderate income households to access LMI programming, improved whole-building and turnkey services, and efforts to expand marketing and outreach as well as ease of participation in EJ and limited English proficiency communities.

Accountability for achieving goals

Mass Save has a history of setting goals and not hitting those targets. As we set new expectations, we must ensure that there are publicly available, regularly published metrics and reporting by program administrators that detail achievements towards equity metrics as well as electrification targets and identify what steps will happen if PAs are not meeting these targets.

² RMI Comments to EEAC Re: Deep Energy Retrofit Market Transformation Program. June 21, 2021. https://ma-eeac.org/wp-content/uploads/RMI_EEAC-Comments_6_21_2021.pdf

³ For information on RetrofitNY, see <https://www.nyserda.ny.gov/All%20Programs/Programs/RetrofitNY>.

⁴ EEAC Equity Working Group Summary to EEAC on Moderate-Income, Renter and Landlord, Small Business, and Community Partnerships Recommendations. January 2021. <https://ma-eeac.org/wp-content/uploads/Workshop-5-Equity-Working-Group-Process-and-Recommendations-01.08.21-MM-Final-002.pdf>.

⁵ Updated EWG Recommendations. February 2021. <https://ma-eeac.org/wp-content/uploads/EWG-Recommendations-2.19.21.pdf>

We appreciate your time and attention. Should the EEAC have further questions, RMI will gladly assist.

Sincerely,

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About RMI

RMI is an independent, non-partisan, non-profit organization whose mission is to transform the global energy system to secure a clean, prosperous, zero-carbon future for all. Our initiatives include researching the business models, policies, technologies, and financing mechanisms necessary to decarbonize the buildings and power sectors and advance an equitable clean energy transition. RMI has supported utilities and governments around the world to develop integrated resource plans by providing analytical support, project management, and advisory input. RMI believes strongly in the importance of analytically rigorous, participatory, and properly overseen energy plans that consider all available options to achieve decarbonization and constituent benefit.