



THE COMMONWEALTH OF MASSACHUSETTS  
House of Representatives  
24 Beacon Street  
State House, Boston 02113 - 1054

LINDSAY N. SABADOSA  
STATE REPRESENTATIVE  
1ST HAMPSHIRE DISTRICT

Patrick Woodcock, Commissioner  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Dear Commissioner Woodcock and Members of the Massachusetts Energy Efficiency Advisory Council:

I am writing to submit comments on the EEAC Three-Year Energy Efficiency Plan 2022-2024 released on April 30, 2021. While the plan has many important changes such as prioritizing electrification, equity, and workforce development, which are important to reducing green house gas emissions, it falls short of what Massachusetts needs to do in order to reach emissions reduction goals. Additionally, the plan does not have sufficient transparency and accountability to assure successful implementation.

We must, immediately, stop incentivizing carbon-dependent technologies and start incentivizing measures that will achieve green house gas emission reductions. In order to do so, the plan needs to meet a cost effectiveness test that includes the social cost of carbon as determined by the EPA, use a 2.2% discount rate, and include emission from the point of resource extraction to end-use. This could be done by **adding incentives** for electric panel upgrades (including them on the list of incentivized pre-weatherization measures), for ground-source heat pumps for new housing developments and commercial buildings, for commercial radiant electric and induction stoves, and for ground source heat pumps for new housing while **phasing out** incentives for cooling only central air conditioners, all residential oil furnaces, and all residential propane and natural gas fired space heating equipment. Ratepayer dollars should not be used to promote the use of fossil fuel fired heating systems that are expected to be in use for years in direct conflict with the goal of rapid, continued reductions in emissions.

Finally, the plan should include *measurable goals* throughout, with suitable record-keeping to continuously evaluate the Plan. It is very important to provide detailed information on what will be included in reporting across all programs, and to whom it will be reported. Given that the equity efforts are likely to be especially challenging, *goals, measurement and reporting on these equity efforts* are essential. Greater clarity should also be provided on the budget for key expenditures to expand equity, such as for outreach to renters and landlords or for CBOs to engage in supportive activities.

Thank you for your time and consideration of these comments. I urge the Committee to implement these recommendations to the three-year plan so that Massachusetts can continue to be a leader in energy efficiency and our battle against climate change. As always, I remain available for any questions or comments.

Respectfully,

A handwritten signature in cursive script, appearing to read "Lindsay N. Sabadosa".

Lindsay N. Sabadosa  
State Representative, 1st Hampshire