



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

Re: April 30 Draft of the 2022-2024 Massachusetts Three-Year Energy Efficiency Plan

Dear Commissioner Woodcock and Members of the Energy Efficiency Advisory Council:
Vote Solar appreciates the opportunity to provide feedback on the 2022-2024 Three-Year Energy Efficiency Plan.

Vote Solar is a national 501(c)3 whose mission is to bring solar power into the mainstream in a way that promotes socially just outcomes for black and brown people and poor folks of any race.

Energy efficiency upgrades offer the best health and financial outcomes when they're aggregated, and creating pathways for households to adopt the full suite of benefits should be a key objective for program design. When homeowners, building owners, or renters are able and willing to take on energy efficiency measures, program resources should be available in one place, and with coordination between program admins and market actors to ensure that the full suite of benefits are realized for that household, including solar and storage to provide maximum benefit to that household. With the potential for transformative benefits available to homes that receive attention, it is critical that the PA's redouble their focus on substandard housing - homes in low income, language isolated, and communities of color. These households offer the greatest opportunity for savings, as well as the greatest bump in quality of health outcomes.

The American Council for an Energy Efficient Economy (ACEEE) recently [compared](#) solar and efficiency as "peanut butter and jelly" in that combined they confer a benefit that is greater than the sum of their individual benefits. Solar, whether it's rooftop or local community solar, leads to savings on energy bills, and pairing it with deep efficiency retrofits means that a smaller array can confer greater savings for the same cost.

Solar also represents a key tool in demand reduction as the grid scales up its overall capacity to meet the needs of an electrified buildings sector. Having solar behind the meter helps fortify the system against variance in demand, and can help avoid brownouts and spikes in energy cost on

high-demand days. Solar also [reduces electricity costs](#) for all consumers. We recommend exploring additional incentives from PAs for pairing solar and storage with efficiency measures.

Vote Solar notes that the current plan does not go far enough to move households off of existing gas heating and cooking systems, and does not do enough to discourage new gas. We now know, and cannot ignore the danger fracked gas poses to the climate, to indoor environmental health, and to the structural safety of buildings. The gas industry has a vested interest in perpetuating gas, and this body should be critical of gas' continued acceptability for home use. "Cost of supply" in context of the law may need to be revisited to account for the astronomical environmental and health cost of gas, and create incentives and programs accordingly.

Finally, we feel strongly that input presented by advocates representing impacted communities should take precedence in this body's deliberation and be reflected in ultimate decisionmaking. In particular, Vote Solar would like to reiterate the Green Justice Coalition's recommendations re:

- Pre-weatherization building retrofits, including roofs, mold, asbestos, and knob and tube wiring.
- Creating new incentives and outreach for renters and landlords
- Targeted outreach in low-income neighborhoods and communities of color; and empowering trusted community partners to connect residents with services

Experiential expertise is the shortest distance from planning to just and robust program execution, and Vote Solar supports dedicated adoption of those recommendations.

Thank you for the opportunity to give input.

Stephan Roundtree, Jr., Northeast Director
Vote Solar
101 Summer Street, Boston