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INTRODUCTION

This document has been drafted to brief Councilors on priority equity-related planning issues for the Mass Save® 2028-2030 energy efficiency plan in advance of a workshop meeting on October 15, 2026. This brief is different than the Council's other workshop briefs because the straw proposals are being advanced by the Equity Working Group (EWG), a subcommittee of the Energy Efficiency Advisory Council, for full Council review and adoption. This brief is intended to complement and supplement equity content from the three prior planning workshops, which included content and proposals for the Low Income Sector, small business segment of the Commercial and Industrial Sector, and moderate income segment of the Residential Sector.

Equity recommendations will be presented in the draft resolution as equity sections as part of each section as follows:

1. Workforce Development and Language Access in cross-cutting,
2. Small Business in the C&I sector,
3. Community First Partnerships in the Residential sector and
4. Designated Equity Communities in the Income Eligible sector,

BACKGROUND

The equity proposals in this brief for the Mass Save 2025-2027 energy efficiency plan build on a foundation of more than a decade of advocacy, research, and implementation experience. The Residential and the Commercial and Industrial Small Business Nonparticipant Studies completed in 2020 and 2024 confirmed that certain customer groups—moderate income households, renter households, limited English-speaking households, and microbusinesses[1]—participate in Mass Save's energy efficiency programs at lower rates than other customers. The Equity Working Group was formed in May 2020 to develop programmatic initiatives intended to improve the equitable delivery and outcomes of Mass Save programs.

An important note: equity is not the same as equality. Equality means each individual or group of people is given the same resources or opportunities. Equity acknowledges that each person has different circumstances and allocates the necessary resources and opportunities to reach an equal outcome.

Achieving equity after a long period of inequitable investments and outcomes is not accomplished easily. Although progress has been made, results to date in meeting the equity targets and other planning goals has been slow and fallen short in some areas. Achieving and sustaining an equitably delivered program requires sustained and continuous iteration. As such the Equity Working Group continues its work throughout the term to monitor progress on implementation and to collaborate with the Program Administrators (PA) on tailored solutions to overcome existing barriers across the Commonwealth.

[1] Consumption (annual) of <0.11 GWh electricity or <8,000 therms gas.

KEY MASS SAVE EQUITY MILESTONES

2013–2018

Early initiatives

- **2013:** Efficient Neighborhoods+SM pilot
- **2016:** Statewide moderate income incentives for weatherization introduced
- **2016:** Renter-specific offer introduced
- **2019:** Moderate income and rental property offers expanded
- **2019:** Municipal and Community Partnerships program created

2019–2020

Understanding barriers

- **2019**: First publication of key performance indicators with regular reporting of more granular performance data
- **2020**: Nonparticipant studies published
  - Residential Nonparticipant Market Characterization and Barriers Study
  - Residential Nonparticipant Customer Profile Study
  - Small Business Nonparticipant Customer Profile Study

2021–2024

Formalizing equity

- **2020:** Equity Working Group formed
- **2021**: Clean Energy Pathways workforce training program launched
- **2021:** Filed 2022-2024 Plan with strong equity focus, including:
  - Compilation of planned equity investments
  - Equity targets
  - Equity component in performance incentive mechanism
  - Distribution of workforce diversity funding to Mass Clean Energy Center per legislative mandate
  - Affordable multi-family decarbonization/deep energy retrofit offering
  - Creation of Community First Partnerships program
  - A list of communities for prioritized targeting of equity efforts (revised by the DPU's order)
- **2022:** Strategic Renters Plan published
- **2024:** Language access recommendations provided by PA consultants
- **2024:** Mass Save MWBE Study published
- **2024:** Updated Nonparticipant studies:
  - 2013-2022 Residential
  - 2024 Small Business

2024–2025

Expanding delivery

- **2024:** Moderate income turnkey offer rolled out in six communities (statewide in 2025)
- **2024:** Filed 2025-2027 Plan builds on many of the equity elements from 2022-2024, includes unprecedented support for equity measures and ties performance incentives to equity outcomes
- **2025:** Enhanced rental property and moderate income weatherization incentives rolled out in 21 Designated Equity Communities
- **2025:** Enhanced Small Business Turnkey rebates for non-profits and renters rolled out

PERFORMANCE

Many EWG recommendations and enhancements to PA reporting in recent years provide the Council and stakeholders with more timely and granular equity performance data derived from the equity initiatives included in the PAs' plans. One key data addition is a compilation of investments in equity initiatives, which provides a high level at a glance review of the status of equity investment. Planned equity investments for the 2025-2027 Plan total almost $1.8 billion representing a 170% increase over planned equity investments of $668 million for the 2022-2024 Term. The following table shows progress in achieving planned equity investment halfway through the current term:

	Total Investment ($)		
Customer Segment	**Term Planned**	**Completed through Q2 2026**	**Completed as % of Term (50% of Term)**
Total Equity Investment*	**1,777,132,037**	**709,398,577**	**40%**
Low Income Incentives	884,802,759	352,649,209	40%
Moderate Income Incentives	348,945,705	102,417,526	29%
Renter Incentives*	589,021,862	245,538,544	42%
--Non-LMI Renter Incentives	*72,823,912*	*58,552,375*	*80%*
Small Business Turnkey Incentives	96,774,118	56,587,648	58%
Workforce Development	79,748,614	38,053,108	49%
Community Engagement	19,421,601	6,150,336	32%
Language Access	22,254,221	2,986,688	14%
Small Business Turnkey Program Support	35,963,194	12,771,195	36%
Low-Income Program Support	216,397,913	79,230,491	37%

*Renter incentives include incentives to low-, moderate- and non-income qualified renter households and therefore there is overlap between the LMI incentives and the renter incentives noted above; that overlap is removed from the total investment.

At this point in the current term, some equity efforts are showing stronger results than others. For example, moderate income weatherization production has been very strong while moderate income heat pump production is behind goal. More detailed information about performance for equity-related initiatives may be found in the Consultants' 2025 Q4 equity and 2026 Q2 results presentations.

SUMMARY OF COUNCILOR AND PUBLIC INPUT

Theme	Key Ideas	Source(s)
Expand and Strengthen Community First Partnerships	Increase CFP funding, improve municipal-CBO partnerships, enhance data-sharing, improve flexibility and collaboration.	Council, Public Comment
Maintain and Refine Designated Equity Communities	Retain DEC framework, increase targeted incentives, use geographic targeting to reach underserved communities.	Council
Use Data to Drive Equity Outcomes	Improve community-level data access, track participation gaps, support targeted outreach and equitable geographic distribution.	Council, Public Comment
Reduce Participation Barriers	Simplify enrollment, improve language access, automate qualification where possible, provide trusted community-based support.	Council, Public Comment
Increase Equity in Program Delivery	Focus resources on low-income customers, renters, underserved communities, diverse contractors, and workforce development opportunities.	Council, Public Comment

EQUITY WORKING GROUP PLANNING PROCESS AND STRAW PROPOSALS

Equity Guiding Principles For 2028-2030

The Equity Working Group's recommendations for 2028-2030 are guided by three principles:

- → Continue support for equitable distribution of investment and outcomes for customers and communities.
- → Streamline program delivery to improve cost efficiency and make participation easier and simpler for customers.
- → Energize and resource communities to better serve their constituents through partnerships with Mass Save

EWG's planning process

The 2025-2027 Plan included a number of new equity initiatives. Their implementation in the initial year of the Plan was delayed for various reasons, including the Department of Public Utilities' order requiring Residential Sector budget cuts and challenges in finalizing data sharing agreements with the Community First Partners. As a result of the delays, when planning discussions began at the EWG over this summer there wasn't a significant period of implementation experience and data (generally less than one year) to support a full assessment of the new offers, especially in the Designated Equity Communities. In general, the EWG maintains there is promise in the approaches and initial results of the equity offers. Planning discussions therefore largely focused on refinements to the approaches in the 2025-2027 Plan.

The EWG has met monthly since July to focus on the planning process for 2028-2030 and developing recommendations to advance to the full Council. Agendas for July-October included the following topics:

- → July: Equity principles, EEAC's guiding principles, Designated Equity Communities

→ August: Small business offer, Strategic Renter Plan, DECs

→ September: Community First Partnerships, workforce development

→ October: Community First Partnerships, straw equity recommendations

Straw Proposals

The Equity Working Group reviewed and discussed the following straw proposals prepared by the Consultants at its October 5 meeting. **These proposals are not final recommendations to the EEAC at this point.** EWG members provided input on these straw proposals at the October meeting that will be incorporated, as well as input provided by the Council at Workshop #4. The EWG will review and develop its final set of equity recommendations that will be presented for EEAC review and adoption during the November EEAC meeting.

Focus Area	Number	Proposal
Community First Partnerships	1.	Streamline and coordinate community partnership programs, including CFPs, Community Education Grants and Municipal Energy Manager Grants
Community First Partnerships	2.	Develop metrics of success that consider the level of community capacity, experience in the CFP program, program support and community objectives
Community First Partnerships	3.	Improve CFP support of small business participation, including through development of the mixed-use building offer
Community First Partnerships	4	Improve Energy Advocate (EA) role and supports (e.g., financial and outreach tools), leveraging resources of MassCEC and enhancing collaboration on EA needs
Designated Equity Communities	5.	Maintain the 2025-2027 DEC communities for the 28-30 Term
Designated Equity Communities	6.	Continue the 25-27 DECs offers for the 28-30 Term:
Designated Equity Communities	6a.	Rental properties
Designated Equity Communities	6b.	Moderate income
Designated Equity Communities	6c.	Weatherization
Designated Equity Communities	7.	Emphasize reduced energy burden (i.e., electric resistance and delivered fuels) in customer targeting
Designated Equity Communities	8.	Develop outcome-based metrics for performance within the DECs
Designated Equity Communities	9.	Develop a mixed-used building offer, i.e., small business with residential units above

Designated Equity Communities	9a.	This could be a statewide offer
Small Business	10.	Continue enhanced offers for small business renters and nonprofits
Small Business	11.	Increase tracking and reporting of participation rates across municipalities to support targeting of and increased participation by areas/segments with lower participation rates
Language Access	12.	Improve and/or establish reporting on budget spend for language access services and for participation by language other than English residential and small business customers
Language Access	13.	Engage community-based organizations with expertise in best outreach practices for serving target languages other than English
Language Access	14.	Identify opportunities to provide language supported services in community-based efforts, including CFPs, Main Streets, etc.
Workforce Development	15.	Collaborate with MassCEC to enhance its programmatic focus on enhancing Mass Save's workforce diversity; report regularly on progress in achieving impact
Workforce Development	15a.	Supplier diversity at every level of supplier engagement with Mass Save
Workforce Development	15b.	More equal participation across types of diverse suppliers
Workforce Development	15c.	Returning citizens
Workforce Development	15d.	Language access at every step in customer's journey
Workforce Development	16.	Continue engagement with EWG on further consideration and/or adoption of fair chance hiring practices
Workforce Development	17.	Maintain aspirational 15% supplier diversity goal and continue to report