

**FINAL DRAFT EWG RECOMMENDATIONS**  
**9/28/23**

**OFFER AND RECOMMENDATIONS THAT APPLY WITHIN TO-BE-DETERMINED GEOGRAPHIC AREA(S)**

Property type	Eligibility process	100% Wx incentive	Expanded funding for Pre-Wx barrier mitigation	100% Heat pump	100% Panel upgrade	100% Targeted air sealing	100% window	Services to reduce customer time and effort	Other/ appliance
Rental property -Wx only	automatic	Yes	Yes	N/A	N/A	N/A	N/A	Support services (project facilitation similar to a general contractor, heat pump coaching),	Increased rebate for efficient electric appliances, including induction stoves
Rental that wants to electrify	automatic			Yes (case by case for gas)	yes	Yes*	Single to triple pane. Consider double to triple	Support services (project facilitation similar to a general contractor, heat pump coaching),	Same as above, plus an added bonus amount for induction stoves
Non-rental-Wx only	Automatic	Yes	Yes	N/A	N/A	N/A	N/A	Support services (project facilitation similar to a general contractor, heat pump coaching),	Increased rebate for efficient electric appliances, including induction stoves
Non-rental that wants to electrify	Some kind of income verification (Simplified or current PA process)			Yes (case by case for gas)	yes	Yes*	Single to triple pane. Consider double to triple	Help with income verification plus support services	Same as above, plus an added bonus amount for induction stoves

\*Note: it is assumed that properties that want to electrify & receive the enhanced electrification incentives would also weatherize, and that funding for targeted air sealing would be part of that.

Recommendation: develop and implement a residential offer, in select geographic areas, to provide the following:

- For rental properties, an offer that includes automatic qualification for measures as depicted in the chart above, including the following:
  - 100% cost coverage for Wx
  - An expansion of and/or increase in funding for pre-Wx barriers as appropriate,
    - 100% cost coverage for heat pumps and pre-electrification barriers (eg electrical panel upgrades)The EWG recognizes that utility costs may increase when heat pumps are installed, and that such increases may be due to gas-to-electric conversions (particularly where the home is not weatherized or where an existing boiler or furnace has a greater than 90% efficiency or AFUE) and/or “cost-shifting” when central fossil fuel systems are converted to heat pumps on individual tenant meters. Refer to Foundational Principle I.C. below for the EWG’s recommendation to address this issue.
  - Increased rebates for efficient electric appliances, including induction stoves
    - Where properties electrify, an increased rebate for induction stoves
- For non-rental properties, an offer that includes qualification mechanisms and measures as depicted in the chart above, including the following:
  - automatic qualification for:
    - 100% cost coverage for Wx
    - An expansion of and/or increase in funding for pre-Wx barriers as appropriate
    - Increased rebates for efficient electric appliances, including induction stoves
  - Qualification based on income:
    - 100% cost coverage for heat pumps and pre-electrification barriers
    - The EWG recognizes that utility costs may increase when heat pumps are installed, and that such increases may be due to gas-to-electric conversions (particularly where the home is not weatherized or where an existing boiler or furnace has a greater than 90% efficiency or AFUE). Refer to Foundational Principle I.C. below for the EWG’s recommendation to address this issue.
    - for properties that electrify, an increased rebate for induction stoves.

Recommendation: By X date, the Mass Save Program Administrators and DOER, with input from the EWG, will determine geographic areas in which to provide the offer described above. In designating such areas, the following types of factors will be considered:

- Average or median income level of residents
- The historical level of Mass Save investment in the area
  - Whether or not the area is a Gateway City as defined by M.G.L.c. 23A section 3A
- Education level of residents
- Minority status of residents
- The extent to which residents are English-isolated
- Minimizing “free ridership” to the appropriate extent, keeping in mind the goal of distributive justice (increasing investment in areas that have been historically under-invested in.)
  - Include an appropriate method of limiting luxury and/or newer rental property participation to prevent receipt of enhanced rebates, incentives, or services to market rate customers
  - Consider First Street Foundation’s Flood Factor, provided it remains publicly available, based on simply address, and free of charge at <https://riskfactor.com/>
  
- Impact on the Mass Save residential budget
- Ease of implementation, including, for example, messaging or impact on the rebate or incentive delivery process

**OFFER AND RECOMMENDATIONS THAT APPLY TO MODERATE INCOME CUSTOMERS OUTSIDE THE TO-BE-DETERMINED GEOGRAPHIC AREAS**

**Moderate income customers are households whose income is between 61% and 80% (inclusive) of state median income (SMI) or area median income (AMI), whichever allows for greater participation.**

Upgrade outcome	Eligibility process	100% Wx incentive	Expanded funding for Pre-Wx barrier mitigation	100% Heat pump	100% Panel upgrade	100% Targeted air sealing	100% window	Services to reduce customer time/effort	Other appliance
Wx only	Some kind of income verification (Simplified or current PA process)**	Yes	Yes	N/A	N/A	N/A	N/A	Help with income verification Support services (project facilitation similar to a general contractor, heat pump coaching),	Increased rebate for efficient electric appliances, including induction stoves

Electrification/heat pumps	Some kind of income verification (Simplified or current PA process)			Yes (case by case for gas)	yes	Yes*	Single to triple pane. Consider double to triple	Help with income verification Support services (project facilitation similar to a general contractor, heat pump coaching),	Same as above, plus an added bonus amount for induction stoves

\* Note: it is assumed that properties that want to electrify & receive the enhanced electrification incentives would also weatherize, and that funding for targeted air sealing would be part of that.

\*\*This is not meant to change the current offer of 100% cost coverage for Wx for 2-4 unit homes.

Recommendation: The offer for moderate income customers shall include the following (See chart above for a visual depiction):

- 100% cost coverage for Wx
- An expansion of and/or increase in funding for pre-Wx barriers as appropriate,
- increased rebates for efficient electric appliances, including induction stoves
- 100% cost coverage for heat pumps and pre-electrification barriers (eg electrical panel upgrades)
  - The EWG recognizes that utility costs may increase when heat pumps are installed, and that such increases may be due to gas-to-electric conversions (particularly where the home is not weatherized or where an existing boiler or furnace has a greater than 90% efficiency or AFUE) and/or “cost-shifting” when central fossil fuel systems are converted to heat pumps on individual tenant meters. Refer to Foundational Principle I.C. below for the EWG’s recommendation to address this issue.
- Where properties electrify, an increased rebate for induction stoves

## DRAFT RECOMMENDATIONS

### I. FOUNDATIONAL PRINCIPLES

**A. RECOMMENDATION:** By X date, the Mass Save Program Administrators and DOER, with input from the EWG, will determine an appropriate income verification process for offers where qualification for financial support for measures, or for services, is not automatic and is based on income. The purpose is to simplify and streamline the customer income qualification process to the extent possible and appropriate, and the approaches listed below shall be considered. Note that this list is not meant to be exhaustive and other approaches may be considered.:

1. “Self-attestation plus follow-up checking” for moderate income residents that do not meet the automatic qualification requirements.

a. Consider a self-attestation pilot in Lawrence or Lowell

b. Consider ways to limit the “luxury” and/or newer rental property participation to prevent receipt of enhanced rebates, incentives, or services to market rate customers

2. Use of software that provides real-time, “instant” approval of income qualification determination

3. The current PA process for income verification.

**B. RECOMMENDATION:** Where qualification is based on income, utilize area median income (AMI) or state median income (SMI), whichever allows for greater participation.

**C. RECOMMENDATION:** By X date, with input from DOER and the EWG, the PAs will work to identify and implement approaches designed to address the potential increase in utility costs that may occur when heat pumps are installed. The EWG recognizes that such increases may be due to gas-to-electric conversions (particularly where the home is not weatherized or where an existing boiler or furnace has a greater than 90% efficiency or AFUE) and/or “cost-shifting” when central fossil fuel systems are converted to heat pumps on individual tenant meters. Examples of approaches that should be considered to address this issue include:

- Requiring that heat pumps be placed on a landlord-owned panel,
- Providing landlords with information about their responsibilities as landlords, including the legal prohibition against violating a lease provision stating that heat will be included in rent
- Providing homeowners, landlords and tenants with the following types of written information:
  - The Massachusetts Green Communities Act requires that Massachusetts be net zero greenhouse gas emissions by 2050,

- heat pumps can reduce greenhouse gas emissions (eg, they provide both heating and air conditioning with zero on-site fossil fuel emissions),
- Utility costs may increase as a result of installing heat pumps
- steps that can be taken to mitigate potential utility bill increases.
- Requiring renters to sign an approval form with the information above to agree to the install.

**D. RECOMMENDATION: By X date, the PAs, with input from DOER and the EWG, shall develop and implement cost management strategies.**

1. Consider fixed pricing model as used in weatherization. (Note that a fixed pricing model may be most useful in situations where building typologies and associated heating system configurations can be identified and standardized.)

2. By date [X], the PAs, in consultation with DOER, shall explore the extent to which they can implement an RFP for vendors to provide bundled services (pre-Wx, weatherization, heat pumps), at fixed prices (or within specified price ranges), as used in weatherization, and report back, by said date, as to how this can be implemented.

**E. RECOMMENDATION: Simplify the customer journey by facilitating access to services regardless of entry point.**

1. Customers should be able to enter at any point. Customers should not have to ask for service twice or be told to call another number. (The related accounting for budget and savings allocations can happen behind the scenes on the back end.)

2. All contactors should be able to seamlessly direct a customer to any service (e.g., warm hand off). Consider supporting a referral pool for contractors to pass on projects that they cannot address due to time/geographic/technological constraints. Consider a small referral fee if a project is completed by another contractor. Also consider encouraging contractors to build partnerships with other contractors to provide whole building services to a customer from what appears to be a one-stop contractor.

3. LEAN and the PAs should continue and expand efforts for cross training of service providers between the IES and Residential programs

**F. RECOMMENDATION: To minimize customer out-of-pocket expenses, develop and implement approaches to provide instant approval of equipment/measure eligibility, and instant receipt of, financial support for equipment/measures. Approaches may be implemented initially for moderate income customers and subsequently expanded.**

1. Maintain quality assurance and quality control provisions that minimize burdens on the customer and contractor

<p>2. Offer “instant payment” for any measures for which financial support is being provided so customers do not have any out-of-pocket expense. The PAs should ensure systems to provide direct payment to contractors in a timely manner for work.</p>
<p>3. Explore and implement other approaches as appropriate, such as increasing the number of contractors qualified to receive direct payments and instituting a coordinated delivery model for moderate income customers. PAs should consider setting up a pre-funded incentive account for contractors that participate in these programs for the purpose of not requiring contractors to float the money for instant rebates given to customers. This account could be pre-funded and reconciled regularly (e.g. quarterly).</p>
<p><b>G. RECOMMENDATION: Provide all customers with simple, prioritized multistep action plan.</b></p>
<p>1. Improve messaging to provide information in a clear and easily understandable format</p>
<p>2. Prioritize customer education during each step of the process</p>
<p><b>H. RECOMMENDATION: As depicted in the charts above, provide facilitated support for customers through adoption of recommendations, including: general navigation, project facilitation, technical assistance and evaluation of quotes.</b></p>
<p><b>I. RECOMMENDATION: Provide additional service delivery improvements to reduce barriers to participation.</b></p>
<p>1. Retain a lead vendor with expertise with service to multifamily properties, community-based approaches, and EJ populations to serve rental properties</p>
<p>2. Partner with Municipal Electric Association of Massachusetts to develop a co-delivered offer for MF customers with PA gas and muni electric service, leveraging IRA funds as available</p>
<p><b>J. RECOMMENDATION: Increase budget and plan goals for all moderate income BCR measures in absolute numbers and as a proportion of Residential Sector spending and goals (distributive justice)</b></p>
<p> </p>
<p><b>II. COMMUNITY FIRST PARTNERSHIPS (CFPs)</b></p>
<p><b>A. RECOMMENDATION: Provide additional funding to support, as needed, hiring a heat pump coach, a facilitator/quarterback, and a small business liaison in each community, as well as to support language services, as needed.</b></p>
<p>1. Increase CFP budget to XX to achieve objectives included in these recommendations</p>

2. Provide additional flexibility for the program to support innovative, place-based solutions
<b>B. RECOMMENDATION: Support the CFPs' outreach efforts with collateral material tailored to the CFP needs.</b>
1. Provide individualized marketing materials
2. Work with CFPs to develop outreach efforts
3. Expedite PA approval process
<b>C. RECOMMENDATION: Work to improve data availability tailored to the CFP needs</b>
1. Develop protocol to provide CFPs with access to information on what buildings have been served with what services so they can effectively target
<b>D. RECOMMENDATION: Continue to work to increase the number of EJMs participating in Mass Save as CFPs.</b>
1. Consider developing a referral program that has the ability to recognize community members within EJMs that refer other community members to services that they have received through Mass Save.
<b>VI. LANGUAGE ACCESS</b>
<b>A. RECOMMENDATION: Provide end-to-end language support for all customers, providing all services and information in a customer's preferred language.</b>
1. Begin this process with seven languages: Haitian Creole, Portuguese, Arabic and all additional languages required by the US Election Assistance Commission's Language Access Designations pursuant to Section 203 of the Voting Rights Act (at time of recommendation, Spanish, Chinese, Vietnamese and Khmer (Cambodian)). Continue with other languages as appropriate.
2. Work to enhance language support to increase access on a community level (e.g. through CFPs) as appropriate.
<b>B. RECOMMENDATION: Prioritize hiring of multilingual staff for all Mass Save programs.</b>
1. Increase visibility of indirect providers with additional language capabilities
<b>C. Record customer's preferred language at every interaction.</b>



**VII. MEASURING SUCCESS**

**A. RECOMMENDATION: Provide consistent tracking and reporting of data to assess progress toward achieving recommendations, including for “ready access” rental and moderate income programs.**

**B. RECOMMENDATION: Establish targets by MF project type (e.g. building size, non-condo, projects in certain geographies) and track and report progress.**

**C. RECOMMENDATION: Re-evaluate Equity Performance Incentive mechanism to ensure alignment with 2025-2027 EWG recommendations.**

**VIII. WORKFORCE**

**A. RECOMMENDATION: Through PAs’ efforts and in coordination with MassCEC, ensure that equity considerations are included in workforce recommendations, including from the customer standpoint and the contractor standpoint.**

1. Ensure that the workforce is equipped to serve language isolated customers
2. Ensure that workforce efforts are designed to foster diversity amongst contractors. Document which contractors are certified MWBEs in the various qualified contractor networks (home performance contractors (HPC), independent insulation contractors (IIC), and heat pump installer network (HPIN)). Additionally identify which contractors can provide services in languages other than English and document on the Mass Save website. Note that this self-identification could be optional.
3. Consider adjustments to qualifications to ease entry for returning citizens
4. Establish a Contractor Development Pathway
  - a. Clearly define the contractor journey pathway.
  - b. Provide contractor- facing information about the Mass Save programs on the Mass Save website.
5. By X date, review background check requirements and implement changes to ease requirements as appropriate

**IX. SMALL BUSINESS**

**A. RECOMMENDATION: Ensure that equity considerations are included in program design/implementation of any small business programs.**

1. Provide translation services for Main Streets events

**B. RECOMMENDATION: Provide concierge services for small businesses**