

# Three-Year Energy Efficiency Plan Update

## Workshop #5 Summary

### Equity Workshop for the Massachusetts Energy Efficiency Advisory Council

Held on October 10, 2023 from 1pm - 5pm ET

### Meeting Overview

On October 10, 2023, the [Massachusetts Energy Efficiency Advisory Council](#) (EEAC) met virtually via Zoom to discuss priorities for the 2025-2027 [Three-Year Electric and Gas Energy Efficiency Plan updates](#) (commonly known as Mass Save programs) through a series of workshops, the fifth on the [Equity](#) recommendations developed by the Equity Working Group (EWG). There were twenty-two EEAC Council Members in attendance and over one hundred members of the public (see [Appendix A](#) for a list of meeting participants). This meeting was facilitated by Michelle Vigen Ralston (Ralston) of Common Spark Consulting with the support of Suhaila Sikand (Sikand) of Common Spark Consulting, and Susan Rivo (Rivo) of Raab Associates.

### Agenda & Housekeeping

*Agenda and Groundrules documents available on [Workshop Webpage](#).*

Facilitator Ralston welcomed all participants and invited Jo Ann Bodemer, DOER, to provide welcoming remarks and to conduct a roll call for Council Members. Ralston provided context to the workshop series, including the agenda for the third workshop, and introduced the members of the DOER, Consultant, and Facilitation Team. Ralston briefly covered the Groundrules and Zoom Protocols (see [Workshop Webpage](#)) that were approved in Workshop #1 and the approach to making recommendations throughout this three-year-plan process.

As documented in the Meeting Summary below, Council Members were provided an opportunity to ask clarifying questions on each recommendation after a brief presentation by the EEAC Consultant Team. After taking clarifying questions of each recommendation, Council Members discussed each recommendation and sub-recommendation and Voting Council Members suggested modifications. *All recommendation language below is abbreviated as displayed in the [Workshop Presentation](#), and the full recommendation language is available in the respective topic Workshop Brief available through the [Workshop Webpage](#).*

### Overview of Recommendations

See [Presentation Slides](#) 12 - 22

Brooks Winner of the Equity Working Group, summarized the Equity Working Group process which met seven times, reviewed the process of meeting equity targets, and met with various partners regarding underserved communities. Winner summarized the themes and takeaways, including: the barriers are too high, simplification, innovative income verification, affordable

technology and easier comprehension of their operation, address program costs and energy burdens, better data is needed to be efficient, strategic, and effective, keep momentum building.

Mary Wambui, of the Equity Working Group, provided a few remarks. She noted that as the EEAC thinks about equity in this 2025-2027 plan, EEAC needs to think about distributive justice (fair and equal access to the benefits of Mass Save). Wambui recalled that the Equity Working Group stemmed from a non-participant study that concluded that Mass Save does not serve every customer equitably. Wambui acknowledged that the past 2-3 years were laying a foundation to rectify the issues found in this study to build a more inclusive EE workforce. Wambui expressed that Distributive Justice is the next step for Mass Save, which has been significantly falling short in Mass Save. Wambui recalled that in 2018, the City of Lowell felt it was underserved by statewide programming and requested to be a program administrator. Wambui noted from various studies that for every dollar a lower income resident puts towards statewide programs, they lose 30 cents, whereas wealthier communities make profit. Wambui summarized that while a foundation is set for equity, there's still a lot Mass Save can do.

Wambui outlined a few steps to distributive justice within Mass Save:

1. Increase the funding to Community First Partnerships—which empowers communities and takes advantage of local knowledge and expertise—and build more flexibility into the program.
2. Increase the share of Mass Save dollars allocated to the income eligible sector and equity services within the recommendations of this Workshop. Consider the 10-20% spending requirements to be the floor, not the ceiling.
3. Continue to lower barriers to participation, especially for low- and moderate-income households, renters, language isolated customers, and small businesses.
4. Identify communities and populations and prioritize those most in need with additional investment. Re-examine the expanded criteria as set by DPU that determine the priority needs in communities—the expansion of criteria in the 2022-2024 plan minimizes the ability to take meaningful steps to justice.
5. Resolve the data questions and seek better data. The role of data in driving equitable energy efficiency outcomes cannot be understated—better data will help target communities for energy efficiency investments.

Wambui closed her remarks hoping that all councilors and PAs are supportive of a budget that moves towards distributive justice.

Jo Ann Bodemer, DOER, provided context and an overview of [Workshop Brief](#). Highlighted the principles and goals, including distributive justice, simplification of customer experience, and energizing and resourcing communities. Bodemer prefaced that many recommendations are in need of implementation details, but that this detail will be integrated in a future process in collaboration with the EWG and PAs. Bodemer recalled the EWG was very excited and enthusiastic for recommendations of the 2022-2024 plan, however, realized that Mass Save isn't "there yet", which is guiding these principles and recommendations to make more strides

forward. Bodemer thanked various partners and collaborators for their participation in this effort.

Stephanie Terach (Liberty Utilities), on behalf of the PAs, shared that the PAs are conceptually in support of these recommendations. Terach noted there are details needed to help make the recommendations work. Terach highlighted that many of the PAs are within communities every day trying to get the word out about programs and solve customer issues. PAs appreciate the ongoing EWG collaborative process and found input from stakeholders quite valuable. Terach presented the current equity targets and noted that while there's progress, more work is needed to ensure everyone has access and benefits from the programs. Terach highlighted that flexibility is needed to determine the solutions and the approaches to implementation and appreciated the framing that's focused on exploring and considering the recommendations.

## Recommendation I: Geography-based Offers

See [Presentation Slides 23 - 34](#)

Alissa Whiteman, from DOER, introduced the first set of recommendations under Recommendation I: Geography-based offers. Whiteman covered two overarching themes for the recommendations:

- communities within select geographic areas (to be determined) would receive an *automatic* and streamlined income verification process.
- communities outside select areas would would be receive a *simplified* and streamlined income verification process

Whiteman noted that “Moderate Income” in this recommendation refers to 60-80% state median income.

### Recommendation I: Geography-based Offers

- A. Develop and implement a residential offer, in select geographic areas, to provide rental properties with an offer that includes automatic qualification for measures as depicted in the chart above, including the following
  1. 100% cost coverage for weatherization
  2. An expansion of and/or increase in funding for pre-weatherization barriers as appropriate
  3. 100% cost coverage for heat pumps and for pre-electrification barriers (e.g., electrical panel upgrades)
  4. Increased rebates for efficient electric appliances, including induction stoves
  5. Where properties electrify, an increased rebate for induction stoves
- B. Develop and implement a residential offer, in select geographic areas, to provide non-rental properties with an offer that includes qualification mechanisms and measures as depicted in the chart above, including the following:
  1. Automatic qualification for:

- i. 100% cost coverage for weatherization
    - ii. An expansion of and/or increase in funding for pre-weatherization barriers as appropriate
    - iii. Increased rebates for efficient electric appliances, including induction stoves
  - 2. Qualification based on income:
    - i. 100% cost coverage for heat pumps and pre-electrification barriers
    - ii. For properties that electrify, an increased rebate for induction stoves.
- C. By January 15, 2024, the Mass Save Program Administrators and DOER, with input from the EWG, will determine geographic areas in which to provide the offers described in I.A. and I. B. above. In designating such areas, the following types of factors will be considered: Average or median income level of residents; Average education level of residents; Whether or not the area is a Gateway City as defined by M.G.L.ch. 23A section 3A; The historical level of Mass Save investment in the area; Minority status of residents; Impact on the Mass Save residential budget; Ease of implementation, including, for example, messaging or impact on the rebate or incentive delivery process; Minimizing “free ridership” to the appropriate extent, keeping in mind the goal of distributive justice; 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; The extent to which residents are English-isolated; % of primary residences relative to the percent of “second homes” in the area
- D. Develop and implement an offer for moderate income customers outside select geographic areas, to include the following (See chart above for a visual depiction):
  - 1. 100% cost coverage for Wx
  - 2. An expansion of and/or increase in funding for pre-Wx barriers as appropriate
  - 3. Increased rebates for efficient electric appliances, including induction stoves
  - 4. 100% cost coverage for heat pumps and pre-electrification barriers (e.g., electrical panel upgrades)
  - 5. Where properties electrify, an increased rebate for induction stoves

Council Members then discussed and suggested modifications for Recommendation I and its sub-recommendations.

- Paul Johnson: Questioned if it's equitable that landlords can get free heat pumps for their rental properties.
  - Whiteman: Responded that while this is the idea. Raised EWG concern about cost shifting from gas to electric and what tenants might need to be paid for. Noted these were essential discussions in EWG.

- Jo Ann Bodemer: Noted there's other Foundational Principles (to be presented later) that address and attempt to mitigate these issues.
- Bob Rio: Raised concern about the eligibility of rebates and the subsequent repairs and maintenance costs, and if replacements aren't covered, it will set people up to fail. Highlighted that customers with old heat pumps aren't replacing them because of cost.
- Charlie Harak: Suggested that some of the communities are defined by DPU, Mass Save might be better off narrowing to better direct resources. Posed if Mass Save can really target the dollars in the places that really need it because there's limited dollars.
- Greg Abbe: Cautioned that some panels need to be upgraded and that coincides with capacity at the street (which might be a utility-side improvement). Suggested to the degree possible, that PAs work with their utility-side counterparts to identify barriers on pre-electrification in order to help move projects along.
- Paul Johnson: Opposed this recommendation because it's a goldmine for rental property owners. Raised that without precautions, it's a bad idea.
  - Brooks Winner: Heard Paul's concerns on heat pumps. Noted that the EWG did include a parenthetical note in the [Workshop Brief](#) on the reasons that Paul noted. Highlighted there's enough flexibility in the recommendation language to protect tenants from utility bill increases. Noted that landlords are underserved, even if not socio-economically underserved, and their tenants aren't receiving the benefits of these technologies due to landlords not uptaking technology.
- Commissioner Mahoney: Agreed with Brooks Winner. Heard Paul Johnson's concern. Reflected on Distributive Justice remarks and that the tenants within buildings should be benefitting from the programs they are paying for. Noted that three year plans are interacting with many other programs and how this work aligns to the [Grid Modernization Advisory Council \(GMAC\)](#) and aligning processes so the geographic areas are being prepped and ready for implementation of these recommendations.
- Mary Wambui: Reminded Councilors on Columbia Gas Explosions. Recalled there was 100% cost coverage for weatherization and EE for Lawrence, Handover, and North Andover. Despite having 100% cost coverage, Lawrence did not benefit enough. Suggested that the problem is not abuse, it's equity. We give three towns the same benefit, and the two of the wealthier areas benefited and Lawrence did not. The deeper question is why those landlords that could take advantage of the program in Lawrence did not take advantage of the program in Lawrence. Raised concern that often free ridership is used as an excuse not to do equitable and justice related work, even though wealthier communities have been on free ridership for a while. Suggested it's time Mass Save takes a risk for free ridership amongst the most vulnerable.
- Dennis Villanueva: Noted that a heat pump is a little different than weatherization, as weatherization impacts are neutral for landlords, but a lack of weatherization hurts tenants. Raised concern on installation and maintenance costs for heat pumps which adds a layer of complexity. Suggested to be careful.
- Charlie Harak: Agreed with Greg Abbe's comment. Suggested to get information from PAs in the tangential forums on the integration of climate goals and PA capacity planning.

- Jo Ann Bodemer: Noted that the Foundational Principles address lots of this concern and that many of the foundational principles discussed them.
- Bob Rio: Raised concern on the heat pump market prices. Requested a study on the price market for heat pumps. Noted there's a cost to some of these programs that aren't being accounted for, for example with induction stoves and the pans that tenants can use.
- Sharon Weber: Agreed with comments on pre-electrification barrier coverage and electric distribution linkage upgrade.
- Mary Wambui: Noted that MA is heading away from fossil fuels. If EEAC is concerned about costs of heat pumps, then EEAC should be concerned about the costs of stranded assets from folks still on the gas system. Noted these recommendations fit into a larger ecosystem. Highlighted that many are working very hard on grid modernization. If EEAC suggests that because of other costs (like maintenance) Mass Save should not allow low- and moderate-income households to get incentives, EEAC is still positioning them hardships in the future.
- Brooks Winner: Supported the recommendation. Pointed Council Members to Page 10 in the Workshop Brief regarding pricing concerns and proposed recommendations.
- Kyle Murray: Agreed with comments by Brooks Winner and Mary Wambui. Supported the recommendation. Flagged the grid issues and noted that the GMAC is looking at this and coordination should be aligned with the EEAC recommendations.

**Facilitator Ralston Summary<sup>1</sup> of Council Member Discussion on Recommendation I:** There is substantial support for this set of recommendations. There is concern for unintended utility bill impacts on gas to electric systems. There is interest in understanding nuances around: heat pump market impacts, pricing, and deployment; grid modernization; grid capacity planning.

## Recommendation II. Foundational Principles

See [Presentation Slides](#) 35 - 50

Margie Lynch, EEAC Consultant Team, provided context and an overview of Recommendation II in groupings to allow for clarifying questions and discussion on each.

### Foundational Principles A and B:

#### Recommendation II: Foundational Principles A and B:

- A. Where qualification is based on income, utilize area median income (AMI) or state median income (SMI), whichever allows for greater participation.
- B. To inform the 2025-2027 Three Year Plan, 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

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<sup>1</sup> The Facilitator Summaries in this document are a mixture of the recap provided by the Facilitator within each recommendation during the meeting where applicable as well as post-meeting insertions for clarity and comprehensiveness.

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.

- a. “Self-attestation plus follow-up checking” for moderate income residents that do not meet the automatic qualification requirements.
- b. Consider a self-attestation pilot in Lawrence or Lowell
- c. 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
- d. Use software that provides real-time, “instant” approval of income qualification determination
- e. The current PA process for income verification.

Council Members then discussed and suggested modifications for Recommendation I and its sub-recommendations.

- Maggie Downey: Noted that PAs are in support of totally simplification of this process given to B or all on board with A.
- Maggie Downey: Suggested to clarify B2 to “develop” or “create” a software.
- Charlie Harak: Supported the modification to develop a software. Raised concern about mistakes versus gaming the system and to measure this data (i.e. what percentage of people simply make the mistake).
- Greg Abbe: Agreed with Charlie Harak. Raised curiosity on QA/QC (quality assurance/quality control) going forward and to investigate if those who are self attesting income are or are not on discounted utility rates in an effort to streamline the connection between EE and utility-side rates.
- Mary Wambui: Noted she was recently at MIT climate energy event and they are looking for ways to be more involved in the energy and climate lives of Massachusetts residents. Suggested for PAs or DOER to engage them on B2 or anything else.
- Margie Lynch: Noted that US DOE is rolling out HOMES and HEERA that can inform income self-attestation.
- Brooks Winner: Noted that US DOE recommends state energy offices consider self-attestation.
- Commissioner Mahoney: Noted that DOER is in charge of HOMES and HEERA implementation and will consider self-attestation given this conversation.

**Facilitator Ralston Summary of Council Member Discussion on Recommendation II A and B:**

There is interest in D2 to not just use, but recognize the need to develop software. There were also some questions around pilots and examples of self attestation and making sure that a self-attestation pilot would be monitored sufficiently to better understand the dynamics of folks that are maybe missing opportunities, folks that are successfully reaching program opportunities.



## Foundational Principles C, D, and E:

### Recommendation II: Foundational Principles C, D, and E:

- C. To inform the 2025-2027 Three Year Plan, 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:
  - a. Requiring that heat pumps be placed on a landlord-owned panel
  - b. 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
  - c. Providing homeowners, landlords and tenants with the [certain] types of written information
- D. The PAs, with input from DOER and the EWG, shall develop and implement cost management strategies.
  - a. Consider fixed pricing model for heat pumps as used in weatherization. (Note that a fixed pricing model may be most workable in situations where building typologies and associated heating system configurations can be identified and standardized.)
  - b. By January 2025, the PAs, in consultation with DOER, shall explore the extent to which they can implement an RFP for vendors to provide bundled services (pre-weatherization, 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. 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.
  - a. Maintain quality assurance and quality control provisions that minimize burdens on the customer and contractor
  - b. 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.
  - c. 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).

Council Members then discussed and suggested modifications for Recommendation II C, D, and E.

- Paul Johnson: Supported with the idea, but questioned why a landlord would go along with this recommendation.
  - Brooks Winner: Noted that EEAC doesn't know any of this stuff will work, but thinks it's worth trying. Summarized that landlords will get free weatherization and free heat pumps if they're willing to take a little risk or change the terms of their lease agreements. Suggested this is a good deal with a win-win-win situation where the residents of their buildings do better, the landlords get a good deal and the Commonwealth of Massachusetts meets its climate goals in 2030 or 2050. Noted that what Mass Save currently is doing isn't working. Highlighted that EEAC can't guarantee any of these recommendations will fix split-incentives, but are trying new stuff through these proposed recommendations.
- Kyle Murray: Agreed with Brooks Winner. Noted that Paul Johnson is raising a good point, but this is what EWG came up with without recommending a requirement to make the upgrades.
- Mary Wambui: Noted that energy efficiency programs are a section of programs in the energy system. Highlighted that not every concern we have can be solved at the EEAC specifically, but perhaps DOER has a full picture view to help address these issues.
- Greg Abbe: Noted there are state entities that have a good deal of say on utility reimbursement works. Noted that not everything will get solved here, but as these conversations are developing, they should continue to happen with state agencies and legislators as well. Suggested that while some landlords think this isn't for me, some will actually think this to be helpful.
- Charlie Harak: Noted that Recommendation II.C is carefully worded which is really helpful. Summarized that if a landlord or tenant who currently pays for the heat, but it's an oil or propane system is going to have cheaper costs if the landlord puts in heat pumps and the electricity stays on the landlord's bill. If tenants get a HP where the landlord pays for gas and continues to pay for electricity, it will be cheaper for the tenants. Appreciated the clause around cost shifting. Noted that a very significant increase in tenant overall cost it would be illegal if there's an existing lease, but a lot of low-income tenants are in properties where it's a kind of tenant at-will and the landlord could fairly easily shift those costs. Supported the recommendation and thought it is very appropriately, helpfully, and precisely worded. Noted that the recommendation that requires a heat pump to be placed on the landlord on panel is envisioned for the situation where the landlords already paid for heat; and that the landlord would make the same determination of a tenant who currently pays for heat (that it stays on the

tenant side). Hoped that if the landlord could shift from an expensive system, like oil and propane, then the landlord might take that weatherization and heat pumps because they're getting a lot of benefit.

- Douglas Quattrochi: Clarified the law is already clear, Chapter 186 Section 14 explicitly addresses that a landlord cannot move utilities from a landlord's meter to renter's meter without consent even without a written rental agreement. Felt this recommendation has landlord input and it has lots of protections for renters. Highlighted that if landlords put on solar panels with the property then they can actually monetize heat pumps and that is a financial incentive for landlords to want to take the pumps onto their own meters.
- Charlie Harak: Noted in EWG, Mass Save just has to make sure tenants know their rights and that landlords know their obligations.
- Paul Johnson: Noted that E is a brilliant suggestion.
- Sharon Weber: Supported E and mentioned that the more we can support upfront, the better.
- Kyle Murray: Agreed with Sharon Weber on E. Noted that D is very important and is so obvious, EEAC is not talking about it a ton. Raised concern that incentives drive up contractor costs and can pocket the difference.

**Facilitator Ralston Summary of Council Member Discussion on Recommendation II C, D, and E:** Recommendation II.C is actually very precisely and accurately worded. Not everything is set in stone or established or decided, but certainly there is room to be creative in finding ways to make it possible to move more heat pumps into this particular segment and achieve greater equity in distributive justice. Did not see any heartburn related to D or E.

## **Foundational Principles F, G, H, and I:**

### **Recommendation II: Foundational Principles F, G, H, and I:**

- F. Simplify the customer journey by facilitating access to services regardless of entry point.
  - a. Customers should be able to apply for energy efficiency services with a minimum of effort. 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.)
  - b. All contractors should be able to seamlessly direct a customer to any service (e.g., warm hand off). Consider the following:
  - c. Supporting a referral pool for contractors to pass on projects that they cannot address due to time/geographic/technological constraints
  - d. A small referral fee if a project is completed by another contractor
  - e. 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
  - f. LEAN and the PAs should continue and expand efforts for cross training of service providers between the IES and Residential programs

- G. Provide all customers with simple, prioritized multistep action plan.
  - a. Improve messaging to provide information in a clear and easily understandable format
  - b. Prioritize customer education during each step of the process
- H. 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.
- I. Provide additional service delivery improvements to reduce barriers to participation.
  - a. Retain a lead vendor to serve multifamily rental properties. The lead vendor should have expertise in serving multifamily properties (including smaller rental properties) and English-isolated customers, and in implementing community-based approaches.
  - b. Work with municipalities served by Municipal Light Plants to develop a co-delivered offer for multifamily customers with gas through the investor-owned utilities, leveraging IRA funds as available

Council Members then discussed and suggested modifications for Recommendation II F, G, H, and I.

- Paul Johnson: Asked about whether this recommendation is suggesting an account manager or concierge service be added.
  - Jo Ann Bodemer: Responded that EWG is contemplating a like a concierge facilitated navigator for the customer through their journey through Mass Save. Noted that this recommendation is about the ability to provide seamless service, which is different.
- Sharon Weber: Suggested not having to call another number and that PA's do a transfer/route them to Mass Save for any questions they may have.
  - PAs confirmed this is possible and happens.
- Paul Johnson: Supported the recommendations and highly supported F2B and revising it to a "significant" referral fee. Suggested to increase HPCs to serve income-eligible customers instead of handing them off and better reporting on how many HEAs weatherization jobs and HBCs are doing for the caps.
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**Facilitator Ralston Summary of Council Member Discussion on Recommendation II F, G, H, and I:** There's a suggestion to make F2B a little stronger by replacing "small" with "significant" and better tracking potentially to better understand that important overlap.

## **Recommendation II: Foundational Principles J:**

Consultant Margie Lynch introduced the next subset of recommendations under Foundational Principles.

## **Recommendation II: Foundational Principles J:**

- J. Increase budget and plan goals for all moderate income Benefit Cost Ratio measures in absolute numbers and as a proportion of Residential Sector spending and goals (distributive justice)

Council Members then discussed and suggested modifications for Recommendation II J.

- Charlie Harak: Supported the goal.
- Sharon Weber: Recommended tracking and data to be added.

**Facilitator Ralston Summary of Council Member Discussion on Recommendation II J:** There is support in this recommendation. It's not just an increase in the current program budget, but an evolution of it.

## **Recommendations III - VII**

See [Presentation Slides 52 - 63](#)

Following a brief stretch break, Consultant Lynch introduced Recommendations III - VII. Lynch presented each recommendation and Facilitator Ralston then opened the floor for clarifying questions of all five recommendations followed by discussion on each recommendation. The discussion below is organized by Recommendation number, not necessarily timing of discussion.

## **Recommendation III: Community First Partnerships (CFPs)**

### **Recommendation III: Community First Partnerships**

- A. 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.
  - 1. Increase CFP budget to achieve objectives included in these recommendations
  - 2. Provide additional flexibility for the program to support innovative, place-based solutions
  - 3. Support the CFPs' outreach efforts with collateral material tailored to the CFP needs.
- B. Provide individualized marketing materials
  - 1. Work with CFPs to develop outreach efforts
  - 2. Expedite PA approval process
- C. Work to improve data availability tailored to the CFP needs
  - 1. Develop protocol to provide CFPs with access to information on what buildings have been served with what services so they can effectively target
- D. Continue to work to increase the number of EJM's participating in Mass Save as CFPs.

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.

Council Members then discussed and suggested modifications for Recommendation III.A and its sub-recommendations.

- Jhenny Saint Surin: Noted that PAs are strongly supportive of this recommendation.
- Commissioner Mahoney: Suggested to make sure that Mass Save is not limiting the great work that this effort has done to stand up those organizations and collaborative, collaborative efforts. Suggested that leveraging the work of Community First Partnerships would actually help serve Mass Save efforts by connecting it with solar implementation. Questioned if it would be beneficial to allow for cross cutting programs (intersectionality) and funding from outside sources.
- Paul Johnson: Supported this recommendation C1 and D1.
- Sharon Weber: Noted that assessors databases have data on specific types of heat pumps. Supported using public available datasets to avoid privacy concerns.
  - Brooks Winner: Noted from own multi-family housing outreach, the data available with assessors are not as useful as utility data and there are misclassifications. Suggested there needs to be better quality data for local outreach which the PAs can provide and hopefully without customer privacy concerns.
- Commissioner Mahoney: Noted that CFPs are addressing the specific needs of individual communities that are very different. Appreciated that the PAs have standardized and are working towards standardized documents that can be used and outreach and endorsed the concept of more flexibility so that these communities can serve the needs that only that really they know best of their communities. Questioned why flexibility isn't already built into the CFP program. Noted that additional flexibility for CFPs is important and should be built into the program.

#### **Facilitator Ralston Summary of Council Member Discussion on Recommendation III:**

- A. General support and a need to figure out what those particular roles might look like in particular communities. Additional flexibility piece while also opportunity for maybe some standardized pieces and what's the right balance that fits and works well with the community.
- B. Need to understand outreach materials with a balance of standardized materials with a faster approval process for those pieces.
- C. Support for expanding access and use of building level data and questions about which data sets to pull from and that PAs could provide more than public databases, but there are concerns around privacy.
- D. Support around developing some type of referral program, perhaps one that includes a monetary reward for community members who refer other community members to programs

## Recommendation IV. Language Access

### Recommendation IV: Language Access

- A. Provide end-to-end language support for all customers at all stages of service, including through Community Partners.
  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. Prioritize hiring of multilingual staff for all Mass Save programs.
  1. Increase visibility of indirect providers with additional language capabilities
- C. Record customer's preferred language at every interaction.

Council Members then discussed and suggested modifications for Recommendation IV.A and its sub-recommendations.

- Sharon Weber: Suggested to make multi-lingual to single-lingual within the language requested or needed. Suggested that preferred language of customers doesn't need to be asked at every interaction.
- Commissioner Mahoney: Suggested Mass Save Website be translated into all these languages as a starting point.
  - Sonakshi: Confirmed the website can translate into some of the languages already.
  - Commissioner Mahoney: Noted they only saw 3.
  - Facilitator: Noted a need to confirm which languages are supported and to build this out.
- Brooks Winner: Supported Mahoney's comments. Noted some discrepancies of where the translations are working and gaps on forms and scheduling tools on the website. Suggested that non-English speakers won't "see programs as their programs" unless it's in their language. Supported Sharon Weber's comments.
  - Jhenny Saint Surin: There is a Language Access Plan which addresses some of these issues across all Mass Save.
  - Sonakshi Saxena: Noted the Language Access Plan tries to capture different sentiments for speakers and also the cultural understanding of Mass Save programs. Highlighted the need to know preferred language not just for communicating to them, but to understand them and programs better.

**Facilitator Ralston Summary of Council Member Discussion on Recommendation IV.A:** Under C, the important piece here is that folks are served in their preferred language and to make sure that the preferred language is recorded at the right interactions to ensure that that happens.

Making sure that language accessibility is comprehensive throughout the Mass Save communications and that the website includes translations of forms and different tools.

## Recommendation V. Workforce

### Recommendation V: Workforce

- A. Through PAs' efforts and in coordination with MassCEC, ensure that equity considerations are included in workforce development recommendations from both the customer and 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, independent insulation contractors, and heat pump installer network). Additionally identify which contractors can provide services in languages other than English and document on the Mass Save website.
  3. Consider adjustments to qualifications to ease entry for returning citizens
  4. Establish a Contractor Development Pathway
  5. Clearly define the contractor journey pathway
  6. Provide contractor- facing information about the Mass Save programs on the Mass Save website.
  7. By January 2025, review background check requirements and implement changes to ease requirements as appropriate to encourage opportunities for potential employees while appropriately protecting the safety and security of participants.

Council Members then discussed and suggested modifications for Recommendation V and its sub-recommendations.

- Mary Wambui: Mentioned at the beginning of the meeting that she had attended a supplier diversity summit for Mass Save contractors. Noted she was convinced at this meeting that Mass Save needs a contractor development pathway that actually equips them. Highlighted that some of the contractors are not able to compete for RFPs and this pathway will help them grow their business in the energy efficiency sector through individual business support, services, mentorship, or anything else. Highlighted that this is the next level, towards distributive justice. Noted that \$4M goes to Mass CEC for the MCC workforce development. Suggested that if MA is giving money for returning citizen workforce development programs in one arm of the energy ecosystem, MA better do something in this other arm to make sure that returning citizens actually benefit from what that money is supposed to do.
- Charlie Harak: A3-7. Worked very closely with Low-Income Network. Noted that if employers are looking at the criminal record closely to see if it's a serious offense, it is a good practice. Suggested to tie A3 and A7 together to give people a decent chance of employment if there's no serious offenses.



- Sonakshi Saxena: Noted that the PAs acknowledge the criminal justice system’s injustices. Noted there is a PA review process for returning citizens to contextualize criminal records. Noted they are open to establishing a pre-qualification process.
- Paul Johnson: Raised concern there’s no mention of contractor training in non-English languages. Suggested to support training and that that contractors be remunerated for training these people because of the burden it puts on existing contractors
  - Jo Ann Bodemer: We are using [Merrimack Valley](#) funds with a workforce development piece that’s in Spanish-only.

**Facilitator Ralston Summary of Council Member Discussion on Recommendation V:** Support for language access expansion in contractor training and contractor development pathway work. Connecting 3 and 7 for individuals in reentry that builds off existing PA efforts, and what a more tailored/detailed background check procedure might look like. Recommendation for language accessibility in the training programs themselves and remuneration for contractors providing that training. Support for expanding language access, not just in the service of the programs but also for the contractor training and contractor development pathway.

## Recommendation VI. Small Business

### Recommendation VI: Small Business

- A. Ensure that equity considerations are included in program design/implementation of any small business programs.
  - 1. Provide translation services for Main Streets events
- B. Provide concierge services for small businesses

Council Members then discussed and suggested modifications for Recommendation IV.A and its sub-recommendations.

- Sharon Weber: Noted Mass Save is difficult to access. Supported more help and handholding for all groups.
- Brooks Winner: Supported the recommendations. Raised concern about the time given to small business recommendations. Noted there’s not much on serving small businesses in this workshop. Raised concern if the C&I side isn’t focusing on small businesses, Mass Save will continue to see the same underservice for small businesses. Suggested to think through structural changes or programmatic tweaks to address small business program shortfalls.
  - Consultant Margie: Suggested there be a stakeholder input session at Equity Working Group for this discussion.
  - Zack Lippert: Recalled there was coverage of small business on Workshop 1 and 3. Noted PAs have implemented a lot of things in the current Three Year Plan that wasn’t in the previous Three Year Plan. Highlighted that Main Streets is about three years old, has almost 90+ Main Streets and that PAs are trying to bring in a broader set of vendors.

**Facilitator Ralston Summary of Council Member Discussion on Recommendation VI:** Support for additional conversation around small business programs in the current plan and any substantial changes from EWG over the next month.

## Recommendation VII. Measuring Success

### Recommendation VII: Measuring Success

- A. Re-evaluate Equity Performance Incentive mechanism (PIM) to ensure alignment with 2025-2027 EWG recommendations.
- B. Revise the Equity Targets as a collaborative effort between the PAs, DOER and the Consultants, and the Equity Working Group to reflect the increased emphasis on equitable outcomes and the Equity Working Group’s priorities and recommendations for the 2025-2027 Term.
- C. Provide consistent tracking and reporting of data to assess progress toward achieving recommendations, including for “ready access” geography-based rental property and moderate income programs described above, and for multi-family projects (by project type, e.g., building size, ownership status, projects in certain geographies).

Council Members then discussed and suggested modifications for Recommendation VII.A and its sub-recommendations.

- Paul Johnson: Noted EEAC always talked about barriers to non-participation. Suggested a study for why people are participating in programs in low-income areas.
- Sharon Weber: Suggested to increase moderate income reporting. Noted that the more data we have, the more questions we can ask. Requested more and more quality data. Noted we don’t need perfect data because that costs more and slows us down. The question is having data that is sufficiently accurate for the purposes used in Mass Save.
- Kyle Murray: Flagged A, the equity PIMs. Raised that PIMs can be an effective tool when used well.
- Paul Johnson: Suggested to measure and evaluate the success of outreach programs, especially for Community First Partnerships.
- Mary Wambui: Reminded there are equity targets in the 2022-2024 plan. Suggested these should be what are improved on and revised. Clarified for PIMs, what the EWG and EEAC comes up with is a PIMs that is not watered down by regulators or other parties.

**Facilitator Ralston Summary of Council Member Discussion on Recommendation VII:** Data doesn’t need to be perfect but sufficient for what we're trying to measure and evaluate. Looking at the performance incentive and recognizing the impact that can have. Measuring outreach, considering the 2022-2024 Three Year Plan equity metrics as well in light of these recommendations. And more frequent reporting for items where progress is lagging.

## Final Comments

See [Presentation Slides](#) 65

Ralston posed questions to Council Members to further understand and assess the state of the Equity recommendations discussed.

- Brooks Winner: Apologized for forgetting about Workshop 3 Small Business section. Experienced planning fatigue. Suggested for the next cycle, don't leave Equity to the end.
- Paul Johnson: Raised that there needs to be innovation wherever possible. If Mass Save is going to make progress, it needs innovation.
- Commissioner Mahoney: Agreed about comments on innovation. Reflected on the Geography-based offers and connection to landlords—there's a lot of innovation here to attract landlords to Mass Save. Elevated Community First Partnership and efforts for language access. Noted these three recommendations will push advance equity.
- Meg Lusardi: Noted difficulty to pick if one is more important to others. Noted that some of the initiatives around increased access should be looked at for other topic areas as well.
- Maggie Downey: Raised thanks. Echoed comments on the need to coordinate with other programs and bring in other funding sources for collaboration.
- Sharon Weber: Echoed comments on planning fatigue. Noted EEAC is doing work to set up the plans, but if we don't have success, this work is for naught. Cautioned that Mass Save has had difficulty in the past for certain implementation planning recommendations. Echoed the need to have data to change course to mid-planning. Emphasized that the outcomes matters in the end.
- Jo Ann Bodemer: Thanked everyone on the EWG, the DOER and Consultant team, and participants in this meeting. All recommendations are interrelated and important. Highlighted that the principles are woven in these recommendations and they're all important as a result. Raised that this is a new incremental step and are proud of these recommendations.

## Next Steps

See [Presentation Slides](#) 66 - 69

Ralston summarized the topics and recommendations for Equity:

- An overview of how these up recommendations came together and EEAC got to hear from PAs about their support and desire to continue to do more.
- A list of different topics of recommendations from Geography-based Offers dealing with rental properties and moderate income and innovative ways to perhaps do more in those areas.
- Foundational Principles, which got to some important balancing intentions and how those can be mitigated through different types of policy or program design.
- Community First Partnerships, Language and Access, Workforce, Small Business, and understanding how those particular areas can be expanded to increase equity, participation, and the benefits of Mass Save programs.
- Measuring Success and the important role of data and understanding the work that is happening allows EEAC to make decisions both in process and at the end of different programs and processes.

Ralston identified next steps including:

- The Meeting Summary will be available within two weeks.
- The EEAC Consultant Team (with DOER) will begin working on fine tuning recommendations based on Council Member feedback from this Workshop and take this to the Equity Working Group for further development. *These recommendations will not be covered at Workshop 6.*
- Subsequent Workshop Series dates:
  - Workshop #6 (Finalization) on 10/26 from 9-1pm ET

The Facilitation Team provide the links to workshop pages: [Workshop #1](#) (C&I); [Workshop #2](#) (Income-Eligible), [Workshop #3](#) (ADM, SB, WD), [Workshop #4](#) (Residential), and [Workshop #5](#) (Equity). The Workshop #6 (Finalization) is still in development.

## Appendix A: Attendees

Name	Representation/Council Role	Organization
<b><i>Voting Council Members</i></b>		
Elizabeth Mahony	Commissioner, Department of Energy Resources	
Jo Ann Bodemer	Department of Energy Resources	
William Rose	Attorney General's Office	
Greg Abbe	Executive Office of Economic Development	
Sharon Weber	Department of Environmental Protection	
Meg Lusardi	Nonprofit Network	Power Options
Paul Johnson	Small Contractors	Greentek
Kyle Murray (for Amy Boyd)	Environmental	Acadia Center
Robert Rio	Manufacturers	AIM
Charlie Harak	Labor	UWUA Local 369
Deirdre Manning	EE Experts	MCCA
Brooks Winner	Cities & Towns	MAPC
Dennis Villanueva	Large C&I	MassGeneral Brigham
Jonathan Schreiber*	Massachusetts Association of Realtors	
Mary Wambui	Residential	POUA
<b><i>Non-Voting Council Members</i></b>		
Michael Ferrante	Oilheat Industry	MEMA
Tim Costa	ISO-New England	
<b><i>Program Administrators (non-voting)</i></b>		
Kate Peters (for Tilak Subrahmanian)	Utility Energy Efficiency Program Administrator	Eversource
Steve Menges (for Chris Porter)	Utility Energy Efficiency Program Administrator	National Grid
Cindy Carroll	Utility Energy Efficiency Program Administrator	Unitil
Maggie Downey	Utility Energy Efficiency Program Administrator	Cape Light Compact
Stephanie Terach	Utility Energy Efficiency Program Administrator	Liberty Utilities
Hammad Chaudry	Utility Energy Efficiency Program Administrator	Berkshire Gas
<b><i>PA Panelists (non-Council Members)</i></b>		
Chris McClellan	Geographically Based Offers, Foundational Principles	Eversource
Jhenny Saint-Surin	Community 1st Partnerships, Language Access	Eversource
Sonakshi Saxena	Workforce Development, Language Access	National Grid
Zach Lippert	Small Business	National Grid
Brandy Chambers	Measuring Success	Eversource
<b><i>Consultant Team</i></b>		
Margie Lynch	EEAC Consultant Team	
Alissa Whiteman	DOER	
<b><i>Equity Working Group Members</i></b>		
Jo Ann Bodemer	Equity Working Group Member	DOER

Name	Representation/Council Role	Organization
Will Rose	Equity Working Group Member	Attorney General's Office
Kyle Murray	Equity Working Group Member	Acadia Center
Brooks Winner	Equity Working Group Member	MAPC
Mary Wambui	Equity Working Group Member	POUA
Charlie Harak	Equity Working Group Member	UWUA Local 369
Maggie Downey	Equity Working Group Member	Cape Light Compact
Jhenny Saint-Surin	Equity Working Group Member	Eversource
Sonakshi Saxena	Equity Working Group Member	National Grid
Stephanie Terach	Equity Working Group Member	Liberty Utilities
Margie Lynch	Equity Working Group Member	Consultant Rep
Doug Quattrochi	Equity Working Group Member	MassLandlords, Inc.
<b>Additional Panelists</b>		
Rachel Evans	Department of Energy Resources	
Ina Dasso	Department of Energy Resources	
Alexis Washburn	Emerald Cities	

\*Attended for 37 minutes