



March 3, 2015

Dan Burgess, Chair
Energy Efficiency Advisory Council
Acting Commissioner
MA Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: Comments to EEAC on 2016-2018 Three Year Plan

Dear Chairman Burgess:

I write to offer comments to the Energy Efficiency Advisory Council on behalf of the Massachusetts Association of Community Development Corporations (MACDC) on the upcoming three-year plan for 2016-2018. MACDC's Senior Policy Advocate Don Bianchi attended the recent February 26 EEAC workshops in Westborough, and it is with the information gained from the workshops that we offer the following comments.

MACDC is an association of mission-driven community development organizations dedicated to working together and with others to create places of opportunity where people of diverse incomes and backgrounds access housing that is affordable, benefit from economic opportunities and fully participate in the civic life of their community. We achieve this by building and sustaining a high performing and adaptive community development sector that is supported by private and public investment and sound public policies. Founded in 1982, MACDC currently has 88 members, including 63 CDCs and 25 associate members.

On this and a variety of other issues, these community-based organizations rely on MACDC to give them voice when public policy decisions are made. On behalf of our members, I would like to speak to three important issues and urge the EEAC to take them into account as it works with utility efficiency program administrators in drafting the 3-year plan for 2016 through 2018.

First, the affordable multifamily housing sector needs a dedicated program that will provide whole-building incentives at a time of refinancing, when a larger scope of rehab work coordinates with the existing framework when housing finance and state and local subsidy allocations are made. We need a new program, with new resources, to complement the existing Low Income Multifamily (LEAN Multifamily) Program. While the LEAN Multifamily Program is an excellent resource, it is better suited to subsidized projects that are mid-lifecycle, or during ongoing operations. With a new program to address energy efficiency at the point of refinancing, and the LEAN Multifamily Program to fund energy efficiency mid-lifecycle, we will be able to provide energy retrofits to a broad spectrum of the affordable housing stock.

Second, if the eligibility criteria for the LEAN Multifamily Program is broadened, as is being recommended by the LEAN Administrators, then more resources need to be secured for the Low Income Multifamily budget. Currently, the queue for gas-related incentives can be up to two years long and cannot accommodate additional pipeline without more funding. If the budget cannot accommodate the program demand then the utility program administrators may not be capturing all the energy savings available. In the absence of additional resources, MACDC believes that broadening the LEAN Multifamily Program to a broader range of incomes or for broader uses should not be considered.

At the February 26 workshop on the Low Income programs, the EEAC Members expressed support for broadening the eligibility criteria for the LEAN Multifamily Program, subject to identifying resources for this broadening so that resources are not taken away from multifamily housing. We therefore urge the EEAC to formally adopt this change only when additional resources are identified and secured.

Third, increased data access is critical. This includes enforcement of the DPU Order that utilities establish a comprehensive statewide database of energy efficiency program results. A comprehensive statewide database will unlock private capital for deeper savings. Furthermore, such a database, which offers data on specific geographic locations, will enable CDCs and other community-based organizations to add appropriate energy efficiency program offerings to their financial coaching, homebuyer education and other programs that match the needs of their communities.

MACDC is happy to provide more information on these issues if requested. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Kriesberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joe Kriesberg, President and CEO