



**To: Department of Public Utilities (DPU)**

**From: Joseph Kriesberg, President, Massachusetts Association of CDCs**

**Date: December 3, 2021**

**RE: Approve the 2022-2024 Three Year Energy Efficiency Plan As Is – Preserve Equity and Electrification, and Performance Incentive Provisions**

Dear Regulators,

MACDC was established in 1982 and serves as the capacity building and advocacy arm of the community economic development movement in Massachusetts. We represent all 64 community development corporations (CDCs) that have been certified as such by the MA Department of Housing and Community Development. Collectively, these CDCs have more than 18,000 rental units in their portfolios, many of them in older multifamily buildings in need of energy retrofits.

As you look to finalize Mass Save's Three-Year Energy Efficiency Plan for 2022-2024, which aims to make significant strides in prioritizing climate targets, we support the following:

- Approval of the plan in full and maintaining a strong focus on electrification, equity and workforce development; and
- Consideration of the following comments and priority recommendations:
  - **This is a consensus plan** – Every member of the EEAC voted to approve the plan in the Council Resolution. A unanimous Council vote to adopt is not common. This plan is strong, and bold, and puts the Commonwealth on the path necessary to meet its climate obligations.
  - **The DPU's mandate has been changed** – With the passage of the Act creating a next-generation roadmap for Massachusetts climate policy ("Next Generation Roadmap Act") earlier this year, the Commonwealth updated the responsibilities of the DPU to include prioritizing equity and reductions in greenhouse gas emissions to meet statewide greenhouse gas emission limits. The priorities and programs outlined in the Three-Year Plan strongly advance efforts to make our energy efficiency programs more equitable and reduce greenhouse gas emissions. We urge the DPU to fulfill its new responsibility to the Commonwealth by approving the plan as is.
  - **Equity** – The PAs have highlighted equity as a key priority of the 2022-2024 Energy Efficiency Plan, and they must be allowed to back that up with significant investments and improvements that make program easier to access, especially for underserved groups and environmental justice communities. The plan must also include tangible goals and metrics for success that allow the EEAC and the public to transparently track the PAs' progress in reforming their programs to make them more equitable and accessible for everyone, particularly those who have been left behind for too long.

- We appreciate that the PAs have committed to designing a strong program for renters beyond extending the 100% incentive for rental units and look forward to additional investment and details on strategic and innovative renter/landlord engagement in early 2022. Decarbonizing rental housing will be crucial to meeting the Commonwealth's climate goals.
- Likewise, we appreciate the significantly increased incentives for moderate-income customers, and look forward to a strong program that simply and fully coordinates delivery of weatherization and heat pump installations for this underserved group.
- **Electrification** – It is a very important step that the PAs have committed to electrification as a key priority in the plan. They must play a big role in helping the Commonwealth meet the emissions reductions required by the Next Generation Roadmap Act overall, and they must comply with the EEA Secretary's GHG emissions determination for the 2022-2024 Energy Efficiency Plan. We support the prioritization of electrification in the plan as it aligns with our local efforts to reduce emissions from homes and businesses by switching to cost-effective clean heating and cooling systems.
- **Performance Incentives** – We urge the DPU to approve the new performance incentive mechanism that supports our priorities of energy efficiency, equity, electrification, and workforce development, as is.
- **Deep Energy Retrofit Focus** – There should be an aggressive approach to the retrofit/rehab of existing buildings. For instance, rethink the market rate and use natural upgrade cycles for things like siding replacement, window replacement, adding central A/C, or replacing heating system as a way to incentivize whole house retrofits. Additionally, there is great need for deep energy retrofit paths in all building category types. Incentives to start should be high to get early adopters trying new approaches.

**Overall, this plan is a critical step in the right direction. We stand ready to work with the PAs to make it even more successful, and we urge the DPU to approve the 2022-2024 Energy Efficiency Plan, as represented in Docket # 21-120 through Docket # 21-129, as is.**

Additionally, we request that the DPU uphold the comments of the EEAC Final October 27, 2021 Resolution. Thank you.

Sincerely,



Joseph Kriesberg, President