

39 the draft Statewide Plan. These efforts informed the July 21st, 2015 EEAC resolution to the
40 DPU³.

41 In July through September of 2015, the DOER, the Executive Office of Energy and
42 Environmental Affairs (“EEA”), and the Attorney General’s Office (“AGO”) met to discuss and
43 explore common agreement of the 2016-2018 goals and budgets with the PAs. These goals were
44 incorporated into the September 23rd draft plan which was presented to the Council. Through
45 September and October the Council provided additional input on the draft Plan, culminating in
46 this resolution.

47 **Overall Plan Comments**

48 The Council appreciates the significant efforts the PAs have invested in the development of the
49 Statewide Plan to address the priorities of the Council and stakeholders. We recognize and
50 appreciate the significant contributions of PA staff, Council consultants, Councilors the Low-
51 Income Energy Affordability Network (“LEAN”), and stakeholders in preparing these energy
52 efficiency plans. The development of the 2016-2018 Statewide Plan reflects significant
53 collaboration across PAs and among members of the Council, DOER, EEA and the AGO.

54 These comments present the judgment and determination of the Council based on its review of
55 the draft of the Statewide Plan, which was submitted by the PAs on October 23rd, 2015:

- 56 • The Council has reviewed the Statewide Plan that the PAs submitted to the EEAC on
57 October 23rd, 2015. We approve and support the 2016 – 2018 Statewide Plan, as these
58 savings levels represent record levels of energy efficiency savings in the United States
59 and continue Massachusetts on a path to achieving all cost effective energy efficiency.⁴
- 60 • We confirm that the Statewide Plan⁵ includes ambitious energy savings goals, sensible
61 program budgets, and substantial benefits to Massachusetts consumers as required by the
62 GCA, and highlights a continued commitment to innovation and technology,
63 demand/peak reduction efforts, and contractor engagement. The programs and strategies
64 in the Statewide Plan represent a significant opportunity to maximize the benefits of
65 energy efficiency for the Commonwealth over the next three years, and represent an
66 increasing commitment to gas and electric savings through energy efficiency.
- 67 • We expect the Individual PA Plans will remain fully consistent with the Statewide Plan. ← **Formatted: Left**
68 Specifically, the energy savings levels and budgets in the Statewide Plan, and reflected in
69 the electric and gas Terms Sheet should be reflected fully in the Individual Plans.
- 70 • While the current savings, budgets, and benefits proposed in the Statewide Plan are
71 appropriate, there exists significant variation in the plan details among individual PAs.
72 The Council urges the PAs to continue their joint planning and best practices efforts, with
73 the goal of achieving appropriate consistency and equivalency, while fostering creativity
74 and providing more equitable service for customers across the Commonwealth.

³ <http://ma-eeac.org/wordpress/wp-content/uploads/Final-EEAC-July-Resolution-7-21-15.pdf>

⁴ This approval is provided there are not unexpected or contrary data or details that appear in later PA submissions. In approving this resolution, the Council also acknowledges the right of the DOER, the Attorney General, and any other member of the Council to participate in the proceedings before the DPU.

⁵ <http://ma-eeac.org/plans-updates/>

- 75 • We recognize that performance incentives are an integral part of the planning and
76 implementation of the energy efficiency programs. We accept, consistent with DPU
77 Guideline 3.6, the performance incentives set forth in the Statewide Plan, including the
78 performance incentive pool (emphasizing the maximum performance incentive pool at
79 the design level shall be \$118 million, comprised of \$100 million for electric programs
80 and \$18 million for gas programs).
- 81 • We believe that the costs to implement and operate energy efficiency programs should be
82 kept as low as possible, while achieving the objectives and requirements of the GCA. We
83 appreciate the willingness of the PAs to project reduced costs to achieve savings and plan
84 for sensible program budgets consistent with the Council's priorities as defined in the
85 Council's July 21st Resolution. Achieving ambitious energy savings at sensible program
86 costs will provide significant and lasting benefits to ratepayers, businesses, and the
87 Commonwealth.
- 88 • We expect that the PAs will use competitive procurement whenever possible to obtain the
89 highest quality, lowest cost service providers in the implementation of the Statewide
90 Plan.
- 91 • We recognize that minimizing bill impacts on customers is an essential consideration.
92 The approach in the Statewide Plan to be filed on October 30th, 2015 pursues ambitious
93 savings goals at sensible program costs, and indicate that most PAs' customer bill
94 impacts are expected to result in moderately low incremental cost compared to prior
95 years. The Council and PAs will continue working together to ensure that savings are
96 being delivered cost-efficiently, including maintaining a keen eye on program costs.
- 97 • The Council and PAs will continue to work collaboratively throughout the three-year
98 roll-out of the Individual Plans, as directed by the GCA, through continued quarterly
99 reports and specific updates in regular meetings that focus on topics to be determined by
100 the Council. We expect the PAs to analyze new lessons learned, develop adjustments, and
101 put them into practice.
102

103 On a statewide basis, the October 23rd, 2015 Statewide Plan reflects the highest levels of
104 efficiency savings goals, as well as close PA attention to Council recommendations from the July
105 21st resolution, and inclusion of many specific recommendations. We appreciate that these
106 elements are reflected in the plan including: *(items in italics not yet incorporated by PAs)*

- 107 • A renter-specific initiative to be rolled out in Q1 2016, *including periodic PA reports to*
108 *the EEAC that will include timely rental visit metrics including participation levels and*
109 *conversion rates by renters and their landlords by PA, and qualitative information on any*
110 *barriers encountered and plans to address them.*
- 111 • A moderate income initiative beginning in Q1 2016, *including periodic PA reports to the*
112 *EEAC on participation rates by PA.*
- 113 • PAs will continue to work with public housing funding agencies (with mutual
114 expectations and deliverables) and LEAN to develop and implement enhanced
115 approaches to ~~will~~ leverage multi-family refinancing events to maximize retrofit potential
116 ~~and develop a~~. The parties will specifically consider performance-based retrofit product

117 | ~~for these situations~~products. The PAs will present the results of these efforts and specific
118 | proposals derived from them by the close of Q1 2016.

- 119 | • More detail about the PA's Massachusetts Technology Assessment Committee (MTAC),
120 | and semi-annual updates to the Council on progress reviewing and implementing new
121 | technologies into programs.
- 122 | • A clear commitment to Combined Heat and Power (CHP) installations, and tracking
123 | CHP project savings and expenditures (subject to customer confidentiality requirements)
124 | against PA's CHP Plan projections in semi-annual presentations to the EEAC and in
125 | data sets provided on Mass Save Data.
- 126 | • Regular and specific updates to the Council on C&I program progress and penetration
127 | (including segment specific approaches - especially for challenging subsectors such as
128 | small and mid-size commercial, small hospitals, non-profits, and multifamily - measures
129 | such as street lighting and LED costs and conversion, and innovations such as strategic
130 | energy management) through semi-annual presentations to the EEAC. The PAs will
131 | collaborate with DOER in Q4 2015 to consider how best to present this information (e.g.,
132 | potential use of roundtables, webinars, etc.) and to develop a schedule for updates on
133 | specific topics.

134 |
135 | However, data tracking and reporting issues have yet to be satisfactorily resolved by the Mass
136 | Save Data website. We recommend that the DPU continue to investigate the need for greater
137 | state-wide data transparency and reporting by the PAs through its open Docket No. 14-141
138 | *Response of the Department of Public Utilities to Data Privacy and Data Security Issues Related*
139 | *to the Statewide Energy Efficiency Database*.

140 |
141 | The PAs have recently provided the Technical Reference Manual (TRM), 2016-2018 Plan
142 | Version, which provides the important supporting details for the savings included in the
143 | Statewide Plan. The Statewide Plan commits that an online Technical Reference Library (TRL)
144 | will be available in 2016. Since the Council has not had an opportunity to review the TRM and
145 | subsequent TRL, the Council reserves its rights to complete a review of these documents and
146 | provide comments to the DPU as appropriate.

147 |
148 | Accordingly, the Members of the Energy Efficiency Advisory Council in recognition of the
149 | aforementioned reasons, respectfully request the Commissioners of the Department of Public
150 | Utilities to approve the 2016-2018 Massachusetts Joint Statewide Three-Year Electric and Gas
151 | Energy Efficiency Investment Plan and the Individual Plans of the electric and natural gas
152 | companies and municipal aggregators, to the degree that the Individual Plans are fully consistent
153 | with the Statewide Plan. We further request that said approval consider, embrace and reflect the
154 | comments that we articulate above.