

39 special meeting for public comments in May as well as two facilitated workshops in June to
40 develop comments on the draft ~~plan.~~Statewide Plan. These efforts informed the July 21st, 2015
41 EEAC resolution to the DPU⁵.

42 In July through September of 2015, the ~~EEAC, lead by~~ DOER, the Executive Office of Energy
43 and Environmental Affairs (“EEA”), and the Attorney General’s Office (“AGO”) ~~negotiated the~~
44 ~~2016-2018 goals and budgets with the PAs. The result of this negotiation is nation-leading~~
45 ~~savings levels for both electric (2.93% of retail sales) and gas (1.24% of retail sales). These plans~~
46 ~~also ensure continued growth of energy efficiency in the Commonwealth with year over year~~
47 ~~increases in annual and lifetime savings for both electric and gas. These goal levels represent a~~
48 ~~significant increase from the PA’s April plans, while reducing cost to achieve and minimizing~~
49 ~~the budget increases; annual electric goals increased 17% while the cost per unit of savings~~
50 ~~decreased 13%, and annual gas goals increased 15% while the cost per unit of savings decreased~~
51 ~~6%.met to discuss and explore common agreement of the 2016-2018 goals and budgets with the~~
52 ~~PAs. These goals were incorporated into the September 23rd draft plan which was presented to~~
53 ~~the Council. Through September and October the Council provided additional input on the draft~~
54 ~~Plan, culminating in this resolution.~~

55 Overall Plan Comments

56 The Council appreciates the significant efforts the PAs have invested in the development of the
57 Statewide PlansPlan to ~~meet~~address the priorities of the Council and stakeholders. We recognize
58 and appreciate the ~~hard work~~significant contributions of PA staff, Council consultants,
59 Councilors the Low-Income Energy Affordability Network (“LEAN”), and stakeholders in
60 preparing these energy efficiency plans. The development of the 2016-2018 Statewide Plan
61 reflects significant collaboration across PAs and among members of the Council, DOER, EEA
62 and the AGO.

63 These comments ~~represent~~present the ~~thinking~~judgment and determination of the Council based
64 on its review of the draft ~~plans~~of the Statewide Plan, which ~~were~~was submitted by the PAs on
65 October ~~XX~~23rd, 2015:

- 66 • The Council has reviewed the Statewide Plan that the PAs submitted to the EEAC on
67 October ~~XX~~23rd, 2015. We approve and support the 2016 – 2018 Statewide Plan, as ~~filed~~
68 ~~with the DPU, as~~ these savings levels represent record levels of energy efficiency savings
69 in the United States.⁶ and continue Massachusetts on a path to achieving all cost effective
70 energy efficiency.⁷
- 71 • We confirm that the Statewide Plan ~~and the gas and electric Term Sheet~~⁸ includes
72 ambitious energy savings goals, sensible program budgets, and substantial benefits to
73 Massachusetts consumers as required by the GCA. ~~The Term Sheet complements the~~
74 ~~Statewide Plan~~, and reaffirmshighlights a continued commitment to innovation and

⁵ <http://ma-eeac.org/wordpress/wp-content/uploads/Final-EEAC-July-Resolution-7-21-15.pdf>

⁶ ~~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.~~

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⁸ <http://ma-eeac.org/plans-updates/>

75 | technology, ~~new~~ demand/peak reduction efforts, and contractor engagement. The
76 | programs and strategies in the Statewide Plan represent a significant opportunity to
77 | maximize the benefits of energy efficiency for the Commonwealth over the next three
78 | years, and represent an increasing commitment to gas and electric savings through energy
79 | efficiency.

- 80 | • We expect the Individual PA Plans will ~~beremain~~ beremain fully consistent with the Statewide
81 | Plan. Specifically, the energy savings levels and budgets in the Statewide Plan, and
82 | reflected in the electric and gas Term Sheets should be reflected fully in the Individual
83 | Plans. ~~While the current overall savings, budgets, and benefits proposed in the Statewide~~
84 | ~~Plan are generally appropriate, there may be particular details or variations across PAs~~
85 | ~~that merit more careful review than is afforded the Council by this limited timeline for~~
86 | ~~review of the Statewide Draft Plan filed on October XX, 2015.~~

- 87 | • While the current savings, budgets, and benefits proposed in the Statewide Plan are
88 | appropriate, there exists significant variation in the plan details among individual PAs.
89 | The Council urges the PAs to continue their joint planning and best practices efforts, with
90 | the goal of achieving consistency and equivalency while providing more equitable
91 | service for customers across the Commonwealth.

- 92 | • We recognize that performance incentives are an integral part of the planning and
93 | implementation of the energy efficiency programs. We accept, consistent with DPU
94 | Guideline 3.6, the performance incentives set forth in the Statewide Plan, including the
95 | performance incentive pool (emphasizing the maximum performance incentive pool at
96 | the design level shall be \$118 million, comprised of \$100 million for electric programs
97 | and \$18 million for gas programs).

- 98 | • We believe that the costs to implement and operate energy efficiency programs should be
99 | kept as low as possible, while achieving the objectives and requirements of the GCA. We
100 | appreciate the willingness of the PAs to ~~reduce the project reduced~~ reduce costs to achieve
101 | savings and plan for sensible program budgets consistent with the Council's priorities as
102 | defined in the Council's July 21st Resolution. ~~Together, achieving~~ Achieving ambitious
103 | energy savings at sensible program costs will provide significant and lasting benefits to
104 | ratepayers, businesses, and the Commonwealth.

- 105 | • We expect that the PAs will use competitive procurement whenever possible to obtain the
106 | highest quality, lowest cost service providers in the implementation of the Statewide
107 | Plan.

- 108 | • We recognize that minimizing bill impacts on customers is an essential consideration.
109 | The approach in the Statewide ~~Plans~~ Plan to be filed on October ~~XX~~ 30th, 2015
110 | ~~pursue~~ pursues ambitious savings goals at sensible program costs, and indicate that most
111 | PAs' customer bill impacts are expected to ~~beresult in~~ beresult in moderately low incremental cost
112 | compared to prior years. The Council and PAs will continue working together to ensure
113 | that savings are being delivered cost-efficiently, including maintaining a keen eye on
114 | program costs.

- 115 | • ~~We expect the~~ The Council and PAs will continue to work collaboratively throughout the
116 | three-year roll-out of the Individual Plans, as directed by the GCA, through continued
117 | quarterly reports and specific updates in regular meetings that focus on topics to be

determined by the Council. We expect the ~~Council to sustain its collaboration with~~ PAs to analyze new lessons learned, develop adjustments, and put them into practice.

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

- A renter-specific initiative to be rolled out in Q1 2016, *including Quarterly/periodic PA reports to the EEAC that will include timely rental visit metrics ~~on~~ including participation levels and conversion rates by renters and their landlords by PA, and qualitative information on any barriers encountered and plans to address them.*
- A moderate income initiative beginning in Q1 2016, *including periodic PA reports to the EEAC on participation rates by PA.*
- ~~PAs~~ PAs work with public housing funding agencies (with mutual expectations and deliverables) and LEAN to develop and implement enhanced approaches to will leverage multi-family refinancing events to maximize retrofit potential and develop a performance-based retrofit product for these situations. The PAs will present the results of these efforts and specific proposals derived from them by the close of Q1 2016.
- More detail about the PA's Massachusetts Technology Assessment Committee (MTAC ~~process to approve new technologies into programs,~~), and semi-annual updates to the Council on progress reviewing and implementing new technologies into programs.
- A clear commitment to Combined Heat and Power (CHP) installations, and tracking CHP project savings and budgets reported in the EEAC quarterly reports ~~expenditures against PA's CHP goals~~ Plan projections in semi-annual presentations to the EEAC and in data sets provided on Mass Save Data.
- Regular and specific updates to the Council on C&I program progress and penetration (including segment specific approaches; - especially for challenging subsectors such as small and mid-size commercial, small hospitals, non-profits, and multifamily - measures such as street lighting, multi-family, and LED costs and conversion, etc.) and innovations ~~through~~ such as strategic energy management) through semi-annual presentations to the EEAC ~~and semi-annual.~~ The PAs will collaborate with DOER in Q4 2015 to consider how best to present this information (e.g., potential use of roundtables, webinars, etc.) and to develop a schedule for updates on specific topics.

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

The PAs have recently provided the Technical Reference Manual (TRM), 2016-2018 Plan Version, which provides the important supporting details for the savings included in the ~~Plan~~. ~~There has not been adequate time for~~ Statewide Plan. The Statewide Plan commits that an online Technical Reference Library (TRL) will be available in 2016. Since the Council has not had an

163 | opportunity to ~~consider~~review the TRM ~~in its review,~~ and subsequent TRL, the Council reserves
164 | its rights to complete a review of ~~the TRM~~these documents and provide comments to the DPU as
165 | appropriate.

166 |
167 | Accordingly, the Members of the Energy Efficiency Advisory Council in recognition of the
168 | aforementioned reasons, respectfully request the Commissioners of the Department of Public
169 | Utilities to approve the 2016-2018 Massachusetts Joint Statewide Three-Year Electric and Gas
170 | Energy Efficiency Investment Plan and the Individual Plans of the electric and natural gas
171 | companies and municipal aggregators, to the degree that the Individual Plans are fully consistent
172 | with the Statewide Plan. ~~The Council also states their support for the attached Term Sheets as~~
173 | ~~part of the 2016-2018 Three-Year Energy Efficiency Investment Plans.~~ We further request that
174 | said approval consider, embrace and reflect the comments that we articulate above.