

DOER TOWN HALL

FEBRUARY 29, 2024 | QUESTIONS & ANSWERS

Building Decarbonization

Q: How is DOER thinking about the housing crisis and displacement as a result of some of the low and no-cost retrofits and upgrades? Has the department considered placing contingencies on funding that goes directly to municipalities to homeowners that provide tenant protections such as restricted percent rent increase or commitment to evictions for just cause only?

A: Yes we are thinking about the connection between the health and energy load of the housing stock. Last year we launched a \$50 million program to improve low- and moderate-income housing, with 10 projects receiving grants so far. Projects that receive funding are required to commit to units remaining affordable for a minimum of 3 years; all of the selected projects well exceeded this with a range of 10-30 years. Under Mass Save programs, property owners receiving investments are required to hold harmless rental prices--a model we are replicating in a Merrimack Valley-focused program.

Q: What is the plan for seeking funding for EJ/low-income housing retrofits?

A: We are seeking such funding everywhere we can! HER/HEAR will focus on it. We're working with the new MA Climate Bank and the Executive Office of Housing and Livable Communities to support their efforts. Our Solar for All application focused on those sectors. And, this is a MAJOR focus of our Mass Save discussions for the '25-27 plans. Our Federal Team has their eyes peeled for new opportunities!

Q: What do you mean by "reduce embodied carbon" in state construction projects?

A: Embodied carbon in this context refers to the carbon that is emitted during the manufacture and installation of certain building materials in construction projects, like concrete and steel, for example. Our efforts to reduce this embodied carbon will include an approach that looks to use materials that are made with lower carbon inputs as well as identify alternative design strategies that result in less use of these materials. This is all in addition to stringent requirements that require very low energy consumption during the life of the building.

Q: Many commercial-industrial buildings suitable for rooftop solar need a new roof. The new roof comes with additional/improved insulation. Can you establish a thermal E-E APS certificate to make this economically viable for projects? This could be done administratively under current statutory authority. Alternatively, there could be a state tax credit for building envelope improvements akin to what supports septic upgrades.

A: For commercial buildings suitable for rooftop solar, we have seen a number of projects utilize the Commercial PACE financing tool available through Mass Development, with support provided by DOER as needed to review and approve the scope of work. Where Commercial PACE is available (it requires local adoption at the city or town level) it has proven to be an effective funding mechanism and may be simpler to implement and make use of than the thermal APS credit proposed in your question. More information is available here: [Commercial PACE – Property Assessed Clean Energy | Mass.gov](#).

Building Energy Reporting

Q: Regarding the existing buildings reporting law (for those over 20,000SF), has there been a state-level database setup yet to track emissions/energy use from these buildings? And if so, is it publicly accessible?

A: The state-level database has not yet been set up. Per the statute, it must be established with public access by 10/31/25, the first year of energy reporting under the law.

Q: Is there any information available now about the building energy reporting regulations at the state level?

A: Please see <https://www.mass.gov/large-building-energy-disclosure> where information about the building energy reporting regulations will be regularly updated and you can find a link to the statute and an email list to sign up for updates.

Energy Efficiency / Mass Save

Q: Who do we contact with respect to our homes?

A: For energy efficiency and decarbonization opportunities for your home, contact the Mass Save program at 1-866-527-SAVE or visit [MassSave.com](https://masssave.com) for more information.

Q: Can residents in Towns with Municipal Electric Departments participate in Mass Save?

A: Mass Save is only available to ratepayers of the investor-owned utilities. A municipal electric customer that is served by a gas utility can participate in Mass Save. DOER will be supporting Municipal Light Plant (MLP) decarbonization efforts with federal energy efficiency funding through the Home Energy Rebate (HER) program.

Q: Why can't MLPs participate in Mass Save?

A: The Mass Save electric program is funded by the regulated utilities' customers – Eversource, National Grid, and Unitil. Currently, the MLP customers do not contribute to that funding through their bills and as such are not eligible for the program's benefits. DOER will be supporting MLP decarbonization efforts with federal funding.

The Massachusetts Municipal Wholesale Electric Company (MMWEC) provides energy audit and implementation services for residential, commercial, industrial and institutional customers of municipal utilities through its NextZero energy efficiency and decarbonization program. More information can be found [here](#). Customers can select their town to see the programs and resources available to them.

Energy New England (ENE) provides free home energy assessments for residential customers of its partnering Massachusetts Municipal Light Plants (MLPs). ENE also offers rebate programs for customers in some MLP territories. More information can be found [here](#), including utilities served.

Q: Does Mass Save provide incentive support for the removal of knob and tube wiring, without the need for the customer to fully electrify their appliances or heating system?

A: Yes, Mass Save provides incentives for knob and tube wiring removal for low- income and moderate-income customers when the customer is insulating.

Q: Are you considering changing the highly restrictive cost effectiveness calculation that utilities currently use to allocate Mass Save funds?

A: The Mass Save programs are ratepayer funded. The cost-effectiveness requirement, as set forth under the Green Communities Act, ensures that investment of ratepayer funds support programs that provide benefits to ratepayers equal to or greater than the investment. It is a mechanism to safeguard the prudent use of ratepayer money. Legislative action would be required to change this requirement.

Q: The Mass Save rebates for heat pumps are complicated and time-consuming for homeowners, and HVAC installers often provide incorrect information. Are there any thoughts about switching more to the Efficiency Vermont model of providing rebates at the distributor level (invisible to homeowners) and working more with distributors and installers?

A: The 'mid-stream' incentive model of providing rebates at the distributor level is used for some Mass Save programs- for example many heat-pump water heaters are discounted at plumbing suppliers. However, evaluation studies suggest that it is often more effective to have more visible customer facing rebates. The Mass Save program administrators are considering improvements to rebate processing to facilitate faster rebate payments. These improvements include a pre-approval process for heat pump rebates and the roll out of a residential turn-key delivery model that will include direct payments to contractors.

Q: Are there any thoughts on changing the Condo rules under MassSave, which limits a Condo to only the tonnage rebate instead of the full house rebate to encourage condo owners to switch from gas to all-electric?

A: DOER as chair of the Energy Efficiency Advisory Council (EEAC) provides general oversight and strategic input into the Mass Save program, however, DOER is not able to dictate program implementation rules. We are able to amplify public comments around concerns with limits on Condo owners seeking to switch from gas to all-electric, but ultimately the Mass Save program administrators, under Department of Public Utilities oversight. Currently, whole-home rebates for heat pumps are available when installed in individually metered 1-4 unit buildings or townhouses.

Energy Efficiency / Mass Save, continued

Q: Can condo owners get individual energy audits, or do they need to do it as a group? If as a group, can this be changed?

A: Condo residents can receive a home energy assessment for just their condominium unit, but it will not include any shared systems. If the condominium building relies on central heating, cooling, hot water, and other systems, those systems would not be included in the home energy assessment. It is recommended that you coordinate with the building management and other condominium owners to ensure that all important systems are included.

Q: Is it possible to get Mass Save reporting by census tract for Mass Save to know whether they are reaching marginalized community members?

A: Some geographic reporting is available on the [Mass Save Data website](#) as well as the [Customer Profile Dashboard](#). Data on both of these sites is sourced from residential and C&I customer profile studies, which use gross savings and incentives data collected from a combination of Program Administrator (PA) customer tracking and other vendor data to geographically represent savings and spending across the Commonwealth. The study data does not always tie directly to the PA customer tracking systems and DPU reported savings, which take into account other factors, such as evaluation impact factors and attribution.

Q: How will the funds for Energy Auditor training be used and how can residents like me access the training and testing for DOE Energy Auditor Certification?

A: DOER and MassCEC are currently in the process of designing workforce training programs in response to several U.S. Department of Energy (DOE) funding opportunities. The initial funding application (Training for Residential Energy Contractors, or TREC) focuses on supporting the expansion of recruitment, training, and placement of new entrants, and upskilling of current workers, for certifications related to residential HVAC/R Technicians, Energy Auditors, and Home Performance Contractors. This application was submitted in January 2024 and is currently in negotiations with DOE. When Massachusetts receives its formula funding from US DOE, MassCEC will release a Request for Proposals (RFP) for training providers to apply for funding to offer training that qualifies under the US DOE rules for the program.

DOER and MassCEC are also designing proposed programs for Energy Auditor Training (focused on training energy auditors to work in the small- to medium-sized commercial building sector) and TREC Round 2. TREC Round 2 will be focused on rural communities that have significant gaps in climate workforce training resources as identified in the MassCEC Workforce Needs Assessment – Berkshire Region, Cape Cod and Islands Region, and portions of Pioneer Valley – including by creating a Climate Service Corps program for young adults ages 18-24. These applications were filed with US DOE in July 2024, with an expected timeframe for finalizing awards in January 2025. These two funding opportunities are competitive, and awards are not guaranteed.

For all programs, DOER and MassCEC will prioritize the recruitment, support, and placement of training participants from disadvantaged communities. Additional information and details on program delivery and opportunities to access training will be available publicly as funding is awarded and the programs are further developed.

Q: What programs exist to incentivize people to conserve energy, especially during high energy use episodes?

A: The primary program that helps people conserve energy when use is high is called ConnectedSolutions. ConnectedSolutions is offered through the Mass Save program and provides incentives for people with compatible thermostats or batteries to receive incentives for managing and reducing energy use during periods of peak electricity demand, like hot summer days. See here for more information: [ConnectedSolutions | Residential | Mass Save](#). In addition, several municipal electric utilities have Connected Homes programs for residents. See your municipal light plant's website for more information.

Stretch Energy Codes

Q: Are there any studies available regarding the cost of implementing the Specialized Code?

A: More information can be found [here](#). The key findings are that for almost all building scenarios modeled, the energy efficiency savings are greater than the modest incremental costs, and anyone purchasing a home with a mortgage ends up saving money over the life of the mortgage. With the federal IRA tax credit improvements introduced since the stretch code analysis was conducted, these savings are increased.

Q: What support is DOER providing to train building inspectors on the Stretch and Specialized Codes?

A: DOER has partnered with Mass Save for 10 years to provide consistent funding for statewide energy code training to building officials. The training focuses on stretch code training for building officials and trades but is open to anyone. It is currently provided by PSD consulting, one of the Mass Save program vendors. The training schedule, additional resources, and sign up for newsletter notifications can be found [here](#). Adding additional Building Code training remains a priority for DOER over the next year and we will be applying for federal funding this summer to fund expanded building code training programs. Mass Save also offers a toll-free number for technical assistance for code officials and others who have attended an energy code training session. Call 1-855-757-9717 or email energycodesma@psdconsulting.com.

Q: In addition to the partners listed above, will DOER include or consult the OPSI/BBRS in education and training? The BBRS has a history with code implementation and Code Official organizations and could help facilitate clear and concise communication to Officials across the Commonwealth.

A: DOER participated in the BBRS training sub-committee and worked with OPSI to jointly sign a commitment to apply for federal funding for additional building energy code education and training. This will access federal funding available through the IRA legislation via the Department of Energy. We hope to build on this initial collaboration with OPSI and the BBRS, in order to maximize the amount of federal funding we can bring to support code officials in Massachusetts.

Q: How does the Opt-In Specialized Energy Code for residential and commercial building dovetail with municipal construction such as a new middle school? How can you support towns to rapidly implement the Opt-In Specialized Code so that it can be the guide for fast-track criteria for developers seeking approval to build under the new MBTA overlays?

A: DOER works closely with the Mass School Building Authority (MSBA), which provides a significant portion of funding for any new public school projects. As a result of that collaboration, last summer the MSBA updated its green schools program criteria and additional funding incentives to align with the new Opt-in Specialized Energy code. This means that new schools are incentivized to follow the Opt-in Specialized code, even if their town or city has not adopted it. More information is available from the MSBA website [here](#).

Q: When does DOER expect to have a Town Hall with Building Officials/Code Enforcement Officials who are charged with enforcement of the Energy Codes?

A: DOER held an online public listening session (similar to a Town Hall) on Wednesday March 27th that was well attended by building officials and other stakeholders. DOER also took public comments on the energy codes through April 3rd and the written comments will be available on our website soon: [Stretch Energy Code Development 2022 | Mass.gov](#).

Q: How do IRA tax credits effect Specialized Code cost assumptions? Will DOER update cost studies to reflect new incentives?

A: DOER's Green Communities Division is working on developing updated cost studies to reflect the new incentives as well as changes in utility costs and mortgage rates.

Q: Will DOER revise language in 225 22:00 section R503.1.5 to coincide with Technical Guidance or vice versa?

A: DOER took in public comment on the stretch code in March and early April and is reviewing all comments including those around clarifying the Residential existing buildings chapter (including section R503.1.5).

Stretch Energy Codes, continued

Q: Can DOER provide more guidance or clarify existing language on energy compliance in Historic Structures especially as it relates to fenestration?

A: The Massachusetts Stretch and Specialized energy Codes defer to the 2021 International Energy Conservation Code (IECC2021) on the matter of when a Historic Structure is exempt from energy code compliance. The residential Stretch and Specialized Code don't have any prescriptive requirements for fenestration beyond the IECC2021 when it does apply. However, high performance windows are a proven strategy to lower HERS ratings, and triple-glazing is generally required to meet passive house performance levels if that code pathway is followed. For more specific energy code questions please submit questions to stretchcode@Mass.gov.

Q: What is the cost of Passive House construction as compared to standard construction? Is DOER considering this as a future standard?

A: Passive house is a current standard for code construction for multi-family new construction over 12,000 square feet in conditioned floor area in the communities that have adopted the Massachusetts Opt-in Specialized energy Code (Specialized Code). Passive house standards (there are 2 standard setting organizations: Phius and Passive House International (PHI) and they have been an optional path in the MA energy codes since 2014. They remain optional in the Base and Stretch energy codes, but the multi-family requirements in the Specialized Code are the first time that they are required. For cost information – the Massachusetts Clean Energy Center funded an affordable housing demonstration program that reports out real world costs prior to incentives available here: [Passive House Design Challenge | MassCEC](#). DOER funded extensive research and modeling of passive house costs for multi-family new construction prior to adopting the Specialized code available here: [Final Stretch Code Guideline Materials | Mass.gov](#). There are also multiple incentive programs – both federal and state (via Mass Save) available to developers of passive house projects to help with technical assistance and to defray any incremental costs. The Mass Save Passive House incentives have been available since 2019. More program information is available here: [Passive House Incentives \(masssave.com\)](#).

Municipal Fossil Fuel-Free Demonstration Program

Q: What is the latest update on the 10-Community Fossil Fuel Free Pilot Program?

A: The fossil-fuel free bylaws and ordinances are in effect in Acton, Aquinnah, Arlington, Brookline, Cambridge, Concord, Lexington and Lincoln. Newton's ordinance will take effect January 1, 2025. DOER is currently reviewing substitute community applications from Somerville and Northampton for the final remaining slot in the pilot.

Q: Why are fossil fuel-burning generators, pool heaters and other equipment installed outside of an ALL-Electric Buildings allowed under the Municipal Fossil Fuel-Free Demonstration Program?

A: The Specialized Code defines an all-electric building as: *A building with no on-site combustion equipment for fossil fuel use or capacity including fossil fuel use in space heating, water heating, cooking, or drying appliances.* That definition makes room for back-up generation using fossil fuels or biomass as a resilience measure. Pool heating with fossil fuels is not permitted in an all-electric building in the Specialized Code as it falls under water heating. Nonetheless, the legislature granted broad authority to cities and towns to set their own exceptions under the fossil fuel free demonstration program. Most have chosen to align with the Specialized Code treatment of back-up generation.

IRA Home Energy Rebate Program

Q: When is DOER planning to apply for the federal Home Energy Rebates (HER/HEAR)?

A: We applied in May. Information, including answers to frequently asked questions, can be found at [Federal Funding Opportunities | Mass.gov](#).

Q: Thank you for hosting this webinar! When will the straw proposal for the HER/HEAR rebate program be available for public review? I'm hoping it will be made available in advance of the March 18 public input session. Thank you.

A: The proposal was provided before the input session and circulated to our DOER general interest email list. The straw proposal is available here: [HEAR IRA funding for Mass Save Moderate Income Program](#).

Q: Will HER/HEAR energy efficiency incentives be accessible to towns served by municipal light plants?

A: MLPs will receive \$22 million in funding through DOER's HER program. See [Federal Funding Opportunities | Mass.gov](#) for more information.

Q: When will MA Homeowners be able to receive the federal Rebates?

A: Massachusetts homeowners can access Mass Save rebates and Federal tax credits today. For the Federal Inflation Reduction Act Home Efficiency and Electrification Appliance Rebates (sometimes called HER/HEAR or Homes/HEAR) we expect these will be available by the end of 2024 / beginning of 2025. These rebates are being prioritized for low- and-moderate income residents under 80% area median income, so not all Massachusetts homeowners will have access to them. For that reason, we encourage exploring Mass Save offerings first.

Q: How will HER/HEAR work together with existing Mass Save Rebate Programs?

A: All funding from the HEAR program will supplement Mass Save funding for low- and moderate-income decarbonization to increase access to those existing programs. Funding from HER will be allocated to two programs that are not part of the Mass Save program – one will support incentives for certain residents served by municipal utilities while the other will provide grants for affordable housing decarbonization.

Q: When you say HER will support MLPs, do you mean that money will go to the utilities to administer? Will they have any requirements? Is it only if the MLP staff and commission is open to it and seeks it out?

A: The HER federal funding program designed to serve MLP customers who are not also Mass Save gas customers will be co-funded by local MLPs. In order to access the HER funding in an MLP community, your local MLP will need to set aside some budget to provide matching funds. This is because federal funds are designed to supplement and not replace existing funding. MLPs will be encouraged to participate in the HER rebate program, and DOER is making matching state funds available on top of the HER federal funding to make the program more attractive. In addition, MLPs will be able to opt-in to the program on multiple occasions – to allow for their fiscal year planning to take place rather than having only one opportunity to participate.

Q: Will the HER/HEAR rebates from the IRA be retroactive for all of 2024?

A: HEAR rebates have no retroactive provision. HER rebates are technically available retroactively but only in instances where homes were in compliance with the statutory HER program requirements – these involve using BPI2400 certified audit software, or another DOE-approved software for multi-family; and reporting data pre- and post-project installation for US DOE to audit and approve the project; and demonstrating the minimum level of energy savings. Given these difficult requirements, DOER sees a limited opportunity to apply HER rebates retroactively and believes that could be most applicable in our Affordable Housing Decarbonization grant program, which already collects a similar level of data and detailed energy savings modeling.

Q: The presentation mentioned that DOER would be submitting the HER/HEAR application to the federal government in April; does DOER have a corresponding estimate on when homeowners would be able to apply for rebates?

A: DOER is working with the US DOE to understand the review and approval process for our HER and HEAR applications. At present, our best guess is that HER funds will be available by the end of 2024 and we are targeting a Jan 1, 2025 launch for HEAR rebates to coincide with a new 3-year plan for Mass Save, and newly expanded low- and moderate- income programs. Meanwhile, if you are a Mass Save or MLP customer, there are significant opportunities under existing programs to support adoption of decarbonization and efficiency measures, and you may get the same or a better incentive level, and better contractor availability today than you will by waiting for the federal funds.

EV Charging

Q: When will MassDOT be installing more EV chargers along the MassPike and at Logan Airport? And will they be fast chargers (350kW)?

A: MassDOT has recently replaced the 6 fast chargers on the MassPike that had stopped working. Because these new stations were a direct replacement for the previous ones, MassDOT was only able to install stations with a 50kW capacity. MassDOT is looking into opportunities for additional installations along the Pike and is working to overcome some of the infrastructure and funding challenges. Additionally, as part of the federal NEVI (National EV Infrastructure) program, MassDOT will be installing a substantial number of 150kW chargers along various highway corridors over the next couple of years. MassPort has installed 6 DCFC at Logan Airport for use by ride-hailing fleets and taxi fleets. Through a MassCEC grant, 2-3 additional DCFC will be installed to further support these fleets. In terms of public access to charging infrastructure, MassPort has determined level 2 stations to be the most appropriate strategy and has installed a number of these stations at Logan.

Q: Why is DOER pursuing the installation of 40-50AMP level 2 EV charging? Many of my clients are not going ahead because the EV chargers' electric requirements are greater than the building requirements.

A: In developing the Stretch Energy Code and Base energy code requirements for EV charging, DOER worked with a number of stakeholders in the EV charging field. The BBRS energy advisory committee set up a subcommittee on electric vehicle charging, of which DOER was a member, and met for over a year with input from electric utilities, EV charging companies and experts from other states, as well as members of the public. The Base and Stretch code language also built on work that was done at the national level to develop the International Code Council guidance on EV ready building code language, and the DOER heard public comment from across North America on EV charging standards. The result was that 40 amps was selected for commercial EV readiness and 50 amps for a single-family residential installation. However, the building codes also allow flexibility in trading off the default Level 2 charging for multiple Level 1 chargers, or for larger parking lots an option for DC fast charging in lieu of the Level 2 EV charging.

Q: The state has finally agreed to add EV Charging signage to our highway exits and rest stops similar to what we have for gas, food and lodging. This will help educate non-EV drivers that there are chargers out there, lowering their 'range anxiety' and easing their decision to buy their first EV. When will this signage be installed?

A: We invite you to reach out to the Massachusetts Department of Transportation with this question, as we are not the agency leading this effort. Here is their website: [Massachusetts Department of Transportation | Mass.gov](https://www.mass.gov/info-details/massachusetts-department-of-transportation).

Q: Can the Commonwealth implement a program similar to San Francisco for multi-family with a 110-volt outlet for each parking space. The outlet is connected to each apartment's electric meter. This will allow an apartment building with 100% EV adoption to serve their renters. California is moving to a "slow charging infrastructure." This we also reduce the size of grid upgrades based on EV adoption. We need practical solutions. –

A: Encouragement and incentives for both Level 1 and Level 2 EV charging at multi-unit dwelling is something that both San Francisco and the Commonwealth are engaged in. In Massachusetts the MassEVIP program has a category of Multi-Unit Dwelling & Educational Campus Charging Incentives that provides funding for both Level 1 and Level 2 AC electric vehicle supply equipment (EVSE). Connecting EV charging circuits to each living unit's electric meter often presents a logistical and/or cost challenge, so alternative technologies to track charging usage and cost by driver/resident are beneficial. The MA Stretch Code and the soon to be adopted Base code both allow 110-volt outlets to be installed in place of the default Level 2 EV ready requirement, with a ratio of at least three Level 1 (110-volt) charging outlets for every Level 2 space that would otherwise be required. That equates to a minimum of 60% of spaces with Level 1 charging for new multi-family parking following this option. This flexibility in the building code allows apartment owners to select "slow charging infrastructure" if this is their preference. In addition to the speed of charging, the MA energy codes (updated Base, Stretch and Specialized) all include incentives to adopt managed charging to reduce the size of grid upgrades required by new buildings and parking spaces.

EV Charging, continued

Q: Is there any help for condominiums to design and install EV infrastructure for anticipated unit owner demand for EV's?

A: The MassEVIP Multi-Unit Dwelling & Educational Campus Charging Incentive program provides incentives for property owners or managers to acquire and install Level 1 and Level 2 EV charging stations. Multi-unit dwellings with five or more residential units and educational campuses with at least 15 students on site are eligible. MassDEP funds up to 60 percent of the hardware and installation costs to a maximum of \$50,000 per street address. For more information, visit the [MassEVIP webpage](#). In addition, MA utilities offer make-ready funding to help with the cost of installation and electrical upgrades, including national Grid: [Multi-Unit Dwelling Programs | National Grid \(nationalgridus.com\)](#) and Eversource: [EV Charging Rebates Next Steps | Eversource](#).

Transportation

Q: Why haven't DOER or other state agencies implemented low-carbon diesel mandates for all state fleets, where electrification is currently not practical not available? Low-carbon fuels like biodiesel and renewable diesel can provide immediate carbon reductions, as well as substantial reductions in co-pollutants like PM which particularly benefits EJ communities. NYC just recently converted every diesel engine in its fleet (including, waste haulers, plows, ambulances and police and fire equipment) to 100 percent fossil-free fuel.

A: We are aware of the emissions benefits that can come from switching to biodiesel and renewable diesel and excited to learn that NYC is showing leadership by switching to 100% renewable transportation fuel for its heavy-duty fleet. We are planning to talk with them about their experience to learn more about how to overcome the challenges that exist for phasing in these fuels in Massachusetts. However, biodiesel fuels present operational challenges, particularly in cold weather, and renewable diesel has historically not been readily available in the local supply chain. We are committed to continue looking for opportunities to transition heavy duty diesel vehicles to fossil fuel alternatives both through electrification as well non-fossil liquid fuels for applications where electrification presents significant technical, cost and/or logistical challenges.

Q: Is DOER involved with the Clean Cities program, funded by US DOE? Over the years, they've been very helpful in advancing cleaner vehicles and electric charging through partnerships with fleets and providers.

A: DOER is directly involved with the Clean Cities program as our agency is currently the host organization for the Massachusetts Clean Cities Coalition (MACCC). You can learn more by visiting <https://www.mass.gov/info-details/massachusetts-clean-cities-coalition-mccc-overview>.

Q: Is DOER helping the MBTA beef up electric supply for subway corridors (already electric, but fragile) and bus garages (to accommodate battery-electric transit buses)? You can count transit passenger-miles against private vehicle-miles in calculating emissions benefit.

A: Absolutely! Our Leading by Example team and the Governor's Climate Office help coordinate those cross-Department efforts. This is especially important with DOER's work coordinating with the utilities.

Siting

Q: Is DOER working to ensure energy siting on disturbed land first, such as brownfields, industrial developed sites, rooftops, transit corridors, and parking lots?

A: Yes, DOER currently provides additional incentives under the SMART program in order to encourage siting on the built environment. The Commission on Energy Infrastructure Siting and Permitting's recent recommendations also included a recommendation that EEA work with stakeholders to create site suitability guidance that will be used in permitting processes to avoid, minimize, and mitigate impacts on the environment and people.

Siting, continued

Q: What input will local citizens have in the siting of energy infrastructure, such as offshore wind transmission?

A: Local citizens are encouraged to engage with their local communities on siting. The Energy Facilities Siting Board (EFSB) offers an opportunity to stakeholders to weigh in on proposed energy infrastructure. The Commission on Energy Infrastructure Siting and Permitting's recent recommendations include establishing mandatory requirements for developers to meaningfully engage with communities early in the development process to ensure robust public involvement and creating an Office of Community Engagement at the EFSB to facilitate dialogue and assist communities and project applicants with engagement.

Solar

Q: Will DOER be amending the SMART regulations to eliminate subsidies for ground-mounted solar? What about preserving farmland? Has the Clean Energy Center finished its study on whether crops like cranberries can actually grow under panels?

A: DOER plans to update the SMART program this year. We will examine the consideration of natural lands in our review. See here for updates and information on the SMART Programmatic Review: [SMART Programmatic Review | Mass.gov](#).

Q: How is DOER preserving biodiversity and critical habitat in our state through appropriate renewables siting?

A: DOER will continue to maintain its commitment to balance energy infrastructure with biodiversity and working lands.

Q: Does dual-use solar on agricultural land undermine our capacity to grow food?

A: DOER has implemented strict requirements on dual-use projects to ensure the agricultural production of the land remains intact despite the addition of solar.

Q: Why were developers included on the Commission on Energy Infrastructure Siting and Permitting?

A: In order to develop a holistic approach to a complicated issue such as siting, all parties need to be included and heard. Developers were included to provide their unique perspective on the challenge to site renewable energy projects, which was balanced with conservation stakeholders.

Q: What are the stormwater management concerns of solar developments? How is DOER ensuring the proper siting and design of solar projects to mitigate these concerns?

A: The current SMART program is designed to not provide any incentives for solar projects sited in a wetland Resource Area or sited on a parcel with 50% or more of its area designated as Priority Habitat, Core Habitat, and/or Critical Natural Landscape. The program also subtracts incentive value for any project sited on undeveloped land, and all projects larger than 500kw must comply with Performance Standards which can be found in the [SMART Program regulations](#) (p.11). DOER is currently revising its SMART regulations, which will include revisions to both project eligibility and the Performance Standards in line with the Administration's land use goals.

Q: We are frequently now with our solar installations using RECs instead of SMART incentives, as they are higher in many circumstances. When the SMART program is updated/renewed, will we at that time be able to apply to move from RECs to SMART incentives?

A: We intend to review a solution for this in the development of the next SMART program. We're conducting an analysis of the financial requirements for solar now, including this issue.

Q: Will DOER adopt in the SMART program, the Governors 1 GW + installation annual installation rate of solar development?

A: DOER is aware of the Governors 1 GW goal and is utilizing all policy tools, including SMART, RPS, and Solar for All to achieve these milestones.

Solar, continued

Q: Where can I familiarize myself with DOER's plans and proposals to update the SMART program?

A: Information on the SMART program review can be found at <https://www.mass.gov/info-details/smart-programmatic-review>.

Q: Due to SMART compensation not being changed since 2016 and long overdue SMART program changes, will DOER promulgate revised SMART regulations by Emergency provisions?

A: DOER plans to address the SMART program and compensation levels. Historically, changes to the SMART program have been made via emergency rulemaking.

Q: We need manual reporting to the PTS for new solar PV systems out here in Western MA where many locations have no internet or cell service. Automatic RGM is not cost effective with Class I REC's incentive value.

A: Unfortunately, the RPS program has specific reporting requirements in order to ensure the integrity of the program. Manual reporting is not currently supported under the RPS Class I program for new facilities.

Q: Is DOER providing any support for community solar programs?

A: Yes, DOER has specific program provisions in the SMART program for community solar and has also included community solar in our Solar for All program proposal.

Storage

Q: Are there any tax benefits or other financial incentives in place on a state level for Energy Storage projects which are not connected to solar? I'm referring to behind-the-meter distributed energy storage and management solutions.

A: There are two primary state incentives for energy storage projects that are located behind-the-meter and not connected to solar. First, DOER offers the Clean Peak Program: <https://www.mass.gov/clean-peak-energy-standard>. Second, MassSave offers the ConnectedSolutions program, which compensates participants when they respond to demand response events called by their electric distribution company that contribute to peak demand reduction. Also, DOER recently announced funding for new storage grant programs currently under development.

Q: Innovations in Battery Storage continues to evolve. Does DOER have a program similar to MASS Dot Innovation Conferences to showcase advancements?

A: Currently, DOER does not have a program similar to MASS Dot Innovation Conferences to showcase advancements in battery storage technology. That said, DOER recognizes energy storage is an area ripe with innovation and would welcome further stakeholder feedback on such a conference and how it could help advance energy storage technology development and deployment in the Commonwealth.

Q: How does DOER's Clean Peak Energy Standard Review relate to DEP's ongoing work to revise the Clean Energy Standard? Will there be any coordination between the two?

A: The Clean Energy Standard incentivizes the clean energy generation mix via a compliance standard that increases through 2050. The Clean Peak Energy Standard incentivizes the *timing* of dispatch of such generation, or demand response or energy storage, to coincide with Seasonal Peak Period that are associated with high electric cost and high emissions rates. Both portfolio standards incentivize the deployment of renewable generators, such as RPS Class I, but only the Clean Peak Energy Standard also incentivizes energy storage and demand response resources. Thus, while both portfolio standards serve unique purposes, they work together to help the Commonwealth meet its clean energy and climate goals by incentivizing a resource mix that is both clean and dispatchable to meet peak demand, lower ratepayer costs, reduce emissions from fossil fuel peaker plants, and provide reliable grid service.

Q: As a solar system owner, where can I go for assistance in battery backup installation?

A: The Massachusetts Clean Energy Center's website helps users search for battery storage installers. Click on [this link](#) and then enter your Zip Code and select the Battery Storage radio button to search.

(Disclaimer: MassCEC has not investigated, and MassCEC expressly disclaims any duty to investigate any company, product, service, process procedure, design, or other matter regarding the installation of the clean energy technology by the installers presented on this website. The entire risk of use of any installer, equipment vendor, company, product, service, process, procedure, or design is assumed by the homeowner.)

Biomass

Q: Is DOER reconsidering Biomass as a heat/energy source?

A: DOER is not currently considering changes to biomass policy for heating or electricity.

Q: Why does Massachusetts allow for logging on state-owned lands and how does this process align with climate goals? Are trees cut on state-owned lands used for biomass energy?

A: The Department of Conservation and Recreation (DCR) Division of State Parks and Recreation is responsible for the stewardship and management of approximately 314,000 acres of state forests, parks and reservations. Various Commonwealth laws, the state Constitution and sound forestry practices require that DCR manage state forests for a range of purposes and goals. For more information, visit this site: [Forest Resource Management Plans on State Lands | Mass.gov](#).

Q: Is biomass classified as clean energy? Why? What are DOER's current programs related to biomass? Is DOER looking to change biomass or wood-burning programs?

A: DOER does not define clean energy technologies but does manage the Renewable & Alternative Portfolio Standards under which certain technologies are eligible according to statute. See the following guidelines for which biomass technologies are currently eligible for each program: [Renewable Portfolio Standard](#), [Alternative Energy Portfolio Standard](#). DOER has no active plans to revise its biomass eligibility for either program or develop alternative programming.

Q: Does the Administration support legislation (S.2136/H.3210 and S.2137/H.3211) to remove subsidies for woody biomass from the APS and the MLP greenhouse gas emissions standard?

A: DOER cannot comment on specific bills. We are looking forward to working with the Legislature as they pursue a climate bill this session.

Q: Does DOER support removing biomass energy from the MLP standard so that MLPs cannot qualify biomass as green energy?

A: Removing biomass from the MLP standard would require a legislative change. DOER cannot comment on specific bills. DOER is monitoring and actively engaging with the legislature on proposed climate legislation.

Power Grid

Q: What are you doing to get ISO-New England to speed up the interconnection process to bring more renewables online?

A: The Federal and Regional Energy Affairs (FREAA) team at EEA, led by Deputy Secretary Jason Marshall and Assistant Secretary Weezie Nuara, work closely with ISO New England and the other New England states on reforms to regional grid operations to facilitate interconnection and deployment of renewable energy resources to meet Massachusetts' clean energy goals.

Q: What is the DOER doing to address interconnection issues in MA?

A: DOER is significantly involved in addressing interconnection issues. Our main avenue for doing so is currently as chair of the Grid Modernization Advisory Council (GMAC) and by intervention into the Department of Public Utilities' review of the utilities Electric Sector Modernization Plans, where DOER is advocating for the prompt development of a long-term planning and cost recovery process for interconnection through a stakeholder process facilitated by the GMAC. For more information, please see: <https://www.mass.gov/orgs/grid-modernization-advisory-council-gmac>

Q: Reggie?

A: RGGI is the Regional Greenhouse Gas Initiative -- a regional cap and trade program for power sector decarbonization.

Power Grid, continued

Q: In our community we have two instances where amount of solar installed requires that a transformer be upgraded and the utility is requiring that the owner of the solar pay for the upgrade. This does not seem like it is encouraging renewables by the utility, this needs to be addressed when working with the utilities. They benefit from the renewables to the grid, so why doesn't the utility pay?

A: DOER is working with the utilities, DPU, and stakeholders to improve the planning and cost recovery process for distributed generation (DG) interconnection to accelerate the deployment of solar and other DG resources in the Commonwealth. Our main avenue currently is as chair of the Grid Modernization Advisory Council (GMAC) and intervention into the Department of Public Utilities' review of the utilities Electric Sector Modernization Plans, where DOER is advocating for the prompt development of a long-term planning and cost recovery process for interconnection through a stakeholder process facilitated by the GMAC. For more information, please see: <https://www.mass.gov/orgs/grid-modernization-advisory-council-gmac>

Q: In the interest of reducing the amount of electric grid build-out, is the state looking at transmission line monitoring? <https://www.linevisioninc.com/>

A: Absolutely. LineVision was a member of our Clean Energy Transmission Working Group. The final report can be found here and includes recommendations: <https://www.mass.gov/info-details/clean-energy-transmission-working-group-cetwg>.

Q: As DOER is working to encourage utility investment to support electrification, are you considering upgrades all the way to the final mile aka neighborhood-level electricity and wires? These systems need to be upgraded to support electrification so that property owners and builders can install heat pumps, solar PV, and EV chargers.

A: DOER is engaging with the electric utilities, DPU, and stakeholders to improve the planning process for the electric distribution system to support clean energy goals. Our main avenue currently is as chair of the Grid Modernization Advisory Council (GMAC) and intervention into the Department of Public Utilities' review of the utilities Electric Sector Modernization Plans, where DOER is advocating for the prompt development of a long-term, proactive planning process for the distribution system through a stakeholder process facilitated by the GMAC. For more information, please see: <https://www.mass.gov/orgs/grid-modernization-advisory-council-gmac>

Q: Is money being allocated to study and implement an integrated, regional offshore wind transmission system to reduce the number of cables and bring power to areas of higher energy load?

A: The Interagency Offshore Wind Council is currently developing an Offshore Wind Strategic Plan for Massachusetts that will examine long-term strategies to support responsible offshore wind development. The Strategic Plan will examine transmission solutions as well as environmental mitigation options. More information is available at: <https://www.mass.gov/info-details/interagency-offshore-wind-council>

EEA's Federal and Regional Energy Affairs (FREA) team is also working closely with ISO New England and northeast states to foster collaboration on regional transmission solutions and planning. On July 9, 2024, the Healey-Driscoll Administration joined fellow New England states, Delaware, Maryland, New Jersey, and New York in signing a memorandum of understanding (MOU) to establish a framework for coordinating their activities to improve interregional transmission planning and development. See press release here: [Northeast States Announce Agreement to Enhance Collaboration in Pursuing Electric Transmission | Mass.gov](#).

Q: Many of the grid upgrades are putting large transmission infrastructure in neighborhoods like on the south coast. What is DOER doing to make sure residents living under these transmission lines are not exposed to more EMFs?

A: The Vineyard Wind project interconnects to the New England regional transmission grid via underground transmission cables that run under Covell's Beach in Barnstable, MA. Several proposed offshore wind projects include similar proposed interconnections underground. These transmission lines are not a danger to public health. The electromagnetic fields from these transmission lines are well below World Health Organization (WHO) exposure limits and they are further reduced by the fact that they are bundled and buried underground. EMFs generated by these transmission lines are both lower than those produced by the distribution/electricity lines that already line streets as well as common household appliances. There is no evidence to support that critical electric infrastructure such as these transmission lines and the power lines on our streets have negative impacts on the environment or public health.

Power Grid, continued

Q: Can we get detailed data on specific energy suppliers such as Northfield mountain pump storage?

A: DOER is not aware of specific data that is available about this facility.

Q: Are there any programs (or is there consideration being given to potential programs) that would support R&D or construction of small-to-medium-scale energy generation and storage options like residential-scale wind that are not time-limited and have very low environmental impact?

A: The Massachusetts Clean Energy Center (MassCEC) is dedicated to supporting the growth and development of new and emerging clean energy technologies. More information is available at:

<https://www.masscec.com/program/accelerator-funding-program>

Policy, Planning, & Analysis

Q: Where can I find data about winter heating costs?

A: DOER's annual report on winter heating costs is available at: <https://www.mass.gov/info-details/massachusetts-household-heating-costs>.

Q: Is the Policy and Planning Team also working to address the need to replace aging gas structure and shift resources from maintaining/replacing that to electrification? My understanding is, we can't do both.

A: 2022's An Act Driving Clean Energy and Offshore Wind required the Department of Public Utilities to assemble a stakeholder working group that would develop recommendations for legislative changes that would align the Gas System Enablement Plans (GSEP) with statewide emissions limits, as well as encourage development of thermal systems. The Working Group, which consisted of DOER's Commissioner and 18 other appointed members, held several meetings throughout the development of its recommendations to create the GSEP Working Group Final Report and Recommendations which were presented to the Legislature on January 31, 2025 and are available here: mass.gov/doc/gsep-working-group-final-report-and-recommendations-13124/download.

Q: Is DOER considering all clean energy options – wind, solar and nuclear? Does DOER consider the lifecycle of every power source be evaluated from mining to infrastructures, govt subsidies, intermittency, disposal and every single cost be included?

A: Massachusetts has conducted long-term planning and modeling analysis in the 2050 Clean Energy and Climate Plan, which takes into account all available technologies and analyzes different scenarios to achieve Net Zero emissions. The 2050 CECP is available at: <https://www.mass.gov/info-details/massachusetts-clean-energy-and-climate-plan-for-2050>.

Q: What relationship does DOER have with DPU? Do you have an update on the implementation of the net metering cap expansion that was legislated in 2022?

A: DOER is an active intervenor in many proceedings at the DPU to advocate for utility investments and programs that align with the Commonwealth's clean energy goals. The DPU will open a separate proceeding with docket number DPU 23-140 to propose further revisions prescribed by the 2022 Act as soon as practicable. For more information on that process, please visit: <https://www.sec.state.ma.us/divisions/pubs-regs/download/manual.pdf>. This formal rulemaking requires interagency review, the timing of which is outside of the Department's control.

Q: Could the State take all existing coal, oil and gas generation facilities and auction them off to developers to repower them as central electricity battery storage where interconnection is already available and present?

A: The state does not own generating facilities so this would not be feasible. However, DOER does advocate for utility infrastructure investments to utilize existing developed land and rights-of-way where possible.

Policy, Planning, & Analysis, continued

Q: Our community is considering level 3 chargers...where can information regarding electric rates be found, including demand charges and at what kW are demand charges incurred?

A: Links to Eversource, National Grid, and Unitil's electric rate offerings can be found [here](#). These links include rates for residential, commercial, and industrial customers, as well as EV rates and information regarding demand charges.

Q: What is being done to change rate tariffs to encourage the installation of heat pumps and make their operation more affordable?

A: In the course of Unitil and National Grid's base distribution rate cases (which are proceedings at the Massachusetts Department of Public Utilities that result in updates to electric rates), DOER has advocated for the implementation of rate offerings that would provide lower electric rates to customers that install heat pumps. These rate offerings would serve to further encourage consumers in Massachusetts to install heat pumps, and ensure more affordable energy costs to consumers who heat with that technology. DOER is also collaborating with the Executive Office of Energy and Environmental Affairs, the Massachusetts Clean Energy Center, and the Attorney General's Office through the [Interagency Rates Working Group](#) to advance near- and long-term rate designs that align with the Commonwealth's decarbonization goals, including to promote building electrification.

Q: Please address the shortage of rare earth minerals required to reach "Net Zero". Do your calculations for net zero goals factor scope 3 emissions (both up and downstream)?

A: The Massachusetts GHG Inventory is maintained by the Massachusetts Department of Environmental Protection (DEP). Massachusetts' strategy to achieve Net Zero emissions is provided in the 2050 Clean Energy and Climate Plan, available at: <https://www.mass.gov/doc/2050-clean-energy-and-climate-plan/download>.

Green Communities / Municipal Support

Q: Can DOER find ways to offer more assistance to rural communities? 40% of the green communities in the four western counties received their last grant prior to 2020. These communities need help applying for grants, finding contractors and monitoring projects.

A: Yes. We have technical assistance grants—we've created new opportunities for this and will continue to get this assistance out. Our Western regional coordinator, Chris Mason, is embedded in the community and wants to help more communities. We'd love a 413 surge in applications and want to help facilitate.

Q: Is there any dedicated liaison between DOER and cities or towns?

A: DOER has four regional coordinators that serve as dedicated liaisons to municipalities. For more information on the Regional Coordinators under the Green Communities Division, please see: <https://www.mass.gov/info-details/contact-gc-coordinator>.

Q: How does DOER interact with town admins to support local efforts of green committees, which often rely on volunteers? In addition to managing efficiency and decarbonization efforts our committee is tasked with convincing our town admin that climate related investments are a priority. It's often overwhelming.

A: DOER is happy to attend any meetings, in-person or virtual, to discuss the Commonwealth's clean energy and climate policies and programs. The Green Communities team has presented to the Small Town [Administrators of Massachusetts \(STAM\)](#) in the past and is willing to do so again if invited.

Q: When does the Climate Leaders Communities program launch?

A: It has launched. Visit our [website](#) or contact your Regional Coordinator for more information.

Q: Hopefully Peabody will soon be accepted into the Green Communities program.

A: Peabody is now a designated Green Community.

Q: Are there Green Communities regional offices? I'm interested in plugging in concerned communities into the battery storage bylaw process.

A: Sign up for our Green Communities [email list](#) to get updates on our programs, including battery storage bylaw development.

Green Communities / Municipal Support, continued

Q: Will there be opportunities for input into the battery energy storage systems (BESS) model bylaw?

A: Yes, there will be opportunity for stakeholder engagement.

Q: How is DOER working with towns with Municipal Electric Departments?

A: We are working with MLPs currently on a number of programs, including under HER/HEAR, and dedicating other DOER resources for programming. MLPs also have additional clean energy requirements through a 2021 law that DOER is helping them to report on.

Q: Would it be possible for researchers to access Mass Energy Insight (MEI) data or household energy consumption data?

A: No. Only individuals authorized by a city, town, or school district can access data in MEI. MEI does not contain residential energy data.

Q: Are incentives for windows being considered? We need to come to a solution to help municipalities put new windows in, along with the other weatherization measures.

A: The return on investment for window replacement has historically been unfavorable and rendered a Green Community grant application less competitive. However, we are open to exploring options for window replacement. The current Mass Save low-income program has been able to demonstrate that triple-pane windows (which have become less expensive in recent years) are a cost-effective replacement for failing single-pane windows in residential units. Making the case for municipal buildings is harder than in residential uses, but they can be included as part of a more comprehensive project in some instances.

Q: As both the MVP and GC programs are being updated this year and many communities are enrolled in both, what kind of cross agency coordination is planned to ensure that both programs are getting at a wide range of community decarb and resilience needs so we can get the most “bang for our buck” out of both programs statewide?

A: We talk with our colleagues at MVP regularly to ensure that our programs complement each other.

Q: What role will DOER play with ensuring appropriate solar siting? Will DOER support municipalities in exercising their zoning powers to “balance” solar siting?

A: The Commission on Energy Infrastructure Siting and Permitting issued its [recommendations](#) to Governor Healey to include site suitability.

Energy Security

Q: My concern for electrification is security. What happens when the power fails? What is the backup for people who only have heat pumps, for example?

A: Power failures impact residential heating whether households use heat pumps or a furnace – thermostats require electricity to operate.

General

Q: How do you consider environmental protection and public health in your policy development?

A: DOER recognizes that many of our programs will lead to improved public health by reducing local pollutants both indoors and outdoors.