

January 17, 2020

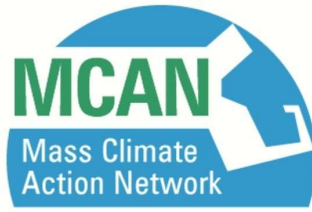
Dear Department of Energy Resources:

For two plus years Massachusetts Climate Action Network (MCAN) has been organizing with local advocates in in towns with municipal light plants (MLP). These teams of advocates are turning to their local MLP to be part of the climate solution, and have become very aware of the roadblocks put in front of them by the numerous climate, clean energy, and energy efficiency exemptions granted to MLPs by the Commonwealth of Massachusetts. Several of these communities have been advocating for their MLP to adopt energy efficiency programs, especially on the residential side. MCAN supports including municipal light plants in the Residential Conservation Services (RCS) 225 CMR 4.00 in the most ambitious way possible.

The Global Warming Solutions Act (GWSA) of 2008 set a legal mandate to eliminate 80% of global warming pollution by 2050. Currently MLPs, and their 15% of Massachusetts electric load, are exempted from this goal. This omission should be corrected. Not holding the MLPs accountable for the pollution created from the generation of their electricity moves that burden to the rest of the electric consumers in state. In effect this will cause National Grid, Eversource, and Unitil customers to eliminate more than 80% of their emissions, since they have to make up for the MLPs who have no such requirement. It is imperative that MLPs and their representative industry groups carry their share of this responsibility and are held accountable through energy efficiency targets. The representative industry groups for the MLPs are fully capable now of developing and administering an energy efficiency programs for each light plant.

MCAN believes in the democratic independence of locally run MLPs, however, this should not exclude them from their share of the responsibility for eliminating carbon pollution. This independence, however, should not be interpreted by the MLP or Commonwealth of Massachusetts as a reason to not adhere to energy efficiency standards. Currently MLPs are failing their customers by not adequately providing incentives to adopt efficiency measures despite customers seeking out these solutions. Each of the MLPs should be allowed to create an energy efficiency plan that works for their community if that plan has measurable annual targets and within 5 years lines them up with the goals of the GWSA.

Residents in MLP territories, like those in investor owned utility (IOU) territories, are seeking climate friendly solutions for cooking, domestic hot water, better insulated and sealed homes, heating and transportation. This results in customers across Massachusetts adopting induction stoves, air source heat pumps, and electric vehicles. For years the MLPs' electric loads have remained relatively flat but now with more residents using these technologies the MLP loads will start to increase and MLPs will soon be facing the need to make expensive upgrades to substations, transformers, and distribution lines. However, energy efficiency programs can mitigate the need for these upgrades at a fraction of the cost, all the while helping to meet the GWSA goals.



On average MLP customers consume more electricity than their IOU counterparts, a result of larger suburban homes and a lack of comprehensive energy efficiency programs. A lack of comprehensive energy efficiency measures for MLPs has been a disservice to residents in those communities and the rest of Massachusetts. There are examples around the country of MLPs and electric coops operating successful programs that increase services to their customers, like on bill financing.

Annual energy efficiency standards that hold MLPs accountable benefit residents by giving them more comfortable and healthier homes while simultaneously reducing their overall energy usage and energy expenses. Each MLP is able to turn to their representative industry group to adopt cutting edge efficiency methods and become centers of innovation, much in the way that Green Mountain Power in Vermont has pioneered forward looking programs to improve operations and reduce emissions . Massachusetts MLPs can be achieve similar results by setting standards that are in line with recommendations that are prescribed by the Massachusetts Energy Efficiency Advisory Council.

Sincerely,

Andrew R. Grande
Clean Energy Program Director
MCAN

Kimberly French
Sustainable Marblehead

Jane Dye
Citizens for Holden's Energy Future

Ken McDonnell
Citizens for Holden's Energy Future

Robin Van Liew
Citizens for Holden's Energy Future

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Joy Gurrie
350Mass
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Eileen Mathieu
Sustainable Marblehead

Huckabee, Jerrylyn (ENE)

From: Adkins-Perry <adkinsperry@gmail.com>
Sent: Friday, January 17, 2020 8:59 PM
To: DOER.RCS (ENE)
Subject: Residential Conservation Services standards

Hello,

I live in Middleboro which has municipal gas and electric. I believe municipal light plants should be subject to state climate goals, including renewable portfolio standards and energy efficiency.

I support including municipal light plants in the Residential Conservation Services (RCS).

Sincerely, Dody Adkins-Perry

Huckabee, Jerrylyn (ENE)

From: Linda Bardwell <linda.bardwell@verizon.net>
Sent: Friday, January 17, 2020 6:08 PM
To: DOER.RCS (ENE)
Subject: Residential Conservation Services

To the DOER:

I live in Middleborough, a town served by a municipal gas and electric utility. In the interest of basic fairness, and the urgency to transition away from fossil fuels, I believe municipal light plants, like Middleborough Gas & Electric, should be subject to state climate goals, including renewable portfolio standards and energy efficiency.

I support including municipal light plants in the Residential Conservation Services (RCS) in the most ambitious way possible.

Sincerely,

Linda Bardwell

Member, Sustainable Middleborough

Huckabee, Jerrylyn (ENE)

From: Kimberly French <kfrench28@gmail.com>
Sent: Friday, January 17, 2020 5:42 PM
To: DOER.RCS (ENE)
Subject: Comment on Residential Conservation Services Guidelines

To th DOER:

I live in a town served by a municipal gas and electric utility. In the interest of basic fairness, and the urgency to transition away from fossil fuels, I believe municipal light plants, like Middleborough Gas & Electric, should be subject to state climate goals, including renewable portfolio standards and energy efficiency.

I support including municipal light plants in the Residential Conservation Services (RCS) in the most ambitious way possible. Sincerely yours, Kimberly French 24 Murdock St, Middleborough, MA 02346 508-947-4782