

## **ENE & NEEP – Comments on Proposed Changes to DOER's RCS Guidelines July 15, 2014**

Environment Northeast (ENE) and Northeast Energy Efficiency Partnerships (NEEP) appreciate the opportunity to provide comments to the Department of Energy Resources (DOER) regarding the proposed changes to DOER's Residential Conservation Service Program (RCS) Guidelines.

ENE and NEEP share DOER's interest in updating the RCS Guidelines to better serve the residential market. The Commonwealth has taken substantial steps to address the emissions of greenhouse gases, as required by the Global Warming Solutions Act (GWSA). Energy efficiency is a key emissions reductions strategy in the Commonwealth's *Clean Energy and Climate Plan for 2020*, which relies on energy efficiency for nearly one-third of the emissions reductions required by 2020. The proposed RCS updates will allow for a more comprehensive approach to residential energy efficiency and renewable energy, one that better aligns state policy and program goals. ENE and NEEP are supportive of DOER's four broad objectives for updating the RCS Guidelines, as detailed below.

### **I. Universal application of "fuel neutrality"**

Currently, the heating system measures recommended to residential customers are limited by the customer's existing fuel. Updating the RCS Guidelines to ensure universal application of fuel neutrality will enhance the comprehensiveness of Home Energy Services (HES) recommendations, will allow more customers to participate, and enable resources to assist customers in moving to renewable thermal technologies (i.e. air-source heat pumps).

The proposed changes will also require a better methodology to quantify and attribute energy savings to the programs, particularly oil and propane savings, as there will be instances of saving one fuel type at the addition of another. It will be important that the programs are able to claim the full value of savings associated with these fuel switching scenarios. DOER should work with the Program Administrators to ensure all savings are counted, and are subject to the same level of evaluation, measurement, and verification as all statewide energy efficiency programs.

We are concerned however that this fuel neutrality policy may have the potential to unintentionally facilitate a rush to natural gas conversions. We do not support any such update to the RCS Guidelines that would be leveraged to convert a large number of customers to natural gas, especially in locations that would require significant delivery infrastructure development. Ratepayer funds intended to support energy efficiency measures should not be used to support a systematic effort to switch customers to natural gas or any other fuel. To avoid the perception of picking winners and losers, the fuel-blind HES program should not prioritize any specific technology or fuel type.

### **II. Renewable program information in HES assessments**

ENE and NEEP are in favor of providing renewable energy program information during HES assessments. Unlike the energy efficiency programs, the state renewable programs do not have an in-home opportunity for information sharing and education. The HES assessments provide an excellent opportunity for integrating information about renewable energy programs, pilots, and grants into an existing home visit process. This integrated approach will deliver a more comprehensive suite of energy solutions to residential customers. ENE and NEEP welcome this shift toward a streamlined delivery model, enabling the HES program to serve as a one-stop shop for energy efficiency and renewable energy information.

Customers should be encouraged to pursue energy efficiency improvements before installing renewable energy. Completion of a home energy audit should be a prerequisite for participation in all renewable programs. Customers should be required to meet a minimum level of home performance in order to be eligible for state renewable energy grants, pilot projects, and rebates. DOER, the Massachusetts Clean Energy Center, and the Program Administrators should work together to establish a minimum level of home

performance. Finally, adding renewable energy information to the HES assessment requires contractor education and training. DOER should provide no-cost renewable energy training opportunities for contractors prior to rolling out these changes in the field.

### **III. RCS application to multifamily buildings**

ENE and NEEP are supportive of efforts to unlock energy efficiency opportunities for hard-to-reach and hard-to-serve customers, including multifamily buildings.

### **IV. Statewide contractor standards**

ENE and NEEP recognize the importance of clear qualification and performance standards for HES contractors. Statewide requirements will ensure consistency across all service territories. Developing the statewide standards should be a transparent, open process, in coordination with the Program Administrators and interested stakeholders.

Overall, ENE and NEEP support DOER's proposal to move toward more a more holistic approach to residential energy efficiency delivery. This approach will align the state renewable and energy efficiency program activities into a more consumer-friendly package.

Respectfully submitted,

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