



*By electronic mail - August 7, 2013*

## **Comments of Northeast Energy Efficiency Partnerships (NEEP) on the Use of RGGI Funds for Thermal Efficiency Programs**

On behalf of Northeast Energy Efficiency Partnerships (NEEP)<sup>1</sup>, I am pleased to provide comments on the creation of new thermal efficiency programs with the use of Regional Greenhouse Gas Initiative (RGGI) auction proceeds, as enabled under 35-A MRSA 10109 (4)(A).

NEEP is a regional non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency in the building sector through public policy, program strategies and education. Our vision is that the region will fully embrace energy efficiency as a cornerstone of sustainable energy policy to help achieve a cleaner environment and a more reliable and affordable energy system.

First, we commend the legislature and the Efficiency Maine Trust board and staff for their leadership and vision in trying to tackle the state's great need for fuel-blind thermal efficiency programs. Maine is not alone among neighboring states where a very high percentage of customers rely on unregulated delivered fuels to heat their home and buildings. All New England states have been working hard in recent years to find ways to fund whole-building, all-fuel programs – and in particular to serve the needs of oilheat customers.

While a high percentage of Maine homes could benefit from thermal efficiency assistance, we realize that this new funding source is limited and the Trust seeks to maximize its impact. Still, directing a significant portion of RGGI proceeds towards thermal efficiency will allow Maine to make important strides towards the goals of weatherizing all homes by 2030 and reducing fuel usage 20 percent by 2020. We encourage continued efforts to look for other funding sources as well, and hope that the state's oil dealers will be partners to that end.

I was pleased to attend the July 24 stakeholder meeting on the development of these programs, and commend the Trust for the collaborative approach to designing programs, and to the many stakeholders who are taking time to share their insights and ideas. In this regard, we see Maine's effort as a model for other states.

NEEP is confident that the Trust will develop and market accessible, fair and well-coordinated fuel-neutral programs that are integrated with existing Efficiency Maine incentives and financial products.

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<sup>1</sup> These comments are offered by NEEP staff and do not necessarily represent the view of the NEEP Board of Directors, sponsors or partners.



Following is some general guidance based on NEEP's experience with thermal efficiency program development and best practices from the region:

- A portion of the funds should be used for training of weatherization and HVAC contractors. We are seeing the importance of advanced knowledge of building science from an environmental health and safety perspective.
- The Trust should consider allowing some of the funds to go towards pre-weatherization issues such as addressing the need for combustion safety, knob and tube wiring remediation, and possibly air and vapor barrier issues that may prevent a homeowner from being able to move ahead with weatherization projects.
- Any customer who takes advantage of high efficiency heating/water-heating rebates should be strongly encouraged to undertake insulation and air sealing. The Trust should consider whether customers who invest in a package of measures should get deeper rebates — say an extra 10 percent on an equipment incentive if they install within a two year period after weatherization.
- We encourage the Trust to look at early replacement programs for old, inefficient heating equipment such as the one offered by [Mass Save](#). By promoting proactive equipment upgrades on so-called “will-not-die” boilers, for example, Efficiency Maine can help get the oldest, most inefficient equipment out of homes.
- Residential Registered Vendors and Qualified Partners will play an important role in promoting the programs and delivering savings. Joint advertising promotions and regular review of customer satisfaction and measure installation will help ensure quality and realization of energy savings.

We encourage the Trust to continue learning from the experiences of neighboring states and to participate in regional product strategies, such as those for air-source heat pumps and heat pump water heaters convened by NEEP. Congratulations to the Efficiency Maine Trust for this undertaking, and we look forward to following and supporting Maine's efforts to expand the state's thermal efficiency programs.

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