

Joint Letter in Opposition to FY 2015 Budget Amendments #20 and #30, Relative to Energy Efficiency

April 25, 2014

Representative Brian Dempsey, Chair
House Committee on Ways and Means
State House Room 243
Boston, MA 02133

Dear Chairman Dempsey and Members of the Committee,

We write to you as a coalition of business organizations, consumer groups, energy efficiency, public health and environmental advocates to urge to oppose two proposed budget amendments that would undermine the state's award-winning and effective energy efficiency programs.

Amendment 20 would eliminate quality control, consumer protection and assurance of savings in the Mass Save programs. This measure seeks to allow any licensed contractor to work directly with customers and access rebates currently coordinated through the collaborative process of the Massachusetts efficiency program administrators and the state. Such a change could in fact leave customers without protection and recourse, and would likely add cost and administrative complexity to the programs.

The fact is that customers already have a range of choices when they select vendors to install efficiency measures through the Mass Save programs. In addition, there are ample opportunities for independent vendors to become certified delivery partners and to address any concerns through the state's Energy Efficiency Advisory Council (EEAC).

Amendment 30 would tamper with the way that electric and gas efficiency funds collected from ratepayers are allocated across customer classes. These changes could be of particular harm to low-income residents, but could also be a hindrance to the programs offered to other customer classes, including businesses. The budgetary process should not be used to dictate the allocation of energy efficiency programs funds, as there is already a regulatory framework that ensures fairness and flexibility for the energy efficiency program administrators to deliver on their stated savings goals.

In each of these cases, the coordination and administration of funds has been carefully considered by the Department of Energy Resources and the Department of Public Utilities. The state's EEAC, which includes representatives from state agencies, utilities and the Cape Light Compact and an array of interested stakeholder parties, works to ensure that efficiency program funds are properly spent and accounted for to deliver the maximum benefit for the Commonwealth.

These twin amendments would be damaging and short-sighted. As such, we urge the Committee on Ways and Means to reject them. We believe that the state's efficiency program portfolio, as designed and implemented, makes good use of ratepayer funds, is equitable across rate classes, and is responsive to the concerns of small contractors while balancing the need for quality and consistency.

Sincerely,

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Eugeia T. Gibbons, Program Director
Environmental League of Massachusetts

Cindy Luppi, New England Director
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Larry Chretien, Executive Director
Mass. Energy Consumers Alliance

Charles Harak, Senior Attorney
National Consumer Law Center (on behalf of its
low-income clients)

Elliott Jacobson, Vice President for Energy
Programs Action Inc.

Peter Wingate, Energy Director
Community Action of the Hampshire,
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Paul Lipke
Senior Advisor
Health Care Without Harm

Berl Hartman, New England Director
Environmental Entrepreneurs (E2)

Dave McMahon, Director
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Worcester Green Low Income Housing Initiative

Sue Reid, VP and Director
CLF Massachusetts

Peter Rothstein, President
New England Clean Energy Council

Peter Shattuck, Director of Market Initiatives
ENE (Environment Northeast)

CC: Representative John Keenan and House Members of the Committee on Ways and Means