



July 28, 2021

Michelle Turner, Administrative Secretary
Efficiency Maine Trust
168 Capitol Street, Suite 1
Augusta, ME 04330-6856

Re: Comments from the Natural Resources Council of Maine in response to Efficiency Maine Trust's Draft Triennial Plan V

The Natural Resources Council of Maine (NRCM) is a 501(c)(3) nonprofit membership organization with more than 25,000 supporters statewide and beyond. For 60 years, the Natural Resources Council of Maine has been protecting, restoring, and conserving Maine's environment, now and for future generations. We work statewide to:

- Protect the health of Maine's rivers, lakes, streams, and coastal waters;
- Promote sustainable communities through initiatives that reduce toxics pollution and waste;
- Decrease air and climate-changing pollution through energy efficiency and renewable sources;
- Conserve Maine lands and wildlife habitat, including our treasured North Woods; and
- Defend the federal environmental policies and programs that help protect Maine.

NRCM's climate and clean energy work is focused on promoting solutions that will have the greatest impact on climate pollution: cleaner cars and trucks, clean and renewable energy production, and greater energy efficiency. One of NRCM's top energy priority is advocating for greater energy efficiency and conservation, as that is consistently the cheapest, cleanest way to meet Maine's needs while reducing energy pollution.

Thank you for the opportunity to comment on this draft plan.

Rebecca Schultz
Senior Advocate
rschultz@nrcm.org

Jack Shapiro
Climate & Clean Energy Director
jshapiro@nrcm.org

On behalf of the Natural Resources Council of Maine, we want to thank Efficiency Maine Trust (the Trust) for the opportunity to submit comments on its draft Triennial Plan V (2023-2025). We appreciate the critical role the Trust plays in reducing the costs and environmental impacts of energy consumption for the state of Maine and commend the Trust for taking steps to align its work plan with the State's 2020 Climate Action Plan (*Maine Won't Wait*) and decarbonization targets. We were pleased to see the Trust incorporate many of NRCM's responses to its Request for Information. In particular, we were pleased to learn that the Trust plans to:

- Incorporate marginal abatement costs for carbon in its cost-effectiveness test;
- Discontinue incentives for oil- and propane-fired boilers and furnaces;
- Launch a load-shifting initiative to provide incentives for batteries and EV smart chargers.

In addition to these positive developments, we believe the Trust should build on its strong track record to further expand and prioritize programs that deliver energy efficiency to underserved, low-income communities which bear disproportionately high residential energy burdens. To this end, the Trust may consider incorporating equity-related benchmarks and criteria into program design, implementation, and evaluation to reinforce these goals within existing programs. We also encourage the Trust to focus on rental and multi-unit housing, continue to use community partnerships to engage specific target populations, and undertake new investigations into this segment of the market to better understand how to serve these ratepayers.

We encourage the Trust to put greater emphasis on whole-home retrofit measures for weatherization and electrification, such as bundling incentives for heat pumps and insulation and air sealing, to capture opportunities beyond low-hanging fruit at the time of renovation. We also want to emphasize the important role for the Trust in improving the energy performance of new construction by supporting code compliance and rewarding above-code construction.

As noted above, we applaud the Trust's decision to include carbon reduction benefits in its cost-effectiveness test. However, reducing fossil fuel combustion in residential and commercial buildings have additional, quantifiable health and safety benefits that the Trust should also incorporate into its accounting practices.

While commending the Trust for discontinuing some fossil fuel incentives, we encourage a full phase-out of subsidies for natural gas on the basis that these payments are inconsistent with Maine's statutory GHG reductions and the Trust's obligations therein.

With respect to the load shifting initiative, we recommend the Trust consider adopting quantitative goals, such as kW of flexible or controllable load, as New Hampshire, Massachusetts, and Vermont have done. The Trust should also consider the potential system benefits of these programs beyond peak-shaving. Designing programs to drive demand toward ISO-NE off-peak hours may not sufficiently take advantage of the opportunity for these technologies (i.e., battery storage and EV smart chargers) to reduce emissions, integrate renewables, and enhance grid reliability.

Similarly, while being widely deployed in Maine, advanced metering infrastructure (AMI) remains underutilized as an efficiency resource. The Trust should consider implementing a pilot project to harness AMI technology, already installed, to capture peak-shaving and carbon reduction benefits through time-varying rates or other means of reflecting the value of demand.

More generally, NRCM would like to see a more robust budget for the Innovation Program. We are in a transformative time for energy efficiency and clean energy, and the Trust stands in a clear position to provide leadership to help the state leverage these opportunities and lay the groundwork to transition the energy sector away from fossil fuels.

The Trust should undertake a review of the non-wires alternatives (NWA) stakeholder process, with particular attention to data sharing and transparency, to ensure that cost-effective alternatives to transmission and distribution upgrades are being achieved as intended by the 2019 law and within the context of utility innovation, grid modernization, and decarbonization.

Recognizing that the draft predated the passage of related legislation, NRCM would like to see substantial attention paid in the final Triennial Plan to how the Trust will implement two new initiatives: Commercial Property Assessed Clean Energy Programs (C-PACE) and the Clean Energy and Sustainability Accelerator.

The Trust's Triennial Plan V is a testament to the crucial contribution that the Trust makes to vital public policy goals. NRCM applauds the Trust for this effort and looks forward to working with the Trust to finalize and implement strategies to deploy efficiency resources and accelerate the electrification of buildings and transportation sectors. Thank you for considering our comments.