



April 9, 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 the Request For Information on Efficiency Maine Trust's 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 very much for the opportunity to comment on this RFI.

## Responses to questions:

Question 1: The Trust requested information on what discrete initiatives are missing; alternative approaches to organizing these programs; and what program aspects should be retained and what should be changed.

- NRCM suggests that the Trust dramatically expand its load management program to increase the number of smart devices in homes and businesses.
- Consider expanding access and widen eligibility for small businesses.
- It is unclear from the RFI whether battery storage is included in the grid/load management initiative but this is an area that should be expanded or made into a discrete initiative given the importance that storage is likely to play in load management.
- Greater emphasis on whole-home weatherization and retrofitting. The Trust should explore opportunities to reach beyond the low-hanging fruit. Because efficiency and weatherization rebates can be selected a la carte by customers, there is not an incentive to do additional work or bundle weatherization with efficiency. This leaves energy savings on the table with each interaction. The Trust should consider ways to incentivize whole-house weatherization and retrofitting to get even more energy savings from each interaction.

Question 2(A): The Trust requested feedback on emerging technologies, operational or behavioral conservation measures, or grid support/load management strategies that should be considered for the Innovation Program.

- Potential technologies that might be considered for the Innovation Program could include advanced demand response residential battery storage systems.

Question 3: The Trust requested feedback on how to improve its Public Information and Outreach initiative.

- The Trust should prioritize providing trainings to contractors on the new base and stretch building codes.
- The Trust should also provide information and organize workshops on the tools, skills, and actions necessary for cities and towns to adopt the stretch codes.
- The Trust should provide information specifically targeted at tenants and landlords to encourage investment in upgrades/weatherization to rental and multiunit buildings.
- The Trust should also share the results of its Innovation Program projects.
- The Trust should provide customer information in multiple languages.

Question 5: The Trust requested feedback on any changes the Trust should make in how it accounts for benefits and costs in its analysis of cost-effectiveness.

- Most importantly, the Trust should take greenhouse gas emissions into account in its benefits and costs analysis of cost-effectiveness. Maine is statutorily obligated to decrease greenhouse gas emissions by 45% by 2030 and 80% by 2050, and achieve carbon neutrality by 2045. Including greenhouse gas emissions impacts in the cost-

effectiveness analysis would help prioritize measures with the greatest carbon reduction potential in furtherance of the state's climate goals.

- The cost-effectiveness test should also include a more holistic analysis of net benefits to consumers and include non-energy benefits. For example, non-energy benefits of certain measures might include health, safety, fewer asthma instances, fewer missed workdays, fewer emergency room visits, and other benefits that should be included.

Question 6: The Trust requested feedback on efforts to support workforce development in energy efficiency.

- NRCM agrees that workforce training is important and should be continued. NRCM also suggests that the Trust provide trainings to municipalities and the construction trades workforce on the new building stretch codes.

Question 7: The Trust requested comments on how the Trust can improve on its goal of equitably delivering benefits to low-income communities while also advancing goals of maximizing energy savings, carbon reductions, and market transformation.

- The Trust could focus on low-income communities for community-based weatherization initiatives similar to Weatherize Rockland and Weatherize Ellsworth. These initiatives could be done in partnership with local municipalities with high percentages of lower income residents and allow for bulk purchases and encourage deeper savings.
- The Trust should also focus efforts on rentals and multiunit housing, especially low-income housing. The Trust should focus on capturing cost-effective savings with less focus on allocating savings to renters versus landlords.

Question 8: Load management initiatives.

- NRCM does not have any studies on load shifting/management but recommends a recent ACEEE White Paper titled "Siting Electric Vehicle Supply Equipment (EVSE) With Equity In Mind", available at:  
[https://www.aceee.org/sites/default/files/pdfs/siting\\_evse\\_with\\_equity\\_final\\_3-30-21.pdf](https://www.aceee.org/sites/default/files/pdfs/siting_evse_with_equity_final_3-30-21.pdf).

Question 9: The Trust requests comment on what priorities or strategies the Trust should put in the Plan for (A) expanding EV charging infrastructure and (B) transforming the market for EVs and on whether and how the Plan should propose to fund incremental electric vehicle initiatives beyond the funding available from the VW and NECEC settlement funds.

- The Trust should explore how Maine could participate in the Transportation and Climate Initiative Program (TCI-P), a regional collaboration that would require large gasoline and diesel fuel suppliers to purchase allowances for the pollution caused by the combustion of fuels they sell in participating jurisdictions. It is estimated that this program would generate \$300 million every year in the participating jurisdictions for investments in equitable, less polluting, and more resilient transportation, including electric vehicles and infrastructure, and will cut greenhouse gas pollution by 26% from 2022 to 2032.

Question 10: The Trust requested feedback on whether the Triennial Plan should outline how the Trust would meet the goals in the Climate Action Plan, pending funding, and how the Trust might fund these programs.

- Yes, the Trust should identify the steps it will need to take to realize the efficiency goals and strategies identified in the Climate Action Plan even though the Trust is unlikely to have sufficient funding to fully implement these strategies.
- The Trust is not able to acquire new funding sources to pursue the additional work outlined in the Climate Action Plan but potential funding opportunities exist. As stated in the answer to question 9 above, Maine’s participation in TCI-P would generate additional funds that could be used by the Trust on measures related to electrifying transportation. A surcharge on delivered fuels would also generate funds that could be used for weatherization and heat pump installations. The Maine Climate Council’s Buildings, Infrastructure, and Housing Work Group suggested adopting a fuel-neutral funding mechanism.