



July 28, 2021

Michael Stoddard
Executive Director
Efficiency Maine Trust
168 Capitol Street, Suite 1
Augusta, ME 04330-6856

Dear Mr. Stoddard:

On behalf of The Nature Conservancy in Maine (TNC), thank you for the opportunity to comment on the Efficiency Maine Trust's draft Triennial Plan V.

The Nature Conservancy is a nonprofit conservation organization dedicated to conserving the lands and waters on which all life depends. We have been working in Maine for more than 60 years with a focus on protecting land, restoring rivers and streams, rebuilding groundfish populations in the Gulf of Maine and developing innovative solutions to address climate change.

TNC is grateful for the Trust's leadership in deploying successful carbon-reducing programs over the past decade-plus. These programs help Maine residents, businesses and municipalities reduce their energy use, save money, and switch to cleaner technologies like heat pumps and electric vehicles that will be critical to mitigating climate change in the coming decade. Efficiency Maine has been and continues to be a national leader in energy efficiency and beneficial electrification, making a lasting positive impact on Maine's economy and environment.

As Efficiency Maine moves into its next Triennial Plan, it has an opportunity to further bolster its leading role in addressing the climate crisis and promoting equitable energy outcomes for Mainers. The draft Triennial Plan V builds on Efficiency Maine's strong track record, proposing a suite of programs that build on the Trust's past successes, as well as changes that represent important steps forward. TNC especially appreciates that the draft Triennial Plan V includes the following provisions:

- The draft Plan prioritizes using RGGI revenues for measures that reduce greenhouse gas emissions and does not budget RGGI funds for fossil fuel heating systems. (pp. 5-6).
- The draft Plan incorporates the avoided non-embedded cost of carbon into the maximum achievable cost-effective energy savings calculations for the first time. (p. 28).
- The draft Plan emphasizes the Trust's role in achieving the goals of Maine's new four-year Climate Action Plan, for example stating that, "During the Triennial Plan V period, the Trust seeks to deploy cost-effective energy resources in a way that also advances State environmental policies and the goals outlined in *Maine Won't Wait*." (p. 17).

- The draft Plan emphasizes the importance of equity in program design and administration, including the continued provision of enhanced rebates for low-income Mainers across a range of programs. We appreciate that the draft Plan expressly notes that, “It is critical that customers from every subsector, income level, and region of Maine have a reasonable opportunity to access the benefits of cost-effective energy efficiency programs,” and that, “The Trust will continue to assess how to improve accessibility and increase participation among Mainers carrying the greatest energy cost burdens, with special effort to engage low-income households and build equity focused metrics for measuring progress through implementation.” (p. 17).

As the Trust finalizes Triennial Plan V, TNC respectfully offers three suggestions for further strengthening the Plan:

- Increase the proportion of the Trust’s budget dedicated to low-income customers and other vulnerable households and communities. The draft Plan allocates approximately 16 percent of the Trust’s projected revenues over the Triennial Plan period to low-income customers, which is commendable and higher than the 10 percent of Electric Efficiency and Conservation Fund revenues statutorily required to benefit low-income customers. Many state and federal programs, however, are moving toward committing 40 percent of climate investments to benefit historically marginalized and overburdened communities. The Trust should consider increasing the proportion of certain revenue streams—electric, FCM, NECEC, ARP—benefitting low-income customers or other vulnerable households or communities. It should also consider dedicating some ARP funds, if allowed by federal guidance, to seed the Clean Energy and Sustainability Accelerator established by LD 1659 in 2021. The accelerator would be statutorily required to direct 40 percent of its investment activities to serve low-income communities and households, communities of color, and tribal communities.
- Commit to regularly reporting on the impact of Efficiency Maine’s programs on the heat pump, weatherization, and EV goals in *Maine Won’t Wait*—along with any equity goals developed by the Maine Climate Council Equity Subcommittee—and to analyzing what additional resources will be necessary for Efficiency Maine to fully achieve the State’s climate and equity goals. This will allow the Trust, policymakers, and other interested parties to better understand whether there are gaps between what Efficiency Maine is authorized to achieve with its current statutory mandates and resources, and what is needed to achieve the State’s climate and equity goals.
- The final draft of Triennial Plan V should include additional details on the implementation of a Commercial Property Assessed Clean Energy (C-PACE) program. TNC appreciates that, during its presentation of the draft Plan, the Trust verbally committed to implementing a C-PACE program during the Triennial Plan V period. A diverse range of stakeholders supported enactment of LD 340 in 2021, highlighting the potential for C-PACE to support important energy efficiency improvements in the commercial and industrial sector. TNC is committed to supporting the Trust as it establishes a program, develops a model ordinance and other materials for municipalities, and conducts rulemaking for the program.

TNC applauds the Trust for its work drafting Triennial Plan V, and we appreciate the crucial role, historically and moving into the future, that the Trust has in achieving vital public policy goals for the State of Maine. Thank you again for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Wood". The signature is written in a cursive style with a large initial "R" and "W".

Rob Wood
Director of Government Relations and Climate Policy
The Nature Conservancy in Maine