



Submitted electronically via: mturner@efficiencymaine.com

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Efficiency Maine Trust
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RE: Request for Information (RFI) On Efficiency Maine Trust Triennial Plan VI (Fiscal Years 2026-2028)

To whom it may concern,

On behalf of Northeast Energy Efficiency Partnerships (NEEP)¹, we are pleased to submit comments on Efficiency Maine Trust's Triennial Plan VI. NEEP is a non-profit whose mission is to accelerate regional collaboration to promote advanced energy efficiency and related solutions in homes, buildings, industry, and communities.

We thank the Efficiency Maine Trust for the opportunity to provide input on Triennial Plan VI. We commend the Efficiency Maine Trust (the Trust) and the state of Maine for the work it has done so far to accelerate energy efficiency, the transition to a clean grid, and to combat the impacts of climate change. Because of ambitious goals set by the legislature and governor, Maine is a national leader in heat pump deployment and adoption of clean heat technology. In addition, the programs run by the Trust are nationally recognized for their accomplishments. NEEP hopes that these comments will help Maine and the Trust maintain this leadership and continue to innovate and set new ambitious targets in the coming years.

In addition to commenting on several of the key questions raised, NEEP would like to highlight general opportunities for working collaboratively with other states and programs in the region as Maine and the Trust continue towards these goals. Growing markets for buildings-sector solutions in partnership with the region offers mutual benefits to Maine and other states in the region. We encourage the Trust to consider how strategic partnerships across state lines can be useful in advancing shared goals around energy efficiency and building decarbonization.

The following comments are intended to provide technical assistance and resources relating to the questions outlined by the Trust in the Request for Information (RFI) on the Efficiency Maine Trust Triennial Plan VI. In addition to the comments and reports referenced, NEEP has additional tools and resources available and can provide direct technical assistance.

¹ These comments are offered by NEEP staff and do not necessarily represent the view of the NEEP Board of Directors, sponsors or partners. NEEP is a 501 (c)(3) non-profit organization that does not lobby or litigate.



Question 1

We are currently planning to deliver and organize our programs in a manner similar to the current approach outlined in Triennial Plan V. What discrete initiatives might we be missing? What alternative approaches to organizing these programs should we consider? What are the most important program aspects that the Plan should maintain and what program elements might we consider changing?

NEEP would like to provide some recommendations around discrete initiatives and important program design aspects that, in our view, provide the greatest benefit while still being feasible.

- Continue to focus on programs to grow an equitable energy efficiency workforce: **NEEP recommends establishing cold climate heat pump education, sizing, and installation guidance for contractors.** Maine leads the nation in heat pump installation due to its efforts investing in a knowledgeable and skilled workforce and streamlining access to rebates. NEEP would like to highlight some ways that we can be a resource to continue this growth and ensure quality installations as the state pivots to a focus on whole-home replacement. To ensure appropriate sizing, NEEP has developed a guide for installers on [sizing and selecting ASHPs for cold climates](#), as well as a [buying guide for consumers](#) to provide them with background knowledge on the technology, what to look for and the best questions to ask their installer for a high-quality installation. Additional resources for both Installers and consumers can be found on NEEP's [Installer and Consumer Resources](#) webpage. NEEP encourages Maine to consider ways to leverage existing training programs in the state to grow knowledge and understanding of cold-climate heat pumps and water heaters. For example, in New York, NYSERDA has developed a supplemental [ccASHP Sizing and Design Training](#) curriculum, to be incorporated into the training installers receive from manufacturers. This program is delivered through participating manufacturers and sponsors, as an add on to existing curriculum.
- **Home Energy Reporting and Labeling Initiative:** These programs are relatively inexpensive but can serve a wide range of residents and act as tools to identify and target participants for current or future programs. NEEP's [Energy Estimator - Powered by HELIX & ClearlyEnergy](#) is a tool that easily generates and stores customizable home energy labels by homeowners or contractors. The tool combines data from publicly available tax assessor databases to generate projected annual energy usage and costs for homes. The energy label can also provide resources, recommendations for efficiency measures, and actions for the customer to use. [HELIX](#) is currently used across the region for storing home energy certifications and labels, such as Home Energy Score, HERS, DOE Zero Energy Ready Homes, and more. It is also currently used in Vermont to store Vermont Home Energy Profiles (VHEP) for their statewide labeling program. HELIX's open architecture means that Maine could add data fields that are relevant to the state's needs such as fuel type, system type, and the presence of mold/asbestos/lead, much of which can be drawn from tax assessor data.
- **Prepare to leverage federal funding from the IRA and BIL alongside existing Trust programs.** The Inflation Reduction Act (IRA) and Bipartisan Infrastructure Law (BIL) provide an unprecedented opportunity to [accelerate energy efficiency programs](#). They can play a key role in streamlining and expanding the adoption of weatherization and energy efficiency programs in Maine. The geographic,



financial, and awareness barriers in adoption of energy efficiency and weatherization programs can hamper program participation rates among hard-to-reach customers. NEEP applauds Maine’s plans to use IRA funding to address key gaps in its current program offerings and expand its heat pump programs to reach hard-to-reach low- to moderate-income and multifamily building customers in the state.

- **Identify changes to current regulatory structures to help accelerate implementation. IRA and BIL programs focus on implementing weatherization and electrification measures with specific intent to serve low- and moderate-income communities.** Weatherization and electrification programs tend to be costly and can take longer to fully realize their energy savings. This makes them appear to be less attractive investments as energy efficiency regulatory structures tend to prioritize near term, low-cost savings. The Trust could consider modifying BCA requirements for programs, changing tracking metrics and targets, and modifying the structure of implementation for low- and moderate-income programs.

Question 4

Evaluation, Measurement and Verification: In prior Plans, the Trust allocated 2.5% of the program budgets to “EM&V” (Evaluation, Measurement and Verification). EM&V activities encompass systematic data collection and analysis related to the Trust’s programs. One type of EM&V activity is third-party evaluations, which are required for every program with annual budgets exceeding \$500,000. Whereas Maine statute requires the Trust to evaluate major programs at least once every five years, the Trust’s practice is to initiate these evaluations at least once every three years. Measurement and verification are largely managed by the Trust Staff with assistance from subcontractors. The Trust seeks recommendations on the appropriate amount to budget for this strategic initiative in Triennial Plan VI and the basis for such recommendations.

While NEEP cannot recommend an appropriate amount for the budget for EM&V, NEEP recommends that the Trust consider not just the budget for EM&V, but the EM&V process as well as it prepares for Plan VI. NEEP encourages the Trust to consider modifications to the EM&V process to allow for easier access to data, the addition of metrics and reporting that aligns with state policy goals, and a more inclusive and public-facing process.

Section 6.1.11 of Triennial Plan V refers to advances in smart metering technology that enable greater data access and potential use of data for pilot programs; In addition to aiding in program design, smart metering technology and metered data can be used to inform consumers of their energy use patterns and incorporate new technology onto the grid (i.e. solar and storage). The Trust could encourage utilities to make this data more accessible to consumers through Home Energy Reports, bill alerts, or other avenues that provide and utilize data to raise consumer knowledge of their energy use.

Section 6.1.2 of Triennial Plan V discusses the objectives of the Trust’s EM&V practices. NEEP encourages the Trust to add language describing its focus on delivering equitable programs and using its evaluations to further equity goals.



Section 6.1.9 of Triennial Plan V discusses the Trust's practices on evaluation data availability. Making EM&V data available on a centralized, transparent platform, such as a website, is helpful to ensure stakeholders can find and use the data. These publicly available data resources also create more public accountability. The Trust can use such a platform to measure program success and allow public access to data in a user-friendly format. New York has developed the [New York State Clean Energy Dashboard](#) and allows users to download the underlying data on [Open NY](#). This practice, as well as additional efforts to increase regional transparency and standardization of reporting practices and terms, helps ensure energy data can be used appropriately and in a meaningful way by diverse audience groups to improve building decarbonization programs.

NEEP has created an [Advanced M&V \(M&V\) 2.0 framework](#) that the Trust could use as guidance to ensure that both the EM&V process and the EM&V funding align with Maine's goals and allow for a robust evaluation of the Trust's programs. To learn more about this framework, visit NEEP's [EM&V Resource Center](#).

Question 5

Workforce: Recent reports have assessed Maine's clean energy and energy efficiency workforce needs, including the 2022 Maine Clean Energy Workforce Analysis report. The Trust has generally focused on specific training needs related to the installation of efficiency measures – for example, the Trust supports industry training for new and experienced heat pump installers through its heat pump basics training module. Please comment on training needs of the energy efficiency workforce. Please also share any recommendations about the approach the Trust's Plan should take to support workforce training.

To develop the clean energy market, there will be a growing demand for all kinds of new workers, including contractors who accelerate heat pump adoption, home auditors that understand stacked efficiency and electrification opportunities, as well as building operators, code officials, and design professionals. States across the northeast and mid-Atlantic region have conducted workforce gap surveys and found that the highest demand jobs include electricians, construction workers, and HVAC technicians. States have also found that while there is an interest in energy efficiency from contractors, contractors and other potential workers are not always aware of all the benefits of energy efficiency or the career opportunities it presents. Below are key recommendations from NEEP's work throughout the region:

- **Providing on-the-job and regional training experience:** On-the-job, in-person training provides the most effective experience for trainees as it allows them to identify challenges that can appear unexpectedly. Additionally, gaining experience working with buildings and homes in the area allows trainees to learn nuances of the region and building stock characteristics. Each home has specific features, and these nuances and challenges can be missed without in-person experience. For example, New York's [Clean Heat Connect Program](#) supports trainees and businesses throughout the state. The program allows for heat pump contractors to sponsor trainees and offers training and wage subsidies, as well as additional support for advertising and equipment. Similarly, Massachusetts' [Clean Energy Pathways Program](#) provides paid training and hands-on experience with 9-month fully paid internships that provide skills, ongoing support, and mentorships.



- **Online contractor-led certification for whole home energy retrofits.** Resources that are widely available online allow people to explore concepts and receive training on their own time outside the rigid schedule of a class. This is one pathway to address barriers to access to education. NEEP is working with stakeholders to create a program that could be used to train contractors on the benefits of whole home retrofits, the [Total Energy Pathways \(TEP\) Certificate](#). The TEP Certificate is an online training certificate that introduces contractors to the many aspects and benefits of home energy retrofits. It can be used to help grow the efficiency contractor workforce and used as a training requirement to ensure that all contractors that work for the Trust have a baseline of understanding of the benefits of these projects when they discuss them with customers.
- **Partnering with experienced local organizations and resources:** Working with existing organizations or resources such as ones offered by the department of labor, community-based organizations, and other non-profits can uplift good work that is already happening. Creating these partnerships and providing them with proper resources can expand the reach of these programs and improve the resources available to businesses and participants. In New Jersey, PSE&G's Clean Energy Future-Energy Efficiency Program [partners with community organizations and the New Jersey Department of Labor to recruit and retain participants](#). New York's Clean Heat Program also partners with the state's labor department to advertise jobs and recruit trainees.
- **Proactive program design.** Programs can seek to alleviate known barriers and provide support for trainees to be successful. The [District of Columbia Sustainable Energy Utility Energy Efficiency Workforce Development Program](#) was designed to create energy efficiency and clean energy career pathways for unemployed and underemployed people in DC, enhance local economic stability, and create a pipeline of workers. Community-based organizations recruit workers for the program, training is offered free of charge, and participants are paid a living wage. The program also provides soft skills training such as interviewing, public speaking, resume drafting, and budgeting and general education classes on clean energy. Massachusetts' [Clean Energy Pathways Program](#) aims to help grow and diversify the energy efficiency workforce. Job seekers are offered paid training and hands-on experience in energy efficiency weatherization and HVAC jobs with 9-month fully paid internships that provide skills, job placement assistance and ongoing support, and mentorships.

Question 6

Equity: The Trust places a priority on advancing equity in the delivery of its programs. For example, geographic equity informs the location and installation of electric vehicle charging infrastructure and municipal incentives. Many of the Trust's programs or incentives have enhanced incentives for income-eligible households, and others are available only for households that meet certain eligibility criteria. Also, the Trust's programs meet statutory requirements setting minimum budgets to benefit low-income Mainers. Please comment on how the Trust may continue to prioritize delivering benefits equitably to low-income and other priority communities while also advancing goals of maximizing energy savings, carbon reductions, and market transformation.



NEEP appreciates that the Trust has identified equity as a key priority in its program implementation and delivery. NEEP recommends prioritizing equity throughout every phase of the Trust's programs including ensuring access to initiatives and all benefits; access to workforce training and job opportunities; and access to the business capital and investment (ensuring an opportunity to be a meaningful part of the booming clean energy economy).

NEEP recommends that the Trust consider:

- **Partnering with existing community organizations** already on the ground to help market the program and provide community-based technical assistance. For example, Massachusetts has the [Community First Partnerships Program](#) that focuses on increasing program participation and community engagement with environmental justice communities through various strategies.
- **Meaningfully engage stakeholders in the process** from the beginning, enabling them to impact program design from the outset. Maine can reference the [Community Engagement to Ownership spectrum](#) by Rosa González of Facilitating Power. This tool provides indicators to establish the level of current input and how to encourage greater input. Providing indicators for each stage helps leaders acknowledge marginalization, articulate an equitable development process, and assess community participation avenues to produce community-driven solutions. Additionally, several NEEP states have developed high-impact stakeholder processes that could serve as models, such as the Connecticut Department of Energy and Environmental Protection's [Equitable Energy Efficiency Proceeding \(E3\)](#) and the Massachusetts Energy Efficiency Advisory Council's [Equity Working Group \(EWG\)](#).
- **Center equity throughout the process and identify metrics to track program success.** NEEP has identified a [framework for energy efficiency programs](#) that could aid the Trust in accomplishing its equity goals. It provides steps that program implementers can take to embed equity in energy efficiency programs. This includes steps such as creating [a process for meaningful stakeholder engagement](#), conducting [a gap analysis to inform program design and implementation](#), setting aside certain funds to ensure equitable outcomes, as well as [tracking metrics and goals](#).

Question 7

Demand Management: The Trust launched a Demand Management program as part of the current Triennial Plan. The program consists of two discrete initiatives: (1) a Demand Response Initiative – a traditional demand response program where participants are compensated for reducing their electricity usage when called upon to do so; and (2) a Load Shifting Initiative – an initiative focused on using both passive and active load-shifting strategies across fleets of devices. This year, the Load Shifting Initiative will include small batteries and managed electric vehicle (EV) charging. What other technologies or strategies might the Trust consider as part of the Demand Management program in the next Triennial Plan period?

Achieving aggressive decarbonization goals will require programs to not only reduce energy use overall, but also reduce it at specific times of the day. Designing and implementing demand response programs lays the groundwork to begin to treat the [grid as a flexible energy resource](#). Furthermore, demand response measures are a great way to engage a wider swath of customers and begin to inform consumers about their energy habits



and empower them to [have more control over their bills](#). Below are some additional considerations for the Trust to incorporate into these programs.

- **Coordinate with stakeholders such as utilities, program implementers, and community agencies to establish statewide data transparency policies:** Collecting real time data on energy use and grid load is important to enable grid interactive homes and buildings. Establishing standard data policies ensures customers can more easily share data with third-party providers that implement demand reduction and flexible grid programs.
- **Include an educational campaign to inform customers:** Educating customers can help them understand the benefits of enrolling in these programs and how to choose programs that best fit their needs. These campaigns can also encourage customers to invest in technologies they might not otherwise consider, like smart thermostats and hot water heaters. Utilities can also [send customers information](#) about their energy use to avoid higher bills and enroll in lower rates.
- **Offer residential appliance-based programs that allow customers to be a part of the grid:** These appliances already exist in homes and when [aggregated together](#) can change demand and load on the grid as needed. Additionally, appliance-based programs provide an opportunity to [use price signals to incentivize customers](#) to participate in the programs, helping to lower customer rates. For example, a study by [Ecotope and NRDC](#) found that using HPWH for demand flexibility can reduce electricity costs by 15 percent for customers and operating costs by 34 percent for the utility. In [Hawaii](#), demand response programs have been designed to reduce residential lighting and water loads, as the state found that those tend to be the largest coincident peak loads. Further, studies exist that allow for a [side-by-side breakdown](#) of residential energy usage by appliance. With this data, program administrators can make more informed decisions about what appliances to target and how to [best design programs to help both customers and the grid](#).
- **Incentivize the equitable adoption of smart technologies:** Smart technologies such as batteries, thermostats, and hot water heaters can lower load on the grid and save consumers money while creating a more comfortable and healthy living space. Unfortunately, these technologies often have a higher upfront price, which can deter adoption. Maine can consider ways to subsidize these upfront costs and target initial projects in underserved communities to begin to address inequities in existing energy efficiency programs.

Question 10

Beneficial Electrification: Recent legislation enacted through LD 1724, “An Act to Enact the Beneficial Electrification Policy Act of 2023,” allows the Trust to leverage electric procurement funds for fuel switching measures in certain limited circumstances: where those measures are cost-effective and would, over the life of the measures, reduce rates. The act directs the Trust to incorporate “beneficial electrification” into its triennial plans and updates. The act also requires the Maine Public Utilities Commission to incorporate beneficial electrification measures into the calculation of electric Maximum Achievable Cost Effective (MACE)



savings and to fund the Trust's budgets for delivering these savings through electricity utility "procurement" under Sec. 10110(4-A) of Title 35-A, even if the majority of the cost savings come from reduced fossil fuel costs. The Trust will be soliciting feedback on beneficial electrification through an upcoming rulemaking but also invites comments and suggestions through this RFI. Which measures, strategies, and program design elements might the Trust consider as part of incorporating beneficial electrification in Triennial Plans V, VI, and beyond?

NEEP looks forward to this rulemaking process. At this point, we would like to highlight three key steps for the Trust to consider as it begins to incorporate beneficial electrification:

- Establish a single touchpoint so that customers can have access to demand response, decarbonization, and efficiency programs all in one place. The Trust should offer a single touch point to provide customers and contractors with a one-stop-shop to access the rebates available to them through energy efficiency, decarbonization, and demand response. This can ensure the same programs are offered on a statewide level and that these programs complement each other. For example, Massachusetts is looking to establish [a Building Decarbonization Clearinghouse](#) that would act as an umbrella for existing programs and enable coordination among state agencies and programs.
- **Create a Statewide Understanding for Weatherization:** Weatherization of existing homes is a key step to implement cost-effective climate and energy policy and to increase the consumer savings for beneficial electrification. To take steps now to increase weatherization implementation and success, the Trust can standardize the measures performed on every home in the state or create a statewide definition of a "weatherized" home. This could help in implementation through streamlining the offerings and ensuring deeper savings through every form of weatherization program delivery in the state, including delivery of the Weatherization Assistance Program (WAP). Additional policy considerations when creating a universal definition for weatherization, are highlighted in [NEEP's Implementation Guide for Energy Efficiency Retrofits](#). Connecticut is in the process of creating a definition and has a [draft standard](#) established by their Department of Energy and Environmental Protection.
- **Identify changes to current regulatory structures to properly value beneficial electrification and distributed energy resource programs.** NEEP commends Maine's ongoing rulemaking process regarding beneficial electrification and the inclusion of savings from beneficial electrification measures in cost-effectiveness tests. Beneficial electrification will require states to change the metrics used to measure the success of energy efficiency programs. The [total systems benefit](#) (TSB) metric accounts for when and how customers use energy by assigning a per hour value for energy generation. Program administrators can use this metric as a goal and evaluate program cost-effectiveness. Furthermore, a metric like the TSB serves multiple energy sectors as it can calculate real time energy cost and provide more level footing for distributed energy resources when compared to traditional energy sources.



Conclusion

NEEP thanks Efficiency Maine Trust for the opportunity to comment on the Trust's Triennial Plan VI. Maine is an exemplary state in its energy efficiency and clean heat technology goals and implementation. NEEP looks forward to continuing to work with the Trust as well as various stakeholders in Maine to help the state move towards its climate, resiliency, and equity goals.

Sincerely,

A handwritten signature in black ink that reads "Erin Cosgrove".

A handwritten signature in black ink that reads "Luke Miller".

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