

December 23, 2022

To: Climate Readiness, Resiliency and Adaptation Committee, Healey-Driscoll Transition  
From: Renewable Energy Advisory Committee  
Re: Recommendations for the Healey-Driscoll administration's climate agenda

Thank you for the opportunity to offer our comments on the Healey-Driscoll administration's climate priorities. The Renewable Energy Advisory Committee is a group of academics and energy experts who advise Environment Massachusetts, the statewide environmental advocacy organization, on policies related to renewable energy, energy efficiency, and the electrification of the economy.

We are pleased to see the incoming administration identify climate change as a priority during the transition. The climate platform released during Gov.-elect Healey's campaign represented a bold pledge to reduce fossil fuel use and accelerate the transition to renewable energy for electricity, heating, and transportation. It also committed to bring the health and economic benefits of the energy transition to everyone in Massachusetts, including residents of environmental justice (EJ) communities. When this platform is fully implemented, Massachusetts will be much closer to meeting 100% of our energy needs with renewable resources, and all communities will benefit from cleaner air and a safer environment.

While Massachusetts has committed to reach net zero greenhouse gas emissions by 2050, we should plan to reduce our greenhouse gas emissions on a faster timeline, to help prevent catastrophic climate change impacts. In all sectors of energy use, we should prioritize policies that reduce overall energy consumption, including making our buildings more efficient and encouraging more trips to be taken by walking, biking, or public transit rather than driving. An "efficiency-first" strategy will make it easier to meet any remaining energy needs with renewable resources.

We offer the following recommendations for climate action, including overarching principles that affect all sectors of energy use, as well as specific recommendations for the electricity, building, and transportation sectors.

## **Overarching principles**

**Take full advantage of federal funding opportunities.** In the coming years, the federal government will spend billions of dollars to promote energy efficiency, renewable electricity, and zero-carbon heating and transportation technologies, through programs authorized by the bipartisan infrastructure law and the Inflation Reduction Act. Some of these programs, including appliance rebates, will be administered at the state level, and state agencies should move quickly to make these funds available to all consumers. Other programs, such as electric vehicle rebates and solar tax credits, will be administered at the federal level. The Healey-Driscoll administration should educate residents, businesses, and institutions about how to take advantage of these programs, with additional outreach efforts focused on EJ communities, and offer state-level incentive and technical assistance programs to complement the availability of federal funds.

### **Ensure access to energy efficiency and clean energy technologies in EJ**

**communities.** To transition Massachusetts to 100% renewable energy, we must ensure that technologies such as rooftop solar, heat pumps, and zero-emission transportation are available to all. Gov.-elect Healey’s climate platform included a laudable commitment to “invest in our environmental justice communities” and “ensure that all communities in Massachusetts are stronger, more resilient, and benefit from these clean energy investments.” As a first step toward achieving this vision, the administration should deploy the \$6.5 million in funding allocated in the December 2021 ARPA bill (Section 1599-2035, Chapter 102 of the Acts of 2021) for energy efficiency and electrification retrofits in low- to moderate-income housing, and support legislation to establish the GREEN Initiative (H.3320 and S.2152 in the 2021–22 legislative session) to provide ongoing funding for this program.

**Prioritize actions with major benefits for public health.** While all fossil fuel combustion emits pollution that harms public health, some uses of fossil fuels are particularly harmful to the health of vulnerable populations. Targeted investments in electrifying these technologies could yield large benefits to public health at a relatively low cost. In particular, diesel school buses are a major source of pollution exposure for children who ride the bus, and gas stoves contribute to poor indoor air quality, with significant impacts on young children, the elderly, and those with underlying health conditions. The administration should supplement federal funds with additional state resources to accelerate the transition to electric school buses and electric stoves.

## **Electricity**

**Transition Massachusetts to 100% non-emitting sources of electricity.** So far, 10 states — including Rhode Island, Connecticut, and Maine — have passed legislation for 100% clean or renewable electricity. We support the 100% Clean Act (H.3288 in the 2021-22 legislative session), which would transition Massachusetts to 100% zero-emission, non-combustion sources of electricity by 2035, including at least 80% renewable generation from resources like wind and solar. We applaud Gov.-elect Healey’s commitment to power Massachusetts with 100% clean electricity, and encourage the Healey-Driscoll administration to support policies that will help achieve this goal, including increases to the renewable portfolio standard (RPS).

**Install the equivalent of one million solar roofs by 2030.** Gov.-elect Healey’s campaign platform included a commitment to install 10 gigawatts of solar generation — the equivalent of one million solar rooftops — by 2030. Today, people who want to install solar often face long delays and arbitrary fees as a result of the utility interconnection process. The administration should reform the interconnection process to address these roadblocks, and consider structural reforms to the Department of Public Utilities to promote the faster and more equitable deployment of distributed renewable energy generation. The state should also incentivize solar installations in locations close to electric load and with minimal environmental impact, including rooftops and parking lots, and require new buildings to be built with rooftop solar wherever feasible.

## Buildings

**Reduce energy use in large office and apartment buildings.** A 2019 report found that approximately 85% of the building square footage that will exist in the city of Boston in the year 2030 has already been built. To meet our state's climate targets, we must make our existing buildings more energy-efficient and replace fossil fuel heating systems with efficient electric alternatives. The 2022 climate law requires the owners of large office and apartment buildings to disclose their energy use each year. State officials should establish energy performance standards that require reductions in energy use in large buildings, as proposed in the Healey campaign platform, and expand technical assistance and incentive programs to help building owners meet these standards. The Healey-Driscoll administration should also consult a recent report on Boston's climate progress by Northeastern University researchers for the Boston Foundation, which found that the city and state are far behind in heat pump installations and identified numerous ways in which policies to promote them are not aligned.<sup>1</sup>

**Empower local leadership for all-electric buildings.** The 2022 climate law allows up to 10 cities and towns to require new buildings to be fossil-fuel-free, using all-electric appliances for heating, hot water, and cooking. Ultimately, every new building across the state should be built without fossil fuel appliances. In the short term, allowing any community to opt into all-electric requirements for new construction would be a good first step. The Healey-Driscoll administration could accomplish this through a revision of the recently established specialized stretch code.

## Transportation

**Transition to electric buses and trains.** Public transit is a more energy-efficient, less polluting, and healthier way for people to get where they need to go. When our buses and trains run on electricity, these benefits will be even greater. Gov.-elect Healey's campaign platform pledged to transition to all-electric public transportation by 2040, with school buses and MBTA buses electrified by 2030. Electrifying our commuter rail system could enable additional improvements to transit service, allowing for the creation of a regional rail system that would provide faster and more frequent service linking Boston and surrounding communities. Better service on buses and trains could encourage more residents to travel by public transit rather than by car, reducing the overall climate and environmental impacts of our transportation system.

**Address barriers to electric vehicle adoption.** While electric vehicle (EV) technology has improved and prices have come down greatly in recent years, the limited availability of charging infrastructure remains a significant obstacle for individuals who want to switch to an electric car. The Healey administration should work with utilities, municipalities, and owners of

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<sup>1</sup> *Inaugural Boston Climate Progress Report*, Joan Fitzgerald and Michael J. Walsh, The Boston Foundation, November 2022, <<https://www.tbf.org/climate2022>>.

multifamily and commercial buildings to facilitate the rapid deployment of EV charging along highways, in commercial areas, and in residential neighborhoods, while being sensitive to concerns around green gentrification. Additionally, many drivers, including those who would benefit the most from the savings in fuel and maintenance costs associated with an EV, are unable to finance the upfront costs of buying a used or new electric car. State officials should structure programs and incentives to help the families that are most burdened by gasoline costs switch to EVs.

Thank you for considering our comments. We look forward to working with the Healey-Driscoll administration to put Massachusetts on track to a 100% renewable energy future.

Sincerely,

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