



SMART GROWTH AND REGIONAL COLLABORATION

July 7, 2022

The Honorable Jeffery Roy  
Chair, Joint Committee on  
Telecommunications, Utility, and Energy  
State House, Room 43  
Boston, MA 02133

The Honorable Michael Barrett  
Chair, Joint Committee on  
Telecommunications, Utility, and Energy  
State House, Room 109-D  
Boston, MA 02133

The Honorable Tackey Chan  
State House, Room 42  
Boston, MA 02133

The Honorable Cynthia Creem  
State House, Room 312-A  
Boston, MA 02133

The Honorable Bradley Jones  
State House, Room 124  
Boston, MA 02133

The Honorable Bruce Tarr  
State House, Room 308  
Boston, MA 02133

#### **H.4524/S.2842, An Act advancing offshore wind and clean energy**

Dear Conferees:

The Metropolitan Area Planning Council (MAPC) is grateful to both branches for addressing the increasingly urgent issue of climate change this session. As one of the most pressing issues of our time, climate change requires a multifaceted approach in a variety of sectors. The legislation before you offers opportunities to stimulate the green economy and grow the local workforce; reduce the energy burden and utility costs for our residents, especially those historically overburdened and underserved; produce more local clean energy; and make our buildings, transit, and transportation network more resilient, healthier, and comfortable for all. We commend the Senate and House for pursuing these policies.

MAPC serves as the Regional Planning Agency (RPA) for the people who live and work in the 101 cities and towns in Metropolitan Boston, which includes roughly half the state's population and two-thirds of the state's jobs. We thank you for the opportunity to share our support for specific provisions in the bills and offer recommendations to strengthen the legislation.

**Clean Energy:** To meet the ambitious goals set by the Commonwealth, we need to make rapid advancements in local clean energy generation, workforce development, and building and transportation sector decarbonization, all while reducing energy burden and centering equity within the energy transition. **MAPC supports large investments in offshore wind energy production and related economic development as proposed in H.4524.** This shift to successful offshore wind energy production will greatly benefit from directly connecting cities and towns, such as through their green municipal aggregation programs, to local wind energy. It will further require energy grid modernization, transmission expansion, and energy storage deployment. We support the provisions that give DOER the opportunity to study large-scale energy storage procurement to ensure the reliability of the clean energy supply. As the clean energy sector



SMART GROWTH AND REGIONAL COLLABORATION

continues to evolve and requires further developments, MAPC supports increasing funding for the Mass Clean Energy Center to leverage technology and innovation to equitably drive and scale the offshore wind and storage industries, and other clean energy technologies in the building and transportation sectors.

As the Commonwealth shifts to clean energy, MAPC supports policies to protect consumers from energy price gauging. A 2021 report from the Attorney General's Office found that over the course of 5 years, competitive electricity supply companies predatorily charged consumers \$426 million more than they would have paid had they stayed with their previous utility company.<sup>1</sup> These impacts were disproportionately borne by low-income residents. MAPC has worked with cities and towns since 2014 to support their adoption of green municipal aggregation programs, which, in addition to their climate, cost savings, and reliability benefits, help municipalities to guide and protect consumers from predatory suppliers. **MAPC supports the language included in S.2842 to protect consumers.**

**Transportation:** To meet the climate goals set by the Commonwealth, we must decarbonize the transportation sector across all modes of transit. To increase the number of electric vehicles (EVs) on the roads, MAPC supports requiring all new vehicle sales to be zero emission vehicles (ZEVs) starting in 2035, increasing funding for the MOR-EV program, and creating an Electric Vehicle Adoption Incentive Trust Fund. MAPC supports steps to make this program more equitable, including allowing used vehicles to be eligible for MOR-EV rebates, providing an additional \$1,500 rebate for low-income residents, requiring rebates to be offered at the point of sale, and creating programs to reach underserved and low-income communities. Additionally, MAPC supports the state setting electrification and emission-reduction requirements for transportation network companies like Uber and Lyft.

MAPC supports the development of an anonymized and aggregated database of motor vehicle types and locations for the purposes of research and planning for electric vehicle related infrastructure, **as included in section 2 of S.2842**. There are technical additions that we suggest including in this section, including: collecting data for each calendar quarter; sorting data by municipality, zip code, and census tract of the garaging location; and estimating miles traveled for each type of vehicle included in the analysis.

Beyond electrification of single-occupancy vehicles, reducing emissions from the transportation sector requires decarbonizing other modes of transit. MAPC supports the requirement that new MBTA bus purchases and leases must be for ZEVs by 2028 and that the entire MBTA fleet must comprise ZEVs by 2040. **We are excited to see the inclusion of language to transition to a fully electric commuter rail by 2040, with the directive that procurements are electric by the end of 2030, as included in S.2842.**

**Built Environment:** Buildings consume roughly 54 percent of energy annually in Massachusetts when accounting for electricity, heating, cooling, and industrial processes. There are many opportunities to reduce the emissions in the built environment that will not only diminish environmental harms but will also positively impact public health.

MAPC has been advocating for years for a stronger statewide building energy code. Our extensive work with the designation process for Green Communities and through our Codes for Climate program exemplifies our deep belief that zero-carbon new construction and renovations are



SMART GROWTH AND REGIONAL COLLABORATION

feasible and beneficial in nearly all cases and should be required **except in cases** where those mandates might cause undue burden to low-income residents and communities of color, or where it might reduce the production or affordability of affordable housing. We believe that the answer in those cases is not to leave our residents behind. Rather, it is to use smart policy and programs, financing mechanisms, and state and local support to enable and encourage Environmental Justice communities to take advantage of Mass Save and other clean energy incentives, rebates, and opportunities while providing exemptions as needed.

Included in S.2842 is a pilot to allow 10 municipalities to restrict new construction that utilizes fossil fuels. By raising the building efficiency requirements for all new construction, the pilots authorized under this section could help scale the workforce, supply chain, and developer readiness and thereby help to lower utility costs for low-income residents. We support fossil fuel free construction and work tirelessly to advance affordable housing production so that we have enough homes for all of our residents. Fossil free construction and affordable housing production should not conflict with each other. To avoid inadvertently increasing the cost of housing production or reducing the number or affordability of low/moderate-income units, we encourage the Legislature to add a requirement that participating communities address the impacts on production and renovation of multifamily rental and affordable housing. These steps could include time-limited waivers, outreach to encourage access to incentives or rebates, or the assignment of *additional* local dollars (such as Community Preservation Act or Community Development Block Grant funds) to ensure that housing is both sustainable and affordable. We also encourage the Commonwealth to direct *new* state dollars to build housing that is both affordable and free of fossil fuels.

In order to reduce emissions from larger buildings at the pace and scale needed in order to achieve Commonwealth targets, MAPC recommends the adoption of statewide energy and emissions reporting requirements, which quickly and explicitly transition to building emissions performance standards (BEPS). **We support language included in S.2842 to start the reporting process with buildings larger than 25,000 square feet within a year.** We recommend that the Legislature be prescriptive about the phased inclusion of all buildings larger than 10,000 square feet by 2027, and the predictable schedule for BEPS requirements, beginning no later than 2024 and including all buildings over 10,000 square feet by 2030. We moreover appreciate the inclusion of alternative compliance pathways and fees as necessary and the ability for municipalities to enforce more stringent requirements. By understanding the baseline energy and emissions use in our buildings, communities and property owners can target retrofits, upgrades, and improvements that enhance their bottom lines, the health and safety of their buildings, and their emission profiles.

We were happy to see the inclusion of requirements for EV charging stations in new buildings and retrofits across the Commonwealth. We recommend that the Legislature consider adding language to require both wiring for additional EV charging stations in parking lots and to create a tiered implementation system that requires more than 10% of parking spaces have EV charging stations by 2030. We can reduce the barriers to access for reliable charging in part by ensuring that our buildings are ready to accommodate the shift to zero emission vehicles in the future.

**Workforce Development:** MAPC is excited to see that both the House and Senate climate bills include provisions to use climate responsive work as an opportunity to build new opportunities to expand and diversify the workforce. **In particular, we support the language in H.4524 to promote**



SMART GROWTH AND REGIONAL COLLABORATION

diversity in the offshore wind workforce and promote participation from women and minority-owned businesses. Additionally, MAPC supports the Senate's inclusion of investments in MassCEC to continue leading clean energy research and development while creating high quality jobs.

#### Additional Recommendations for Inclusion:

MAPC strongly encourages the Legislature to consider funding a well-capitalized **Clean Energy Investment Fund or Climate Bank**. This funding and financing platform is needed to support not only wind and electric vehicles, but also a resilient electric grid and zero carbon retrofits of existing buildings, particularly those that house low- and moderate-income residents and communities of color.

In this moment, we also recommend that the Legislature consider opportunities for investments in and support for decarbonizing and improving public health in our schools. One promising method to achieve these goals would be to direct the Massachusetts School Building Authority (MSBA) to require new construction and retrofits at schools using state dollars meet net zero or passive house standards, or as close to these standards as possible, and to highly incentivize all-electric buildings and onsite renewable energy generation.

Lastly, as the Commonwealth transitions to a future that depends substantially on sufficient and clean electricity supply while continuing to face the increasing threats of climate change, **MAPC urges the Legislature to include language creating an Advisory Council to approve plans and oversee an updated electric grid, as proposed in an amendment to S. 2842 by Senator Joanne Comerford**. In its current state, the electric grid would need significant modernization to handle the shift to all-electric systems, which we are planning to see by 2050. With rapid and innovative approaches, we can transition to a modern and clean electric grid that is resilient, equitably sited and connected, and equipped to handle the increased capacity required of the system.

Thank you for your consideration of these priority investments. If you have any questions, please contact Lizzi Weyant, MAPC Deputy Executive Director of Public Affairs and Advocacy, at [eweyant@mapc.org](mailto:eweyant@mapc.org).

Sincerely,

Marc Draisen  
Executive Director

Lizzi Weyant  
Deputy Executive Director of Public Affairs and Advocacy