



Via Electronic Mail

July 11, 2022

The Honorable Jeffrey N. Roy
House Chair, Joint Committee on
Telecommunications, Utilities, and Energy
Massachusetts State House, Room 42

The Honorable Michael J. Barrett
Senate Chair, Joint Committee on
Telecommunications, Utilities, and Energy
Massachusetts State House, Room 109D

The Honorable Tackey Chan
House Chair, Joint Committee on Consumer
Protection and Professional Licensure
Massachusetts State House, Room 43

The Honorable Cynthia S. Creem
Senate Majority Leader
Massachusetts State House Room, 312A

The Honorable Bradley H. Jones, Jr.
House Minority Leader
Massachusetts State House, Room 124

The Honorable Bruce E. Tarr
Senate Minority Leader
Massachusetts State House, Room 308

Re: Sierra Club urges action on climate and environmental justice provisions in the joint House/Senate climate bill

To the Conference Committee members:

On behalf of the 100,000 members and supporters of the Massachusetts Chapter of the Sierra Club, we urge you to include provisions from S.2842 and H. 4524 which (a) begin to address the urgent and significant challenge of transitioning our buildings to use renewable energy, (b) make environmental justice a priority and (c) make essential advancements in electrifying transportation.

Both versions of this bill advance the Commonwealth's clean energy and economic development goals. Unleashing the potential of our offshore wind industry will decarbonize our grid. Meanwhile, we must electrify polluting sectors like buildings and transportation to prepare for this shift. Both will take years to accomplish, which is why they must occur simultaneously. Each version of this bill contains crucial components to acting comprehensively on climate this session; both must move forward.

Buildings and Environmental Justice.

The development of a large, experienced workforce and deployment of technologies to transition our huge stock of existing buildings to efficient clean heating must begin now for us to obtain a 50% emissions reduction by 2030 and net zero by 2050. A member of the House recently said that it makes little sense to advance building electrification prior to greening the electricity supply (hence the focus on offshore wind). This view might be true in an ideal world, but is definitely not true in the real world where "things take time", our world where we are way behind in responding to the science and legal mandates of climate change. We cannot serialize and meet our 2030 and 2050 mandates.



We want to emphasize “equitable decarbonization”. Consider this: Incentives for solar electricity and for EVs have largely gone to wealthy residents that own homes and buy new cars. As we now turn to decarbonizing buildings low income and marginalized residents who bear the brunt of climate and health impacts must be the first in line for support and benefits, not the last.

The Clean Energy and Climate Plan says we must make efficiency improvements and install heat pumps in 1 million buildings by 2030. We have less than 10 years left and we are already very much behind on the need to convert over 100,000 homes a year.

Clean Energy Equity Workforce: We urge you to adopt Sections 11 and 11A of H.4524 and Section 8 (beginning at line 78) of S.2842 which, among other things, “establishes a clean energy equity workforce and market development program to provide workforce training, educational and professional development, job placement, startup opportunities and grants to: (i) certified minority-owned and women owned small business enterprises; (ii) individuals residing within an environmental justice community; (iii) current and former workers from the fossil fuel industry” to “promote participation ... in the commonwealth’s energy efficiency, clean energy and clean heating and cooling industries”.

Commercial Buildings: Within Section 34 of S.2842 we urge you to adopt Section 20 (beginning at line 337). This requires the owners of large existing buildings to report their energy use at the state-level. If we refuse to even measure energy use, surely we are not on a path to managing energy use. In addition to supporting this section, we also encourage you to consider building performance standards for large existing buildings that would be aligned with existing programs like BERDO 2.0 in Boston, and the required digital infrastructure and staff capacity required at the state-level to implement such a program.

City and Town Fossil-Fuel Free Construction: We urge you to adopt Section 65 (beginning at line 970) of S.2842 with the modifications shown in italics below. Section 65 allows DOER to approve not more than 10 city or town applications to “restrict or prohibit new building construction or major renovation projects that are not fossil fuel-free”. If possible, two of the 10 applications should be reserved for cities or towns with significant environmental justice populations. Therefore, we urge you to modify the text beginning at line 994 to read as shown in the attachment.

Deployment of Technologies Transforming Our Building Sector: As the House bill understands, workforce development must be paired with technological deployment. Otherwise, we risk continuing the chicken and egg problem of jobs and demand. We need the Massachusetts Offshore Wind Industry Investment Fund and the Clean Energy Investment Fund to propel our clean energy sector. To better align their missions and begin the critical transition in our building sector to be more green, more healthy, and more affordable, we urge you to adopt the Offshore Wind Industry Investment Fund and adopt modified text of S.2842, Section 9 beginning at line 110, to read as shown in the attachment

Adjudicatory proceeding w.r.t. DPU Docket 20-80: We urge you to adopt Section 59 (beginning at line 854) of S.2842. The utility companies must not be allowed to proceed without careful review by other stakeholders.

Transportation

We welcome and support several transportation provisions in S.2842 that put in place policies to make electric vehicles (EV) accessible to more people, expand charging infrastructure, set timelines



for electrification of transit fleets, and codify the date by which all new vehicle sales must be electric. We offer the following recommendations to strengthen the language and urge the conference committee to incorporate them in the final climate bill.

Section 34: Increase the upper rebate limit for electric medium-and heavy-duty vehicles (MHDV). The current language in S.2842 limits incentives for MHDV to \$7,500. This would remove the existing tiered level of rebates that extend up to \$90,000 for Class 8 vehicles under the [MOR-EV Trucks program](#). We urge you to raise the upper rebate limit in consultation with DOER to support the electrification of large MHDV that account for a disproportionate share of air pollutants and greenhouse gas emissions from the transportation sector.

Section 38: Support expansion of EV charging infrastructure by strengthening requirements in new construction. A robust network of charging infrastructure is crucial to accelerate EV adoption. To overcome the current charging access shortfall, language in S.2842 should be strengthened to require 100% of parking spots in new residential construction to be EV ready and for 25% of parking spots to be equipped with electric vehicle charging stations. For new commercial construction and parking facilities, 25% of parking spots should be equipped with charging stations and an additional 25% of parking spots should be EV ready.

Section 52 and Section 53: Require the MBTA bus fleet to be electric by 2030 and set electrification targets for commuter rail. We urge the Commonwealth to demonstrate its commitment to electrification of public fleets by requiring all new MBTA bus procurements to be electric by January 1, 2023 and for the MBTA bus fleet to be all-electric by 2030. Further, the language in S.2842 should be expanded to include full electrification of all commuter rail lines by 2035. As the pace of electrification is dependent on adequate funding, we recommend that the legislature create a fund to support this transition.

Section 57: Convene interagency council to implement EV charging infrastructure plan by March 1, 2023 and set targets to expand charging infrastructure. We support setting up of the interagency coordinating council to create an equitable statewide plan for the deployment of EV charging infrastructure and strongly recommend that EEA convene the council by March 1, 2023. The CECP for 2025 and 2030 sets a goal of 75,000 public charging stations in this decade. To meet this target and ensure that we have an adequate number of charging infrastructure in place well before 2035 –the target date for all new vehicle sales to be electric– it is crucial that the climate bill set interim targets for expansion of charging stations that takes into account charging of both personal and electric vehicle fleets.

Respectfully yours,

Paul Dale
Energy Committee Chair
Sierra Club Massachusetts Chapter
pauldale@massachusetts.sierraclub.org
office: 617.423.5775
cell: 617.852.2641

Veena Dharmaraj
Director of Transportation
Sierra Club Massachusetts
veena.dharmaraj@sierraclub.org
office: 617.423.5775

Jess Nahigian
State Political Director
Sierra Club Massachusetts
jess.nahigian@sierraclub.org
cell: 617.460.6351

Deb Pasternak
State Director
Sierra Club Massachusetts
deb.pasternak@sierraclub.org
cell: 617.794.0851