



Yiran He
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Via email: cprg@neep.org

January 29, 2025

Re: [January 7, 2025 Request for Information To Support Program Design of the New England Heat Pump Accelerator Program](#)

Dear Ms. He,

On behalf of the Sierra Club and our 150,000 members and supporters in Connecticut, Maine, New Hampshire, and Massachusetts, thank you for the opportunity to provide comments on the Request for Information To Support Program Design of the New England Heat Pump Accelerator Program. Below are overall general comments as well as responses to specific questions asked in the RFI.

We are pleased to offer our support for the overarching goals of the Accelerator program for nearly every space and water heater sold in New England to be a heat pump by 2040 and to direct 40% of the funding to low- and moderate-income (LMI) households and disadvantaged communities. As noted in the Description of GHG Reduction Measures, our region's overreliance on gas, oil, and propane in building equipment is expensive for customers and damaging to our climate and air. Heat pumps will significantly reduce harmful pollution and can deliver lower costs.

Overall recommendations:

Address high energy costs. Because electricity costs in our region are among the highest in the nation, Sierra Club recommends that emphasis be placed on lowering energy costs in the following ways:

- One-Stop Shop: Heat Pumps, Weatherization, Solar, Battery, etc.
 - The Accelerator should prioritize whole home retrofits along with heat pump installs, and should be a point of entry to a range of offerings including weatherization and solar which reduce energy costs. Information and next steps for other offerings should be integrated into the program so that consumers can access them.
 - Require weatherization for whole home heat pumps to reduce demand and right size whole home systems
- Robust program to replace all types of hot water heaters with heat pump hot water heaters. Heat pump hot water heater replacements across most types can reduce overall energy costs.

- Heat pumps for space heating
 - Target replacement of systems run on delivered fuels and electric baseboard heating, which are described in the RFI as the most polluting and the most expensive options on a dollar-per-BTU basis.
 - Portable, window and room heat pumps should play a role as appropriate.
- Thermal Energy Networks (TENs) should be included as part of the program. TENs are the most efficient systems available to deliver climate-friendly heating and cooling at a neighborhood and community scale.

Streamline eligibility and application processes to encourage program participation across varying programs particularly for low-income renters and to reduce administrative burden for implementers.

Technical Assistance and Outreach. The program should provide comprehensive technical assistance and be easy for the consumer to navigate including verifying eligibility, finding a contractor, problem solving on technical aspects, and making informed decisions. The program should include a robust consumer and contractor promotion campaign. As the program is implemented, there should be a communications strategy to share how it is going and tell the human interest story. For outreach to LIDAC, programs should leverage community based organizations to ensure they are designed, implemented and delivered in a culturally sensitive way through these trusted messengers.

Data and transparency. The aim for heat pumps to make up at least 65% of residential-scale heating, air conditioning, and water heating sales by 2030 and 90% by 2040 is exciting and ambitious. To help the public understand how the program is doing, the Resource Hub should include:

- A year-by-year projection of program goals in the aggregate, by heat pump type, LIDAC goals, and by state.
- Updates on the results (deployments and GHGs reduced) in the aggregate, by heat pump type, LIDAC results, and by state.

Price control - Program administrators should ensure adequate consumer protections are in place to prevent unnecessary price gouging owing the incentive availability.

Tenant protections - A tenant protection policy should be in place to ensure that rent is not increased or evictions are not issued as a result of this upgrade. This could include affordability covenants or similar mechanisms. Tenants should also be educated in the protections offered through this program.

Answers to questions asked in the RFI:

Question 1. *What recommendations do you have for the New England Heat Pump Accelerator to encourage market transformation for heat pumps and heat pump water heaters across the region?*

Early outreach to manufacturers, distributors and contractors is highly recommended to explore options for lowering costs including bulk purchasing, to understand specific product needs, and to ensure training needs are met. Outreach to code enforcement officials to understand barriers to deployment, and address them in the program design.

Question 2. *The Accelerator will invest a portion of Market Hub funds and 100% of Innovation Hub funds in LIDACs. How can the Accelerator prioritize equitable outcomes? What recommendations or insights do you have for program design and implementation that can center equity?*

Equitable outcomes for LIDACs can be prioritized by allocating 100% of all funding for this community. Additionally, we recommend engaging community members and community organizations from the start so that the program is equitably designed and implemented. The program should be a whole home approach that leverages and layers other programs including remediation, weatherization, solar, battery storage.

The program should have robust evaluation, measurement and verification. It should monitor bill savings. And it should prevent displacement through tenant protections.

Question 3. *What resources and practices currently exist to promote heat pump and heat pump water heater workforce capacity, trainings, and certifications, and what more is needed at the state and regional level? What role should the Accelerator play in addressing these needs? How can the Accelerator help to align the region on heat pump and heat pump water heater workforce trainings and certifications?*

The program should identify training needs with contractors, distributors and manufacturers and collaborate with existing training programs that have a demonstrated history of success to fill training needs. Training programs could include local community-based programs, skilled union training programs, and technical school programs.

Question 7. *What are best practices for monitoring equipment costs for potential inflation?*

As noted above, program administrators should ensure adequate consumer protections are in place to prevent price gouging.

Question 13a. *What recommendations or strategies would increase adoption in LIDACs as defined by the EPA?*

In addition to including LIDAC community members and groups in the development of the program, other strategies to consider are stipends for outreach and referrals, and documenting and sharing the stories of adoption.

Question 14.d.vii. *If the program is marketed alongside other efficiency, electrification, decarbonization, or housing programs in the territory or state.*

Yes, the program should be marketed to consumers alongside other efficiency, electrification, decarbonization and housing programs. All programs should be a point of entry for whole home retrofits.

Question 20. *What are the key barriers to the adoption of heat pumps by low-income households and residents of LIDACs in New England? Please include any reports or additional resources that provide insight into these barriers.*

Low-income households and residents of LIDACs are more likely to be renters, and have little or no access to programs without the approval of their landlords. Rental properties are less efficient, on average consuming 15% more energy per square foot than owner-occupied

homes.¹ Low-income owner occupied homes with high energy burdens also require attention.² Remediation, weatherization, and a whole home approach is needed alongside heat pump incentives.

22. What kind of projects should the Innovation Hub prioritize at the state- and Community-level?

The program should include Thermal Energy Networks (TENs). TENs are the most efficient systems available to deliver climate-friendly heating and cooling at a neighborhood and community scale. They give access to renters and low and moderate income customers who face barriers to getting heat pumps.

Thank you for the opportunity to comment.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut Chapter

Catherine M. Corkery, State Director
Sierra Club New Hampshire Chapter

Vick Mohanka, State Director
Sierra Club Massachusetts Chapter

Jane Brekke, Acting Chapter Director
Sierra Club Maine Chapter

¹ <https://www.aceee.org/energy-equity-for-renters>

² https://www.aceee.org/sites/default/files/pdfs/data_update_-_city_energy_burdens_0.pdf