



Massachusetts Comprehensive Energy Plan: Comments on Stakeholder Meeting Presentation

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Process Concerns

The timing of the 2018 Massachusetts Comprehensive Energy Plan (CEP) stakeholder process does not seem best gauged to permit and encourage stakeholder input:

- The opportunity for stakeholders to provide feedback on CEP analysis assumptions is limited to just two weeks.
- These two weeks coincide directly with both the end of the Commonwealth's legislative session and key deadlines in the Massachusetts Energy Efficiency Advisory Council's review of the 2019-2021 draft energy efficiency plan.
- The materials provided for review are limited to slides shown at stakeholder meetings. No more detailed materials (for example, specific descriptions of methodologies, assumptions and data sources) were made available for review.
- There appears to be no provision made for stakeholder review and comment on the results of the analysis.

Overall, opportunities for receiving full review and comment by Massachusetts stakeholders and input from third-party experts are being missed. Good public policy can only be made better, more robust, and more sustainable by a truly participatory and transparent process for receiving public input.

Role of GWSA Compliance

The CEP analysis' scenarios will not be constrained to comply with the Global Warming Solutions Act (GWSA). Rather than including a constraint in the model that would require all scenarios to meet legally mandated GWSA emission limitations, each scenario will include a *post hoc* report of its *Massachusetts Greenhouse Gas Inventory* emissions in comparison to GWSA limits. The usefulness of scenarios that do not meet legal mandates is not clear.



In addition, as of the July 17 stakeholder meeting, the Department of Energy Resources (DOER) did not yet know what specific emissions limits it will use for future years in the CEP analysis. Per Executive Order 569, a greenhouse gas emission limit for 2030 need not be set until December 31, 2020. Nonetheless, some assumed annually decreasing limit is needed to successfully model Massachusetts energy policy and investments from 2021 to 2030. In response to stakeholders' questions, DOER staff appeared to suggest that the CEP analysis will use the range of emissions limits agree to by Governor Baker in the "United States Climate Alliance" (signed in response to the federal government's decision to withdraw from the Paris Climate Agreement), which calls for states to reduce emissions by at least 26 percent below 2005 levels by 2025.

For Massachusetts, a 26 percent reduction in greenhouse gas emissions from 2005 levels is equivalent to a 2025 limit of 71.3 million metric tons (MMT) of carbon dioxide (CO₂), or 24 percent of 1990 levels. For comparison, emissions reductions based on linear (straight-line) targets from the 25 percent reduction in 2020 to 80 percent in 2050 are as follows:

- 34 percent from 1990 levels in 2025 (compared to 24 percent under the U.S. Climate Alliance agreement)
- 43 percent in 2030
- 53 percent in 2035
- 62 percent in 2040

Stakeholders cannot provide a useful review of CEP analysis assumptions without access to a full set of these assumptions, include the greenhouse gas limitations to be applied (or to which scenarios will be compared).

Missing Assumptions

Several critical assumptions for the CEP analysis have not yet been developed and, therefore, could not be presented at July 2018 stakeholder meetings. These assumptions include:

- Greenhouse gas emissions limits
- The amount of storage deployed in the Clean Peak scenario
- The "load shape" of storage, and the rationale behind that load shape
- The use and impact of space cooling equipment
- The future of public transportation and ride sharing in Massachusetts, and their impact on the use of private transportation, for all scenarios
- The future of public (government-owned) fleets of vehicles in Massachusetts

Stakeholders cannot provide an effective review of the CEP analysis without access to these critical assumptions.



Presentation of Information

By not presenting renewables and energy efficiency growth in their most commonly discussed metrics, DOER is missing an opportunity to gain useful feedback from a wider set of stakeholders. Presenting renewables growth as it would compare to an X percent increase in the Renewable Portfolio Standard and presenting energy efficiency growth as it would compare to a Y percent annual incremental increase from current cumulative levels would enhance the readability of the report (and stakeholder presentation slides) and expand the audience for the CEP.

Weaknesses in Transportation Methodology

While little has yet been made public regarding the transportation methodology to be used in the CEP analysis, the limited information presented in the stakeholder meetings raises concerns. The analysis as planned appears to be limited to two policy levers: (1) the number of electric vehicles on the road; and (2) vehicle miles traveled. More levers will be required to successfully model Massachusetts complex transportation sector and provide a comprehensive representation of current and future transportation modalities. At the very least a Comprehensive Energy Plan should include some consideration of changes in public transportation, ride sharing, active transportation, public fleets, freight vehicles, and transportation demand management (flexible work hours, congestion pricing, high occupancy vehicle lanes, etc.).