CHAPTER 4

# DIGGING INTO THE SCORES

# Introduction

A high rank in this Scorecard is the result of MLPs' significant efforts, strong policies, and documented practices that support clean energy and a just transition. To gain a clearer understanding of the work underlying these scores, this section highlights five MLPs whose efforts have resulted in strong scores across one or multiple categories. For each MLP, we highlight particular progress, programs, and practices that MCAN considers ambitious and effective in transitioning MLP communities to clean energy, increasing energy efficiency, ensuring transparency and community engagement, and leveraging local policy tools to support climate mitigation efforts.

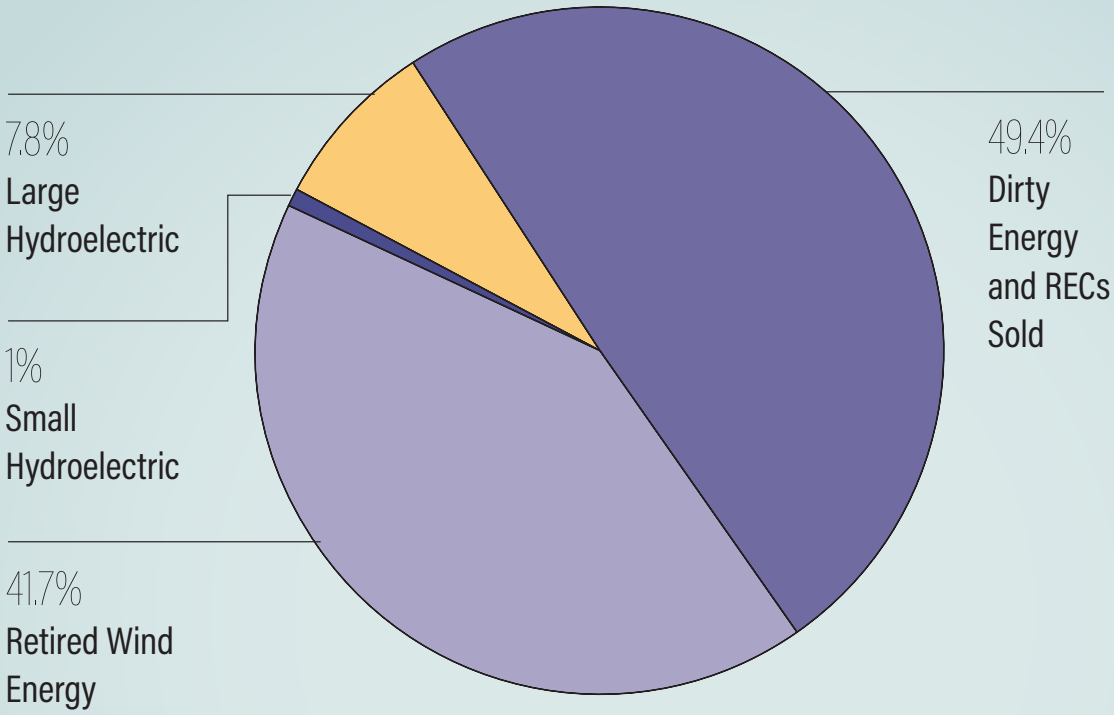
The MLPs discussed below include Concord Municipal Light Plant (CMLP), Belmont Municipal Light Department (BMLD), Holyoke Gas & Electric Department (HG&E), Ipswich Electric Light Department (IELD), and West Boylston Municipal Light Plant (WBMLP). While other MLPs received scores on par with some of these examples and should be acknowledged for their progress in combating climate change, this group of MLPs was selected because they provide a comprehensive outline of the actions, policies, and outcomes that demonstrate advances across all four performance categories.

## Concord Municipal Light Plant (CMLP)

MCAN's analysis shows that CMLP is a clear leader in energy transition and energy efficiency. Regarding energy transition, CMLP has made immense progress in transitioning its energy portfolio, with clean energy accounting for over 42% of their total energy mix in 2019 (based on retired Class I RECs). With this percentage, CMLP is far outpacing other MLPs and IOUs across the Commonwealth in clean energy integration. As shown in **Figure 17**, 41.7% of CMLP's total mix is made up of retired Class I wind energy RECs. This proportion includes RECs that came from CMLP's energy supply as well as Class I RECs that were purchased separately and subsequently retired. The remaining clean energy came from small hydroelectric energy (1.0%), and retired solar RECs

## FIGURE 17 CONCORD'S ENERGY MIX[78]

78 Based on MCAN's methods. Percentages may vary depending on how calculations are made




An additional 7.8% of CMLP's total energy mix came from large-scale hydroelectric sources. The total non-emitting percentage of their energy mix was approximately 51% based on MCAN's methods.

In addition to their clean energy mix, CMLP has taken several steps to adopt clean technology and enable their residents to do the same. They have installed more than 11 MW of clean energy capacity in their district (when combining utility, commercial, and residential solar) and plan to install utility battery storage which will be connected to solar generation. According to the DOER, CMLP has spent $216,286.00 through the MLP Solar Rebate Program, equal to a commitment of more than $26.41 per customer. Additionally, while their net metering policy does not provide an excess generation fee equal to the residential rate, they have no limit on aggregate capacity and have a residential systems capacity limit above 100 kW. The investment in the Solar Rebate Program and CMLP's net metering policy both support customers in their transition to clean, renewable energy technology.

CMLP is also a leader in energy efficiency. They lead all MLPs with approximately 2.90% of their revenue allocated to energy efficiency programs and incentives. This investment contributes to their ability to offer weatherization and heat pump incentives that are larger than the average MLP offering. It has also enabled them to incorporate programs that incentivize the use of electricity when overall demand is low, reduce peak demand in the summer, and educate and encourage customers to adopt electric vehicles. These initiatives have led to reported savings of over one million kWh, approximately 0.65% of CMLP's total kWhs sold.

Transparency and Community engagement was another area in which CMLP performed very well. They had listed all of the key governing information tracked for this Scorecard on their website and recently conducted a survey which included questions about renewable energy. However, more notably CMLP was the only MLP that provided sufficient information about their REC retirement strategy to gain full bonus points in this section. Specifically, they represented the percentage of clean energy in their energy mix in accordance with the number and types of RECs that were retired.[79] While their methodology of calculation differs from MCAN's, the way that CMLP discussed and represented their REC retirement should be viewed as an excellent example and similar descriptions should be adopted by all 41 MLPs across the Commonwealth.

On the whole, CMLP's progress in mitigating climate change has been supported by numerous local policies and plans that provide them with a clear direction. In addition to the town of Concord adopting a climate action plan,[80] CMLP has authored a Strategic Plan for 2018–2025 that tasks the MLP with using data-driven approaches to aggressively reduce greenhouse gas emissions by retiring RECs, promoting energy efficiency, and encouraging electrification.[81] These policy documents emphasize CMLP's commitment to a transparent clean energy transition and outline how this transition can be accomplished without compromising other priorities such as low rates and reliability.

79 Increasing Percentage from Non-Carbon Emitting Sources (The Town of Concord, n.d.), https://concordma.gov/515/Power-Supply-Portfolio

80 "Concord Climate Action and Resilience Plan 2020" (Town of Concord, June 2020), https://concordma.gov/DocumentCenter/View/25318/Sustainable-Concord-Climate-Action-and-Resilience-Plan-2020.

81 CMLP Strategic Planning Committee, "Strategic Plan 2018 – 2025 (Version 2.0)" (Concord Municipal Light Plant, November 2017), https://concordma.gov/DocumentCenter/View/11239/CMLP-Strategic-Plan-Version-20.

## Belmont Municipal Light Department (BMLD)

BMLD is another MLP showing leadership in the clean energy transition and energy efficiency. Regarding the energy transition, BMLD scored well on virtually every metric, exhibiting a clear commitment to a well-rounded and holistic transition. Guided by clean energy targets adopted into their energy policy, BMLD exceeded IOUs and MLPs in its percentage of clean energy with nearly 16% in 2019.[82] Based on MCAN's methods for calculating the percentage of non-emitting RECs and EFECs, BMLD also showed fairly strong adoption of non-emitting energy, representing 31% of their overall energy mix.[83] This level of non-emitting energy is impressive, especially considering that BMLD has no contracts for nuclear energy and is not planning to sign any in the near future. BMLD decided not to sign nuclear or biomass contracts following extensive engagement with community members and other stakeholders to identify acceptable fuel types to add to BMLD's power portfolio.

BMLD is also committed to implementing programs that enable their residents to transition to clean energy and has made doing so easy for their customers. They have a net metering policy that meets two of MCAN's three criteria, have spent $106,533.00 to date through the MLP Solar Rebate Program (equal to more than $9.13 per customer), have electric vehicle charging rebates, and offer a 100% clean energy opt-in program for residents.

The same is true of BMLD's efforts to increase energy efficiency. By investing over 1.80% of their total revenue into energy efficiency programs, BMLD has established a comprehensive and ambitious energy efficiency effort. With the exception of 0% interest loans, BMLD offers all energy efficiency incentives and rebates tracked in this Scorecard. Similarly, their weatherization and heat pump incentives are above average compared with other MLPs. Like CMLP, BMLD provides numerous additional incentives including electric vehicle awareness and education, peak reduction rewards, and off-peak electric vehicle charging incentives.

82 "Energy Portfolio" (Belmont Electric Light Department, April 14, 2021), https://www.belmontlight.com/energy-solution/energy-portfolio/.

83 This differs from the energy mix reported on Belmont's website because Belmont factors in Out-of-state RECs not purchased with a PPA, whereas MCAN does not.

Importantly, BMLD has taken strong initial steps to ensure that their energy efficiency programs are accessible based on knowledge of vulnerable communities in their district. BMLD offers an additional $500 heat pump incentive for income-eligible residents, has a strategy focused on reaching renters and landlords to promote available energy efficiency programs, and is continuing to find ways to ensure that the approximately 30% of residents who speak a language other than English have access to information in their language both online and in printed materials.[84]

Part of BMLD's success in energy efficiency and the clean energy transition is undoubtedly due to their transparency and engagement with residents. BMLD was one of four MLPs to score full points in the Transparency and Community Engagement section, demonstrating leadership in translating the democratic and public nature of MLPs into their programming. BMLD conducted consumer satisfaction surveys in 2017 and 2019, each of which inquired about customers' willingness to pay more for BMLD to reach a 100% clean energy portfolio. The results of these surveys led BMLD to retire RECs at an accelerated rate and revise their power supply policy.[85]

In addition to consistent and meaningful community engagement, BMLD has a comprehensive website which lists light board meeting times, light board contact information, and light board meeting notes. The site also provides documents that include financial information, light plant policy information, and more.[86] In addition, BMLD is one of only four MLPs to discuss the implications of REC retirement and distinguish between power supply and energy mix based on REC retirement.[87] Although their methods for calculating renewable energy differ from those of MCAN, they provide a clear description of what is included and are transparent about RECs that were retired.

## Holyoke Gas & Electric Department (HG&E)

With a population that is more than 50% LatinX, Holyoke is the most diverse MLP district in the Commonwealth. It also has a lower median income than any other MLP district at just under

84 "Belmont Municipal Light Department (BMLD) Municipal Action Plan," Municipal Action Plan (Energy New England, June 15, 2020), pg 20–25.

85 Belmont Municipal Light Department Questionnaire Response, MCAN MLP Questionnaire 2021, (June 18, 2020) Leadership Section, Question 7

86 "Financials, Policies & Terms" (Belmont Electric Light Department), accessed May 27, 2021, https://www.belmontlight.com/about/financials-policies-terms.

87 "Energy Portfolio" (Belmont Electric Light Department, April 14, 2021), https://www.belmontlight.com/energy-solution/energy-portfolio/.

$41,000.[88] Despite this, HG&E has made substantial progress in decarbonization and energy efficiency.

HG&E has been a leader in decarbonizing their operations. While they do not have clean energy in their energy mix (because they do not retire Class I RECs), their energy mix is almost 88% non-emitting, powered by a large hydroelectric dam that HG&E owns and operates. HG&E has also invested significantly in the development of clean energy within their district and has rapidly adopted clean technology. They have more than 62 MW (equal to approximately 3.5 kW per customer) of Class I eligible renewables in their MLP district, more than any other MLP. They are also leading in battery technology, having already installed 8 MW of batteries with another 5 MW planned to be operational by December 2021.[89]

In addition to adopting clean technology, HG&E is taking steps to reduce their use of dirty energy by working to electrify their gas services. They have imposed a moratorium on new gas loads and worked with the Rocky Mountain Institute to develop an action plan for electrifying their buildings and housing stock, thus reducing demand for gas.[90]

HG&E is also a leader in energy efficiency. By investing nearly $700,000 into energy efficiency (just over 1.00% of total revenue), they offer all energy efficiency program incentives scored in this Scorecard – only one of two MLPs to do so. They are also one of only three MLPs to offer a 0% interest loan for energy efficiency improvements such as heat pumps and weatherization.[91] This loan is more comprehensive than any other loan program available by MLPs and offers loans of up to $10,000 for single-family homes and up to $20,000 for multi-unit properties.

The progress that HG&E and the city of Holyoke have made in decarbonization and energy efficiency is a testament to their emphasis on mitigating climate change. It is also a clear indication that MLP districts with majority low-income and working-class ratepayers can still be effective in addressing climate change without sacrificing low rates.

88 "QuickFacts Holyoke City, Massachusetts" (U.S Census Bureau, n.d.), https://www.census.gov/quickfacts/fact/table/holyokecitymassachusetts,MA/PST045219.

89 Holyoke Gas and Electric Department Questionnaire Response, MCAN MLP Questionnaire 2021, (June 18, 2020) Leadership Section, Reduction of Brown Energy, Question 5 https://drive.google.com/drive/u/1/folders/1bA134KMTeJ36YogzksHzNKYtLGVW8LG8

90 https://drive.google.com/drive/u/1/folders/1iS-9d6jgH-3KIEm6TK4tbE75KZN7AEl5d

91 "Residential Energy Conservation Program" (Holyoke Gas and Electric), accessed May 27, 2021, https://www.hged.com/customers/save-energy-money/for-home/residential-energy-conservation/default.aspx.

## Ipswich Electric Light Department (IELD)

IELD is a clear leader in transparency and community engagement as well as in creating a progressive climate policy context. They were awarded top scores in Transparency and Community Engagement and were the only MLP to receive more than the full 10 points in the Policy Context category.

From a transparency perspective, IELD's website lists all the information that MCAN tracked and scored in addition to other materials on the MLP's operations, policies, and financial status.[92, 93] One such resource is IELD's projected power portfolio for 2021. This portfolio provides an in-depth summary of the MLP's power supply as well as a description of the environmental attributes and whether they had been sold or retired. While there is no discussion about the benefits of RECs or the impact of REC retirement on the percentage of clean energy that can be claimed in the energy supply, IELD's projected portfolio clearly describes the current power supply. This information helps residents easily understand IELD's current position and strategy.[94]

When looking at policy context, IELD has taken several steps to be more aggressive on mitigating the harmful effects of climate change. By participating in Green Community Designation and the Renewable Energy Trust Fund (RETF), they have increased their funding opportunities and the number of rebates and incentives available to residents for clean technology adoption and energy efficiency improvements. Additionally, IELD was one of the first MLP communities to publish a climate action plan in 2011.[95] Their action plan is coupled with numerous other policies and plans and presents a clear strategy for how IELD and the town of Ipswich can reduce emissions, increase efficiency, and transition to clean energy.

92 Which is the same as the town's website

93 "Electric Light Department," Ipswich, MA - Official Website (Town of Ipswich), accessed May 27, 2021, https://www.ipswichma.gov/369/Electric.

94 "2021 Projected Power Portfolio By Resource" (Ipswich Electric Light Department, n.d.), https://www.ipswichma.gov/DocumentCenter/View/12972/Projected-2021-Power-Portfolio-with-RECs.

95 Ipswich Commission on Energy Use and Climate Protection, "Climate Action Plan Ipswich, Massachusetts" (Town of Ipswich, May 2011), https://ipswich.files.wordpress.com/2019/12/climate-action-plan-2011.pdf.

## West Boylston Municipal Light Plant (WBMLP)

Serving 3,726 customers and distributing just over 55,700 MWh of energy, only 11 MLPs are smaller than WBMLP. Despite this, they scored above average in virtually every category, highlighting the fact that smaller MLPs can make significant progress in transitioning to clean energy. Unfortunately, WBMLP was the exception rather than the rule among smaller MLPs, which generally scored below average in multiple sections. This is an indication that more state resources may be necessary to ensure that smaller MLPs can effectively transition to a just energy future.

While WBMLP did not have any clean energy in its energy mix (because they did not retire the Class I RECs generated from their power supply), in 2019, approximately 55% of their energy mix was non-emitting based on MCAN's methodology. WBMLP is thus already on track to meet the 2030 emissions levels in the Greenhouse Gas Emissions Standard (GGES) established under the *Next-Generation Climate Bill*. In addition to non-emitting energy, WBMLP has made progress in clean technology adoption. According to the statewide list of eligible Class I units, the district has over 3.5 MW of clean energy in their district.[96] A large portion of this energy comes from community rooftop and landfill solar.[97] WBMLP also has a flywheel storage facility which is connected to their solar and has a capacity of 125 kW. This capacity is set to be increased by a battery storage project that is expected to be operational in the next three years.[98]

In addition to scoring above average in most categories, WBMLP is a leader in community engagement and transparency. This is largely due to their comprehensive website, on which all information tracked in this Scorecard was easily available. WBMLP's website also provided additional insight into their environmental efforts including a comprehensive summary of their energy sources accompanied by an overview of each project as well as a description of their renewable and clean energy strategy.[99, 100] This clean energy strategy also detailed WBMLP's Class I REC retirement schedule.

96 "Lists of Qualified Generation Units," Mass.gov (Department of Energy Resources), accessed May 27, 2021, https://www.mass.gov/service-details/lists-of-qualified-generation-units.

97 "WBMLP's Clean & Renewable Energy Strategy" (West Boylston Municipal Light Plant), accessed May 27, 2021, https://www.wbmlp.org/clean-energy.html.

98 West Boylston Municipal Light Plant Questionnaire Response, MCAN MLP Questionnaire 2021, (June 18, 2020) Leadership Section, Reduction of Brown Energy, Question 5.

99 "WBMLP's Energy Strategy" (West Boylston Municipal Light Plant), accessed May 27, 2021, https://www.wbmlp.org/energy-generation.html.

100 "WBMLP's Clean & Renewable Energy Strategy" (West Boylston Municipal Light Plant), accessed May 27, 2021, https://www.wbmlp.org/clean-energy.html.

WBMLP has made considerable progress, exceeding that of MLPs of a similar or smaller size. However, they are the exception rather than the rule among smaller MLPs. Their distinct achievements highlight the struggles that smaller MLPs may face in expanding energy efficiency programs and adopting clean energy. The state can respond to this urgent need by providing additional support to smaller MLPs. If we want all communities and utilities to rapidly transition, then we must ensure that those with limited budgets and fewer resources are adequately supported.