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DEPARTMENT OF PUBLIC UTILITIES

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March 31, 2026

VIA LAWS

Michael D. Hurley
Clerk of the Senate
Massachusetts State House
State House, Room 335
Boston, Massachusetts 02133

Hon. Michael J. Rodrigues, Chair
Senate Committee on Ways and Means
State House, Room 413-A
Boston, Massachusetts 02133

Hon. Michael J. Barrett, Senate Chair
Joint Committee on Telecommunications,
Utilities, and Energy
State House, Room 312-B
Boston, Massachusetts 02133

Hon. Rebecca L. Rausch, Senate Chair
Joint Committee on Environment and
Natural Resources
State House, Room 215
Boston, Massachusetts 02133

Hon. Cynthia Stone Creem, Chair
Senate Committee on Global Warming
and Climate Change
State House, Room 312-A
Boston, Massachusetts 02133

Timothy Carroll
Clerk of the House of Representatives
Massachusetts State House
State House, Room 145
Boston, Massachusetts 02133

Hon. Aaron Michlewitz, Chair
House Committee on Ways and Means
State House, Room 212
Boston, Massachusetts 02133

Hon. Mark J. Cusack, House Chair
Joint Committee on Telecommunication,
Utilities, and Energy
State House, Room 43
Boston, Massachusetts 02133

Hon. Christine P. Barber, House Chair
Joint Committee on Environment and
Natural Resources
State House, Room 167
Boston, Massachusetts 02133

Hon. Tram Nguyen, Chair
House Committee on Climate
Action and Sustainability
State House, Room 36
Boston, Massachusetts 02133

re: 2022-2024 Greenhouse Gas Emissions Reduction Statement

Dear Messrs. Hurley and Carroll; and Chairs Rodrigues, Michlewitz, Barrett, Cusack, Rausch, Barber, Creem, and Nguyen:

Pursuant to An Act Creating A Next-Generation Roadmap for Massachusetts Climate Policy (“2021 Climate Act”), St. 2021, c. 8, § 28; see G.L. c. 25, § 21(d)(5), the Department of Public Utilities (“Department”) is pleased to submit this statement regarding the greenhouse gas emissions reductions achieved through the activities undertaken by the electric¹ and gas² Program Administrators pursuant to their 2022-2024 Three-Year Energy Efficiency Plans (“2022-2024 Three-Year Plans”).³ As required by the 2021 Climate Act, this statement compares the Program Administrators’ greenhouse gas emissions reductions with the emissions reduction goals set by the Secretary of Energy and Environmental Affairs (“EEA Secretary”) for the 2022-2024 Three-Year Plan term.

I. INTRODUCTION

For more than a decade and a half, the policy of the Commonwealth has been to pursue “all available energy efficiency and demand reduction resources that are cost effective or less expensive than supply” to meet electric and gas resource needs. G.L. c. 25, § 21(a). The Program Administrators report that, since 2013, Mass Save programs have:

- provided \$31 billion in total benefits to customers;

¹ Fitchburg Gas and Electric Light Company, d/b/a Unitil (Electric Division), Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, NSTAR Electric Company, d/b/a Eversource Energy, and the Towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Eastham, Edgartown, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, Wellfleet, West Tisbury, and Yarmouth, and Dukes County, acting together as the Cape Light Compact JPE.

² The Berkshire Gas Company, Eversource Gas Company of Massachusetts, d/b/a Eversource Energy, Fitchburg Gas and Electric Light Company, d/b/a Unitil (Gas Division), Liberty Utilities (New England Natural Gas Company) Corp., d/b/a Liberty, Boston Gas Company, d/b/a National Grid, and NSTAR Gas Company, d/b/a Eversource Energy.

³ The Program Administrators’ 2022-2024 Three-Year Plans can be found here: www.mass.gov/info-details/energy-efficiency-dockets-and-filings#three-year-plan-filings. The 2022-2024 Three-Year Plans were approved by the Department in 2022-2024 Three-Year Energy Efficiency Plans, D.P.U. 21-120 through D.P.U. 21-129 (2022).

- invested \$1.1 billion in improvements that lower energy bills and improve health, safety, and comfort for low-income households;
- provided \$6.7 billion in customer incentives;
- delivered over 153 million megawatt-hours and 4.7 billion therms in energy savings, equivalent to the average annual output of five Brayton Point power plants; and
- reduced greenhouse gas emissions by 3.7 million metric tons of carbon dioxide equivalent (“MTCO₂e”), the same as taking 800,000 cars off the road for a year.⁴

During the period in which 2022-2024 Three-Year Plans were implemented, the Commonwealth received \$8.01 billion in total benefits for the \$4.05 billion total investment in energy efficiency resources. Put another way, for every \$1 spent on energy efficiency, Mass Save programs generated \$1.98 in return.⁵

Cost-effective energy efficiency investments also have the benefit of reducing greenhouse gas emissions. In 2021, the Legislature directed the Department to report on the greenhouse gas performance of the gas and electric plans as a way to quantify the climate value of these programs. Specifically, Section 28 of the 2021 Climate Act requires that:

[n]ot later than 15 months after the conclusion of the final year of each [Three-Year Plan], the [D]epartment drawing upon the most accurate and complete data and measurements then available, shall issue a statement . . . indicating the degree to which the activities undertaken pursuant to the performance of each plan met the goal for [that] plan set by the [EEA Secretary] pursuant to section 3B of [General Laws] chapter 21N.

Upon the conclusion of each Three-Year Energy Efficiency Plan term, the Program Administrators must submit a term report describing the actual energy savings, benefits, and

⁴ The Massachusetts 2025-2027 Energy Efficiency and Decarbonization Plan Executive Summary at 3 (April 30, 2025) available at <https://ma-eeac.org/wp-content/uploads/Executive-Summary-to-the-2025-2027-Plan-Revised-4-30-255380676.pdf>

⁵ 2022-2024 Term Report, App. G, Tab “BCR,” “2022-2024 Evaluated Total Resource Cost Test (in 2022 dollars)” (revised August 14, 2025). The Department evaluates cost effectiveness using the total resource cost test, which includes all benefits and costs associated with the energy system and program participants. Benefits are derived from avoided resource costs (e.g., avoided energy and capacity costs) and impacts beyond energy efficiency savings from installing energy efficiency measures (e.g., longer equipment replacement cycles). Investments (or costs) include program implementation expenses, performance incentives, and the costs customers incur from participation in the program (e.g., planning, installation, and services associated with energy efficiency measures).

expenditures resulting from the implementation of their energy efficiency plans. Investigation by the Department of Public Utilities on its own Motion into Updating its Energy Efficiency Guidelines, D.P.U. 20-150-A at 17 (2021); see G.L. c. 25, § 19(d)(2); G.L. c. 25, § 21(b)(3); G.L. c. 25, §§ 19(a) and (c). In preparing this statement, the Department relied on information from the Program Administrators' 2022-2024 Energy Efficiency Term Reports ("2022-2024 Term Reports") submitted on August 1, 2025.⁶ The Department's review and investigation of the 2022-2024 Term Reports is ongoing.

II. GREENHOUSE GAS EMISSIONS REDUCTIONS

Pursuant to G.L. 21N, § 3B, the EEA Secretary sets statewide goals for greenhouse gas emissions reductions to be achieved through the Three-Year Energy Efficiency Plans. On July 15, 2021, the EEA Secretary issued a letter setting greenhouse gas emissions reduction goals by 2030 of **504,000 MTCO₂e** for the electric Program Administrators and **341,000 MTCO₂e** for the gas Program Administrators, totaling **845,000 MTCO₂e**.⁷ Letter from EEA Secretary Kathleen A. Theoharides to Program Administrators (July 15, 2021) available at www.mass.gov/doc/greenhouse-gas-emissions-reduction-goal-for-mass-save/download ("EEA Secretary's Letter").

The electric Program Administrators report that energy efficiency measures implemented in the 2022-2024 Three-Year Plan term avoided 349,637 MTCO₂e, which is 154,363 MTCO₂e less than the EEA Secretary's goal. The gas Program Administrators report that energy efficiency measures implemented in the 2022-2024 Three-Year Plan term avoided 378,406 MTCO₂e, exceeding the EEA Secretary's goal by 37,406 MTCO₂e. Avoided annual greenhouse gas emissions by individual Program Administrator and fuel are provided in Appendix 1. Overall, the electric and gas Program Administrators achieved total greenhouse gas emissions reductions of 728,043 MTCO₂e, which is 116,957 MTCO₂e less than the EEA Secretary's combined electric and gas goal of 845,000 MTCO₂e.⁸

⁶ The Program Administrators 2022-2024 Term Reports can be found at www.mass.gov/info-details/energy-efficiency-dockets-and-filings#three-year-term-reports. Documents associated with the Department's ongoing review and investigation of the 2022-2024 Term Reports are available in the Department's File Room by searching for docket numbers "D.P.U. 25-120" through "D.P.U. 25-129".

⁷ The EEA Secretary's goals are expressed in cumulative annual metric tons of CO₂e reductions expected in 2030 that are directly associated with energy efficiency measures implemented in 2022 through 2024.

⁸ All values are expressed in terms of cumulative annual metric tons of CO₂e reductions expected in 2030.

In addition, the EEA Secretary set separate goals for cumulative emissions reductions in 2025 and 2030 for the Residential/Low-Income and Commercial & Industrial sectors. As shown below, the Program Administrators did not meet all sector goals; however, the gas Program Administrators achieved the Residential/Low Income sector goal for 2030.

Goals Compared to Reductions Achieved in Cumulative Annual Emissions Reductions (MTCO₂e)⁹

		2025			2030		
		Goal	Actual	Difference	Goal	Actual	Difference
Electric	Residential/ Low Income	392,000	312,767	-79,233	351,000	295,797	-55,203
	Commercial & Industrial	296,000	185,616	-110,384	153,000	53,840	-99,160
	Total Electric	688,000	498,383	-189,617	504,000	349,637	-154,363
Gas	Residential/ Low Income	252,000	247,618	-4,382	191,000	250,018	59,018
	Commercial & Industrial	156,000	146,699	-9,301	150,000	128,388	-21,612
	Total Gas	408,000	394,317	-13,683	341,000	378,406	37,406
Total Electric + Gas		1,096,000	892,700	-203,300	845,000	728,043	-116,957

⁹ The Program Administrators state that the 2025 and 2030 actual greenhouse gas emissions values were calculated using the method set forth in the EEA Secretary's Letter. 2022-2024 Term Report, App. G, Tab "GHG," "Notes" (revised August 14, 2025).

The Department appreciates the opportunity to provide this statement regarding the greenhouse gas emissions reductions achieved pursuant to the 2022-2024 Three-Year Plans. We are happy to respond to any questions you may have.

Sincerely,

A handwritten signature in black ink, reading "Jeremy C. McDiarmid". The signature is written in a cursive, flowing style.

Jeremy C. McDiarmid
Chair

cc: The Honorable Karen Spilka, Senate President
The Honorable Ronald Mariano, Speaker of the House
Rebecca Tepper, Secretary of Energy and Environmental Affairs
Service List: D.P.U. 21-120 through D.P.U. 21-129

Appendix**Table 1. 2022-2024 Avoided Greenhouse Gas Emissions by Electric Program Administrator and Fuel, 2030 (MTCO₂e)**

Program Administrator	Electric	Oil	Propane	Gas	Gasoline	Diesel	Non-Energy	Total
Cape Light Compact	1,190	18,596	6,696	291	253	-	6	27,023
NSTAR Electric	21,980	94,827	19,640	1,949	1,421	-	44	139,817
National Grid (electric)	17,325	132,510	25,927	1,786	1,441	-	33	178,990
Unitil (electric)	301	2,944	483	46	33	-	0	3,807
Grand Total	40,796	248,877	52,746	4,072	3,148	-	83	349,637

Table 2. 2022-2024 Avoided Greenhouse Gas Emissions by Gas Program Administrator and Fuel, 2030 (MTCO₂e)

Program Administrator	Electric	Oil	Propane	Gas	Gasoline	Diesel	Non-Energy	Total
Berkshire Gas	(441)	-	-	7,502	-	-	-	7,061
EGMA	(3,337)	-	-	68,397	-	-	-	65,060
NSTAR Gas	(5,816)	-	-	95,267	-	-	-	89,451
Liberty	(407)	-	-	6,711	-	-	-	6,304
National Grid (gas)	(13,936)	-	-	222,092	-	-	-	208,156
Unitil (gas)	(127)	-	-	2,501	-	-	-	2,374
Grand Total	(24,063)	-	-	402,469	-	-	-	378,406