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July 31, 2020

Governor's Task Force on Climate Change
 Office of Sustainability and Clean Energy
 101 E. Wilson St.
 Madison, WI 53703

Re: MEEA's comments on the Energy, Housing and Infrastructure Subcommittee's draft recommendations

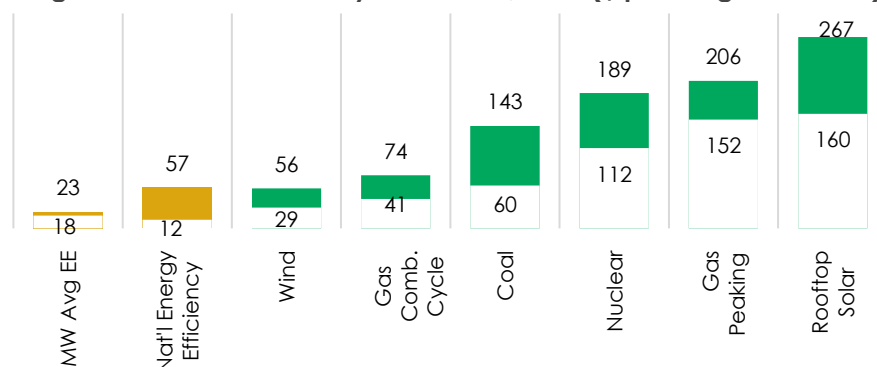
Dear Members of the Energy, Housing and Infrastructure Subcommittee,

Thank you for the opportunity to provide feedback on the Governor's Task Force on Climate Change draft recommendations in front of the Energy, Housing & Infrastructure Subcommittee. The Midwest Energy Efficiency Alliance (MEEA) is a member-based non-profit organization that promotes cost-effective energy efficiency policies in order to reduce energy waste and advance economic development in the Midwest. MEEA serves as a nonpartisan resource to policymakers and regulators. As the trusted source on energy efficiency in the Midwest, MEEA educates and advises a diverse set of stakeholders on meaningful ways to pursue an energy efficient agenda that's both achievable and cost-effective. MEEA's members headquartered or operating in Wisconsin include Alliant Energy, APTIM, Franklin Energy, Mid-West Energy Research Consortium, Slipstream and the Wisconsin Office of Energy Innovation, among others.

MEEA commends the Task Force for recognizing the importance of energy efficiency in addressing climate change. MEEA was pleased to see energy efficiency included in several of the subcommittee's draft recommendations, and we hope the broader Task Force agrees in recognizing the positive impact energy efficiency can have on Wisconsin's future. Increased energy efficiency investment can not only reduce energy waste but also strengthen the state's economic prospects, expand job opportunities for under-resourced communities and enhance public health.

MEEA applauds the subcommittee's recommendation on setting goals for energy use reduction. Energy efficiency can meaningfully contribute to the subcommittee's recommended carbon reduction goals for 2030 and 2050, while providing other health and economic co-benefits. As the lowest cost resource, energy efficiency is a tool that Wisconsin can leverage to delay or prevent the build out of more expensive energy generation.

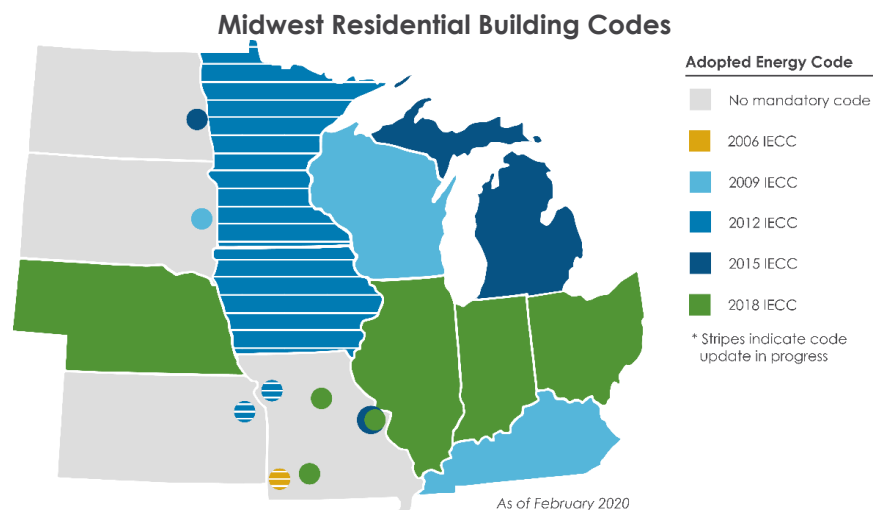
Long-Term Cost of Electricity Resources, 2018 (\$ per megawatt hour)



Any increased statewide energy efficiency investment will require a strong workforce. We appreciate the subcommittee's inclusion of a workforce development goal. Energy efficiency is an important tool for economic growth and job creation. Energy efficiency employs 63,569 people in Wisconsin, which ranks 17th in the nation for EE jobs. Energy efficiency jobs are stable, local jobs. Efficiency employs workers in both rural and urban Wisconsin, and the average wage of an energy efficiency job is 9.2% higher than the national average salary.

Building up this workforce can also contribute to the Task Force's emphasized goal on centering environmental justice and equity. Prior to COVID-19, the energy efficiency workforce was estimated to grow 7.4% in 2020. The industry is growing and will require more skilled and trained workers. The field's outsized percentage of veterans—12% of its workforce—demonstrates that outreach and training can be effective. Expanding training opportunities for under-resourced communities should be a priority. Additional investment in energy efficiency would create well-paid employment opportunities for job seekers from under-resourced communities and contribute to economic growth throughout the state.

MEEA is pleased to see the inclusion of building energy codes in the list of recommendations. Updating the state's residential and commercial building energy codes will provide numerous economic, health and resilience benefits to residents and businesses living and working in Wisconsin. Updating the code will maximize cost-effective improvements, reduce energy costs and improve the performance of commercial buildings, and help make homes more affordable for homeowners by reducing their energy bills. Modernizing and retrofitting state buildings can demonstrate the state government's leadership on this recommendation, and MEEA appreciates the "State as a Leader" suggestion.



Since building codes only cover new buildings, the inclusion of energy efficiency financing in the recommendations is a good way to increase the availability of efficiency measures to a larger percentage of the population. Energy efficiency financing is rapidly growing. Property Assessed Clean Energy (PACE) helps finance renewable energy and energy efficiency projects for commercial and industrial buildings. PACE projects create jobs, strengthen infrastructure and



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improve building safety and quality. Wisconsin saw \$40 million in PACE financing in 2019, but there is room for much more growth. While Wisconsin has benefited from PACE, MEEA is encouraged to see the Task Force recognize that more can be done with energy efficiency financing in the state. On-bill financing is a tool that helps residential customers finance the upfront costs of efficiency measures. Without having to worry about the initial capital, customers can take on energy efficiency projects that result in deep energy and bill savings. This is also a tool that can help low-income customers and renters access efficiency.

MEEA is heartened by the Task Force's effort to more equitably disperse the benefits of clean energy and energy efficiency. MEEA recognizes the importance of expanding energy efficiency programs to include customer classes that have historically been left out of these programs. On-bill financing is one mechanism that can increase access, but increasing the efficiency of multifamily buildings, strengthening the resiliency of communities through efficiency and uniting agency efforts on affordable multifamily housing and efficiency are additional ways to increase coordination and access to efficiency.

In short, MEEA is encouraged to see energy efficiency play a leading role in many of the subcommittee's draft recommendations. Efficiency can cost-effectively help Wisconsin accomplish its environmental and economic goals. In addition, targeting workforce development efforts and energy efficiency financing opportunities can help Wisconsin bring the benefits of energy efficiency to all communities in Wisconsin.

MEEA appreciates the opportunity to weigh in on the subcommittee's recommendations and looks forward to further engaging in these discussions. MEEA would be happy to provide any additional information or specific analyses from the region. If any members of the subcommittee or broader Task Force have any questions, please do not hesitate to reach out to MEEA's Policy Director, Nick Dreher, at ndreher@mwalliance.org.

Sincerely,

Stacey Paradis, Executive Director
Midwest Energy Efficiency Alliance

These comments reflect the views of the Midwest Energy Efficiency Alliance – a Regional Energy Efficiency Organization as designated by the U.S. Department of Energy – and not the organization's members or individual entities represented on our board of directors.