



The Nature Conservancy in Massachusetts
20 Ashburton Place, Suite 400
Boston, MA 02108

December 16, 2025

The Honorable Aaron Michlewitz, Chair
House Committee on Ways and Means
State House, Room 243
Boston, MA 02133

Re: Comments on: *H.4744, An Act relative to energy affordability, clean power, and economic competitiveness*

Dear Chair Michlewitz,

Thank you for your consideration of clean and affordable energy policy, which is helping make the Commonwealth a national leader. The Nature Conservancy (“TNC”) respectfully submits its comments on *H.4744, An Act relative to energy affordability, clean power, and economic competitiveness*.

TNC is a global conservation organization committed to finding durable solutions that support ecosystems and communities with a mission to conserve the lands and waters on which all life depends. In Massachusetts, TNC has a long history of helping to develop and implement clean energy and climate policies, including gubernatorial appointments to the Global Warming Solutions Act Implementation Advisory Committee and the Commission on Clean Energy Infrastructure Siting and Permitting. We worked with the legislature to codify the recommendations of these advisory bodies into many clean energy and climate laws and are collaborating with the Commonwealth’s energy and environmental agencies to implement them.

TNC respectfully submits these comments as part of our on-going support of the Legislature’s and Healey-Driscoll Administration’s efforts to balance energy affordability, the growing need for clean energy, tackling climate change and protecting nature. In Massachusetts, meeting the Commonwealth’s decarbonization goals while addressing rising electricity demand requires a two-pronged approach: maximizing energy conservation and significantly expanding renewable electricity generation—more than doubling current levels. At the same time, we must remain highly attentive to energy affordability and apply policy levers strategically to minimize cost impacts. Ratepayers are entitled to the most complete and accurate information to inform decisions about the Commonwealth’s energy future. Energy affordability policies should be grounded in evidence and supported by peer-reviewed research to ensure they are effective.

Competing on Clean Energy, Winning on Affordability

Families are feeling the pinch of rising energy bills, and headlines often frame affordability and climate action as opposing forces. The truth is the opposite: clean energy and efficiency are among the most powerful tools we have to lower costs, create jobs, keep our economy competitive while reducing impacts on public health and nature.

While Massachusetts ranks high for energy prices per unit, energy costs as a share of our economy tell a different story—we rank 48th. According to the U.S. Energy Information Administration, Massachusetts uses less energy per dollar of GDP than nearly every other state, thanks to decades of leadership in conservation and clean energy.

Renewable energy is not causing the recent price spikes—they stemmed from natural gas volatility and distribution spending, including costly gas pipe replacement programs. An October 2025 report by Lawrence Berkeley National Laboratory and The Brattle Group¹ confirms this:

- Distribution and transmission costs are rising due to resilience and replacement projects, compounded by supply-chain constraints.
- Natural gas price fluctuations are among the largest factors behind year-to-year changes in retail electricity prices.
- Utility-scale wind and solar deployment do not appear strongly related to recent retail price increases.

In short, clean energy is not what is driving bills up—and smart policy can tackle the actual cost drivers while continuing to mitigate climate and air pollution.

Clean energy is also one of Massachusetts' fastest-growing job sectors. Today, over 115,000 workers are employed in clean energy—double the number from 2010—and the sector has contributed \$15.9 billion to our economy since 2012. Jobs span every region, with 74% outside Greater Boston, and most pay family-supporting wages. Energy efficiency alone supports 81,000 jobs, from insulation installers to heat pump technicians. Offshore wind and solar are creating thousands more jobs, revitalizing ports like New Bedford and boosting local businesses. Programs like Mass Save have saved residents \$34 billion while creating nearly 84,000 jobs.

Clean energy is more than climate -- it is about affordability, competitiveness, local prosperity and the health of our community and our natural resources. Efficiency and electrification reduce household energy use and bills. Simply put, we do not burn or pay for the energy we do not use. Our low energy intensity makes Massachusetts a magnet for innovation and business. Clean

¹ [PowerPoint Presentation](#)

energy jobs stay here, supporting small businesses and communities statewide. Based on these results, we should focus on solutions to affordability—like reforming distribution costs and expanding local generation—while defending our leadership in energy efficiency and renewable energy. These investments make Massachusetts more competitive, secure and economically strong.

Maximizing Outcomes for Climate, Conservation, and Communities

The Nature Conservancy supports policies that expand well-sited renewables, lower barriers to siting on previously disturbed lands and support proactive local renewable energy planning. We believe the Commonwealth needs to invest in state-based renewable generation and storage to reduce reliance on imported electricity and price volatile fuels and accelerate efficient and electrification programs that deliver immediate savings to consumers.

We respectfully urge the House of Representatives to consider the above information and our comments when revising and redrafting H.4744. We organized our comments into two sections: support to retain provisions that will provide cost savings and objections to provisions that will be costly to consumers.

Support

- **Authorization of clean energy resource solicitation plans (sections 12, 14, 21):** The bill proposes to create a new division of Clean Energy Procurement within the Department of Energy Resources (DOER) to manage and implement clean energy resource solicitations. The provision will improve outcomes for people and nature. Existing procurement goals should be fulfilled while DOER implements this new procurement model. These provisions are based on recommendations DOER prepared this year in its Massachusetts Solicitation and Procurement Effectiveness Report. We support this change and think DOER is best positioned to conduct a more thorough solicitation and procurement process to avoid unnecessary costs and environmental impacts. The utilities' flawed solicitation and procurement process for the New England Clean Energy Connect transmission line added several years to permitting, converted ecologically sensitive forest land without any regard for mitigating these impacts or an eye toward identifying alternative siting locations.
- **Prioritization of right-of-way transmission (section 96):** Preferential permitting for transmission along roadways (rights of way) will streamline siting and permitting, reduce costs, avoid impacts on ecologically sensitive land and improve access to electric vehicle charging infrastructure.
- **Prohibiting ratepayer-funded utility spending (Section 50):** We appreciate the improvements made by the Committee on Telecommunications, Utilities and Energy on proposed prohibitions by gas and electric utilities that are regulated by the Department of

Public Utilities (DPU) from seeking rate recovery for direct or indirect costs associated with a wide range of business and political activities.

Objections

We respectfully request the removal of the following sections in H. 4744 and oppose inclusion in any energy affordability or climate legislation,

- **Targets (sections 2, 3, 4, 92):** The Commonwealth's laws requiring emission targets and goals do not stand alone -- they are woven into policies that provide assurances to the clean energy and energy efficiency sectors to make investments, create jobs and provide cost savings to consumers. Clear goals drive innovation and can reduce costs. Massachusetts' innovation economy needs consistency and predictability of targets that drive consistent and predictable regulations, incentive programs and sustainable funding.

New England neighbors rely on Massachusetts as the leader in collaboration on clean energy procurement and transmission that provides efficiencies and reduces costs for consumers. We can keep energy local to New England and reduce our dependence on price-volatile natural gas imported from outside the region, which caused significant price spikes in 2023.

- **Mass Save (Sections 5-11, 38, 61, 94, and 97-98):** The proposed statutory changes adversely impact the program delivery of cost-saving conservation and efficiency measures. Historically, Mass Save has a ratio of providing a return on investment of \$3.40 in benefits for every \$1 spent.² The combination of energy efficiency and conservation with electrification provides a sequential and cost-effective way to reduce energy use and decarbonize energy supplies for heating and cooling. Sections 97 and 98 set statutory caps on the Mass Save program budget which reduce the cost-savings opportunities of efficiency, conservation, and the electrification of heating and cooling.
- **Changes to the Renewable Portfolio Standard (RPS) (Section 16):** Annual renewable energy increases of three percent should be retained and not reduced to one percent. A consistent and predictable increase to the RPS each year provides clear signals and requirements for both the clean energy industry (including investors, supply chain and workforce) and distribution companies as to the pace needed to meet our electric sector decarbonization targets. We expect that renewable energy deployment will increase due to the development and implementation of clean energy infrastructure siting and permitting reforms required by the 2024 Climate Law and reforms made to the Solar Massachusetts Renewable Target Program.

² [Energy Efficiency Programs | Next Generation Energy Sources](#)

- **Affordability and competitiveness standard (Section 3):** We believe this section is unnecessary and redundant as the Commonwealth already has controls in place under MGL CH 30A, section 5 and Executive Order 562.

Section 5 of MGL CH 30A already states that no rule or regulation so filed with the state secretary shall become effective until an estimate of its: fiscal effect and impacts of proposed regulations, including setting rates, on the public and private sector over time, including whether any of the following methods of reducing the impact: establishing less stringent compliance or reporting requirements and schedules and consolidating or simplifying compliance or reporting requirements; establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation; an analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the commonwealth; and minimizing adverse impact on small businesses by using alternative regulatory methods.

EXECUTIVE ORDER NO. 562 TO REDUCE UNNECESSARY REGULATORY BURDEN already requires that each agency shall prepare in connection with any proposed, new regulation an business/competitiveness impact statement that will include a competitiveness review and assess disruptive economic impacts on small businesses, cities and towns, non-profit organizations; there is a clearly identified need for governmental intervention that is best addressed by the Agency; coordinated review across all Agencies and participating governmental bodies; the costs of the regulation do not exceed the benefits that would result from the regulation; less restrictive and intrusive alternatives have been considered and found less desirable based on a sound evaluation of the alternatives; the regulation does not unduly and adversely affect Massachusetts citizens and customers of the Commonwealth, or the competitive environment in Massachusetts.

Thank you for your time and consideration. Please feel free to contact Steve Long, Director of Policy and Partnerships if you have any questions at slong@tnc.org or 617-312-5932.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Sarri".

Kristen Sarri
State Director