



March 29, 2024

U.S Environmental Protection Agency  
Office of the Greenhouse Gas Reduction Fund  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Massachusetts Department of Energy Resources  
100 Cambridge St., 9th floor  
Boston MA 02114

via email: [vick.mohanka@sierraclub.org](mailto:vick.mohanka@sierraclub.org), [jess.nahigian@sierraclub.org](mailto:jess.nahigian@sierraclub.org)

RE: Letter of Commitment for the EPA Climate Pollution Reduction Grant

Dear Commissioner Mahony,  
The Massachusetts Sierra Club, with 100,000 members and supporters statewide, strongly supports the proposed five-year Regional Mid-Stream Heat Pump Program. This program will create mid-stream incentives at the distributor level to encourage the full replacement of HVAC and water heating systems across Connecticut, Maine, Massachusetts, New Hampshire, and Rhode Island.

Massachusetts' buildings rely significantly on oil and gas heating, with about 80% of the Commonwealth's 2.6 million homes using fossil fuel heat<sup>1</sup>. Overall, onsite building fuel combustion generates 30% of Massachusetts emissions, second only to transportation<sup>2</sup>.

Heat pumps reduce emissions up to 93% across their lifetimes compared to gas furnaces<sup>3</sup>. The Regional Mid-Stream Heat Pump Program will be a vital support in making this conversion and in meeting the goals of the Massachusetts Clean Energy and Climate Plan<sup>4</sup>. The Plan commits the Commonwealth to electrify 38% of

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<sup>1</sup><https://www.mass.gov/info-details/how-massachusetts-households-heat-their-homes#:~:text=How%20Massachusetts%20Heats,heat%20pumps%20leading%20the%20way>.

<sup>2</sup> <https://www.mass.gov/doc/pcap-straw-proposal/download>

<sup>3</sup> <https://rmi.org/now-is-the-time-to-go-all-in-on-heat-pumps>

<sup>4</sup><https://www.mass.gov/info-details/massachusetts-clean-energy-and-climate-plan-for-2025-and-2030>



households by 2030<sup>5</sup>, requiring the installation of up to half a million heat pumps. While heat pump installations have increased significantly, due in part to state-based incentive programs such as MassSave, significant acceleration of installations is required to meet these climate goals.

Massachusetts Sierra Club staff and volunteers are actively involved in community and statewide initiatives to reduce building carbon emissions, including an equitable transition to heat pumps. Should this proposal be selected, Sierra Club will continue to engage and mobilize our members, supporters and allies in opportunities for public comment, education, and to participate in an advisory role. We look forward to working with you to equitably reduce emissions in Massachusetts' homes and buildings.

Sincerely,  
Vickash Mohanka  
Chapter Director  
Massachusetts Sierra Club

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<sup>5</sup>[https://www.mass.gov/info-details/massachusetts-clean-energy-and-climate-metrics#buildings\\_section](https://www.mass.gov/info-details/massachusetts-clean-energy-and-climate-metrics#buildings_section)