

Dear Commission

I am writing to you as co-owner of Abacus Energy Solutions, LLC. We are a very small weatherization company, a three-star trade ally to the Energy Trust and a general contractor within Clean Energy Works. We have been operating since 2009, delivering whole house energy efficiency and combustion safety testing and upgrades to owners of existing residential homes in Energy Trust territory.

In the first years of our operation we experienced steady growth, but after 2012, we kept losing volume, in a very large part due to the trend of diminishing ETO incentives for weatherization measures. We used to be able to hire locally and maintain a diverse crew. We provided steady, family supporting jobs to persons from disadvantaged groups, such as people of color, veterans and women.

Our diminishing volumes since 2012 however resulted in one layoff after another, and recently our crew has shrank to one single person, Billy, our crew lead. Currently, we cannot even keep this one person busy at all times. Billy's family of two adults and six children feels the pinch.

If you take away even more incentives, for measures so essential and basic to whole-house weatherization as wall insulation, floor and duct insulation, we will likely have no choice but to lay off our very last employee and either close our doors or reinvent our company providing very different services. With ever diminishing volumes we simply cannot maintain our employees, and cannot keep together our network of specialty services providers.

By the time the commission decides to once more approve incentives, we will likely not be around to provide weatherization services. Unfortunately, I have heard plenty of references to similar bleak outlook from the owners of other small weatherization companies. Today's experienced Trade Ally Network may disappear very quickly.

Regarding non-energy savings benefits: Never in our history have we come across one single homeowner who said "give me only savings through cost-effective energy savings measures, I do not care for health and safety benefits". Naturally, we all want to be safe at home. Safe from inhaling combustion gases, safe from cancer due to inhaling radon isotopes, from electrocution or fire at home, safe from mildew spores in our living spaces. We also want our home to stay standing and be fire safe in an earthquake. What is the meaning of saving thirty dollars per month by insulating the attic, if the family will soon have to spend on cancer treatment due to an exposure to radon through unsealed surfaces? You cannot peel NEBs off of the face of weatherization measures, just like you cannot separate one side of a coin from the other. Similarly, you cannot separate the best interests of a rate payer from the best interest of the homeowner and her family as human beings. Have you met a residential rate payer that was also not a human being with his vulnerabilities?

I know that when you make your decisions you must first and foremost consider your mandates. As a contractor that is at the frontline of discussing homeowners' needs, I assure you that you will do best, and not one educated and considerate stakeholder will ever blame you for following the Total Societal Benefits approach to incentives. Please maintain the incentives for testing, air sealing, attic, wall, floor and duct insulation.

Sincerely: Peter Tofalvi

Co-owner, CEO, Rate Payer, Human Being

