A house with a solar panel

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**Low Load and All-Electric Residential New Construction Study**

**R2015**

**A Report to the Connecticut Energy Efficiency Board**

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# Abstract

Connecticut’s energy efficiency program for residential new construction is in a state of transition. Industry standard practice has approached efficiency levels historically promoted by Energize Connecticut, leading the program administrators, advisors, and regulators to consider whether a structural shift is needed as part of a program update and how the next generation of residential new construction programs should be designed. Concurrently, state policy has shifted toward greater interest in decarbonization, and the Department of Energy and Environmental Protection has directed the investor-owned utilities that administer Energize Connecticut to shift the program to an all-electric program by June of 2023. This study was designed to identify best practices among industry-leading residential new construction programs outside Connecticut, help define what the next generation of residential new construction programs in the state may encompass, and to provide actionable insights and input for on-going program planning. This work is based on interviews and secondary reviews of best practices among leading programs outside Connecticut.

Recommendations address a need to upgrade program tiers and incentives; increase the share of program efforts designed to transform the market rather than just influence participating structures; future-proof program homes by preparing them for a more dynamic grid that accommodates dynamic pricing, demand response, and distributed energy resources; integrates state policy, codes and standards, and program activities to a greater degree; and adjusts governance of the program a bit to encourage and allow for an updated program focus.

# Executive Summary

The Connecticut Energy Efficiency Board (CTEEB) commissioned an investigation of low-load residential new construction program approaches to help inform the direction that Energize Connecticut takes with its support of efficient new single-family and multifamily buildings. The study employed secondary research to identify and examine leading-edge residential new construction programs throughout the United States.

## Background

This study was motivated in part by indications that industry standard practice within residential new construction has been catching up to program standards and by the need to find the next generation of efficiency improvements beyond past go-to measures such as lighting. Updates to Connecticut’s residential energy codes are scheduled for the fall of 2022, leading to further upward pressure on building practices. Meanwhile, Connecticut’s energy-related policies have been moving toward greater focus on climate issues and reductions in greenhouse gases within the state. These policy considerations led to a directive during the implementation of this study in which the Connecticut Department of Energy and Environmental Protection (DEEP) instructed the state’s utilities that administer Energize Connecticut to shift the focus of the residential new construction program to an all-electric offering in 2023.

This study uses insights and experiences from leading programs to provide recommendations for Connecticut that address program design and state policy that apply for either a multi-fuel or electric-only focus. The recommendations are designed to maximize the impact of Energize Connecticut’s program activities on the energy efficiency levels of residential new construction in the state and to reduce energy and carbon impacts from new homes in the years to come.

## Adjust Program Design

We found that Energize Connecticut’s new construction efforts are already a leading program nationally with its comprehensive tier-based set of offerings. However, there are several issues that need to be addressed for the program to keep up with changing industry practices and continue to push the market toward higher efficiency levels (and carbon reductions):

* The current tiers offer rebates for efficiency levels that are minimally better than current practices and energy codes that are about to be adopted.
* Connecticut’s programs are largely resource acquisition (RA) oriented and focus on measure or participant incentives by design with only a lighter touch effort to fundamentally transform new construction market activity.

This RA focus leaves more widespread energy savings on the table by concentrating (and counting savings) mostly on participating homes rather than on the opportunity to fundamentally alter builder and market actor practices, as market transformation approaches seek to do. Many leading programs take a greater market transformation approach than Energize Connecticut (and may have more flexibility to do so in their jurisdictions).

To improve performance, **we recommend that Energize Connecticut:**

* **Update CT’s tiers of offerings to place greater shares of the incentives at higher efficiency levels** by eliminating the 51 to 60 HERS[[1]](#footnote-2) level from its HERS-based rebate, except where this tier is integral to maintaining enhanced rebates for meeting the established specifications of Energize Connecticut’s partner programs.
* **Increase the enhanced incentives associated with standards that address identifiable future needs**, including the All-Electric bonus incentive and the Zero Energy Ready Homes bonus incentive.
* **Expand CT’s non-financial offerings to builders and other market actors in the new construction market to more strongly support the transition toward very low load all-electric buildings through greater use of “market transformation” approaches**. (See Section 2.1.3 for more detail.)

During the course of this study, the Department of Energy and Environmental Protection directed the program administrators for Energize Connecticut to (paraphrasing)…

‘… identify barriers, develop a plan, and begin a transition to an all-electric-only residential new construction program in July 2023 with an apparent desire that the transition to all-electric offerings be completed by the end of 2023.’

The Conditions of Approval include the transition, but not the end date, for the completed conversion to an all-electric offering. We discuss the implications of this aggressive timeline in the report, as well as some additional program activities that will be required to ensure a smooth transition in the market among the majority of builders and homebuyers who do not appear ready to make that leap yet.

### Preparing for Future Energy – Home Interaction

To balance electrical demand and supply, utilities are increasingly implementing demand response efforts, and some jurisdictions are moving toward more dynamic pricing. Increasing use of renewable generation affects the timing of supply (an issue in the Midwest), and efforts to electrify both buildings and transportation are increasing electrical demand (an issue being tracked in the Northeast, among other locations). In addition, distributed energy resources (DERs) are slated to become a growing part of the energy resource mix. These include customer-sited solar or storage options, including electric vehicles. The increase in energy supply from DERs will make them a growing part of energy supply planning and provides the state with opportunities to support its evolving climate and energy policies.

New construction and major renovation of buildings provide opportunities for demand response and distributed generation to become part of the solution for a changing balance of supply and demand now and in the future. Connecticut’s energy system can benefit through further expansion of the residential new construction program’s existing efforts to prepare new homes and multifamily buildings for upcoming energy-related needs. To achieve this, **we recommend that Energize Connecticut, in coordination with DEEP, where needed,**

* **Continue to promote Zero Energy Ready** homes, even with the program transition to an all-electric offering;
* **Continue to require EV and PV readiness and expand these expectations to include battery storage readiness; and**
* **Promote demand response and dynamic pricing readiness as part of encouraged home design attributes in CT’s residential new construction program.** (See Section 2.2.1 for more detail.)

## Integrate Policy, Codes, and Program

We find that Connecticut’s relevant policies and building energy codes are making advances, but do not appear to be as aggressive or as complementary to new construction efficiency programs as those in several leading states.

States with leading-edge new construction programs tend to have progressive climate or energy policies that set a high-level direction, and energy efficiency program goals and efforts are often directly linked to them. Policy sets the direction and establishes targets, such as intended levels of greenhouse gas reductions, and then directs energy efficiency programs administered by regulated utilities and public agencies to put into place initiatives or programs that achieve the stated goals. Sometimes, these efforts establish direct relationships between building energy codes and energy efficiency programs for coordinated efforts that simultaneously push and pull the market (in California and the Northwest).

Connecticut could better facilitate effective and aggressive new construction program efforts through policy and codes. To do so, **we recommend that DEEP**

* **As part of its comprehensive energy planning, lay out as much of a vision as feasible for how Energize Connecticut’s residential new construction program will help achieve the state’s relevant energy policies and what its priorities should be.**
* **Coordinate with the Office of the State Building Inspector on future code upgrades and state amendments to introduce, if feasible, a requirement that newly built residential buildings’ energy-using systems be all-electric.** (See Section 3.3 for more detail.)

As discussed in the report, we applaud DEEP’s move toward greater electrification. The research indicates such direction is a positive step in ensuring that program activities support state policies. We see a need for the desire to electrify to be put in context of its purpose in Connecticut — presumably, reducing current and future carbon emissions. This can better ensure that builders that are interested in high efficiency, but not ready to fully leap into all-electric homes, continue to have a path toward fully low load all electric homes (with program support), rather than potentially stagnating their progression toward ever more efficient home construction. Ideally, the comprehensive state energy plan would lay out a complete roadmap for achievement of state goals through Energize Connecticut and the state’s other levers, including codes and standards, and leads the way with state-controlled and state-influenced buildings.

## Promote Forward-Looking Program Approaches

In leading states (California and New York), the regulations and directives that govern utility-administered energy efficiency programs establish the boundaries within which the utility programs operate and provide incentives to the utilities to maximize certain outcomes. Further, Illinois and Minnesota have recently updated their directives to align with policy in several ways. In Connecticut, a performance management incentive for the utilities is driven largely by quantified energy savings. Our research indicates that this incentive system could be aligned better with state policy directions that are shifting toward greater emphasis of carbon and electrification.

At the same time, cost-effectiveness expectations effectively set boundaries around the financial incentives the programs can offer to market actors and customers. They also set some effective limits on the degree to which programs can engage in activities that prepare the market for changes without providing directly attributable energy savings (including some market transformation activities). We find that the current Connecticut regulatory structure and policies governing energy efficiency programs is consistent with typical resource acquisition and demand side management programs focused on providing cost-effective energy savings; however, the seeming policy intent is to move markets to climate-friendlier approaches. Connecticut’s system of inducements for utility program administrators is not well-linked with these state priorities.

W**e recommend that DEEP shift a substantial share of the utility performance management incentives for the new construction program from energy savings associated with program participation to expected greenhouse gas emission reductions from program participation and related market effects.**

**We also recommend that DEEP facilitate market transformation approaches for new construction by broadening the allowable definition and countable savings associated with well-supported market activities for the Energize Connecticut new construction program.**

Ideally, the market transformation approach would be guided by an empirically derived roadmap that is informed by market and evaluation research and that translates DEEP-established policy goals and Connecticut-specific market information into a comprehensive strategy. The strategy should identify:

* Specific market changes that are needed for state policies and objectives for new construction to come into fruition;
* Which changes will occur naturally (or due to code upgrades alone);
* Which changes will require program intervention; and
* How various levers the state uses to achieve policy including energy efficiency programs will contribute to the overall policy objectives.

The roadmap would be specific to new construction activities, but some of the program solutions (such as accelerating market adoption of heat pump technologies generally) may engage the entire Energize Connecticut portfolio.

# Introduction

The state of Connecticut and its regulated investor-owned utilities provide rebates, information and education, technical assistance, and other market support to encourage energy efficient choices by consumers, businesses, and market actors in the state. These services—implemented under the brand Energize Connecticut— complement regulatory standards that specify minimum standards and seek to encourage greater adoption of energy efficiency than would have occurred through market forces alone. One of Energize Connecticut’s program areas addresses residential new construction and the approximately 5,000 single family homes and multi-family units built in the state annually.

## Program Description

The residential new construction program provides educational outreach, technical trainings, and financial incentives to encourage builders and homeowners to integrate advanced energy-efficient building construction, techniques, and technologies into their new construction or major renovations and addition project. At its core, financial incentives are based on a four-tiered incentive structure based on Home Energy Rating System (HERS) scores. Tiers are defined as follows:

* Tier 1: HERS score of 51 to 60, offering rebates of $3,000 for a single-family home
* Tier 2: HERS score of 41 to 50, with rebates of $4,000 for a single-family home
* Tier 3: HERS score of 0 to 40, with rebates of $4,500 to $6,500 for a single-family home
* Tier 4: HERS scores below 0, with rebates of $6,500 for a single-family home

According to Energize Connecticut, most program participants qualify for rebates at the 51 to 60 HERS range. The program bases these incentives on the assumption that a home built to current energy codes should have a HERS score of 85[[2]](#footnote-3), a supposition that is not supported by recent evaluations.

Additional enhanced incentives ranging from $500 to $2,500 are offered for meeting standards for:

* Passive House
* ENERGY STAR Homes (Version 3.1)
* LEED for Homes
* National Green Building Standard
* Zero Energy Ready Homes

Each of these programs promotes energy efficient designs with somewhat different emphases, including ultra-tight buildings (Passive House), future additions of on-site generation (Zero Energy Ready Homes), and adherence to sustainable considerations beyond energy (LEED and the National Green Building Standard). In addition, Energize Connecticut offers a Zero Net Energy Challenge that can provide prizes of $5,000 for winning homes and designs.

Participation has been strongest in the multifamily offering—especially for Passive House specifications—and lighter among single-family homes. Participation levels among the available tiers is highest at the lowest efficiency tiers. Program staff indicate that requirements by the state agency that helps fund affordable housing has spurred interest in Passive House construction for multifamily buildings in Connecticut, leading to the higher participation levels among affordable multifamily construction. In contrast, demand for program-compliant efficiency is comparatively lower within single family (than in neighboring Massachusetts, for example) in part because code requirements and stretch code efforts across the state lines have been more aggressive and helped spur greater builder participation there.

## Industry and Regulatory Developments

Industry practices, regulatory practices, and state policy have all changed since the current program structure was put in place.

An imminent change in building energy codes by the Office of the State Building Inspector will upgrade requirements for new construction to the 2021 IECC model code (with amendments) in October 2022. Currently, the code is based on the 2015 IECC model code (also with amendments). These changes in code will result in upgrades in the naturally occurring level of energy efficiency of new construction in Connecticut (also known as standard industry practice).

While there are indications from neighboring Massachusetts that standard industry practices are better than current code minimums, Connecticut-specific information is more complex and, in the case of standard industry practice, less current. To assess the appropriateness of program standards, it is relevant to consider program minimums to both building energy codes (the absolute minimum permissible efficiency allowed) and to what is known about standard industry practice. We present such a comparison in Table 1, which shows that:

* The change in energy codes in Connecticut in October 2022 will bring minimum efficiency requirements for new construction in line with current program minimums (indicating a need for an upgrade in program standards).
* The most recent snapshot of standard practice from 2017 shows practices at that time were substantially less efficient than current program minimums (indicating a need for an update in information about current standard practice, which is currently underway).
* There is a discrepancy between Connecticut evaluator assessments of the efficiency levels associated with current code and similar information advertised by Energize Connecticut. (Energize Connecticut should resolve this discrepancy when the code adjustment takes effect in October 2022.)

Table 1: HERS and ERI Levels for Program Compared to Standard Industry Practice and Code Minimums

|  |  |  |
| --- | --- | --- |
| **Customer Group** | **Approx.a HERS Score** | **Approx. ERI** |
| Current Minimum for Program Rebates | 60 | n/a |
| CT Code to be Introduced in October 2022b | n/a | 60 |
| Current CT Code (estimate #1)c | ~60 | 55 |
| Standard Industry Practice circa 2017 (median among non-program homes)d | 70 | n/a |
| Current CT Code (estimate #2)e | 85 | n/a |

a) All values are estimates except the current program minimums  
b) NMR estimate  
c) NMR estimate  
d) CTEEB report R1602 (Table 23); updated values will be available when R1968 is completed.  
e) Energize Connecticut estimate

The efficiency standards shown in the table are the Home Energy Rating System index (or HERS score) and the Energy Rating Index. Both scores are normalized to a past value to allow for time-series comparisons and resemble one another. Likewise, with both scores, lower values indicate higher efficiency levels. To put HERS indexes and code requirements in context, a HERS score of 100 reflects the energy code represented by the 2006 IECC energy code. Each point reduction in the HERS score represents a one percentage point reduction in energy use off that standard.

State policy has shifted to greater interest in climate protection, greenhouse gas emissions, and electrification. For example, Public Act No. 22-5 establishes aggressive climate change goals for the state, which DEEP is charged with incorporating into its quadrennial comprehensive energy strategy alongside the energy efficiency plans for Energize Connecticut programs established in the Conservation Load Management Plan and the state’s integrated resource plan.

In fact, as we detail elsewhere in this report, DEEP has directed Energize Connecticut’s program administrators to shift its residential new construction program to an all-electric offering as a way to promote electrification of new homes in anticipation of a carbon-free or low-carbon electricity production.

## Study Approach and Objectives

The Connecticut Energy Efficiency Board’s evaluation administrator commissioned this study to inform program updates. The study was designed and intended as a literature review of strategies and programs that are aimed at low energy consumption residential new construction, including the Passive House low energy construction standard, zero net energy standards, CT’s all-electric RNC package, and other programs that promote highly efficient low load single family and multifamily buildings, with a focus on all-electric.

As part of this study, we conducted background interviews with 4 program staff and stakeholders associated with Connecticut’s program efforts, reviewed program information from 34 leading edge residential new construction programs outside Connecticut, and conducted interviews with 10 program managers or other informants from leading programs throughout the country who could provide more detail and perspective on those programs’ approaches, strategies, and experiences.

## Report Overview

One of the themes and patterns in our study results is the benefit of integration of policy objectives, regulatory standards, and efforts to induce voluntary action through energy efficiency programs and other market support. As noted in Table 2, our primary findings have implications for Eversource and Avangrid as the administrators of the Energize Connecticut program and for DEEP; some recommendations can be implemented immediately, while others require more time, more preparatory action, and greater interaction.

Table : Actions Covered in Report Recommendations

| **Action** | **Timing** | **Primary Party to Implement** | **Applicable Report Section(s)** |
| --- | --- | --- | --- |
| Shift incentives and market engagement toward higher efficiency levels | Now | Utilities | 2.1.3 |
| Expand demand response and dynamic pricing readiness in new home designs | Plan now to implement later | Utilities | 2.2.1 |
| Incorporate essential DERs into program plans | Plan now to implement later | Technical consultants | 2.2.1 |
| Define how state climate goals are to be achieved by specifying the roles of building energy codes and new construction programs in Comprehensive Energy Strategy | Now | DEEP | 3.3 |
| Integrate utility program offerings and messaging with building energy code upgrades | Long term effort | DEEP  Utilities | 3.3 |
| Increase the share of the utility performance incentives for new construction that is linked to expected greenhouse gas emissions from program participation and market effects | Now | DEEP | 4.4 |
| Shift toward a market transformation approach for new construction based on a roadmap and with focused plans for builders at differing levels of migration toward low-load / all-electric homes | Now | Utilities  DEEP | 2.1.3  4.4 |

We organized this report with the primary audience and timing or staging of any recommendations in mind. Report sections are:

* Adjust Program Design—This section presents our observations about the current program structure and recommendations concerning upgrades. The main audience for this section is the program administrators and those who advise Energize Connecticut’s program structures and design.
* Integrate Policy, Regulation, and Program—This section presents our observations about the integration (or lack thereof) of state energy and climate policy and the mechanisms intended to achieve them, including the utility-administered efficiency programs. The main audience for this section is DEEP.
* Promote Forward-Looking Efficiency Program—This section presents our observations about the ways governance of the utility-administered energy efficiency programs could be adjusted to allow more freedom and incentive for innovation for new construction efforts.

# Adjust Program Design

Energize Connecticut compares well to other residential new construction programs and fits among those recognized as industry-leading or cutting edge in many ways. Given the goals it was designed to accomplish—the cost-effective delivery of energy-saving efficiency improvements for ratepayers—the program requires adjustments rather than wholesale redesign. More recent goals and expectations by Connecticut regulators, including a greater emphasis on climate concerns and a desire to electrify energy use in the state, could require greater changes or acceleration.

We base our complementary assessment of the program’s current design to meet its traditional goals on the following:

* The program structure uses tiers of performance with increasing incentives, which is a common (and best) practice among the leading programs we reviewed and provides an entry point as well as advanced levels at which builders can participate and increase the efficiency of the homes they build. At their highest levels, these tiers extend all the way to net-positive homes that produce more energy than they consume.
* The program promotes and offers incentives for the optional adoption of multiple future-oriented standards such as zero energy-ready and the ultra-efficient Passive House standards.
* The American Council for an Energy Efficient Economy as a leading program; and one of our interviewees from a program we consider to be leading pointed back to Connecticut as probably being further along than they are.

Program adjustments for additional advancement and future-proofing of the program include:

* Updating the existing efficiency tiers to be more aggressive;
* Expanding market transformation components of the program to prepare and challenge the market further in preparation for stricter minimum standards and the need (and, hopefully, desire) by market actors to build even more efficient and climate-friendly homes that are appropriate for the energy systems of today and those of tomorrow;
* Responding more aggressively to state policy directives concerning all-electric homes without leaving behind market actors who are still transitioning to the required technologies to make that change happen.

We discuss these changes, options, and recommendations with two separate time frames in mind: immediate and near-term adjustments and those that require planning and preparation now for implementation at a later time when market, policy, and technology conditions are appropriate.

## Immediate Adjustments

Our comparison of Energize Connecticut’s program approach to best practices and insights from elsewhere focused on efficiency levels promoted by the programs, program activities, and program structures. We draw on insights from this work to identify adjustments that the program administrators can make to advance residential new construction efforts to the next level.

Further, during this study, DEEP, as part of its formal review of Energize Connecticut’s Conservation and Load Management Plan for 2022-2024, directed the program administrators to identify barriers, develop a plan, and begin a transition to an all-electric residential new construction program by July 2023 and complete the transition to all-electric offerings by the end of 2023. While the Final Determination states that the transition to an all-electric residential new construction offering needs to be completed by the end of 2023, the end date is not specified in the Schedule of Conditions of Approval, which may require some clarification and further discussion.

Regardless of the specific timing, the regulatory directive to the program is to develop a proposal for transitioning the residential new construction program to an all-electric offering that will start accepting projects no later than July of 2023. The proposal shall include interim targets for increasing the proportion of all-electric projects completed through the program, changes needed to incentive structures or levels, and any perceived barriers to an all-electric program, including workforce development needs, education needs, customer outreach needs, and proposed solutions to these issues.

### Upgrade in Targeted Efficiency Levels

Energize Connecticut is following best practice and allows for effective market intervention across a wide range of market actors by continuing a tiered approach. The present tiers need updating, however, as the entry level provides incentives for HERS scores that are only moderately more efficient than current code and approximately on par with the code being introduced in October. As noted above, the bulk of incentives are being offered at the 51 to 60 HERS level and most participation occurs at this efficiency level. Best practice would suggest that programs should be one or two steps ahead of industry standard practice and code minimums.

As noted above, the incoming energy code for Connecticut will bring minimum new construction to HERS levels of about 60. Recent code upgrades have tended to result in efficiency improvements of about 10 percent per code cycle, on average, since about 2006.[[3]](#footnote-4) Staying ahead of energy codes by two cycles would require program efficiency standards at HERS levels of about 48.

Table 3 presents current tiers and enhanced incentives offered by the program currently. Core tiers are based on HERS-based performance, while enhanced incentives are offered for meeting additional standards identified by the Passive House Institute, the U.S. Environmental Protection Agency through its ENERGY STAR portfolio, the U.S. Green Building Council, and others.

Table : Energize Connecticut Incentive Structure

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Incentives** | |  |
| **Tier** | **Single-Family Detached** | **Multi-Family** | **Annual Participation** |
| Standard HERS-based tiers | $3,000 | $1,500 | SF: 500  MF: 1,400 units |
| 51-60 | $4,000 | $2,000 |
| 41-50 | $4,500 | $2,500 |
| 0-40 | $4,500-$6,500 | $2,500-$3,500 |
| Below 0 | $6,500 | $3,500 |
| Passive House bonus | $750 (modeling) | $500/unit (modeling)  $5,000 feasibility study  $1,500/unit (certification) | 13 MF bldgs.; 250 units |
| All-electric bonus | $1,250-$2,500 | $500 - $1,000 / unit | 67 |
| Bonus for ENERGY STAR Homes, LEED, National Green Building Standard, or Zero Energy Ready Homes | $500 | $250 / unit | ES: 484  LEED: 55  NGBS: 56  ZERH: 140 |
| Connecticut Zero Net Energy Challenge | $5,000 prize; $500 for HERS rating | $5,000 prize; $250 / unit for HERS rating | <10/year |

NOTE: There are also single-family attached incentives. For purposes of brevity and simplicity, we are not showing those incentive levels here. Participation levels are for a recently available year to illustrate scale of participation.

### Increase in Market Transformation Efforts

Connecticut’s programs put the bulk of their resources on resource acquisition[[4]](#footnote-5) activities through which financial incentives and complementary activities seek to cause direct increases in efficiency through rebated homes with a comparatively smaller effort on transforming the market in fundamental or structural ways.[[5]](#footnote-6) Market transformation efforts are part of the program effort, but not primary.

***Resource acquisition:*** *Energy efficiency resource acquisition programs seek to  
purchase energy savings in the public interest, often through  
financial or technical assistance.*

***Market transformation:*** *Strategic interventions that attempt to cause lasting changes in the structure or function of a market, or the behavior of market participants, resulting in an increase in the adoption of energy-efficient products, services, or practices*

That is, the residential new construction program is designed—in large part due to cost-effectiveness requirements and expectations for Energize Connecticut activities that—it is hoped—spur builders of participating homes to make efficiency improvements that they were not already planning.

The program does include market transformation elements through training and technical assistance that enable and may prompt permanent change among builders who take advantage of program incentives and among these builders’ subcontractors. These efforts include training on building science, collaboration with Phius[[6]](#footnote-7) on ultra-tight construction practices, and efforts through other parts of the program portfolio to reduce market barriers to heat pump technology adoption.

However, the program is not directed primarily on the market overall and seemingly prevented from focusing more than it currently does on market transformation by cost-effectiveness requirements and the metrics by which success is defined. We discuss these barriers in the section titled Promote Forward-Looking .

As noted in Table 4, market transformation activities distinguish themselves from resource acquisition by seeking to mobilize the entirety of the market that the program is seeking to influence. The target goes beyond participants to include all relevant market actors and goals are defined at a market level. As such, market transformation activities for new construction may encompass such components of the market as the real estate industry, home financing, supply chains and market perceptions concerning advanced building approaches and technologies, and others. In the case of an electrification focus, the program needs to address the markets for electric space and water heating options, as well as cooking and fireplaces included for ambiance.

Table : Distinctions between Resource Acquisition Programs and Market Transformation Initiatives[[7]](#footnote-8)

|  |  |  |
| --- | --- | --- |
| **Program Element / Characteristic** | **Resource Acquisition** | **Market Transformation** |
| Scale | Program | Entire defined market |
| Target | Participants | All consumers |
| Goal | Near-term savings | Structural changes in the market leading to long term savings |
| Approach | Save energy through customer participation | Save energy through mobilizing the market |
| Scope of Effort | Usually from a single program | Results from effects of multiple programs or interventions |
| Amount of Program Administrator's control | PAs can control the pace, scale, geographic location, and can identify participants in general | Markets are very dynamic, and the PAs are only one set of actors. If, how, where, and when the impacts occur are usually beyond the control of the program administrators |
| What is tracked, measured, and evaluated | Energy use and savings, participants, and free-ridership | Interim and long-term indicators of market penetration and structural changes, attribution to the program, and cumulative energy impacts |
| Timeframe for cost-effectiveness | Usually based on 1st year or lifecycle savings | Is usually planned over a 5 -10 year timeframe |

Other leading programs already tend to take a market transformation approach to shifting new construction practices—pushing at the highest edge of current practices. These market transformational efforts rely less on individually incentivizing specific measures and more on holistic “whole house” achievements and seek the engagement of market actors than is possible from resource acquisition programs. For example:

* The Northwest Energy Efficiency Alliance’s new construction program efforts seek to work across the new construction community as a whole and offer technical conferences, trainings, tools, best practices, case studies, a library of energy models, research and vetting of new approaches to home construction and applications of new technologies, as well as comprehensive tracking of new home and measure performance in a way that is linked to future code development—a topic that we discuss further in the section titled Integrate Policy, Codes, and Program. While NEEA is a regional collaborative, its efforts support local utility programs that work with builders and offer financial incentives for participating homes (thereby combining market transformation with a resource acquisition element).
* California’s utility programs and ComEd (the utility that serves northern Illinois) conduct emerging technology programs that feed pilots into program design. In California’s case these pilots and work in selected communities served as demonstration projects that seek to influence the builder community to engage in voluntary advancement of efficiency in their homes. In addition, California has implementer builder-specific assistance on such things as re-usable prototype floorplans and related in-field support that seeks to directly shift market practices.
* New York has provided multiple layers of support for a full range of adoption levels, thereby serving builder segments based on their readiness to implement efficiency.
* During a past period of greater emphasis on market transformation in Wisconsin, the statewide energy efficiency program helped support an annual residential new construction conference that provided technical skills building and promoted the benefits of following advanced energy efficiency practices for the builders and their customers.

Generally speaking, market transformation-oriented programs require insight into the market structure, barriers, drivers, and dynamics. They are more sophisticated and more complex than simply offering rebates for near-term energy savings, so they are often informed by research and an established or implied roadmap that considers the market actors, supply chains, influencers, drivers, and barriers for decisions related to the targeted end-use, technology, or practice. Resulting activities for a new construction program may include:

* Direct to builders: Technical training (classroom, project site), certification, co-branding.
* Indirect via market: Awareness building, certification, technology-specific market support.
* Indirect to end users: Awareness building includes real estate market as well as end-customer-focused and builder / trade ally-focused.

Wisconsin provides one example of how research-based planning supports market transformation efforts. The Public Utilities Commission of Wisconsin recently funded the development of a roadmap to lay the steps needed to promote heat pump technology in the state. The study is providing a market and stakeholder needs assessment; defining the value propositions for market actors by use cases; assessing the coordination needed among utilities, regulators, and local governments; and providing implementation support.

Figure 1 illustrates a broad range of market support activities that we have seen other programs provide as part of their market transformation efforts. The activities listed are not those of any one program, but a generalization of the breadth of support that market support activities often entail. We offer them here to provide an illustration of the range of activities that Energize Connecticut might consider, but not as a blueprint to follow.

Figure : Illustrative Multi-Faceted Approach to Market Support



Connecticut’s program efforts do not appear to reach this far into the market, but focus more on program participation, thereby leaving behind the potential benefits of market transformation initiatives in spurring broader application of highly efficient home design and construction. Given the proximity of Connecticut to Massachusetts and New York—both of which follow relatively advanced building practices—the state has the benefit of nearby precedents and practices it can leverage in promoting broader change in the new home building industry.

### Recommendations

As a result, **we recommend that Energize Connecticut:**

* **Update its tiers of offerings to place greater shares of the incentives at higher efficiency levels** by eliminating the 51 to 60 HERS level from its HERS-based rebate, except where this tier is integral to maintaining enhanced rebates for meeting the established specifications of Energize Connecticut’s partner programs.
* **Increase the enhanced incentives associated with standards that address identifiable future needs**, including the All-Electric bonus incentive and the Zero Energy Ready Homes bonus incentive.
* **Expand its non-financial offerings to builders and other market actors in the new construction market to more strongly support the transition toward very low load all-electric buildings through greater use of “market transformation” approaches.** Doing so would involve greater emphasis on industry-wide and market-wide activities already included in the program plan, such as education, training, and engagement of a wide range of market actors and technical training related to Passive House standards and building science; and publicization of ZNE Challenge winners. Further ideas to consider include:
  + Demonstration sites;
  + Engagement with builders that is tailored to the builder’s current practices, including more work with individual builders on repeatable building plans and construction crew / subcontractor training on how to effectively and efficiently build these particular homes;
  + Integration of program efforts with other Energize Connecticut efforts that are seeking to overcome barriers to certain electric alternatives to equipment that has traditionally been gas-fueled (like water heaters, cooktops, and fireplaces); and
  + Work with the real estate industry to establish sustained demand for high efficiency and all-electric new construction and sustained benefit of high-performance homes at resale.

Ideally, however, the actual expansion of efforts should be guided by local insights about which building practices are widely feasible in the region (because they are practiced effectively by some builders in Connecticut or more commonly practiced in Massachusetts or New York), an understanding of the barriers that have prevented their adoption by the market in Connecticut, and the development of a program roadmap that promotes these practices and addresses the identified barriers. The roadmap should consider some segmentation of builders, their subcontractors, and their equipment suppliers into segments by current efficiency practices so the outcome is an understanding of how to serve each group in a customized manner. The local market research required for such an effort is also an opportunity to develop relationships with builder associations and individual builders that may not yet exist. The resulting program activities would include “program participation” as well as broader market engagement such as those in the figure above that seeks to change practices whether or not the affected market actors ultimately seek rebates or count as participating homes or buildings.

In Connecticut, high efficiency multifamily building practices already have a foothold among new construction of affordable housing, in large part because public funding for new affordable housing has imposed requirements and expectations that resemble those of Passive House buildings. Energize Connecticut is already leveraging these market trends in its work with affordable housing construction. The program should also seek to promote spillover from these practices to market rate construction (as many builders working on affordable housing may also construct market rate housing).

To the extent there is crossover in single family building market activities from Massachusetts and New York, the program should seek to promote adoption of advanced practices in these neighboring states in Connecticut too.

### Additional Considerations for an Immediate Move to All-Electric

DEEP’s directive that the program transition to an all-electric offering occurred while this study was in progress. With this directive, the program design will need to change substantially and quickly. We discuss here the implications of this directive for our recommendations and for the program.

Further, given differences between DEEP’s determination on the Conservation and Load Management Plan for 2022-2024 and its conditions of approval[[8]](#footnote-9), it is unclear to us whether this transition is *required* to be completed by 2023 and the extent to which program activities may continue to serve newly constructed homes that include non-electric fuels, albeit without financial rebates. We assume that there is some flexibility in the timing and approach to ensure effectiveness, albeit with clear direction to move toward electrification aggressively.

#### Upgrade in Targeted Efficiency Levels

The transition toward an all-electric program will require a redesign of program standards for rebates and more non-financial support for builders who are ready to make the transition to all-electric homes now.

**Our recommendation above to upgrade the efficiency levels rebated by the program stands**, but the reference home used for HERS standards may need to be an all-electric home and the bonus incentives for partner programs would need to be reviewed for compliance and adherence to the all-electric directive.

#### Increase in Market Transformation Efforts

Because market actors do not react to state policy directives that fall short of regulatory requirements, the transition in the market to all-electric homes will continue to proceed at a more measured pace regardless of changes in Energize Connecticut’s program design.[[9]](#footnote-10) It is likely that some currently participating builders would cease to build program-qualifying homes for a time until they—and their customers—are ready to transition to all-electric across all appliances and end-uses. We note that the number of participants in the all-electric program component has been in the double-digits (see Table 3).

In particular, interviews with program staff, consultants, and evaluators active in Connecticut pointed to technical and market acceptance challenges of making heat pump water heating work in all housing scenarios, as well as market preferences for gas cooking appliances and gas fireplaces among some consumers. (Interestingly, use of heat pump technology for space conditioning appears to face somewhat lower barriers given informants’ input.)

Other states at the forefront of electrification efforts are continuing to help builders and homebuyers who are not ready to abandon some remaining non-electric end-uses and pursue a dual-pronged strategy. For example, California programs and pilots are simultaneously moving toward electrification, toward increased energy efficiency (with multiple fuels), and toward zero-energy with mandates for photovoltaic generation for new homes.

As a result, we envision a need for on-going market and technical support to builders who continue to use some non-electric appliances in order to prepare them to make the transition at a later time. Hence, **our recommendation above to increase market transformation efforts stands and includes on-going work and support of builders with an interest in high efficiency construction that, for now, includes some non-electric end-uses, to the extent this is allowed and acceptable to DEEP**. More specifically:

* Continued and increased promotion of net-zero-ready homes offers a solid path of continuing to prepare the market (and individual buildings being constructed now) for the transition to all-electric while promoting aggressive efficiency improvements regardless of fuel type. It would make sense for the program to encourage participation in the Passive House and Zero Energy Ready Homes programs, as they serve very similar purposes as all-electric homes. Passive House concepts favor electrification, but the fundamental ultra-efficient design reduces energy use and carbon emissions regardless of fuel type. Zero Energy Ready Homes also favor efficiency and ensure that homes constructed now can transition easily to zero energy use and, thus, very low or no carbon emissions.
* Support for transition in water heating, cooking, and fireplaces will need particular focus given the resistance from the market to electric versions of these end-uses. Whether or not program activities include financial incentives, it will be important for the program to provide encouragement, assurance that the supply markets are able to handle any additional demand, and guidance on any logistical and technical questions or concerns. (In some cases, these efforts may involve collaboration with other aspects of the Energize Connecticut program portfolio working on the same technologies and supply chains.)
* **Previous participants who opt not to go all-electric yet should continue to receive support, training, and technical assistance from the program to advance their efficiency levels** even if they are not offered financial rebates for their homes and buildings. In particular, it is important to help them continue to increase the efficiency levels of the homes they build until they are ready for all-electric and to reduce the barriers for them, for their supply chains, and for end-customers of the remaining end-uses that continue to use non-electric fuels.

#### Guiding the Transition to an All-Electric Program

DEEP is already directing Energize Connecticut’s program administrators to develop a plan for a transition to an all-electric program and to consider and address existing barriers. We suggest building onto this planning process with a research-based roadmap of the type we describe in the section titled Increase in Market Transformation Efforts (see the Wisconsin heat pump roadmap example). The roadmap could guide the nature of the program support needed for builders who transition to all-electric construction and those who do not. We advise builder-specific segmentation for the study so that the program can tailor its offerings at a mix of builder (and trade ally) types based on their readiness and interest in transitioning to all-electric construction and the efficiency level of their current construction projects.

## Preparing for Future Energy – Home Interaction

Energize Connecticut’s residential new construction program is designed with the future in mind. In addition to promoting high levels of efficiency that are possible with today’s technology, the program design has an eye toward the future with program components for all-electric homes and the US Department of Energy’s Zero Energy Ready Homes program standard. Through these efforts, the program seeks to “mak(e) homes ‘ready’ to support clean energy technologies and electric vehicles” (as noted in the program plan in the 2022-24 CLMP). As noted below, some of the dynamics of electrification and the addition of customer-sited generation require management of their impacts on the grid at a centralized (utility) and decentralized (building) level.

The Zero Energy Ready Homes program promotes high efficiency levels combined with either current adoption of customer-sited or community photovoltaic power or a series of preparatory steps that would facilitate the addition of customer-sited photovoltaic system in the future. Homes tend to have HERS ratings in the lower 50s or better, and the PV preparation includes physical components (electrical system requirements and wiring), orientation and roof design, and informational components for the homeowner.

Meanwhile, homes at HERS tiers 3 and 4 are required by Energize Connecticut to be wired for easy subsequent additions of electric vehicle charging, and all participating single-family homes with suitable locations and roof types for photovoltaics are required to include certain electrical wiring and capabilities to facilitate later installation of solar generation that resemble those of the ZERH program requirements.

Practices from other states with leading new construction programs and efforts point to additional ways the program and the state could future-proof homes built now to meet anticipated needs of the homeowners, the energy system, and the state. These practices are based largely on the likelihood that:

* **The need and use of time-based energy demand management will continue to grow** as electric generation shifts increasingly to non-dispatchable renewable sources and increased use of electric transportation will add to electric loads. These trends seem likely to increase the use of demand response programs and shifts to dynamic pricing. In both of these cases, future homeowners may desire the option to enroll end-uses in their homes in demand response programs through which utilities control equipment operation for periods of time or have increased options to respond to more dynamic rates and incentives to more closely control their time of energy usage. For example, California is requiring that time-of-use rates be presented to customers as the default rate option.
* **Utilities may seek ways of “storing” electricity generated from renewable sources in homes in creative ways,** as has happened in Minnesota where a utility aggregator serving cooperatives and municipal utilities promotes the use of controls for (sometimes oversized or superheated) electric water heaters that time water heating to absorb wind energy when it is abundant for customer use in the form of hot water when it is needed.
* **Distributed energy resources (DERs) will continue to become more common** as owners of single-family and multi-family homes install customer-sited photovoltaic systems and battery storage systems and integration of electric vehicle batteries with the grid become more common. Some utilities are currently researching ways to serve their customers with DER offerings in existing homes.

New construction is the most opportune time for the inclusion of technologies that will enable such functionality or flexible construction that will allow for later additions of systems, interfaces, or controls with lower costs and less hassle due to integrated designs and planning. There is no obvious common pattern that would point to a specific best practice in preparing new homes for future technology, but a few utility and state programs point to the range of possibilities. These include:

* NYSERDA's Multifamily Buildings of Excellence gives points for carbon neutral-ready design including demand flexibility.
* California’s statewide program requires electric vehicle charging readiness and battery storage readiness, while the state already mandates the inclusion of photovoltaics on new homes.
* ComEd's Single-Family All-Electric program requires communicating thermostats and encourages the selection of time-of-use rates, photovoltaic readiness, electric vehicle charging readiness, and battery storage readiness.

### Recommendations

To expand further on the residential new construction’s efforts to prepare new homes and multifamily buildings for upcoming energy-related needs, **we recommend that Energize Connecticut – in coordination with DEEP, where needed:**

* **Continue to promote Zero Energy Ready Homes** even with the program transitions to an all-electric offering.
* **Continue to require EV and PV readiness and expand these expectations to include battery storage readiness.**
  + Add the optional distribution by builders to their home purchasers of program-vetted information about the costs, benefits, and processes involved in adding photovoltaics and storage.
* **Promote demand response and dynamic pricing “readiness” as part of encouraged home design attributes in its residential new construction program.** This would involve:
  + Inclusion of control systems or interfaces that the Connecticut utilities demand response programs do or could use if homeowners chose to participate in demand response offerings.
  + Inclusion of in-home electric usage displays to provide feedback for homeowners interested in monitoring or controlling their energy usage, along with promotion of time of use rates and supporting information about strategies for managing usage across rate periods.

# Integrate Policy, Codes, and Program

Review of leading new construction programs from other states as part of this study revealed just how much policy, codes, and programs interrelate. In some leading states, there is substantial effort to create linkages among these levers toward the objectives that energy efficiency programs are designed to accomplish, particularly as these objectives shift from a focus on promoting cost-effective energy solutions for ratepayers and residents to an increasing effort to reduce greenhouse gas emissions and electrify end-uses in homes, in buildings, and in transportation.

As examples of such integration, we point to examples such as:

* California, where state policies established by the legislature or by gubernatorial executive order result in initiatives and orders by the California Energy Commission and the California Public Utilities Commission. These actions, in turn, result in pilots and programs by the regulated utilities, which are actively involved in codes and standards, energy efficiency programs, and electrification initiatives (both for the state’s building stock and in transportation). California also funds extensive clean energy technology research through a statewide research and development program with objectives linked back to state policy goals, as well as utility-specific emerging technology programs.
* The Northwest, where the regional energy efficiency organization, creates market transformation initiatives, collaborates with utility and statewide energy efficiency programs, and leverages program efforts to advance energy code upgrades.
* Illinois, where a recent set of legislative acts—the Future Energy Jobs Act and the Climate and Equitable Jobs Act—have set into motion an expansion of traditional energy efficiency programs by utilities with greatly expanded savings goals and budgets, as well as incorporation of a path to electrification by allowing beneficial electrification.
* Minnesota, where the Energy Conservation Optimization Act has provided direction and permission for the Department of Commerce to expand the role of the utilities’ Conservation Improvement Programs to consider or include such components as fuel switching and demand response within the program portfolios in an effort to expand the manner in which the programs serve the needs of state residents and complement state policy. Minnesota also supports the discovery and vetting of new technology by funding an applied research, development, and demonstration program that supports the adoption of new approaches by the utility energy efficiency programs.
* Closer to home, Massachusetts has used aggressive stretch codes and a permissive approach to allowing utility savings credit in communities that use the stretch code to increase efficiency levels of newly constructed single-family homes and increase program participation.

Each jurisdiction is unique in how it seeks to promote its policy aims, but these states examples point to the value of integration of policy, codes and standards, and voluntary energy efficiency programs. We present here some related activities in Connecticut and suggestions and recommendations for further integration of policy, codes, and programs.

## Energy Policy Relevant to the Residential New Construction Program

There is much relevant energy policy in Connecticut that relate, directly or indirectly, to program plans for Energize Connecticut’s program portfolio, including its residential new construction program. Most of the policy is either driven by or directed at the Department of Energy and Environmental Protection. Recent policy directions have strongly emphasized climate initiatives, which is a shift from historic energy policy under which energy efficiency programs existed as an alternative to building new generation and to help consumers control their energy costs.

Current policy directives and initiatives of note include:

* Public Act No. 22-5, which was approved in May 2022, codified an earlier executive order by Governor Lamont and established as law the intent for zero greenhouse gas emissions by 2040 from electricity supplied to electric customers in Connecticut. The act also establishes overall state goals for the reduction of greenhouse gas emissions in Connecticut by 45 percent of 2001 levels by 2030 and 80 percent of 2001 levels by 2050.
* That prior executive order, issued in 2019, included a directive to DEEP to analyze pathways and recommend strategies for achieving a 100 percent zero carbon target for the electric sector by 2040. DEEP representatives have indicated that these goals require a combination of energy efficiency, demand response, demand flexibility, and the establishment of electric vehicle infrastructure.
* DEEP is charged with establishing a Comprehensive Energy Strategy for the state every four years. An update is now underway, which will include a set of strategies to achieve the greenhouse gas emissions mentioned above. Information from an initial public presentation about the strategy’s development indicated a plan to draw on modeling information from other states and specifically referenced a neighboring state’s decarbonization roadmap. The development of the strategy reviews the findings of the state’s integrated resources plan, the Conservation and Load Management Plan (which spells out Energize Connecticut’s program plans, including those for the residential new construction program), clean energy investment plans developed by the Connecticut Green Bank, and the Energy Assurance Plan.

Furthermore—as indicated in earlier sections of this report—DEEP directed the program administrators to transition the program to an all-electric offering as part of the conditions of approval for the overall Conservation Load Management Plan for 2022 - 2024. Specifically:

DEEP’s Final Determination on the 2022 – 2024 Conservation and Load Management Plan states that the utilities must “develop a proposal for transitioning the Residential New Construction program to an all-electric offering by July 2023.” It later states that by October 15, 2022, the utilities must “develop a proposal for transitioning the Residential New Construction program to an all-electric offering by the end of 2023.” The Schedule of Conditions of Approval states that the utilities must “develop a proposal for transitioning the Residential New Construction program into an all-electric offering that will begin accepting projects no later than July 2023.” The Conditions of Approval further elaborates that the proposal should include “interim targets for increasing the proportion of all-electric projects completed through the Residential New Construction program, any necessary changes to incentive structures or levels, and any perceived barriers to an all-electric new construction offering, including workforce development, education, and customer outreach needs and proposed solutions to those barriers.”

Finally, we present in Figure 2 a generalized illustration of the interrelations of policy, code, and programs within the realm of residential new construction.

Figure : Illustration of Policy, Code, and Program Interrelationships



## Building Energy Codes

Building energy codes are an additional aspect of energy policy that is sometimes treated as a separate issue or independent input to the state policy equation.

Like other states, Connecticut’s energy code-making entity (the Office of the State Building Inspector working together with the Codes & Standards Committee) sets minimum standards for new construction that effectively establish minimum efficiency levels. Typically, states, including Connecticut, apply model energy codes established by the International Code Council with state-specific amendments. These model codes, referred to as the International Energy Conservation Code (IECC) are updated every three years. Connecticut skipped the 2018 update but is set to adopt the 2021 version in October of 2022.

However, state energy codes can be part of a state energy plan and strategy. Some states with leading residential new construction efforts treat energy codes in this way, seeing codes and energy efficiency programs as related and interconnected. Existing models and approaches include:

* In California and New York, policy has driven codes and program design. Upcoming codes are leveraged to promote programs, while program designs and standards strive to stay two to three cycles ahead of code.
* In the Northwest, the Northwest Energy Efficiency Alliance uses data from its own efforts and those of multiple regional collaborators to prove the achievability of new aggressive levels of efficiency, which its codes program leverages when making suggestions for new code upgrades in the states the Alliance serves. It is instructive to note that NEEA used to offer a more traditional incentive-based residential new construction program, but now only offers market support such as case studies, trainings, tools, and other resources. Their market support for residential new construction, branded BetterBuiltNW, is a part of its codes and standards program. Our contact at the Alliance told us that they made this change because quickly rising baselines (codes) made it nearly impossible to maintain a cost-effective resource acquisition program.
* In Massachusetts, towns are allowed to pass bylaws that raise the minimum energy code to the state’s Stretch code levels. Because of financial incentives, more than 80% of towns have adopted the Stretch code. That rise in code along with continued support of incentives through the Mass Save residential new construction program have lifted the level of energy efficiency in new construction significantly.

## Recommendations

Connecticut could better facilitate effective and aggressive new construction program efforts through policy and codes. To do so, **we recommend that DEEP:**

* **As part of its comprehensive energy planning, lay out as much of a vision as feasible for how Energize Connecticut’s residential new construction program will help achieve the state’s relevant energy policies and what its priorities should be.**
  + Ideally, this vision would allocate an aspirational share of the climate reduction goals Connecticut is seeking to meet to the program so it has a target to plan around. The vision should also specify how priorities, such as greenhouse carbon emission reductions, affordability, and other considerations, should be balanced.
  + Establishing a roadmap, as Massachusetts has done, would be helpful, but we recommend that the roadmap be more specific in linking goals, strategies, and implementation mechanisms (such as the Energize Connecticut programs).
  + With the larger strategy and priorities still being worked out, we believe it is prudent to allow the utilities and market sufficient time for the full transition of the residential new construction program to all-electric offering to ensure that builders not ready to make the transition are not left behind. We applaud DEEP for acknowledging the need for a transition plan and some of its key components. We believe that the utilities—and the market—may need more time to complete (but not begin) the transition. We base this assessment on such factors as the small share of participating homes currently that follow the all-electric path and the fact that high efficiency for remaining in-home combustion will be needed to achieve the established climate targets.
* **Coordinate with the Office of the State Building Inspector on future code upgrades and state amendments to introduce, if feasible, a requirement that newly built residential buildings’ energy-using systems be all-electric.**
  + Doing so and communicating the intended timing of this transition widely to the market would allow ensure all-electric new construction within a reasonable timeframe (presumably one or two code cycles) and position the Energize Connecticut residential new construction program to support and accelerate the transition through financial, technical, and market support.
  + If such a code transition were clearly laid out for the code, participation rates in Energize Connecticut’s all-electric offerings would likely increase substantially and the residential new construction program could become an all-electric program without losing important influence in homes with continued use of combustion appliances and equipment.

# Promote Forward-Looking Program Approaches

As the regulatory agency overseeing the utility-run energy efficiency program in Connecticut, DEEP could pave the way for some of the practices we identified in other leading states and promote more innovation that aligns with state policy goals in several ways. We describe the role of incentives, cost-effectiveness requirements, and flexibility to conduct market transformation efforts below and then present recommendations for adjustments DEEP could make in each of these areas. Where relevant, we present examples from leading states, but parts of this discussion are not based on best practice, but rather on observations about Connecticut’s current structure.

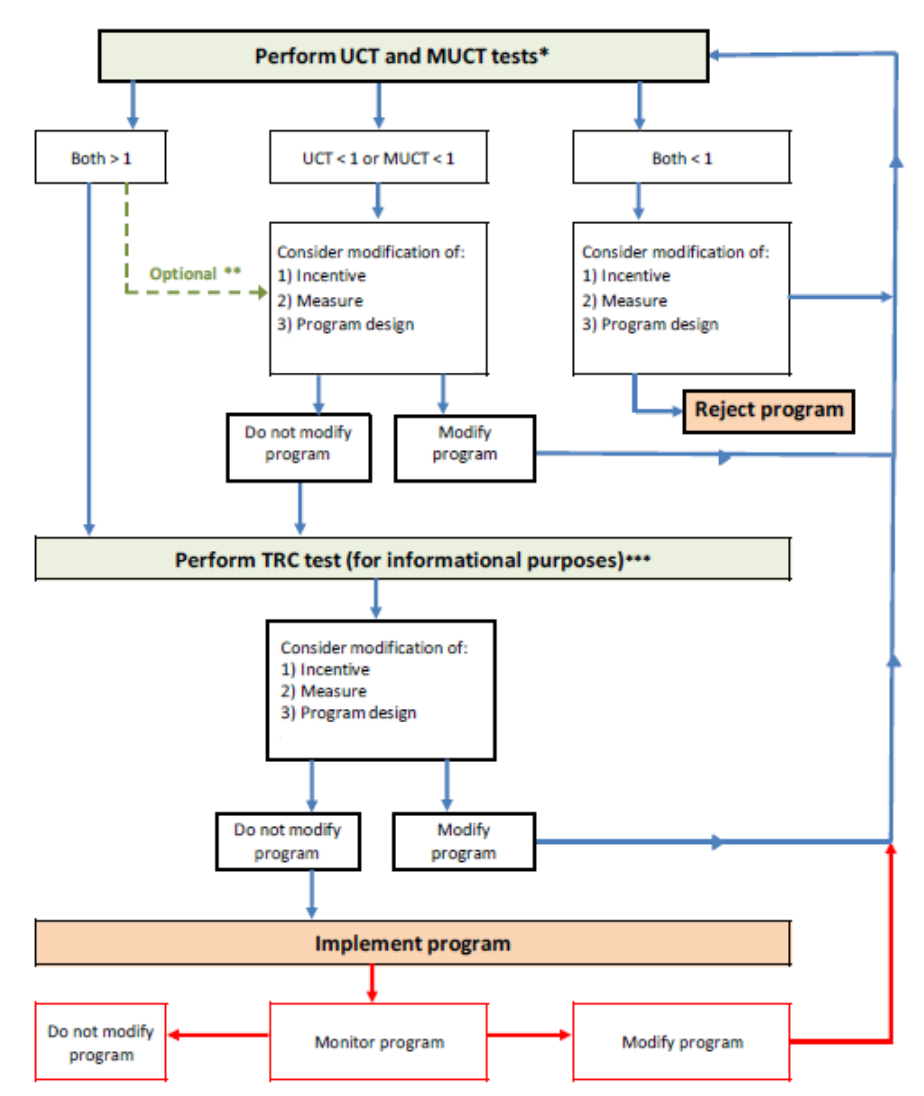
## Incentives and Metrics

DEEP incentivizes Energize Connecticut’s program administrators to prioritize certain objectives through the performance management incentives offered to the utilities and through the quantitative goals that are set and them tracked and reported as metrics.

In Connecticut, a performance management incentive for the utilities is driven largely by quantified energy savings. While there is a secondary metric for residential new construction that is based on the percentage of participants with HERS scores of 50 or less, such secondary metrics are not weighed heavily. Also, while a step in the positive direction, framing incentives on the share of participation at a certain efficiency level promotes efficient home performance. A better metric for a program that seeks to change market practices would be framed as the share of all new homes being constructed that exceed code or past industry standard practice in some measurable way. As the current policy goals are oriented around overall reductions in greenhouse gas emissions, an appropriate metric for a holistic new construction program would be oriented around (decreased) total modeled greenhouse gas emissions from the entirety of newly built homes. Admittedly, such a metric would include and reward practices outside the program’s control, but it would also provide an inducement and reward indirect effects, such as the influence training and market support have on builder practices.

## Cost Effectiveness as a Barrier

We find that the benefit-cost process in place for Energize Connecticut programs is too restrictive for residential new construction programs and is likely a barrier to optimized program design. As illustrated in Figure 3, programs must meet a Utility Cost Test or a Modified Utility Cost Test before they can be considered further and undergo a Resource Cost Test (for informational purposes). The Resource Cost Test does include consideration of non-energy impacts, including reductions in greenhouse gas emissions at a respectable $125 of valuation per ton of CO2. However, the absence of these considerations in the initial screening tests may well hold back the program from optimizing its potential to contribute to state climate goals. Given the importance of climate goals to the state and the role new construction can play in reducing future carbon emissions, the benefit of reduced carbon emissions should be a primary factor and not a secondary for-information-only metric in deciding whether a program is cost-effective.

Figure : Connecticut Benefit-Cost Testing Process for Energize Connecticut Programs (as presented in the CLMP)

## Explicit Permission and Support to Conduct Market Transformation

We discussed market transformation in the section titled *Increase in Market Transformation Efforts*, where we suggested that the Energize Connecticut residential new construction program should take on more elements designed to transform the market. Here, we circle back to that point and discuss what DEEP can do to support these efforts.

### Taking a Broad View of Program Activities

The regulatory environment for market transformation initiatives differs from that of resource acquisition efforts in the types of activities for which spending is permitted and the manner in which program successes or metrics are defined. Regulatory oversight for market transformation programs tends to take a broader view of the influence program activity has and frames the desired outcomes of programs beyond program-participating first-year or measure life savings.

Examples of this form of flexibility in other states and regions include the Northwest Energy Efficiency Alliance, which is a market transformation organization that reports impacts back to its funders but takes a broad view of its influence on market activity without requiring that savings be directly tied to a specific activity taken by someone who received a program rebate.

DEEP could allow and encourage residential new construction metrics to encompass market-level activities where there is a good rationale for why program action may or should have spillover to non-participating homes or non-participating market actors that are nonetheless influenced by the program. Specific activities should have a rationale rooted in program objectives or related state policy goals and a clear theory of how the activities will lead, directly or indirectly, toward desired outcomes. These rationales could be defined in the comprehensive state energy plan or in the Conservation and Load Management Plan.

Furthermore, market transformation activities also tend to require a loosening of cost-benefit restrictions so that market effects beyond program-participating-homes count as program benefits.

### Support

Beyond simply allowing market transformation activities, some states facilitate it directly. A few examples include:

* California and Minnesota both administer research, development & demonstration grant programs that contribute to the pipeline of clean energy technologies. California’s Electric Program Investment Charge (EPIC) program also funds market facilitation projects to support the development and preparation of the market to use the developed technology.
* Wisconsin is funding a roadmap to help define the activities needed to spur program influence and impact on the market so heat pump technology can gain a greater foothold in the state. As noted earlier, this study is providing a market and stakeholder needs assessment; defining the value propositions for market actors by use cases; assessing the coordination needed among utilities, regulators, and local governments; and providing implementation support. It is funded by the state agency that oversees the statewide Focus on Energy program.

## Recommendations

To provide more flexibility and inducements to the utility program administrators of Energize Connecticut that are tied more closely with state priorities, **we recommend that DEEP shift a substantial share of the utility performance management incentives for the new construction program from energy savings associated with program participation to expected greenhouse gas emission reductions from program participation and related market effects.**

**We also recommend that DEEP facilitate market transformation approaches for new construction by broadening the allowable definition and countable savings associated with well-supported market activities for the Energize Connecticut new construction program.**

Ideally, the market transformation approach would be guided by an empirically derived roadmap that translates DEEP-established policy goals and Connecticut-specific market information into a comprehensive strategy. The strategy should identify the market changes that are needed for state policies and objectives for new construction to come into fruition, which changes will occur naturally (or due to code upgrades alone), which will require program intervention, and how. The roadmap would be specific to new construction activities, but some of the program solutions (such as accelerating market adoption of heat pump technologies generally) may engage the entire Energize Connecticut portfolio.

Appendix A: Methodology

This study was designed to conduct secondary research on leading residential new construction efforts outside Connecticut in order to identify practices Energize Connecticut may consider as it updates future versions of its residential new construction program. New policy directives within the state and the need to relate learnings from out-of-state efforts prompted an internal focus and review of in-state information as well. We describe here, briefly, the study phases and methodology.

## Stage 1: In-State Background Interviews

The study team conducted interviews of in-state stakeholders to obtain background and context and to be better understand informational priorities. We conducted four interviews in August 2021, one each of: program staff at Eversource, program staff at Avangrid, policy staff at the Department of Energy and Environmental Protection, and the technical consultants to Energize Connecticut.

## Stage 2: Out-of-State Secondary Research

The core part of the data gathering consisted of secondary research and interviews with leading residential new construction programs, relevant thought leaders on residential new construction, and regulators or stakeholders overseeing leading programs. From October 2021 to March 2022, our team reviewed and interacted with 34 such programs or organizations. The 34 programs were identified through a variety of means, including ratings by the American Council for an Energy Efficient Economy, awareness of programs from past research our team has conducted, nominations from interviewees, and a general secondary search. Activities for these programs consisted of:

* Basic information gathering (for all programs);
* Review of public-facing information about the program details, designs, results, and strategies (with varying levels of effort depending on the unique features of a program, fit with study priorities, and prior coverage of similar program efforts);
* Interviews with 10 program managers, stakeholders, or representatives covering high priority programs vetted with the evaluation administrator.

Table 5 lists these programs and summarizes the degree of our review.

Table 5: Programs and Thought-Leading Initiatives Consulted

| **Program or Initiative** | **Degree of Review** |
| --- | --- |
| Arkansas Home Energy Data Platform | Background |
| British Columbia Zero Energy Challenge | Background |
| CenterPoint Smart Homes Pilot | Email inquiry |
| ComEd's All-Electric Residential New Construction Pilot | Interview |
| District of Columbia Sustainable Energy Utility's ZNE-Residential Initiative | Background |
| Dominion Energy-Utah's ThermWise Program (plus CarbonRight offsets) | Interview |
| Efficiency Vermont High Performance Homes Program | Interview |
| Efficiency Vermont Multifamily New Construction Program | Reviewed Public-Facing Program Info |
| Efficiency Vermont Zero Net Energy Modular Homes Initiative | Background |
| Energize Delaware Zero Net Energy - Residential / Milford Homes Modular | Background |
| Focus on Energy's ENERGY STAR Homes Program | Background and Knowledge from Past Work |
| MassSave Multifamily Passive House New Construction Initiative | Interview |
| Minnesota Conservation Improvement Programs | Interview |
| Missouri Home Energy Data Platform | Background |
| National Grid-RI, Path to ZNE-Residential Pilot | Background |
| New Jersey Clean Energy Programs | Background |
| Northeast Energy Efficiency Partnership Home Energy Data Platform | Background |
| Northwest Energy Efficiency Alliance's Next Step Homes Program | Interview |
| NYSERDA Buildings of Excellence Multifamily Competition | Interview for Full Set of Programs |
| NYSERDA Low-Rise Residential New Construction Program |
| NYSERDA Low-Rise Residential New Construction Program |
| NYSERDA Mid-/High-Rise Multifamily New Construction Program |

|  |  |
| --- | --- |
| Oregon Home Energy Data Platform | Background |
| Pacific Gas & Electric's Advanced Energy Rebuild Program | Interview |
| Pacific Gas & Electric's Codes and Standards Program | Background and Knowledge from Past Work |
| Pacific Gas & Electric's Zero Net Energy Production Builder Demonstration Initiative | Interview |
| Phius (Passive House organization active in multiple states, including CT) | Interview |
| Rocky Mountain Institute | Email interview |
| Sacramento Municipal Utility District's All-Electric Smart Homes Builder Incentives | Background |
| San Diego Gas & Electric's Codes and Standards Program | Background |
| Southern California Edison's California Advanced Homes Initiative | Background |
| Southern California Edison's Clean Energy and Resiliency Rebuild Program | Background |
| Southern California Edison's Codes and Standards Program | Background |
| Southern California Edison's Emerging Technologies Program | Background |
| Southern California Gas's Codes and Standards Program | Background |

## Stage 3: In-State Program and Policy Reviews

During the analysis stage of our work, we added additional investigation into existing program details for Energize Connecticut and a review of established and changing policies and directives by DEEP. These included reviews of:

* Draft and then final determinations by DEEP on the 2022-2024 program plans for Energize Connecticut and conditions of approval for the program plans;
* Policy drivers in Connecticut that affect the stated and implied objectives of the utility energy efficiency program, including legislation and executive orders related to state goals on in-state reductions of greenhouse gas emissions;
* Cost-effectiveness processes and requirements for Energize Connecticut and current and planned adjustments by DEEP;
* Performance management incentives for the program administrators of Energize Connecticut;
* Connecticut energy code practices and upgrades; and
* Relationships between codes, what is known about industry standard practice, HERS scores, and ERI scores.

These reviews became necessary as best practices identified during secondary research identified the importance of the integration of policy, codes, and programs; as actionable recommendations required greater Connecticut context than we had from background interviews; and as policy and directives to the program administrators evolved during the study.

Appendix B: Program Descriptions

For the programs we investigated more fully, we offer brief summaries of the programs overall, what makes them noteworthy, and any key take-aways for Connecticut.

| **ComEd’s All-Electric Residential New Construction Pilot** |
| --- |
| * Prescriptive all-electric, energy efficient single family program that evolved from a pilot program. Encourages but does not require electric cooking, EV-readiness, storage-readiness, and solar-readiness. Includes indoor air quality and comfort requirements. The program largely works with niche builders and has not engaged production-type builders yet. Incentives vary based on the size of the dwelling. Provides training for builders especially on ASHPs in cold climates. * As the program evolved from a pilot that did not have traditional cost effectiveness requirements the implementation team stressed the importance of defining priorities, metrics, and KPIs upfront. They also stressed the importance of developing relationships with and gathering data and information from market actors early and often. They conducted structured interviews and quarterly surveys at the beginning and prior |

| **Dominion Energy-Utah's ThermWise Program (plus CarbonRight offsets)** |
| --- |
| * ThermWise is a fairly traditional natural gas resource acquisition program with largely prescriptive offerings that nonetheless offers tiers to builders so it is able to attract a full range of market actors. The program collaborates with the electric program offered in parallel by the local electric utility. The program addresses net-zero concerns by promoting renewable natural gas at a premium and carbon offsets that are available outside the utility’s energy efficiency offerings. * The program reinforces the importance of a tiered approach to program offerings so multiple components of the builder and homeowner markets can be addressed. One other unique take-away is the program’s approach to seeking net-zero options for natural gas through sustainable natural gas and offsets. |

| **Efficiency Vermont High Performance Homes Program** |
| --- |
| * Efficiency Vermont’s High Performance Homes program is a higher tier add-on to its standard residential (single-family) new construction program, which is aligned with the state’s stretch code. (The HPH program is several notches above in efficiency). The overall goal is ZNE readiness for all new construction by 2030, and both programs are intended to help achieve Vermont’s climate action plan. The HPH program is shifting from a project focus to a builder focus as a way of influencing the market and participating builders’ and subcontractors’ standard practice without touching each home they build. This approach is new. Recent participation levels are 132 in the standard program and 25 (dedicated builders) in the HPH add-on out of about 1,000 new homes annually in the state. * The program approach reinforces the value of a tiered approach, demonstrates the linkage between policy goals and program-based achievement of those policies, and the strategy of seeking market change rather than a home-specific approach. |

| **MassSave Multifamily Passive House New Construction Initiative** |
| --- |
| * (Focused on Passive House component, not the full program) Passive House offerings in Massachusetts is similar to Connecticut, incorporating workforce development efforts, training, and certification assistance. Implementation is easier and uptake higher for multifamily than single-family because multifamily structures have more optimal envelope designs and internal heat gains. Uptake in Massachusetts is comparatively higher among market rate development than in Connecticut, in part because Passive House standards are a smaller leap from the state’s stretch code, which does not exist in Connecticut. Meanwhile, uptake is comparatively higher in Connecticut for affordable housing due to standards by the main affordable housing agency that resemble Passive House standards. * Passive House is a good standard to use for highly efficient multifamily new construction. The experiences in Massachusetts and Connecticut highlight the importance of non-program factors in program uptake. Codes, stretch codes, and non-regulatory standards work hand-in-hand with voluntary programs to achieve results collectively rather than individually. The full context needs to be considered; energy efficiency programs cannot be viewed in isolation. |

| **Minnesota Conservation Improvement Programs** |
| --- |
| * Note to reviewers: We will add descriptions and take-aways for this body of programs in the final report. |

| **Northwest Energy Efficiency Alliance's Next Step Homes Program** |
| --- |
| * Note to reviewers: We will add descriptions and take-aways for this program in the final report. |

| **NYSERDA Family of Programs (Buildings of Excellence Multifamily Competition, Low-Rise Residential New Construction Program, Mid-/High-Rise Multifamily New Construction Program)** |
| --- |
| * Note to reviewers: We will add descriptions and take-aways for this body of programs in the final report |

| **Pacific Gas & Electric's Advanced Energy Rebuild Program** |
| --- |
| * Note to reviewers: We will add descriptions and take-aways for this program in the final report. |

| **Pacific Gas & Electric's Zero Net Energy Production Builder Demonstration Initiative** |
| --- |
| * Note to reviewers: We will add descriptions and take-aways for this program in the final report. |

| **Phius (Passive House organization active in multiple states, including CT)** |
| --- |
| * Note to reviewers: We will add descriptions and take-aways for this standard in the final report. |

Appendix C: Additional Concepts

During the course of the study, analysis, and synthesis, we identified several additional concepts, issues, and and questions that may be of value to Energize Connecticut in the future, but that we did not fully explore and did not include in the body of the report. We offer them here as food for thought here for future consideration and or sake of completeness:

* Regional collaboration & standards—Market practices and market actors cut across state and utility boundaries. As a result, there is value in thinking more regionally in setting program standards and providing market-focused services. Our report is focused on what Energize Connecticut and DEEP can do within Connecticut, but we call out the benefit of thinking regionally and collaborating with neighbors in ways that will result in consistent offerings for market actors the programs are seeking to influence.
* Modular homes efforts—We gave a light touch to modular homes efforts in our secondary research in favor of site-built single-family and multifamily construction. We do want to acknowledge that there are potentially valuable modular home efforts underway that have market transformation potential in Vermont and Delaware.
* Role of major renovation—We framed this report in terms of new construction, but need to acknowledge that the information presented applies to additions and major renovations as well. For the most part, these are already included in the new construction program.
* Complication of tax credit as added incentive for efficiency and distributed energy resources—Federal (and sometimes state) tax credits provide additional drivers for some efficiency upgrades and the installation of distributed energy resources in homes. While energy efficiency programs do tend to mention them, these drivers are challenging for energy efficiency programs to incorporate into marketing and promotions as tax incentives are complicated and depend very much on household circumstances and filings. Often, the best programs can do is to mention potential tax rebates and suggest that households talk to their tax advisor. This limits the benefit of these incentives as part of program messaging because programs cannot be specific about just how much—or even whether—a household will receive any additional benefit beyond energy savings and program-specific rebates. This is a missed opportunity without an easy solution.
* Gas customer equity—Some interviewees raised the question of equity across customer types and suggested that the contribution to all-electric program efforts by Connecticut utility customers via their natural gas bills needs further discussion. We wanted to acknowledge this question, but also comment that the benefits of electrification efforts are societal in nature. Reducing greenhouse gas emissions is a benefit to all Connecticut residents, regardless of the fuels they use or the utilities that serve those fuels.
* Timing of decarbonization—An executive directive in Connecticut has specified that electric generation shift to be free of fossil fuels by 2040. Before that time, there may (and probably will) be fossil fuel emissions associated with electricity used in homes. As a result, electrification of in-home appliances will not be fully free of fossil fuel emissions. Electrification may occur now, but the climate benefits will require the transition to non-carbon generation over time.

Appendix D: Selected Metrics

We offer here a partial list of metrics of interest to Energize Connecticut from some other leading programs that were able to provide them easily. We focused on information on costs, savings, incentive offerings, and participation. Please note that programs differ in how they define or gather all of these metrics; we have not standardized them but offer them here mostly for context.

Table : Selected Metrics Across Programs

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Program** | **Incremental Costs** | **Savings** | **Incentive** | **Participation** |
| MassSave |  |  | Core Incentive:  $0.50/kWh + $50/MMBTU + $2,500 \* savings percentage compared to industry standard  Additional Incentives:  -Feasibility Study: $5,000  -Energy Modeling: $500/unit max or max $20,000  -Pre-Certification: $500/unit  -Certification: $2,500/unit  -Net Performance Bonus: $0.75/kWh, $7.50/therm | 6 builders |
| Passive House |  |  | NA | Single Family: 5  -Certified: 2  -Design Certified: 1  -Submitted/Registered: 2 |
| Multifamily: 59  -Certified: 8  -Design Certified: 28  -Submitted/Registered: 28 |
| ComEd SF All-Electric Residential New Construction | Minimum $3,540[[10]](#endnote-2) | SF: 7,000 – 8,000 kWh | <800 sf = $1,000  800-1,500 sf = $1,500  >1,500 sf = $2,000 | 11 homes (2020)  18 homes (2021)  60 homes (Goal for 2022) |
| MF: 4,000 – 5,000 kWh[[11]](#endnote-3) |
| PG&E ZNE Production Builder Pilot/Demonstration | $36,700[[12]](#endnote-4) | 3-55% below builder’s standard practice[[13]](#endnote-5) | Up to $15,000 in incremental costs | 6 SF homes[[14]](#endnote-6) |
| CA Statewide Energy-Smart Homes[[15]](#endnote-7) | None available[[16]](#endnote-8) | All-Electric: 2,317 MWh and 6,446 therms[[17]](#endnote-9) | All-Electric:  -SF: $3,500 + $10/0.1 EDR Δ > 1.0[[18]](#endnote-10)  -MF: $2,200 + $5/0.1 EDR Δ > 1.0[[19]](#endnote-11) | All-Electric:  -15 applications[[20]](#endnote-12)  -target of 1011 new construction installations for 2023 |
| Mixed-Fuel: 7,928 MWh[[21]](#endnote-13) | Mixed-Fuel:  -SF: $800 + $5/0.1 EDR Δ > 2.0[[22]](#endnote-14)  -MF: $450 + $6/0.1 EDR Δ > 2.0[[23]](#endnote-15) | Mixed-Fuel:  -1 application[[24]](#endnote-16)  -target of 150 for 2023 |
| NYSERDA Buildings of Excellence | $0/sq ft - $105/sq ft or 0% - 25%[[25]](#endnote-17) |  | Early-Design Support:  -$250,000  Demonstration Projects:  -$20/sq ft up to $1,000,000 | Round 1: 28​  Round 2: 14  Round 3: Launched April 2022 |
| NYSERDA New Construction Housing |  |  | Single Family and Multifamily Incentives:  -$1,000/dwelling unit (up to $300,000/project) if 20% performance threshold is met  -$2,500/dwelling unit (up to $500,000/project) if 30% performance threshold is met  Additional Incentives: -$2/sq ft commercial space (up to $250,000) for carbon neutral ready and 15% source energy savings compared to ECCC  -up to $25,000 reimbursement for designing carbon neutral or electrified solutions  -mentorship incentive of up to $200/dwelling unit or /1,000 sq.ft. of non-dwelling residential space (up to $10,000/project) |  |
| NYSERDA SF Building Better Homes |  |  | Total Incentive up to $250,000/2 years  -$20k/home design ​  -Up to $100,000 in technical support/2 years​  -Up to 50% of marketing costs/2 years​  -$6K/model home  -Add'l $5k/home designed for Passive House, ZER or Living Building Challenge certification​  -Add'l $2k for model homes built to Passive House (no cert)​  -Add'l $6.5k for model homes Passive House, DOE Zero Energy Ready, or Living Building Challenge |  |
| NEEA Next Step Home (no longer running) |  | Goal: 30% savings compared to state code | NA | 12 pilot homes (phase 1)  28 homes (phase 2)  79 homes (phase 3) |

Table notes:

1. HERS refers to the Home Energy Savings Rating system that is commonly used to identify efficiency levels of homes. [↑](#footnote-ref-2)
2. See <https://energizect.com/your-home/solutions-list/residential-new-construction-program>. Last retrieved July 8, 2022. [↑](#footnote-ref-3)
3. See https://energyefficientcodes.org/iecc/. [↑](#footnote-ref-4)
4. See also callout box for a definition offered by the Institute for Industrial Productivity (https://www.aceee.org/sites/default/files/publications/researchreports/ie126.pdf). [↑](#footnote-ref-5)
5. See also callout box for a definition offered by the American Council for an Energy Efficient Economy (https://www.aceee.org/2016-national-symposium-market-transformation). [↑](#footnote-ref-6)
6. Phius is a non-profit that advocates for and facilitates Passive House practices in the United States. [↑](#footnote-ref-7)
7. Keating, et al. 1998. ”Wheat, Chaff, and Conflicting Definitions of Market Transformation.” American Council for an Energy Efficient Economy (ACEEE) *Proceedings of the 1998 Summer Study on Energy Efficiency in Buildings*, Vol. 7 pp. 7.157 – 7.169 and Sebold et al. 2001. “A Framework for Planning and Assessing Publicly Funded Energy Efficiency.” Pacific Gas and Electric, San Francisco, CA. Study # SW040. As referenced in Prahl, Ralph and Ken Keating (California Public Utilities Commission). 2014. *Building a Policy Framework to Support Energy Efficiency Market Transformation in California*. [↑](#footnote-ref-8)
8. The determination mentions a targeted end-date for the transition to an all-electric program of the end of 2023, but the conditions of approval only speak of a transition that begins in July 2023 without a completion date. [↑](#footnote-ref-9)
9. It would take regulatory action in the form of energy codes that require all-electric construction to propel the most rapid possible transition by the market. [↑](#footnote-ref-10)
10. For mechanical equipment only, doesn’t include envelope costs [↑](#endnote-ref-2)
11. Savings above IECC 2018. Calculated (claimed) savings, not evaluated [↑](#endnote-ref-3)
12. Includes design, equipment, and installation. Incremental design costs were approximately $18,700. Incremental design and installation costs expected to be decreased in future projects. [↑](#endnote-ref-4)
13. Modeled savings, not evaluated [↑](#endnote-ref-5)
14. Pilot program [↑](#endnote-ref-6)
15. Has alterations/Rehab Pathways and has 3 webinars and 5 lunch and learns with trades in 2022 [↑](#endnote-ref-7)
16. New program (launched January 1, 2022) [↑](#endnote-ref-8)
17. Annualized first-year energy savings (gross) for 2022, modeled [↑](#endnote-ref-9)
18. Additional incentives available for alterations (incentives decrease for 2023-2025) [↑](#endnote-ref-10)
19. Additional incentives available for alterations (incentives decrease for 2023-2025) [↑](#endnote-ref-11)
20. In 2022 and as of May. No completes yet. [↑](#endnote-ref-12)
21. Annualized first-year energy savings (gross) for 2022, modeled [↑](#endnote-ref-13)
22. Additional incentives available for alterations [↑](#endnote-ref-14)
23. Additional incentives available for alterations [↑](#endnote-ref-15)
24. In 2022 and as of May. No completes yet. [↑](#endnote-ref-16)
25. Before incentives or tax credits, relative to NY’s code in place at time of permit [↑](#endnote-ref-17)