



Efficiency For All
77 Pierson Ln Unit E
Windsor, CT 06095

October 11, 2023

Connecticut Energy Efficiency Board
Attention: Neil Beebup
10 Franklin Square
New Britain, CT 06051

Connecticut Department of Energy and Environmental Protection
Attention: Katie Dykes, Vicki Hackett, Hank Webster
79 Elm Street
Hartford, CT 06106-5127

Eversource
Attention: Ron Araujo, Diane Del Rosso
107 Selden Street
Berlin, CT 06037

Avangrid
Attention: John Karyczak, Amy McClean
180 Marsh Hill Road
Orange, CT 06477

Dear EEB, DEEP, Eversource, and Avangrid,

The following Appendices are attached to this letter:

- I. Appendix A: *State Definitions in Appendix A - Protecting Disadvantaged Communities;*
- II. Appendix B: *Additional Resources and Opportunities for Improvement;*
- III. Appendix C: *Discussion Questions from Companies, 9/28/23 and 10/5/23; and*
- IV. Appendix D: *EFA - Key Industry Issues regarding the budget and proposed changes.*

This letter requests formal and public attention to the blatant disregard of Diversity, Equity, and Inclusion practices related to the planning or implementation of the State of Connecticut's Conservation & Load Management ("C&LM") Plan ("The Plan"). With this letter, Efficiency for All also will formally document the procedural exclusion and false representation of meaningful collaborative planning.

The Connecticut Department of Energy and Environmental Protection ("DEEP") and its C&LM stakeholders had opportunities to plan collaboratively for these upcoming program changes over a period of three years. During this time, C&LM contractors have requested the space and time to have these discussions at Contractor Technical Assistance Committee ("CTAC") meetings, and they were advised that an inclusive and equitable process would be provided for discussion and consensus prior to consequential

changes to The Plan.

During the Contractor Focus Group meeting on Sept 27, 2023, moderated by Becca Treitch, contractors requested a discussion of the proposed C&LM residential program changes. On that call, DEEP staff advised contractors; “That the conversation is for tomorrow.”

At the September 28th meeting, which was described as a “discussion,” facilitated by DEEP, the Companies presented only two (2) options. Option A, as presented, is not viable because it is Incentivizing technicians to attain “minimum” CFM reductions in order to earn prescribed incentives. This Option A ignores the evaluation study which asserted that CFM incentives were the primary cause of failing realization rates. On this basis, the only viable alternative is Option B. This has created an “illusion of choice,” “illusion of engagement,” and “illusion of collaborative planning.” Contractors have witnessed an approach to planning that contradicts concepts and goals stated in the [DEEP Final Determination Equitable Energy Efficiency - Phase One Goals and Actions](#),” released July 21, 2021. [Connecticut ratepayers paid for this report through the C&LM budget.]

DEEP has access to the list of contractors in Connecticut and also has access to the DAS list of Small Minority Business Enterprise (“SMBE”) certified contractors. The state DEEP should intentionally seek to engage these known disadvantaged groups and ensure that these small disadvantaged businesses, and the EJ communities that they serve, are not being harmed by drastic, proposed changes to The Plan. (Potential Harms to LMI)

We also note that there were two letters submitted to DEEP, whereby EFA contractors and industry experts asked for time to work together to come up with a plan to move forward. To date, we have not received a formal response to either letter.

EFA contractors formally request that DEEP read, consider, and respond to the key stakeholder letter dated August 29, 2023. This letter was submitted by key stakeholders and program service providers. Equity, inclusion, and diversity guidelines would require the State of Connecticut DEEP to acknowledge -- formally -- when the request was made and to allow sufficient time to comment, especially when proposed changes imply serious and far-reaching consequences for affected constituencies. Moreover, consequential changes must be viewed and considered through the *State of Connecticut Equity Lens*, which was established by *Executive Order 21-3 Section 17, 18, and 19*. This newly-enacted [Equity and Environmental Justice lens](#) requires the inclusion of Environmental Justice representatives to ensure that Connecticut’s C&LM Plan does not cause further harm to disadvantaged populations.

Thank you.

Respectfully,

Efficiency For All
Board and Contractors

Appendix A

Protecting Disadvantaged Communities

Small minority contractors are part of the recognized disadvantaged small business community of America. As a state entity, DEEP must take these protected designations into account. DEEP has charged the utilities with expanding workforce diversity and customer-based diversity, yet **many of the proposed changes may result in greater exclusion of low-income customers, result in exacerbated lack of access to energy resilience, and increased environmental justice impacts.**

1. **Distributive Equity (or Equitable Outcomes).** Equitable mitigation and adaptation strategies place the most vulnerable communities at the forefront. Such strategies would provide our most vulnerable communities with work opportunities and quality-of-life benefits. These proposed changes decimate the workforce leaving “stranded assets”, the people we worked hard to train, who live and work in our state, and harming the businesses which pay taxes here.
2. **Procedural Equity (or Equitable Planning).** Equitable mitigation and adaptation strategies must be planned in partnership with low-income communities and communities of color. This process did not allow for proper discussion with state entities, nor does the timeline allow for proper time to respond or even to fully digest or generate a response to the proposed changes. It does not allow time for groups to meet with affected communities such as our customers/ ratepayers.
3. **Contextual Equity Equitable mitigation and adaptation.** These strategies take into account that low-income communities and communities of color are often more vulnerable to climate change, and the development of mitigation and adaptation strategies must take into account the special mapping of these vulnerabilities.
4. **Corrective Equity Equitable mitigation and adaptation .** These strategies would provide communities with clear processes to hold the state accountable to its commitments to pursue equity.

For Equity context, please reference the *State of Connecticut Governor’s Council on Climate Change Equity Lens* training materials. These training materials are nationally recognized equity lenses, and the lenses also apply to energy equity, including C&LM planning.

Additional equity-based planning guidance can be found at:

<https://efficiencyforall.org/wordpress/wp-content/uploads/2020/07/GC3-EQUITY-Lens-CT-2.25.2020-.pdf>

Appendix A (continued)

Equity Resilience Planning Guide 2022 DEEP

<https://portal.ct.gov/-/media/DEEP/climatechange/GC3/GC3-2022-agendas-and-minutes-and-other-docs/Entering-Equity-in-Climate-Change-Resilience-Planning-A-Guide-for-Connecticut-Municipalities672022.pdf>

Examples of existing Guidance on Engaging Stakeholders

1. **“The Oversight Team must inform representatives of all [impacted] groups about the municipality’s intention to develop... [a] Prioritization Plan. The Oversight Team should make sure potential Community Planning Team [key stakeholders or impacted populations] members from these groups have at least six weeks to respond to and process this information.”**
2. “The Community Planning Team should include at least 60% representatives from the identified people of concern, with intentional representation of people of color. Depending on the size and distribution of people of concern, it may be necessary to bring in representatives from outside the community (e.g. members of organizations representing disability rights).”
3. <https://portal.ct.gov/-/media/DEEP/energy/ConserLoadMgmt/Final-E3-Phase-I-Determination.pdf>

Historical Background Information on the need for intentional planning

Since 2020, our members and key stakeholders have been writing the staff at DEEP to request inclusive meetings for strategic planning to develop improved processes and procedures which result in saving models that will support CLM goals, energy demand reduction, equity, diversity, and inclusion requirements; while avoiding knee-jerk planning reactions or program shutdowns which result in unnecessary harm to the infrastructure which has been paid for by Connecticut ratepayers.

The 2020-2023 CLM plan included a request from DEEP for the utilities to complete a program evaluation and potential redesign. This request by DEEP prompted the proposed residential program changes. Unfortunately, the proposals for changes were not formally communicated until September 28, 2023. The CLM program is in the last quarter of 2023 yet the engagement of key stakeholders and program deliverers has just begun. Beginning the engagement at this late stage certainly places contractors and key stakeholders at a disadvantage to read and formally respond or meaningfully engage within a 5 working day period. We note that standard response periods for major programmatic changes are usually 30 days. **Please see the attachment outlining the appropriate timeline for engagement and comments (PURA).*

We note the consultant report on equity encourages meaningful engagement of key stakeholders.

Energy Efficiency remains the least expensive, most effective, demand reduction tool. We note that the state of Connecticut has multiple plans and several funding sources are currently siloed. These plans must begin to work collaboratively to address overlapping state energy and environmental goals and identified EJ and DEI transformations. The newest of these state plans include entities created by executive order <https://portal.ct.gov/ConnecticutClimateAction/Executive-Order/Executive-Order-No-21-3>.

Appendix A (continued)

This executive order defines steps for increased review of Environmental Justice impacts and addressing in our planning and policies.

DEEP must consider the processes which will allow equal access and inclusion in planning through CEEJAC and The Connecticut Clean Economy Council (CCEC). CCEC has been tasked with advising on strategies and policies to strengthen Connecticut's climate mitigation, clean energy, resilience, and sustainability programs, thereby lowering emissions, and advancing the state of economic justice for its residents. The Advisory Council includes leaders across state government and industry, including the Department of Economic Community Development, the Department of Energy and Environmental Protection, the Office of Policy and Management, the Department of Transportation, the Office of Workforce Strategy and the Office of the Governor, Connecticut Green Bank, and Connecticut Innovations.

The CCEC will be used to engage relevant businesses to communicate opportunities within Connecticut's Clean economy, inform the needs and development of workforce development training programs, and advise the CCEC in approaches to deploy funding on the previously identified opportunities and needs.

It seems unjust to expect contractors and program participants to digest the entire proposal, meet and discuss with other states and programs, and respond in 7 days? The letter requests the use of procedural safeguards, such as planned meetings, intentional outreach to small protected classes, and offering support to those protected classes, as well as ensuring fair opportunities for those groups to have meaningful voices. Examples may include a voting seat, opportunities to present findings formally to voting parties, and opportunities for key expert stakeholder and small businesses to dialogue with the state planners.

Appendix B

Opportunities for Improvement

We acknowledge that there are opportunities to improve the program as it relates to energy savings, air sealing opportunities, thermal boundary upgrades, and appropriate equipment replacement where necessary by following the nationally accepted building science methods and criteria.

1. Assess Safety of building and document building related safety needs
2. Perform Diagnostic Baseline testing to assess energy usage and propose ways to save
3. Develop a Plan of Action to draw down energy waste in a way that intentionally increases: the building's health, and the occupant's health, improves environmental health by lowering energy waste/ pollution onsite and at the power plant, and results in the participants' increased comfort, increased energy savings, and lowered energy costs.
4. Whereas, Blind air sealing without the use of diagnostic testing, or expert guidance is like blindfolding your surgeon and asking him to operate on you. Or worse asking the surgeon to operate with her eyes closed or asking your mechanic to operate on you because it will save you money at that moment.
5. Building science training, BPI guidelines, and professional status for our staff, as well as business models focused on customer experience and energy savings with requirements on ROI, has resulted in a program that continues to improve and evolve. Yes it is time to evolve, and create something that meets the needs of the ratepayers of Connecticut, while ensuring energy resilience, and reliability, and which demonstrates responsibility to equity, diversity, inclusion, and environmental justice guidance.

Electrification increases demand for electricity. This statement is true!

Unless efficiency measures are implemented prior to electrification then, converting heating systems from oil, or gas, to electric results in higher demand for power plant generated energy. Thus, increasing energy demand for electricity to heat or cool via heat pumps, will actually increase our cost per KWH.

If the state of CT desires to meet our state demand reduction goals, then we must intentionally invest in expanding access to improved home efficiency. *We are not at 80% of housing, *LMI are much lower rates of access to EE and renewable energy access.

Other states, such as NY, a minimum requirement that a home's envelope must meet has been implemented in order to incentivise a heat pump to be installed. If not addressing the home's envelope prior to installing heat pumps we are performing more harm than good to a customer's home. If a customer upgrades his envelope post heat pump installation this will impact the home's heat load capacity and the heat pump which was properly sized will now need to be replaced for smaller units which creates a large financial impact to our customers. An oversized heat pump will result in comfort issues, humidity problems and potential mold issues.

Example of NY minimum requirements for a heat pump install.

Area Required	Insulation Level
1-4 Family Homes	
Attic Gable Walls	R-14
Knee Walls	R-15
Attic Roof Deck	R-28 or Fill to Capacity
Attic Floors/Open Attic	R-38 Average ¹ or Fill to Capacity
Attic Slope Ceilings	R-38 or Fill to Capacity
Attic Hatches	R-20
Pull-Down Stairs	R-13
Walls	R-14 or Fill to Capacity
Rim Joist	R-14
Air Tightness	7 ACH ²
Mobile Homes	
Walls	R-6
Attic	R-24
Belly	R-21
Air Tightness	12 ACH ³

Workforce and EE program Infrastructure - Decimating the workforce creates “Stranded Assets”. These most important assets include the human investments in time training for certificates, under the false promise of a growing CT-based EE industry. Pulling the rug out from under CT’s working families results in layoffs, and further Impacts the entire industry and the ratepayers who paid for these programs and services. We will lose our trained staff to neighboring states who have been steadily growing the EE and clean energy budgets and programs to meet new federal EJ and Climate goals.

The building science principles are the crux of providing the most energy efficient measures at the best possible cost. Building science places limited resources in a position to address the highest energy savings as priorities, and seeks to evaluate each individual home or building to ensure the most efficient plan of action.

Appendix B (continued)

As experts, we can provide thousands of examples of homes built after 1990 that were not insulated, air-sealed and did not meet energy code. These local example audits have not only been witnessed by teams doing the work but by third-party auditors with photo proof of work installed.

Each home is unique and our work is not “cookie cutter” work. While we agree there is an opportunity to improve the work and improve energy-saving outcomes, we ask kindly that the opportunity be fair and planned in collaboration with key stakeholders. We ask that the process not leave disadvantaged businesses or our communities to suffer the unnecessary impacts of a knee-jerk reaction to a problem that began in October of 2017 with a C&LM fund raid.

In closing : This 5-day and even a 10 day response period, without the offer of meaningful dialogue, and without access to planners and leaders, is an egregious example of procedural exclusion. This exclusion comes layered on top of the continued refusal to have open dialogue about major impactful changes to ratepayer access to energy resilience, climate safety, and a demonstrated lack of concern for small minority contractors. Furthermore, on Sept 28th it seemed as if the utilities were proposing that contractors over spent the budget. This is false, our state directives for measures and spending were directed by DEEP during Covid and are still directed by DEEP and the EEB guidance. The lack of focus on creating a viable plan during the three years allowed for planning, should not result in an attack on program providers who work within the allowed Energize CT offerings.

This is a 20 million dollar problem in 2023 and a 20 million dollar problem in 2024, but the investments are incalculable when we are honest, and seek to help the people and businesses of Connecticut. Furthermore DEEP has the opportunity to demonstrate leadership by advocating with the Governor on the need to return a small portion of the raided funds, and cover the budget gap while they plan the implementation of the federal IRA funding.

We should be asking for all of the funds back. These were funds stolen from the CT ratepayers in 2017. The current administration doesn't seem to care about that since the budget was already balanced when Lamont came into office. **Energy efficiency doesn't move forward without proper funding.** If the residents of CT knew that their funds were ***stolen and they cannot take advantage of the EE incentives because of funding issues...***

Appendix C

The following Discussion questions were posed by the Companies on 9/28/2023:

Vendor Discussion Questions

1). Please provide your feedback and reactions on the average air sealing hours per project, shown in Table 1 above.

Response: Equity would allow more than a 5 day comment period and a week later round table. See Pura's process here which takes 6 months.

a) Is this hourly data reflective of your field experience on the number of air sealing hours needed in CT homes? Why or why not?

Response: Equity would allow more than a 5 day comment period and a week later round table. See Pura's process here which takes 6 months.

b) Please provide your feedback on using the proposed approach that uses a large dataset to predict air sealing hours based on home type and square footage.

Response: Equity would allow more than a 5 to 10 day comment period and a week later round table. See Pura's process here which takes 6 months.

c) What fraction of your technicians' time is spent air sealing in attics to basements vs other areas of the envelope?

Response: Equal- this depends on the home, apartment, condo, and past upgrades, as well as LMI factors, such as LMI housing often lacks insulation due to knob and tube, or other factors see data here:

Problem: Up to 30% of homes in Connecticut (CT) have one or more safety concerns such as asbestos, mold, knob-and-tube electrical wiring, and pests, which are barriers to full weatherization and lowered energy bills. Energy Assessments provided by Energize CT and WAP locate and identify hazardous conditions in LMI housing (based on Energize CT data on homes barriered from Wx in CT, 2017- 2019.) Join our work to increase access by removing barriers to EE in CT and beyond [.https://efficiencyforall.org/wordpress/2021/03/01/addressing-health-and-affordability-challenges-for-low-income-families/](https://efficiencyforall.org/wordpress/2021/03/01/addressing-health-and-affordability-challenges-for-low-income-families/)

d) How much additional time is needed in the home to conduct the other parts of the assessment and to install other direct measures?

- a. Barriers - health and safety [30 min]
- b. CAZ test-in/test-out [30 min]
- c. DHW saving measures, [30 min]
- d. Insulation needs assessment and measurements, [90 min]
- e. Duct Testing & Sealing [90 min]

, and

- f. Customer Education [30 min]

g. Project documentation, recommendations [90 min]

H. Air sealing (4 hrs/ 10 mhrs)

e) Do you have additional data or experience to share from programs in other states that you believe is relevant? **Yes please see attached. There are many models that work to serve in an equity-based way. NY and MA are attached. All models should seek to properly compensate contractors for the work they do: Intakes, data entry, safety, CAZ, air sealing, return visits, Health and safety forms, education, direct installed measures, and outreach.**

An Example from a Massachusetts Model:

70 cfm Wall-Mounted Exhaust Fan w/smart switch	0	\$1,088.00
80-110 cfm Bath Fan (new install) with timer	0	\$1,088.00
Attic/basement blower door guided sealing with one-part foam	0	\$105.00
Attic/basement blower door guided sealing with two-part foam	0	\$125.00
Blower Door Testing with Zonal Pressure - Pre & Post	0	\$71.00
Boiler	0	\$0.00
CAZ Testing	0	\$85.00
Central AC Register and Vent covers over 12" x 12" (AC only-not heat)	0	\$81.00
Central AC Register and Vent covers up to 12" x 12"(AC only-not heat)	0	\$65.00
Central Heat Pump Full Displace-Gas	0	\$0.00
Central Heat Pump Full Displace-Oil	0	\$0.00
Central Heat Pump Full Displace-Propane	0	\$0.00
Central Heat Pump Partial Displace-Gas	0	\$0.00
Central Heat Pump Partial Displace-Oil	0	\$0.00
Central Heat Pump Partial Displace-Other	0	\$0.00
Clothes dryer vent including Exhaust Duct	1	\$152.00
CO Alarm (10 year lithium)	0	\$70.00
Combo smoke/CO Detector	0	\$70.00
Continuous variable speed fan w/ controls (whole house new installation living space)	0	\$1,109.00
Continuous variable speed fan w/ controls (whole house replace existing)	0	\$1,090.00
Cut/close - exterior shingle access	0	\$180.00
Cut/close attic - kneewall access	0	\$138.00

Example of NY Model with DI measures installed during initial visit and air seal performed on return visit. (from EmpCalc V8.4 in Albany region)

Section B. Project Information and Proposed Measures			
Proposed Energy Efficiency Measures	Prequalified	Quantity	Measure Cost
Audit, Energy Education, Blower Door Fees	NA	1	\$ 394.30
--- DI Measures ---			
DI - DHW Pipe Wrap Insulation	Yes	9	\$ 20.88
DI - Door Sweep	Yes	3	\$ 92.16
DI - Weatherstrip	Yes	3	\$ 153.00
DI - DHW Pressure Relief Valve Discharge Pipe	Yes	1	\$ 25.00
DI - Detector Combo CO/Smoke	Yes	1	\$ 105.08
DI - Furnace Filter	Yes	1	\$ 35.90
DI - Furnace Filter Slot Cover	Yes	1	\$ 29.34
DI - Programmable/Smart Thermostat	Yes	2	\$ 458.32
DI - Candelabras	Yes	15	\$ 165.00
DI - LEDs	Yes	16	\$ 176.00
DI - Low Flow Showerhead	Yes	2	\$ 82.96
DI - Advanced Power Strips	Yes	2	\$ 63.68
--- Energy Efficiency Upgrade Measures ---			
Building Envelope - Air Sealing	Yes	1	\$ 1,304.70
Project Level Totals & Cost Effectiveness			\$ 3,106.32

The following Discussion questions were posed by the utilities: on 10/5/23

For all Contractors: 1. Please review the draft text of the 2024 Plan Update and indicate how you expect the proposed changes to impact your business and workforce.

Consider reviewing page 15, which outlines priorities, and relevant parts of Section 2, Portfolio Changes.

2. Please provide information on how you scale your workforce in response to funding expectations.

Do you coordinate or consult with the Utilities before growing your businesses?

What improvements in communication would better allow your company to scale according to projections regarding future available funding?

For ADS contractors: 1. Please provide a detailed explanation demonstrating the impacts that the proposed shift in the ADS program will have on your company; particularly, its impact on your workforce, revenues, and ability to serve customers.

If your answer would, in your opinion, require you to share confidential information, please review the instructions below for submitting such information

2. Please provide information describing when, why, and how your company began providing ADS services to Connecticut customers.

to ensure that coordination?

6. What types of data, reporting and metrics currently (or should) exist to support the efficacy and popularity of advanced duct sealing outcomes?

7. What are the best ways to address the dramatic increase in program demand, and what are the best ways to plan for and address the continuously increasing popularity of the Energize CT programs?

8. For the utilities: What are the current thresholds for program demand, by measure, and related steps taken to increase or decrease demand (e.g. changes to co-pays, incentives, marketing, program design, budgets)? What are the related timelines for these steps? At what point in these timelines are (or should) stakeholders notified of issues? Please include AeroSeal and other high demand services, products and measures such as heat pumps.

What level of investment was required to begin providing this service, and what was your understanding of the ADS business model at the time this investment was made? At your discretion, please provide any supporting business information. For ADS Contractors, the Utilities, and the program technical consultants:

3. The proposed modification to the ADS program is based on a June 2023 report: "Connecticut HES/ HES-IE Single Family Impact and Process Evaluation (R1983)." portal.ct.gov/DE Please provide any thoughts or reactions to this study based on your experience working in the field. 4. What programmatic measures could be taken to limit negative impacts on ADS Contractors' businesses and employees and prevent them from having to lay off employees or absorb stranded costs?

5. How should the Utilities be coordinating with contractors to better ensure impacts from programmatic changes are implemented with consideration for workforce impacts? What processes need to be in place

9. Currently, the Utilities earn their performance incentives largely based on program savings. DEEP has instituted some changes to connect performance incentives to provision of data to evaluation consultants and key stakeholders. What additional changes should be considered to performance incentives to ensure effective program management?

10. How effective has the Connected Solutions program been? How many customers will be affected by the planned transition to the Energy Storage Solutions program, and how will the transition affect them? What has your experience been with the programs, and what is your opinion regarding the program sunset date? What are customer expectations regarding incentives at the time of their enrollment, and how will expected incentives be impacted by the program transition?

What is the incentive level those affected customers are receiving?

Would any of those customers be eligible to participate in the Energy Storage Solutions program at the expiration of ConnectSolutions, and if so, how many would be eligible and how many would not be eligible? Declaration of Confidential

Information Those submitting written comments are advised that all materials associated with this Request for Written Comment are subject to the terms of the Freedom of Information Act (FOIA), the Privacy Act, and all applicable rules, regulations, and interpretations. If a commenter deems that certain information required by this Request for Written Document is confidential, the commenter must label such information as CONFIDENTIAL prior to submission. The commenter must reference where the information labeled CONFIDENTIAL is located in the submission. For each piece of portal.ct.gov/DE information so referenced as confidential, the commenter must provide an explanation and rationale sufficient to justify an exemption of the information from release under the FOIA. For example, proprietary business or financial information are generally exempt from FOIA. The explanation and rationale must be stated in terms of (a) the prospective harm to the competitive position of the commenter that would result if the identified information were to be released and (b) the reasons why the information is legally exempt from release pursuant to C.G.S. § 1-210(b).

Appendix D

Key issues to bring forward - CLM Budget and Air Sealing changes

1. There is a set budget for C&LM programs. These funds must remain stable and avoid raids or misappropriation of funding to other areas of state work. The state of CT must seek to ensure that the funds are utilized properly to reduce energy burdens, and that funds are utilized in an equity based manner to reduce energy waste in ways that support ratepayers energy resilience. The state must ensure those who pay into the C&LM funds maintain access to the rapidly changing technology and services supported by national programs and new national EJ energy and clean energy funding sources such as IRA and increased levels of WAP funding, as well as braided funding sources such as RGGI, Green Bank funds, Inclusive Prosperity Capital funds, and other related state energy programming and planning. The state of CT must seek to end the silo approaches to energy and climate plans, and ensure fair access to information and planning opportunities for historically marginalized communities defined here:

<https://portal.ct.gov/DEEP/Environmental-Justice/05-Learn-More-About-Environmental-Justice-Communities>

2. **State of CT legal Definition of protected classes in CT**

Minority Business Enterprise (MBE): In order for a business to be certified as a Minority Owned Business in Connecticut, it must have at least 50% ownership by one or more minority person(s) who exercise operational authority over daily affairs of the business, have the power to direct management and policies, and receive the beneficial interests of the business. A minority is a person(s) who is American Indian, Asian, Black, Hispanic, has origins in the Iberian Peninsula, a woman, or an individual with a disability. The state is required to take action to formally interview these groups and ensure protections of these groups during state initiated program changes which are being proposed by the large public utilities.

3. **HES technicians have acquired training and certifications at the cost of small businesses. These local human assets and small business based assets are being stranded by the unplanned response to a budget problem that was raised in Jan 2023 and which was created by the 2017 raid and high-ticket measures (which offered little energy savings) such as heat pumps and double pane to triple pane window upgrades.**

- The cost of trained lead techs has risen due to high certification requirements stated by the state of CT. These trained CT workforce members will be lost to our neighboring states. Neighboring states are increasing their EE budgets and EXPANDING ACCESS to Energy Efficiency to support both state and federal EJ and climate resilience mandates, and other energy and environmental sustainability climate resilience goals.

4. **Every home's structure is unique and changes over time. Technology is changing rapidly. Funding is changing rapidly and policy guidance and technical guidance is also coming down from federal bodies. Fortunately Building science follows national standards, and directly addresses a building or home from the frost line to the ridgeline. Building science allows for planned upgrades which align with ROI guidelines, save energy, save money, and lower pollution both at the source and at the power plant, resulting in decreased peak demand.**

5. **Proposed air sealing reforms are needed and can be developed by December.**

6. **Appendix G analysis**

- Excluded data has value and has skewed the focus on the planning, wasting valuable time, and shortening the planning timeline for stakeholder engagement, meaningful discussion or professional data gathering from stakeholders.

7. **Can the state please further explain the methodology that yielded realization rates for insulation installed in HES-IE homes heated with oil (101%) and propane (102%)**

8. **DEEP and the state of CT C&LM program should review the impact of Heat pumps and heating systems being applied to vendor purchase orders. This change was implemented in 2020, and has increased the residential budget spend tremendously. This impact has not been fully taken into account and has deep implications on energy plans.**

Industry notes: Heat pumps are a great asset, but DO NOT result in energy saving unless they replace electric heating, and are installed with proper thermal boundary resilience as the bedrock of energy efficiency.

9. **What is the actual reserve the utilities are planning to use.** Slide was \$5 million – at one EEB meeting it was stated that they approved up to 10% of the 2024 budget. 13.5 million which is 10% . We seek clarification.

10. **Tier-2 HES-IE upgrade administration unnecessary costs during a budget crisis.**

Admin outsourcing response: With C&LM budgets already strained, it would seem to be an irresponsible choice to outsource this work to another company to manage the process of the upgrades. We should work hard to ensure the budget supports ratepayer's needs for energy efficiency, energy resilience, energy savings through real demand reduction retrofitting, and increased storm preparedness. Currently in the residential IE program the contractors are already doing the work of coordination of mandatory comprehensive ROI based energy saving retrofit upgrades. These upgrades include Heat pumps which increased the budget line for IE, along with triple pane windows which were a 10th of a percent higher in efficiency but significantly more expensive to the budget. They also include domestic hot water upgrades, insulation and deep air sealing, thermostats, and double pane windows, as well as safety testing of HVAC systems, clean and tunes, and other EEB approved measures.

When the program is proposing to lay off half of the workforce; it would seem counterintuitive to hire a separate company to do the program administration as part of the current requirements of the contract.

The C&LM IE and MR programs boast thousands of customer success stories with proof of comprehensive upgrades, inclusive of renters energy success stories, LMI homeowners letters of

life changing upgrades and services, and even health barrier removal successes in the C&LM program. We would love to present a few local case studies which are representative of CT based C&LM IE and MR customer outcomes. If given the opportunity to present as professionals we will gladly provide the information.

In closing as a collective group of dedicated building science professionals, experts, engineers, advocates, and ratepayers, we continue to come forward as stakeholders and collaborators in these award winning life saving energy efficiency programs. We remind the EEB and DEEP of our years of dedicated community service related to the work of raising the bar in the energy efficiency and clean energy industry. EFA's focus has remained steadfast in supporting equity, diversity, inclusion, and increased access to stable and expanded energy efficiency and clean energy environmental wins for the people of the state of Connecticut. We offer our combined hundreds of years of real world experience as builders, planners, marketers, educators, building scientists, policy experts, EJ leaders, and CT energy users to the state of Connecticut, and hope that the promise of Executive orders meant to increase fairness and equity in our state and federal energy and climate action plans are implemented.

Learn more at www.encyforall.org

LANGUAGE

The notion that the “budget shortage” is the cause for these proposed changes, makes little sense. The budget shortage was reported as early as January of 2023. The budget shortages were formally raised monthly at the EEB meetings. Contractors also submitted suggestions on how to resolve and close budget gaps. The contractor proposed solutions included but were not limited to simple changes such as:

- focusing the program on proven energy-saving building science-based approaches that show direct energy savings like air sealing and insulation;
- reducing high incentives for measures that have limited energy savings, such as triple pane windows in houses where double pane windows are in place, electric heat pump systems, “big box store subsidies”, and HVAC upstream rebates.

We continue to emphasize that residential energy demand reduction programs follow National standards set by the Building Performance Institute (“BPI”) and the U.S. Department of Energy (“DOE”). These technical guidance documents help ensure an ROI based approach that truly saves energy.