

**2012 CONSERVATION AND LOAD MANAGEMENT PLAN
PUBLIC INPUT AND COMMENTS**

Introductory Comments of the Energy Efficiency Board:

The Energy Efficiency Board (EEB) appreciates all of the input and comments submitted by the public, as these comments have been valuable in developing the 2012 Plan and in increasing the effectiveness of the programs.

Although the following responses to public comments are being submitted by the Energy Efficiency Board as part of the 2012 Plan filing, the Board wishes to emphasize that it has reviewed all comments submitted to it throughout the past year at its monthly meetings, at its Committee meetings, and through separate submittals. All of these comments have been considered as part of the Board's deliberations on the 2012 Plan, and comments considered by the Board are not limited to the comments documented in this attachment.

**Date Received: May 11, 2011
Name: Bruce Angeloszek**

**Contact Method: Public input session
Representing: CT Electrical Services - CT Solar Services**

Request / Comments:

Experience as a vendor in the HES program includes being steered to work with another electrical contractor in the small business program "for a fee of \$250.00" just to receive rebates, and being verbally scolded for selling project for more than what the utility deems right. Funds generated from rate payers should go toward educating the consumer to purchase upgrades from a free market, not with a company picked by a third party from the government. Many consumers don't know how the CEEF is funded, and it is possible people in the industry are also unaware. A for-profit utility company that generates profit for stockholders by delivering electricity should not administer a program to save electricity.

Companies' Position(s): The Companies provide numerous opportunities for vendors to participate in the programs without going through a selection process. These include Energy Opportunities, the Express Lighting Rebate form as well as a Tier II for Home Energy Solutions.

EEB Position:

The Board is committed to the effective and efficient administration of the CEEF programs and encourages vendors and customers to bring their concerns and issues directly to the Board for its review.

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Date Received: May 11, 2011
Name: Gary Baggett

Contact Method: Public input session
Representing: Green Building Designs

Request / Comments:

The energy efficiency industry is growing rapidly, but it is inundated with people whose background is not construction or building science. In addition, Connecticut's standards for programs are lower than many in other parts of the country. For example, one program in New York requires participating companies to have three separate BPI certifications as well as BPI "Accredited Contractor" status. In Michigan, technicians are required to be certified in any corresponding certification in their area of work. In Connecticut, employees in the field have no certifications because the requirement is for at least one employee to have at least two certifications. This means we are failing the industry as well as consumers, compromising the quality of the work and potentially endangering homeowners.

The HES program has great promise, and could be one of the best in the country with a few alterations. First, it should be made sustainable; rather than relying on utility surcharges and other funding, homeowners should pay for work using their savings from lower energy usage (see Babylon, NY's program at <http://bit.ly/smZ7b>).

Quality must be assured. Many are working under the current HES program without certification. Higher quality work will result from a requirement that all contractors must become accredited with BPI. Connecticut needs a third party quality assurance program that is not associated with providers. Utility companies should not perform quality assurance for their own programs.

Standards for participating contractors should be higher, requiring proper certification for specific retrofit measures. Audits should be performed by technicians with a minimum of building analyst and envelope certification (and perhaps a third, heating). A higher standard would help to make sure technicians understand the testing procedure and results. Such standards are working well in other parts of the country.

A mentoring service within the HES program would be beneficial, since putting certification knowledge to practice sometimes presents unexpected challenges. A mentor to help walk companies through their first three audits would help get them off to the correct start within BPI guidelines. Implementation of energy efficiency programs has been so rapid that some vital steps are being overlooked or done incorrectly, a problem nationally as well as in Connecticut. A mentoring board or committee dedicated to BPI standards (not program or utility standards) could curtail the problem.

Lastly, the selection process for vendors should be less limited, and instead opened to qualified contractors. This would create thousands of jobs in the state and help to make it a leader in correcting energy efficiency issues in our building stock. We should follow the same guidelines as the EPA and DOE, and use BPI's requirements for our programs.

Companies' Position(s): Mr Baggett may not understand the details of the operation of the Home Energy Solutions (HES) program. The responsible party for each HES project is required to have a BPI certified building analyst. A requirement was recently added to also have a BPI envelope specialist certification. New vendors are provided assistance and mentoring in their initial projects. The Companies are working toward ensuring that all HES vendors are BPI certified.

The HES program is also a Home Performance with Energy Star program, just not named as such, but following EPA guidelines. The HES Tier II aspect provides an opportunity for vendors to have incentives available for deep retrofit projects that homeowners pay for. The challenge nationally with this approach is generating the desired volume of projects. As a result, many programs are migrating to the Connecticut model for home energy retrofits.

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EEB Position:

The HES program has made considerable strides in raising the bar for contractor performance and certification as is noted in the Companies' response. Further, the Companies continue to pursue a possible state licensing requirement for contractors delivering HES-type services. This will accelerate the movement of the program into the market and shift some responsibility for quality assurance away from the Companies to the state. However, to the extent that ratepayer funds continue to be expended to support in-home services, the Companies will need to continue to implement some continued quality assurance/quality control (QA/QC) of participating vendor work. Mr. Baggett does raise a question as to whether this QA/QC function should be administered by the Companies. In MA a third-party is responsible for these functions, though this contractor does report to the Efficiency Program Administrators in that state. The Board may explore the possibility of a similar QA/QC model in Connecticut.

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Date Received: May 11, 2011
Name: Andy Bauer

Contact Method: Public input session
Representing:

Request / Comments:

Establish a CEEF-funded Community EE organizer. N2N is only in 14 CT towns, and the towns that don't have access to the program could use the help.

A change in interest rates for financing upgrades should have 120 days' notice, as well as an alert to volunteer town energy task forces. Short notice is hurting credibility as word spreads about financing. Also, the uncertainty about the \$75 copay for oil customers vs. natural gas or electric is confusing and frustrating. This should be laid to rest if possible.

We should track vendors' progress on post-HES measures to identify savings.

CL&P radio spots promoting HES should mention the ctsavesenergy.com website and 1 800 WISE USE. Also, CL&P giving towns electrical data in EPA Energy Challenge benchmarking format would be a great help, since towns that are stretched can use the assistance.

CEEF rebates have been a huge help in the past year: I've had an HES, insulated my attic to R-60, insulated my walls to R-19, air sealed my house to a 1 to 1 ratio, and installed EPA Energy Star windows.

Companies' Position(s): The Companies are glad that Mr. Bauer has found HES rebates helpful. The Companies are working on an expanded eeCommunities program in conjunction with the Clean Energy Fund. This should allow for additional assistance for the towns.

Funding impacts cause the Companies to adjust interest rates, change rebates and otherwise limit incentives. Adequate, stable funding is an important policy objective for Connecticut. The most important policy issue to be resolved is the oil heating funding issue, and the Companies look forward to our policy makers resolving this issue. The Companies do track post HES installations to determine the effectiveness of the program.

EEB Position:

The Board understands some of the frustrations that Mr. Bauer notes. The Board has requested and encouraged the Companies to communicate any changes to the HES Program clearly and quickly to vendors and to other stakeholders. The Board has also requested that the Companies provide notice to the Board prior to making announcements of program changes. The Board has also worked with the Companies to improve the HES Program's tracking and reporting capabilities so that both measure recommendations and measure installations can be reported.

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Date Received: May 11, 2011
Name: Harry Cullinane

Contact Method: Public input session
Representing: Clover Corporation

Request / Comments:

The state should continue to expand gas air conditioning and heating programs. They require very little electricity and gas engine chillers actually reduce electric demand by over 90% compared to electric chillers, and they use 35% less energy. Programs should be developed to encourage gas air conditioning.

Such programs should include marketing through contractor training and advertising campaigns. They should also include seminars, presentations and service training to educate and encourage use. Agencies that are knowledgeable and informed can provide the marketing and training, while gas utilities could support the effort through their own marketing and sales services.

Companies' Position(s): The current incentive provided to gas engine chillers was established at a time when Forward Capacity Market (FCM) prices were at a higher level, and the avoided electric capacity a gas engine chiller provided was at a higher value. The current status of the FCM is such that incentives for capacity reducing measures have been lowered, and the gas engine chiller incentive should be lowered as well.

At its Quarterly C&I Contractor Meetings, the EDCs have been promoting the Energy Efficiency Partners Program via Public Act 07-242 (An Act Concerning Electricity and Energy Efficiency) and its incentives for

- Ice Storage (\$950/Ton)
- Gas Chillers (\$300/Ton)
- Direct Digital Control/Bldg Automation (\$165/kW)
- Solar Assisted Air Conditioning (\$318/Ton)
- HVAC Duty Cycle Controls (\$46/Ton)

Incentives are also offered through CEEF programs for high efficiency gas fired heat pumps which address both heating and air conditioning needs.

Gas utilities actively promote gas cooling, and that is the most effective type of promotion for what is a very customized product. In addition, the Companies have training session that address gas technologies.

EEB Position:

The Energy Efficiency Board continues to appreciate Mr. Cullinane's efforts to educate the Board and its Consultants about the attributes of gas heating and cooling technologies in providing energy service solutions to residences, businesses and institutions and reducing demand and energy use to Connecticut's energy systems. The Board agrees that additional efforts should be made to educate customers about the full array of options available to them to meet their energy needs. In partial support of that effort, the Board's C&I Committee has worked with the Companies and PURA to provide better web-based information and fuel type assessment tools for all customers. The Board believes that such info services and tools will significantly enhance customer knowledge and choices. In addition, aside from the gas equipment incentives noted by the Companies' response, the Board's C&I Committee continues to evaluate and develop strategies for promoting total energy solutions for customers and encourage comprehensive energy savings projects that included gas measures.

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Date Received: May 11, 2011
Name: Gene DeJoannis

Contact Method: Public input session
Representing: Citizens for a Greener Manchester

Request / Comments:

Homeowners need a competent technical analysis of energy efficiency options, best accomplished by a third party. A standardized spreadsheet accounting tool should be developed to apply to all certified energy efficiency contractors, quantifying the costs and savings for each potential measure under present and future energy rates. This would give the homeowner a clear picture of options and the order in which they should be installed to get the best return on an investment. It might limit the number of options, but it gives all parties confidence about available options.

Contractors should be approved by the EEB in order to lend confidence to all parties about their financial commitment. Contractors will then also know what must be done to maintain certification.

If a spreadsheet accounting tool were implemented, banks may be willing to lend to homeowners with confidence that projects will recover their costs through utility bill reductions. Even better, though, is a plan to attach repayments to their associated monthly bills. Financing through the energy suppliers is one option. The PACE concept might be effective in order to market retrofitting to homeowners.

Lastly, the realty industry should be a partner in proper valuation of homes that have undergone energy retrofitting.

Companies' Position(s): The Companies have a spreadsheet tool that was developed as a compliance with a Department order that provides the information described.. This spreadsheet is currently undergoing updating and refinement.

EEB Position:

As noted by the Companies, there is a spreadsheet tool used by HES vendors to develop home-specific savings estimates. Further, HES vendor staff are required to attain certain Building Performance Institute (BPI) certifications in order to participate in the Program. Finally, the ability to engage the real estate industry effectively in the manner suggested by Mr. DeJoannis may be predicated on industry accepted building labeling tools. Such tools are under development, field testing, and initial market roll-out by a number of parties including US Department of Energy. The Board and its consultants are monitoring these developments and their implementation.

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Date Received: May 11, 2011
Name: John Greeno

Contact Method: Public input session
Representing: New England Conservation Services

Request / Comments:

Adopt the Societal Resource Recovery Test to assess the impact of energy conservation cost benefits for the 2012 Plan, along with a consistent, broad message to the public about the benefits of energy conservation. All energy providers in the state should participate in efficiency efforts, not just those who can be easily regulated.

The Mass Save program in Massachusetts is a model for residential energy conservation services. It allows independent contractors to compete for residential customers while maintaining a core group of contractors and third-party assistance. It avoids conflicts of interest that arise under CT programs when a service provider gives an analysis and then additional services.

Companies' Position(s): The Companies currently have both the core HES services aspect as well as the Tier II aspect of the program. The Companies are working to find a blend of the higher volume of activity experienced under HES with the customer choice afforded under Tier II.

The Companies, in collaboration with the EEB consultants, regularly examine other program models in order to include the best aspects of those programs in the Connecticut programs. The Companies will take note of the Massachusetts program.

EEB Position:

The Board used both the Electric System Test and the Total Resource Cost test in its analysis of cost-effectiveness during the development of the 2012 Plan. The Total Resource Cost test takes into account savings and benefits from other fuels and resources, including fuel oil and water savings. Any movement towards full or partial use of a Societal Test would need to be considered by DEEP and PURA.

The Board notes that there are multiple models by which to administer and implement a residential retrofit program. The Massachusetts MassSave HES has undergone significant changes in the past year and it is probably premature to assess the ultimate success of that effort and determine whether the model or components of it should be replicated in Connecticut. The Board and its consultants will continue to observe the Massachusetts program and other programs to determine whether some program aspects should be replicated in Connecticut.

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Date Received: May 11, 2011
Name: Hank Gruner

Contact Method: Public input session
Representing: Connecticut Science Center

Request / Comments:

Since opening in 2009, more than 550,000 visitors have come to the CT Science Center, including nearly 100,000 students. More than 70,000 have participate in energy-related programming. An Energy City exhibit is contributing to a significant increase of the public's understanding of energy efficiency and renewable resources.

Over the next two years, upgrades to the Climate Change Theater and Energy City exhibits will insure the inclusion of technological advancements and scientific knowledge.

Funding requests include \$385,000 to upgrade the Climate Change Theater (video content and exhibit props), \$15,000 to upgrade the "In Your Community" exhibit in Energy City (CPTV videos on student energy-related projects, including a new touch monitor, programming, and a display component), and \$15,000 toward the establishment of an "Energy Review" panel including scientists from the National Renewable Energy Laboratory, among others, to complete a technical review of the Energy City exhibits, and recommend upgrades to others.

Companies' Position(s): The Companies provided support to the Center during design and construction, and look forward to continuing the relationship and monetary funding.

EEB Position:

The Board has long supported the educational effort of the Connecticut Science Center and appreciates the important role it has played to raise customer awareness and encourage sustainable energy use. The Board continues to support the Center's proposals for upgrades to the Center.

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Date Received: May 11, 2011
Name: Lee Hebert

Contact Method: Public input session
Representing: Mr. Electricity Energy Storage Systems

Request / Comments:

My invention stores low-cost, off-peak energy that is already on the grid but currently goes to waste. It has the potential to lower the cost of electricity for individual ratepayers, leading to a surplus of peak time energy on the grid, which will then lower rates for government and industry.

Companies' Position(s): The Companies support cost effective solutions to reducing peak demand. The Companies have thoroughly examined Mr. Hebert's system and have not found it to be cost effective.

EEB Position:

As noted by the Companies, the proposed energy storage system has been reviewed in the past. However, the Board would be open to reviewing any updated information on Mr. Electricity's storage product, especially with respect to case studies and updated cost performance data.

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Date Received: May 11, 2011
Name: Natalie Hildt

Contact Method: Public input session
Representing: Northeast Energy Efficiency Partnerships

Request / Comments:

The CEEF is to be commended for its success in delivering cost-effective programs that reach all sectors of the state. Program administrators continued to deliver innovative solutions despite last year's distressing raid on more than a third of related funds to plug state budget gaps. NEEP believes CT is on the right track with statewide coordination of programs, integration of gas, electric, and fuel-oil efficiency, support for complementary programs like appliance standards and building energy codes, and introduction of new financing programs to help customers over the initial hurdle of investing in efficiency.

We hope that [DEEP] will adhere to Public Act 07-242 directing utilities to procure all cost-effective energy efficiency before turning to costly and polluting sources. Program stops and starts are harmful to commercial and residential customers, and cause contractors and vendors to focus efforts on territories where programs are still open for business, potentially flooding certain areas serviced by a certain utility. A far better solution intended by Public Act 07-242 is the elimination of an artificial cap. Customer demand for efficiency programs means utilities should be allowed to service them. The regulatory process will ensure an adjustment of ledgers and a balance of interests.

We urge [DEEP] to look at neighboring states on the issue of bill impacts; overall energy costs will likely decline with increased investments in efficiency as well as permanent reductions in the state and regional load curve. Rate impacts would be nominal compared to savings through the capture of all cost-effective energy efficiency. Demand reduction has the potential to drive costs down for all customers. NEEP is prepared to share information about the Rate Impact Working Group in MA and other state data.

Step it up on codes and standards: Insufficient guidance has been issued regarding the advancement of more progressive energy efficiency codes and standards. The state should provide examples of ways electric and gas distribution companies should be more involved beyond offering training and development. NEEP organized and hosted a regional workshop on the topic last fall, and is prepared to assist further in reaching consensus on which activities can be undertaken, and how to claim related resulting savings. NEEP is also working on a comprehensive list of activities to support appliance efficiency standards, which can work hand-in-hand with ratepayer-funded programs. The state should take a more active role in determining how best to use the companies' expertise, relationships with building professionals, and customer support to deliver efficiency gains.

Continue regional collaboration: We encourage continued CT funding and participation in the Regional Evaluation Measurement and Verification Forum.

Regulatory flexibility for new programs and products: [DEEP] needs to look beyond low-hanging fruit such as tried-and-true technologies and programs to attain the market transformation envisioned by the state. Program administrators should have the leeway to innovate, not always directly attached to success, but knowing lessons will be drawn. New technologies need the room to be tested; innovative customer outreach and education, and deeper retrofits, are worthwhile to overcome market obstacles.

Companies' Position(s): The Companies appreciate the efforts of NEEP over the last 15 years in advancing energy efficiency, and we look forward to working with them in the future.

EEB Position:

The EEB and its Consultants continue to appreciate NEEP's input on improving CEEF programs effectiveness and reach. The Board has asked its Residential and C&I Committees to more thoroughly

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review NEEP's detailed recommendations and work collaboratively with the Companies to implement those determined to be most effective for the programs.

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Date Received: May 11, 2011 **Contact Method: Public input session**
Name: Larry Janesky and Tom Casey Jr. **Representing: Dr. Energy Saver**

Request / Comments:

The state's administration of public funds excludes contractors who are not in programs, and overly controls those who do participate, stifling the free market and providing unfair competition for startup businesses in the energy conservation market. Many consumers know they can get services "for free" from the utility companies, while the HES vendors are superficial rookies who lull the public into believing their homes are energy efficient after a two-hour visit. The program punishes vendors who want to work to meet the state's goal of energy efficiency.

The solution is to make funds available to consumers who have projects done, covering a percentage of the costs, but letting them do the shopping. Utilities are using public funds to do their own PR, leading the public to think the utility did them a favor. If the utilities really wanted efficiency, they would partner with small companies and work together to achieve goals.

Funding reduction leads to fewer homes serviced through energy efficiency programs, and most market-based businesses must trim waste and improve operational efficiency. But the opposite is occurring: approved vendors are doing more administrative work with no utility reductions or savings for rate payers. The net effect is powering the ROI of public funds used in these programs, and the data is useless. The market is then confused further, and the focus on energy efficiency is lost.

Instability of funding coupled with micro oversight by administrators has significantly reduced the green workforce. Market-based businesses are expanding, adding new jobs, but without assistance from rate payer dollars. Governing bodies are influenced by utility stakeholders. A focus on energy efficiency should be fuel blind. Existing conservation programs can be hurdles to clean energy because of quota-based HES visits by fuel type, which is counterproductive. Some rate payers may receive fewer prorated services because of program caps. Serving more homes with fewer devices drives up administration costs but decreases the fund's ROI; serving fewer homes more thoroughly reduces administrative costs and saves more energy for less investment.

Companies' Position(s): Funding for all efficiency contractors is available through the Tier II aspect of HES. Market based vendors can independently promote efficiency and still receive incentives for their projects. The Companies agree that the programs need to be fuel blind, and look forward to working with policy makers to identify solutions to this problem.

EEB Position:

The Board supports the Tier II aspect of HES and will work with the Companies to assess whether this Program tract needs to be better marketed to the home improvement contractor community.

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Date Received: May 11, 2011
Name: Martha Kelly

Contact Method: Public input session
Representing: CT Coalition for Environmental Justice

Request / Comments:

Existing conservation and energy efficiency programs are failing to offer adequate assistance to low income communities. We offer several suggestions to improve delivery of information to them.

- 1) Copy the "moto-voting" effort by mailing information on this subject to every DSS client.
- 2) Review efficiency programs and services as part of the intake for energy assistance application.
- 3) Engage churches in the process of disseminating information on efficiency programs.
- 4) Involve grassroots groups such as CCEJ, Hartford NRZs, and others in the process.
- 5) Conduct tabling and other outreach at fairs, summer cultural events, and town recreational events.
Hire Spanish-speaking outreach workers to access tenants as well as homeowners.
- 6) Emphasize how energy conservation can free up family funds for other essential concerns (food, education, recreation, etc.).
- 7) Provide materials in both Spanish and English.
- 8) Link to CEEF programs on utility bills, providing both phone numbers and website addresses.

Companies' Position(s): The Companies have implemented, or are working on several aspects of the issues mentioned. Some of those are providing materials in Spanish, engaging churches, and promoting the programs at recreational events. The Companies look forward to working with DSS and DEEP to determine how to best penetrate the income eligible market.

EEB Position:

The Board concurs with the Companies and supports increased outreach efforts to income eligible customers.

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Date Received: May 11, 2011
Name: Raquel Kennedy

Contact Method: Public input session
Representing: Victory Energy Solutions

Request / Comments:

Victory Energy Solutions is a vendor to Northeast Utilities and United Illuminating in the residential HES program and the commercial program. In 18 months the New Britain-based company created over 25 jobs and established itself securely in a variety of ways. EEB programs are an economic driver that have allowed the company to continue to grow in an industry that is quickly expanding. Funding uncertainty, however, may propel trained individuals to work in other nearby states. An inclusive, cooperative, transparent environment will make it possible for the public and private sectors to work together effectively and bring more benefits to the rate payers and taxpayers.

Companies' Position(s): Availability of funds, especially for oil homes is a concern that the Companies share.

EEB Position:

The Board and DEEP are working to reduce funding uncertainty for the HES Program, including the identification of outside funding for oil heated homes.

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Date Received: May 11, 2011
Name: William M. Leahy
Connecticut State University

Contact Method: Public input session
Representing: Institute for Sustainable Energy at Eastern

Request / Comments:

Both the performance contracting and community sustainability programs are initiatives that should continue and deserve support.

Regarding performance contracting, private investment in efficiency improvements should be promoted as a sound financial opportunity especially as there is uncertainty in other traditional investments. Heavy subsidy from the EEF should only go toward new technologies or where there is a large societal benefit. Public benefit funds should not be required to persuade residents, schools, governments or businesses to make investments in commercially-available efficiency improvements in their own facilities. Third party private financing would encourage the growth of private sector services and related businesses, with leveraging from the EEF. Performance contracting often guarantees that savings generated by a project will finance the project fully.

Regarding community programs, the collaboration between EEF program administration and organizations participating in community sustainability programs should continue. They enable communities to reduce their carbon footprint, lower energy use and peak demand, save water, and improve air quality. Municipal action plans to address these issues should be developed. Nationally-recognized and industry-accepted practices for setting priorities are also good standards to follow. Four programs CT communities currently participate in are CT Clean Energy Community, EPA Community Energy Challenge, Local Governments for Sustainability (ICLEI), and Clean Cities.

Companies' Position(s): The Companies have an active performance contracting working group to develop standard tools to help implement performance contracting. The Companies are also working with CT Clean Energy Fund to implement a new joint community program.

EEB Position:

The EEB concurs with Mr. Leahy concerning the value of performance contracting and third party financing in leveraging CEEF funds and promoting the development of private sector services. The EEB has been fully supportive of the performance contracting working group and has committed to the effective use of performance contracting and third party financing in the 2012 Plan.

In addition, as noted by the Companies, the joint Energy Efficiency Fund and the Clean Energy Finance & Investment Authority Clean Energy Communities program will be launched in early 2012.

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Date Received: May 11, 2011
Name: Marie MacDonald

Contact Method: Public input session
Representing: Connecticut Public Television

Request / Comments:

CPTV proposes three additional 30-minute shows in the series Empowering Connecticut, about energy conservation and efficiency, to accommodate subjects designated by the EEB. The series presents projects that emphasize conservation and efficiency in an entertaining, easy-to-understand way, and will be accompanied by short vignette pieces and promotional material. Production will ideally begin in fall 2011 and the three shows will air three months later, or in early 2012. Each of the three shows will air at least five times over the course of the year.

The tentative funding estimate/request is \$180,000, or \$60,000 per show.

Companies' Position(s): The Companies believe that the current CPTV initiative needs to be evaluated before additional funding is committed.

EEB Position:

The Board is reviewing marketing and educational efforts as part of its development of the 2011-2012 Marketing Plan. The Board will consider the CPTV request as one potential component of the implementation of the Marketing Plan in 2012.

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Date Received: May 11, 2011
Name: Ross Mannuzza

Contact Method: Public input session
Representing: Climate Partners

Request / Comments:

The term "market-based": DPUC and HES administrators have failed to make HES market-based, which sends mixed signals to different parties. Language like "market transformation" is best, but it goes against HES administrators' principle of securing their own positions. Climate Partners spun off a market-based business only after being reprimanded for developing it. Pull the program and accelerate a transition to market-based without utility administrators, or allow utilities the autonomy to run the programs themselves, or have a single program run by one admin for the whole state.

Budgets and job creation: Climate Partners earned our RFP with time, training and payment. We won our bid on our commitment to deliver what we promised. Still, we must reduce jobs, and will have to go through yet another level of RFPs for low income, N2N, and certain towns. We were chosen from over 250 other companies, yet we have to prove our mettle? I say one, and done. Give access to all programs once a company is approved, and don't pick and choose vendors over each other once they win an RFP.

Cost of doing business: Increasing vendors by reducing budgets is not helping markets, but hurting them. A quota stretched over 12 months does not allow a for-profit business any flexibility. We will incur \$12,000 in insurance costs on top of our existing \$16,000 to keep 4 employees. We are hindered in our growth and are unable to lay off temporarily as that will reduce our quota, but the overhead is fixed. Months ago, we requested the ability to market and to have an adjustable copay. The copay should be raised (make \$450, pay \$300), with vendors allowed to adjust it individually.

Companies' Position(s): The Companies offer the HES program under the direction of the Department. Many parameters of the program are directed by the Department such as the copay. The Tier II aspect provides the flexibility to the vendors that Mr. Manuzza seeks.

EEB Position:

The Board recognizes the challenges in trying to move a program like HES "into the market" while still ensuring that ratepayer needs are best met and that ratepayer funding is spent in an appropriate manner. The Board and its consultants will continue to work with the Companies and HES stakeholders to expand and evolve the HES Program design within existing regulatory and budget constraints.

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Date Received: May 11, 2011
Name: John Mazur

Contact Method: Public input session
Representing: Green Star Energy Solutions

Request / Comments:

Green Star Energy Solutions is a CEEF stakeholder and HES vendor, and appreciates the opportunity to raise concerns about allocation of resources.

The US DOE has been promoting training programs to certify Data Center Energy Practitioners (Green Star was certified in 2010). (See supplemental slideshow presentation) This industry provides well-paying jobs and drives the economy. The CEEF should consider offering a data center program along these lines, both to attract companies to the state and to drive energy efficiency and clean energy gains.

Secondly, Residential Retail Products has become a victim of its own success. Out of state customers are purchasing subsidized products to install in their home states. We can't count their energy savings in CT. The EEB should consider controls at the retail level to prevent this, working with the retailers, or through a direct install model.

Companies' Position(s): The Companies incent efficient data centers through the Energy Conscious Blueprint or Energy Opportunities programs.

The retail products program has safeguards in place to assure that the incented products are sold in Connecticut.

EEB Position:

The EEB's C&I Committee has been tracking recent national and private initiatives for improving the efficiency of data centers. The EEB notes the rapid advances being made by the data center industry in developing and adopting efficient practices and believes that the best opportunities for CEEF programs contributions is with the small to medium-sized data centers embedded in commercial facilities. The EEB's C&I Committee will collaborate with the Companies to determine what activities, beyond current CEEF offerings, would be most effective in addressing these market opportunities.

As to Retail Products, the Companies take a more conservative view, which is largely supported by the Board, as to the actual net energy savings that can be attributed to the purchase of efficient appliances and consumer electronics at retail. As a result, the Companies do not currently provide rebates for these products on an on-going basis. In 2012 the Companies will investigate providing support, which may involve rebates, to promote the most efficient models in certain appliance and consumer electronics categories. In all cases the efficiency of these models would significantly surpass current ENERGY STAR[®] requirements. Finally, rebates are available for the early retirement and replacement of certain appliances through the HES Program.

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Date Received: May 11, 2011
Name: Walter Micowski

Contact Method: Public input session
Representing: Carabetta Organization

Request / Comments:

The CEEF should maintain adequate funding levels to accommodate the following initiatives for the 2012 plan: 1) Comprehensive, whole-building energy efficiency equipment/systems and building envelop upgrades (especially windows and insulation) for private, multi-family, affordable housing facilities 30 years old or older. 2) Continuing education and ongoing engagement through CEEF's energy conservation programs for low-income, elderly and handicapped residents of subsidized housing. 3) Monitored field testing, demonstration, and performance evaluation of cost-effective, combined energy efficiency equipment/systems technologies for application at low-income, subsidized housing facilities.

Carabetta is evaluating the potential economic and operational viability of installing and evaluating a newly-developed, combined geothermal/solar thermal/solar power generating system at one of our Middletown housing complexes.

I ask the CEEF to consider funding programs to encourage the installation of water monitoring and leak detection equipment as an adjunct to efficiency and conservation programs. Water and wastewater management have become integral to property owners' operating costs. Carabetta is evaluating the feasibility of installing advanced water leak detection devices in its New Haven housing complex units.

Companies' Position(s): The Companies are supportive of continuing comprehensive programs to the extent that CT policymakers authorize funding for the measures described by Mr. Micowski.

EEB Position:

The Board is generally supportive of Mr. Micowski's recommendations and would encourage Mr. Micowski to continue to make the Companies and the Board aware of its findings from its Middletown and New Haven demonstration projects.

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Date Received: May 11, 2011
Name: Tom Nichols

Contact Method: Public input session
Representing: 4 Elements Group

Request / Comments:

Retro-commissioning: CL&P has apparently not issued an RFP. There are currently six firms approved to provide retro-commissioning services through CEEF. Of these, one is in CT, two are in CO, one is in NY and one is in MA. One additional CT firm asked to be taken off the list. We don't believe the intent of the CEEF is to pay funds to out of state companies. We believe additional CT commissioning firms should be able to access the program. Further, we believe any nationally recognized commissioning certified individual or firm should be allowed to participate in the program without pre-certification.

Energy conscious blueprint modeling: the submission format requires the customer to pay a large fee for reports that are required. More funds would be available to the customer if we can provide the model database to the reviewer. This would require NU reviewers who are experienced in mechanical design and simulation software specific to a project. NU currently requires a letter of compliance from the owner's design team stating that the model reflects actual design. As a third party, we have no stake in the outcome of the model. The design team needs to comply with the owner's project requirements, which often specify a level of efficiency of LEED certification. It is more reasonable for NU to review both the baseline and proposed models, and the design documents, that to rely on a letter of compliance.

LEED incentive: we do not need to have an energy simulation vetted by the design team for LEED. In addition, most LEED projects do not reference the same version of ASHRAE 90.1 adopted by the state, which requires that we model the project twice.

LEED Core and Shell project: We recently proposed such a project to NU. Requirements are so stringent that we couldn't apply for the Whole Building Performance incentive. We're working with NU to qualify for an incentive under a different program instead, but would like to see the program include core and shell projects as an enticement to developers to create more efficient buildings.

Companies' Position(s): The Companies are diligently working to make our programs as user friendly as possible, while also striving for reasonableness of estimated energy savings, and we welcome input from individuals such as Mr. Nichols.

The EDCs have the following 2 basic requirements for Whole Building Simulation incentives, which are intended to help support our claimed energy savings:

- We require a letter from the owner's design team certifying that the energy simulations reflect the building as designed. This requirement provides the EDCs a level of assurance that the relevant members of the design team are communicating with each other and with the simulator and that all are in agreement with how the building was simulated (i.e. simulation results match up with building design).
Example A – Do the simulation results reflect a final lighting design unit lighting power density of 1.1 watt per square foot or 2.5 watts per square foot?
Example B - Does the simulation results reflect a final chiller design of 250 tons at an IPLV of 0.4 kW per ton or 350 tons at an IPLV of 0.355 kWh ton?
- We also have an energy engineer (usually a licensed PE) to ask some basic questions of the design team about the actual building design and the inputs and outputs of the simulation software to provide additional assurances of energy consumption for the baseline design and the high-efficiency building design.

These kinds of requirements have been in place for as many years as the EDCs have been promoting Comprehensive New Construction using Brainstorming meetings with the Design Team and DOE-2

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simulations. The EDCs do not feel that these programmatic requirements are unreasonable or unfair to participants looking for incentives to do things “over and beyond” what would otherwise occur in the marketplace. Hence the term “Lost Opportunity”.

Retro commissioning will be playing a greater role in our program portfolio. Developing a working relationship with multiple RCx providers will help this cause. Again the Companies would welcome input from Mr. Nichols.

EEB Position:

The EEB is strongly committed to ensuring that the CEEF programs are delivered effectively and efficiently and welcomes input from CEEF vendors and trade allies concerning program requirements. The whole building offering and the related LEED incentive were recommended by the EEB and developed in collaboration with the Companies. As the programs achieve more experience with these offerings, the EEB is committed to assisting the Companies in making appropriate adjustments to ensure transparency and efficient application. However, the Board is also committed and obligated to ensure that funds are being used appropriately and that the CEEF is meeting high quality standards and achieving verifiable savings. The Board will direct its C&I Committee to work with the Companies to review the implementation issues raised by vendors and customers to ensure that both objectives are being met.

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PUBLIC INPUT AND COMMENTS**

Date Received: May 11, 2011
Name: Kerry O'Neill

Contact Method: Public input session
Representing: Neighbor to Neighbor Energy Challenge

Request / Comments:

The Department of Energy views N2N as a leader among BetterBuildings grantees, and has praised these specific elements in our program: partnership with rate payer fund; comprehensive program design; innovative community approaches; focus on testing, data collection, and analysis; robust IT, online, and mobile apps system architecture; and successful partnering with a major utility on a comprehensive data sharing agreement. Areas of concern the DOE has highlighted: lack of robust quality control on the HES visit and the use of the HEY tool; lack of robust contractor standards for the upgrade work; lack of quality control for upgrade work; and lack of consistent availability of rebates and financing, level of support for the majority of homes that heat with oil aren't at levels for electric/gas.

In the last year, changes to the residential program have had a mixed effect on N2N. The June 2010 financing program was very positive. N2N considering setting up its own financing program, but didn't need to once the EEF launched its own. On the other hand, the limitations on oil funding, based on DPUC directives, yielded a negative impact. Insulation rebates for oil-heated homes are no longer available, oil is no longer financed, and there are caps on HES vendor allocations/oil. The majority of CT homes are heated with oil; in N2N towns, several communities are overwhelmingly oil-heated. N2N's program goals will be materially impacted by the change.

We request that you prioritize N2N HES visits, particularly for oil-heated homes, so as not to jeopardize our grant targets. Other programs that are achieving 40%+ pull-through from audit to upgrade that timely scheduling of the audit and the follow-up are critical to getting people to move forward.

Our suggested improvements to the HES program are: 1) Improve use of HEY tool to promote upgrades that yield deeper energy savings, and 2) Develop a robust contractor base capable of installing high-quality home efficiency upgrades.

Our suggestions for changes in marketing to support market transformation are: 1) Use the behavioral principle of "scarcity" when program funds run low, with limited-time offers, for example, but with sufficient advance notice about timing so demand can build; 2) Offer sales training to contractors on selling upgrades, closing a deal, and pitching financing and rebates; and 3) Add an energy advisor role at the EEF as the go-to source for customer questions relating to which upgrades to prioritize, and the pros and cons of various efficiency products, such as insulation.

Our suggestions for changes in financing are: 1) Work to develop an all-fuels financing program using RGGI and other non-ratepayer sources of funds; and 2) Work with CCEF to offer a loan product to residents that covers both efficiency measures and solar thermal water heaters.

Companies' Position(s): We share Ms O'Neill's concerns regarding oil funding and we are hopeful that CT policy makers can come to a quick resolution. We are continually working to improve the technical abilities and installation quality of our HES program and to improve the skills of the vendor network.

EEB Position:

The Board values N2N's partnership with the Energy Efficiency Fund and its valuable feedback on the HES program. The Board and its consultants will review and give serious consideration to Ms. O'Neill's recommendations as they continue to work with the Companies to improve the services provided through HES. Finally, the Board and DEEP are working to find outside sources of funding for oil (and propane) heated homes that would supplement current electric and gas HES funding.

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PUBLIC INPUT AND COMMENTS**

Date Received: May 11, 2011
Name: Tim Phelan

Contact Method: Public input session
Representing: Connecticut Retail Merchants Association

Request / Comments:

The Lean and Green campaign of the CRMA promotes the benefits of energy efficiency and conservation investments, and promotes the state's deregulated electric supply options.

A request for funding totals \$225,000 to cover the continuation of the Lean and Green campaign (\$85,000), as well as the addition of one full-time energy program manager (\$75,000) and one part-time communication staff member (\$20,000). Tim Phelan will act as chief spokesman for the campaign and will have support staff contributing their time as well (\$25,000), and legal and accounting services will be needed (\$20,000).

Companies' Position(s): The current efforts of CRMA should be evaluated before any additional funding is authorized.

EEB Position:

The EEB recognizes the value of pursuing alternative approaches to ensure that all small businesses have equal access to CEEF program offerings. However, the Board is also committed and obligated to ensure that the funds are being used appropriately and that the CEEF is meeting high quality control standards and achieving verifiable, cost-effective savings. Therefore, the Board concurs with the Companies that CRMA's Lean and Green campaign should be subject to an assessment and evaluation of recent performance, as is the case with other CEEF programs, before additional funding commitments are made. The Board suggests that potential future CRMA funding be considered as part of the implementation of the 2012 Marketing Plan.

**2012 CONSERVATION AND LOAD MANAGEMENT PLAN
PUBLIC INPUT AND COMMENTS**

Date Received: May 11, 2011
Name: Charles Rothenberger

Contact Method: Public input session
Representing: Connecticut Fund for the Environment

Request / Comments:

Expanding investment in our efficiency programs to capture "All Cost Effective Energy Efficiency" as required by Public Act 07-242 is sound public policy that will yield a substantial return on investment. We urge the utilities and the EEB to continue working on the development of low-interest energy efficiency financing options for residential customers, and ancillary policies that will increase the effectiveness of such financing opportunities. Current HES programs provide an excellent "platform" to encourage customers to invest in additional energy efficiency measures.

It is critical that any financing program take an "all-fuels" approach and that the large portion (52%) of CT homeowners that use fuel oil for primary heating be able to benefit from the program. The EEB should actively explore ways to integrate unregulated fuel customers into its conservation programs.

Energy ratings and disclosure policies are beneficial in several ways: they help determine whether a building is in compliance with state energy code; they encourage the valuation of energy efficiency in real estate transactions; and they encourage sellers and buyers to make energy efficiency investments at the time of transfer, or to improve building efficiency. Energy efficient buildings command a price premium. Regular benchmarking for commercial buildings informs owners about opportunities to increase their energy performance. Public data on performance allows ESCOS to market directly to owners with the largest opportunities.

Utilities and the EEB should be active participants in encouraging policies that complement core programs to assist in the reduction of energy demand. We encourage support for: 1) Promoting the adoption of improved efficiency standards for appliances, and 2) Strengthening building energy codes and encouraging the adoption of advanced building energy code standards.

Companies' Position(s): We agree with Mr. Rothenberger on a number of these points and are working to make them a reality.

EEB Position:

The Board and DEEP are working to find outside sources of funding for oil (and propane) heated homes that would supplement current electric and gas Company HES funding. The Board also supports a strong engagement by the Companies on building codes and standards opportunities and will be working with them to define how best CEEF funds can and should support these efforts. The Board will also work with DEEP as appropriate to help identify potential standards opportunities.

The Board's C&I Committee has been examining the opportunities available from energy rating and certification programs to help make the natural market for building energy efficiency upgrades and operations work more effectively. The Committee is working collaboratively with the Companies to identify, review and possibly implement energy rating and disclosure policies. This will be among the priorities for 2012 C&I program development.

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PUBLIC INPUT AND COMMENTS**

Date Received: May 11, 2011
Name: Roger Smith

Contact Method: Public input session
Representing: Clean Water Action

Request / Comments:

Increase transparency and communication: improve the way the EEB informs its partners about program changes, with ample advance notice and consistent updates to interested parties. We request that the CEEF administrators provide at least several weeks notice of program changes to the vendor community, CEEF partners, the EEB, and other parties, as well as an opportunity to comment on proposed changes at EEB board and committee meetings. We also recommend that the CEEF create a distribution list for the general public and allied nonprofits to remain apprised of all program changes. Information should also be posted on the CEEF websites, which are currently hard to navigate and not written from a customer perspective.

Strengthen HES: as pent-up demand for services collides with shrinking budgets, we urge an immediate change to move funding from other programs (like retail residential lighting) to HES, as HES has potential for deeper savings. We recommend petitioning the DPUC for an increase in the gas program budget, using the total resource cost test to credit the program with energy savings. We also ask CEEF to work collaboratively with vendors and other parties to create a path to deep energy savings, with better data reporting and tracking systems. We need the Fund to require all vendors to provide comparable levels of post-HES service to remain in the program. It is critical to communicate the effectiveness of upgrades so participants have a basis to choose between them. Standards are essential to create a market that discriminates based on quality, and not just price.

We suggest the CEEF move to a Home Performance with Energy Star model that requires Building Performance Institute (BPI) accreditation for participating companies (which could be phased in), as well as post-upgrade testing and quality control (which needs to be implemented immediately). CEEF should combine certification requirements (demand) with support for in-state BPI trainings (skilled worker supply). This would orient the retrofit market toward paying for performance and integrated systems. Participation in rebate programs should be provisional until a set number of jobs are completed and inspected. Lastly we suggest the CEEF create a website where customers can rate their experience with HES and contractors doing post-HES work to let the market differentiate customers.

Program changes as marketing opportunity: we ask the Fund to better coordinate program administration and marketing, especially when rates are about to change, triggering an opportunity to sell upgrades, or when rebates are about to end.

Community-based programs: we are disappointed that the Fund is still not beyond a pilot for community-based efficiency programs. We urge a significant increase in funding from what was allocated in 2011 to at least match the annual investment by the Clean Energy Fund. We urge the EEF to retain the Clean Energy Communities established name. We also support an efficiency program that provides web-enabled tools for towns to track municipal energy use and to set efficiency goals. The current portfolio manager data entry process is onerous and much of it should be automated. The Fund should also provide towns with aggregated usage data for town residents and businesses to facilitate community-wide challenges. CEEF should provide points towards incentives for a range of actions undertaken; we suggest using the Neighbor to Neighbor Energy Challenge catalog approach. A key to success is providing support for volunteer town task forces about how to do effective outreach. A variety of nonprofits can provide aspects of such support (Clean Water Action, Sierra Club, Clean Air Cool Planet, and the Interreligious Eco-Justice Network).

Municipal programs: the CEEF should reserve funds to support municipal projects, and not leave them to compete head to head with large commercial entities, as they are funded by taxpayers and should be helped to control their energy costs. Also, there should be a program that provides deeper

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walkthrough audits that quantify the potential for all electricity and heating savings measures, with longer-term financing options for municipalities.

Companies' Position(s): The Companies regularly announce program changes to a large audience. Unfortunately changes in things such as incentive changes can not be provided well in advance because it creates a "run on the bank" for incentive dollars.

The Companies have increased funding in HES over the years, and the gas utilities have ramped up funding as well. The primary barrier to a fuel blind HES program is solving the oil heating funding issue.

The Companies operate an EPA-approved Home Performance with Energy Star program. The challenge that this aspect of the program face, along with many other Home Performance with Energy Star programs is attracting sufficient participation.

The Companies are actively working with the CCEF to develop a community based program such as the one Mr. Smith describes.

EEB Position:

The Board and DEEP are working to find outside sources of funding for oil (and propane) heated homes that would supplement current electric and gas Company HES funding.

Mr. Smith makes a number of recommendations, e.g., expanded HES Program distribution lists for Company communications that the Board and its consultants will consider. While the Board is also disappointed with the delayed roll-out of the Clean Energy Communities Program (the name is being retained for the joint CEEF-CEFIA effort), it looks forward to monitoring the Program's progress and impact in 2012.

The Board, its Committee's and Consultants carefully track the programs and work with the Program Administrators to ensure that all customer groups have equitable access to program offerings. In addition, the Board has actively supported the activities of the performance contracting working group and has made a commitment as part of the 2012 Plan to facilitate the effective use of performance contracting and third-party financing to leverage CEEF funds and broaden opportunities for municipalities and other customers.

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PUBLIC INPUT AND COMMENTS**

Date Received: May 11, 2011
Name: Tom Swarr

Contact Method: Public input session
Representing: Sustainability By Design, LLC

Request / Comments:

We need to expand energy efficiency programs to the rental market, especially in one-to-six-unit apartment buildings. A more holistic view with coordinated investments will address multiple goals. In a review of residential fires that displaced occupants, the Hartford Courant found that nearly 60% of buildings had existing housing or building code violations. These could have been addressed effectively by energy efficiency upgrades, which would yield multiple benefits. Neglected apartments encourage tenants to skip rent, causing a variety of other related problems.

The EEB can address both energy conservation and housing by providing funding mechanisms for community-based organizations to conduct streamlined audits of apartments (caulking windows, replacing incandescent bulbs with CFLs, installing low-flow shower heads), programs to tenants on the benefits of energy efficiency, and encouraging clean energy sign-ups and basic electrical safety awareness.

Qualifying landlords should be able to apply for subsidized, low-interest loans to upgrade and weatherize their building envelopes and install high-efficiency HVAC systems, water heaters, and appliances. Electrical upgrades to address code deficiencies should also be eligible. Some portion of the benefits should be passed on to the tenants, perhaps by restricting the ability of landlords to raise rent for a period, counting rent reduction toward required cost share provisions. Coordinate provisions carefully with housing policies to encourage stability in the rental market.

State programs should include an enabling framework towns can use to implement supplemental programs tailored to specific needs. Vacant and abandoned properties can reduce neighborhood values by as much as 20%. Housing and energy consumption are tightly linked, so a coordinate policy is needed.

Companies' Position(s): The rental market is one of the most challenging markets to penetrate primarily because the landlord pays for any upgrades that would reduce usage and the tenants pay the electric bill. Many of the provisions Mr. Swarr recommends are found in the existing programs. We need to distinguish between market rate apartments and income eligible units because the landlord or the tenants of market rate units will be required to bear much of the expense for their upgrades

EEB Position:

The Board concurs with the Companies' assessment that the rental market is a difficult one to penetrate. The Board and its consultants will continue to work with Companies to explore means to address both the market rate rental market through HES and the rental market for income eligible customers through HES-IE.

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Date Received: May 11, 2011
Name: Maxwell Warren

Contact Method: Public input session
Representing: Farmington Woods condominiums

Request / Comments:

A new state program called CHEER (Complete Home Energy Efficient Rating) promises to help us reduce energy consumption and carbon emissions. It is aimed at older residential homes and condos and helps owners qualify for home Energy Stars (which potentially increase a home's resale value) and strive for both short- and long-term energy conservation. Homeowners would also receive a 10% credit voucher for purchasing a qualifying Energy Star appliance, and a 5% credit voucher for each star.

Towns and communities would appoint a local program administrator, who may opt to create a local volunteer team to promote the program. Training would be available for the volunteers, who might promote the program, share information about resources, and help to verify homeowners' cost savings.

CHEER should also promote water conservation by providing efficiency stars for water savings, with results reported to the state for verification. Rewards earned would be the same as rewards for energy conservation, leading to a certificate of excellence and a water star decal for home display.

The program could lead to Connecticut's leadership as a "key indicator state."

Companies' Position(s): The Companies are interested in learning more about the CHEER program and who administers it.

EEB Position:

The Board and its consultants are not currently familiar with the CHEER Program and encourage Mr. Warren to submit additional information on CHEER.

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Date Received: May 11, 2011
Name: Stephanie Weiner

Contact Method: Public input session
Representing: New England Smart Energy Group

Request / Comments:

The current cost benefit tests in CT for energy efficiency initiatives only take into account the electric measure utility cost, and ignores other upstream energy, environmental, and societal savings and benefits. Benefits should not be limited only to individual electric source usage reduction. A Total Resource Benefit test would include more energy efficiency savings and benefits, giving consumers a higher level of measures. This shortcoming limits the extent of the positive effects of programs for consumers, society, and the environment.

The TRB test compares the present value of all energy costs to society against the present value of benefits, assessing the impacts of a portfolio of energy efficiency initiatives on the economy. It includes: 1) value of all sources of energy saved, 2) non-energy benefits resulting from energy efficiency measures, 3) electric bulk system transmission and distribution capacity benefits (line loss and avoided transmission and distribution construction), and 4) avoided need to increase generation.

An abrupt transfer to a market-based delivery of HES, or an increase of customer copay to \$300 to \$500, or a reliance solely on financing or rate of customer participation, will result in a precipitous drop in lasting energy savings and net benefit to Connecticut. We have lost over 90 jobs from the current cuts, not including additional business the HES visits generate. We need a consistent, stable and transparent policy for any industry to grow, prosper and be sustainable. Fits and starts will destroy progress thus far.

Companies' Position(s): The Companies agree with many of Ms. Weiners observations, and we look forward to CT policymakers resolving them.

EEB Position:

The Board used both the Electric System Test and the Total Resource Cost test in its analysis of cost-effectiveness during the development of the 2012 Plan. The Total Resource Cost test takes into account savings and benefits from other fuels and resources, including fuel oil and water savings.

The Board understands Ms. Weiner's concerns regarding sudden HES Program changes and has encouraged the Companies to make such announcements as soon as possible and as clear as possible to minimize disruption to HES vendors.

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PUBLIC INPUT AND COMMENTS**

Date Received: May 11, 2011
Name: Carol A. Wilson
Name: Andrea Cohen Kiener

Contact Method: Public input session
Representing: Wilson Educational Services, Inc.
Representing: Interreligious Eco-Justice Network

Request / Comments:

In 2010, Wilson Educational Services and Interreligious Eco-Justice Network received \$35,000 from the CT EEF to provide 15-hour Savings Thru Energy Management (STEM) for This Old House of Worship classes across the state for 50 congregations, each with at least 20 participants each. The classes train participants to recognize opportunities to reduce energy consumption, calculate potential savings, and present the information effectively. Since 2006 the program has been offered to over 150 congregations in the state, with many reporting enormous reductions in heating fuel consumption. All report lighting upgrades and substantial electricity savings. Several have had utility audits and participated in rebate programs. Many have sponsored energy efficiency events.

A request for funding totals \$45,000 to fully cover ten classes at \$4,500 each. The increase in cost reflects a plan for more media attention, follow-up programming, and upgrades around each 15-hour class.

Companies' Position(s): The Companies are working with IREJ to develop the Cool Congregation program in CT and we look forward to being able to integrate that effort with This Old House of Worship.

EEB Position:

The Board is very supportive of independent community efforts to improve energy management by CEEF customers and is impressed with the results of IREJ's classes. The Board concurs with the Companies' position but also suggests that it would be appropriate for a program review or evaluation to document the program's accomplishments.