

# STATE OF CONNECTICUT

## OFFICE OF CONSUMER COUNSEL

Ten Franklin Square  
New Britain, Connecticut 06051

TELEPHONE  
(860) 827-2900  
Voice & TDD

FAX  
(860) 827-2929

Email: [occ.info@CT.gov](mailto:occ.info@CT.gov)

Internet: <http://www.ct.gov/occ>

January 10, 2012

Tracy Babbidge  
Interim Bureau Chief  
Department of Energy and Environmental Protection  
Bureau of Energy and Technology Policy  
Ten Franklin Square  
New Britain, CT 06051

Dear Ms. Babbidge,

OCC hereby submits its Areas of Inquiry, in accordance with the Notice of Request for Comments and Technical Meeting, 2012 Conservation and Load Management Plan, issued December 23, 2011 by the Department of Energy and Environmental Protection ("DEEP"). OCC is in agreement with the Areas of Inquiry posted by DEEP's Bureau of Energy and Technology Policy ("BETP") and looks forward to participating in the discussion on those topics. OCC also sets forth a few additional Areas of Inquiry, as follows:

### **Home Energy Solutions – Vendor Incentives**

Currently, program administrators are not permitted to pay incentives to program vendors for achieving savings associated with "Phase Two" measures such as insulation and HVAC replacements. Thus, vendors have no financial interest in promoting those deeper measures unless they also offer installation of those measures. OCC requests that participants be prepared to comment on whether program administrators should offer vendor incentives, the amount and nature of such incentives, and how to ensure consumers are protected from vendors "overselling" such measures (i.e., when it is not truly cost-beneficial) as a result of any such incentives.

### **Home Energy Solutions – Cap for Air Sealing**

Currently, vendor payments from program administrators are "capped" for air sealing once a certain level of improvement over the home's baseline has been reached. Reportedly, this has led to substantial lost opportunity in homes that need a significant amount of air sealing to become efficient. OCC requests that participants be prepared to comment on whether the cap for air sealing should be removed or changed to allow

vendors to be paid for more air sealing in order to avoid this type of lost opportunity, keeping in mind that doing more air sealing would increase the cost per home.


### **Home Energy Solutions – Audit and Tracking Tool**

This topic is included in BETP's Areas of Inquiry. OCC seeks to expand this topic to include discussion of how comprehensive data collection and management software could also provide better access to information for program administrators, DEEP and OCC staff, and the EEB, as well as to improve evaluation, measurement and verification. OCC also requests that participants be prepared to comment on whether an RFP should be issued to develop software that meets the goals established through this process.

OCC looks forward to participating in the technical meeting and working with all parties to achieve greater conservation savings through the 2012 Conservation and Load Management Plan, as amended by this DEEP process.

Very truly yours,

ELIN SWANSON KATZ  
CONSUMER COUNSEL,

By:   
Victoria P. Hackett  
Staff Attorney