

December 8, 2023

Dear Home Energy Solutions and Home Energy Solutions-Income Eligible vendors and Efficiency For All,

During the development of the 2024 Plan Update, two letters were submitted to the Energy Efficiency Board (“EEB”), the Connecticut Department of Energy and Environmental Protection (“DEEP”), Eversource, and Avangrid. On August 29, 2023, vendors for the HES and HES-IE programs submitted a letter requesting to extend the comment period on changes to the Home Energy Solutions (“HES”) and HES-Income Eligible (“HES-IE”) programs to January 1, 2024 and delay the implementation of any changes to those programs until January 1, 2025.¹ On October 11, 2023, a letter was received related to diversity, equity, and inclusion (“DEI”) practices application within the Conservation and Load Management (“C&LM”) program processes from Efficiency For All (“EFA”).

Although our response to the letters is delayed, it is important to note that the EEB considers all public input, including content within the letters received, as part of the EEB’s review and approval of the plan and subsequent recommendations for DEEP to consider as part of its determination. There is a delicate balance when there are pressures to adjust programs to accommodate budget and evaluation impacts. However, the EEB recognizes the importance of stability and incorporation of vendor feedback in program development. These items were considered as part of the EEB’s approval. As a result, the EEB requested, as part of its 2024 Plan Update recommendations, that the Companies work with vendors in a timely manner to facilitate discussions and collect feedback prior to adopting changes to the HES and HES-IE programs related to air sealing and duct sealing.² In particular, we proposed the following recommendations:

- To pause the Companies proposed change to move the advanced duct sealing (“ADS”) out of core services and changing the rebate level to allow for further exploration of the impact of the changes, on both the program and vendors, and that the assumptions for the ADS savings value in the Program Savings Document be discussed further.
- When changes to vendor compensation for air sealing is made, it should be viewed as a pilot for the first six months and that during that time the Companies should evaluate whether it is a fair compensation method.³

¹ The vendors included Peter Carlson, Jr, Timothy Fabuien, Stephen Birch, Denise Pankosky, Michelle Long, Peter J. Callan, Jane Bourdeau, Jeff Gerber, Anthony Fonseca, Elizabeth Galante, Barry Pelton, Stephanie Weiner, Edgardo Mejias, Martin Harisi, Gina Crist, and Vivian Perez.

² The Companies include Connecticut Natural Gas, Eversource Electric, Eversource Gas, Southern Connecticut Gas, and United Illuminating.

³ The EEB’s adopted recommendations are recognized in the meeting minutes and meeting materials folders for October 2023 and can be found using this link: <https://energizect.com/eeb-meetings>.

It is our understanding that there are ongoing meetings occurring between the Companies and their vendors for this program to consider feedback. The EEB Technical Consultants have been participating in these meetings and monitoring the progress on adopting changes to air sealing and insulation. We will continue to work with the vendors and the Companies to ensure that the process to incorporate program changes is transparent and allows for feedback. We encourage vendors to utilize the forums to provide feedback directly to the Companies, as well as through the Contractors Technical Advisory Committee (“CTAC”), and through the public comment portions of the monthly EEB and committee meetings. Additionally, please note that there is an upcoming DEEP technical meeting on December 14, 2023 concerning the proposed 2024 Plan Update, in which interested stakeholders may present or have an opportunity to speak during multiple public comment periods. Lastly, outside of providing verbal comments, comments may be submitted to the EEB’s Executive Secretary, James Williamson, at eeb_secretary@energizect.com.

The EEB recognizes that it has a long journey ahead of itself related to incorporating DEI into not only the C&LM programs and incentives, but also the EEB processes itself. We appreciate the information and resources provided as part of the October letter from EFA. The EEB is working with DEEP to implement DEI practices throughout our work, including but not limited to meeting practices, public comment at Board and committee meetings, public input sessions, and consideration of programmatic changes. As part of that work, we are incorporating recommendations from the Equitable Energy Efficiency (“E3”) proceeding and the State of Connecticut Governor’s Council on Climate Change Equity Lens. Please note that this work will be done collaboratively to enable comprehensive and inclusive outcomes.

After the February 14, 2024 EEB meeting, the Board plans to hold a workshop to identify areas where improvement is needed, discuss recurring methods to better incorporate DEI practices, start development of a timeline for incorporating the improvements, and soliciting feedback from the EEB members, vendors, stakeholders, and the community at large. Notification of the workshop will be provided by the EEB Executive Secretary in December, with an agenda to follow in January. The workshop format will allow time for short presentations, public comments and feedback, and interactions between parties and EEB members. Additionally, we will provide regular correspondence through meetings and meeting materials on the progress being made and the steps remaining. In the new year, we plan to include a DEI page on the EEB section of the Energize CT website. This section will not only reflect the work completed within the C&LM programs to date, but also identify how the EEB is incorporating transparency and inclusion into the EEB’s practices. We look forward to working with those that submitted the letters, other stakeholders, and the community throughout the coming months to develop best practices. We look forward to hearing feedback and ideas from vendors on making the overall process more equitable and inclusive. Your participation is crucial to the success of the program and encourages you to further engage.

The EEB appreciates your efforts to make the C&LM programs successful and want to convey that we are actively considering the comments put before us. We look forward to working with you and other parties as we outline these guidelines and adopt practices that will increase transparency and inclusion throughout the development and implementation of the C&LM programs.

Sincerely,

A handwritten signature in black ink, appearing to read 'AKosior', with a stylized flourish at the end.

Anthony Kosior
Connecticut Energy Efficiency Board Chair