

Attachment A: Schedule of Compliance Conditions of Approval 12-20-18
 2019-2021 C&LM Plan

Item #	Topic or Program	Condition of Approval	Due Date	Action
1	Heat Pump Pilot Program	<p>DEEP has determined that the pilot can proceed with the additional incentives for oil and propane heating consumers that were proposed in the November 19, 2018 Conservation and Load Management Plan (C&LM Plan), provided the Companies develop and submit for DEEP’s review a more detailed description of the pilot, no later than March 1, 2019.</p> <p>DEEP appreciates the multiple stakeholders’ time and effort to attend the public meeting and to provide written comments. DEEP has weighed stakeholders’ concerns about moving forward with strategic electrification against concerns over the use of Conservation and Load Management funds for fuel switching as well as concerns of alignment with the <i>2018 Comprehensive Energy Strategy</i>.</p> <p>This updated description should clearly articulate the goals for the pilot, including proposed tracking and analysis methodology, and at a minimum information regarding:</p> <ul style="list-style-type: none"> • Total cost: Identify the total cost of the 100 heat pump pilot program and how this compares to what was previously spent on the cost of the incentives in the last ten years. • Incentive/rebate levels: Provide a breakdown of the specific rebate or incentive levels offered per installation and clarify whether the rebate is for each customer, or intended as an incentive to HES vendors to successfully acquire customers willing to install and use heat pumps for heating. Identify how incentive levels were calculated. Identify any market research or data used to determine the "additional" incentives for oil/propane customers. • Customer use cases: Clearly identify the specific customer use cases the pilot envisions to target. For example, clarify whether the pilot targets partial home or whole house conversions and whether the targeting reflects the assumptions used in incentive development. • Financing products: Summarize the existing or new financing products (in addition to these incentives) available to help customers purchase and install heat pumps. 	March 1, 2019	Modification

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		<p>All other educational and promotional efforts for renewable heating and cooling equipment, including heat pumps, as well as other high efficiency HVAC equipment should continue as described in the Plan.</p> <p>While allowing this pilot to proceed, DEEP is not endorsing the use of conservation and load management dollars for fuel switching. DEEP looks forward to learning how to transform this market successfully and this pilot should contribute to this knowledge. To date, the C&LM Plan Program Administrators have not recommended one fuel over another, but provide an incentive to encourage adoption of high efficiency equipment based on the customer’s preferred fuel choice. Fuel switching at scale remains crucial to achieve the state’s greenhouse gas emission reduction targets to address climate change, and will require identifying sustainable incentive sources to catalyze the transition of oil and propane equipment.</p> <p>As outlined in the Plan, the Energy Efficiency Board plans to review and assess the 2019 pilot results in September 2019, in time for the 2020 Plan Update. The future efforts regarding low-carbon heating technologies will be considered during the 2020 and 2021 Plan Update planning processes, and any such efforts will be reviewed by the Energy Efficiency Board as part of the Plan Updates, with subsequent review and approval by DEEP.</p>		
2	Equitable Distribution Data	Pursuant to CGS Sec. 16-245ee, each EDC must annually submit to DEEP and the Energy Efficiency Board the prior calendar year’s Equitable Distribution data on a form prescribed and provided by DEEP no later than July 1, and also submit an updated method of census tract identification and economic status that determines whether the census tract is distressed. This data shall be provided on a census tract basis, or if not available by census tract, on a town-by town basis, the amount of conservation program funds assessed and the amount of incentives expended, disaggregated as small or large customers according the 100 kW peak demand threshold, and further	February 1, 2019 July 1, 2019	Report

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		<p>disaggregated by customer class (i.e. Residential and C&I). The residential data component for small customers shall be disaggregated by the HES and HES-IE programs, and identify the total number of projects participating in each program, and disaggregate those project numbers by housing stock (i.e., single family, multi-family (2-4 units), and multi-family (>4 units)).</p> <p>Though the statute requires submission on a census tract basis, the companies have noted in the past that a town-by-town submission is less costly, generally more useful to municipalities, and would streamline the analysis. DEEP requests that the companies provide written explanations of their position no later than February 1, 2019. This could include an analysis of the approximate number of homes that could be served in place of expending the budget on third-party census tract analysis.</p>		
3	<p>Propose a Frequency to Conduct Financial and Operational Audits;</p> <p>Conduct Such Audits on the Approved Frequency Schedule</p>	<p>No later than March 1, 2019, the Companies shall propose, with a revised budget as needed, a process and frequency to routinely conduct a Financial Audit or alternately, Agreed Upon Procedures review, and to routinely conduct an Operational Audit of the Conservation and Load Management Plan, consistent with standard practices. The processes should cover each program year for each audit, however multiple years may be included in a single audit. No later than July 1, 2019, the Companies shall develop and propose the timeline for routinely conducting the audits of the Conservation and Load Management Plan.</p>	<p>March 1, 2019</p> <p>July 1, 2019</p>	<p>Report</p>
4	<p>EnergizeCT Center</p>	<p>No later than March 1, 2019, additional information is required to be made available to the Energy Efficiency Board and the public prior to implementing this proposed decision. Therefore, DEEP instructs the Companies to provide an analysis of the number and types of groups served (prior to legislative diversion) and other usage data such as the use of the center for C&LM trainings, to illustrate how this center supports education. The analysis should include a breakdown of the budget and the activities planned after the Center shutdown. This analysis should include the effective budget decrease of the closure.</p>	<p>March 1, 2019</p>	<p>Report</p>

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5	Benefit-Cost Testing Methodologies and Inputs	No later than March 1, 2019, the Companies shall provide a written rationale for the inclusion and impact of the Pooled Transmission Facilities, Capacity DRIPE and the Reliability components. The number of years for each DRIPE component needs to be specified. A comparison of the 2015 to 2018 AESC benefits should be included. A nominal discount rate of 3% shall be used, for the reasons detailed in Attachment B to DEEP’s Approval with Conditions, for all Benefit/Cost Ratio calculations provided on or after March 1, 2019.	March 1, 2019	Report
6	Performance Management Incentives (PMI)	DEEP approves the concept and percentages of the PMI. More work is needed on the secondary metric descriptions to ensure clear and effective metrics. No later than March 1, 2019 DEEP directs the Companies to provide additional detail on the secondary metrics and their progression from the previous plans/or the importance of the added metric, and offer suggestions for modifications of existing or for additional secondary metrics that would catalyze increased opportunities for progress in achieving the Plan’s goals. DEEP expects to revisit PMI in 2019 for a review of entire program.	March 1, 2019	Report
7	Winter Reliability and Winter Demand	No later than March 1, 2019, the Companies shall provide a quantification and discussion of the effect of conservation, load management, and energy efficiency investments, both electric and gas, on winter peak demand and as applicable, winter fuel reliability.	March 1, 2019	Report
8	Street Lighting	No later than March 1, 2019, the Companies shall submit to BETP for DEEP’s records a report that summarizes the state of street lighting in Connecticut. Specifically, the Companies shall provide best estimates of the numbers of street lighting fixtures and exterior private area lighting fixtures owned by the utilities, municipalities, and the State of Connecticut. UI’s Outdoor Lighting Solutions programs, previously known as Private Area Lighting and any equivalent Eversource program should be included in this analysis. To the extent such information is available to the Companies, the report shall quantify how many street lights in each category have been upgraded to LED technology and/or with advanced lighting controls. The Companies will provide recommendations on the timeline for upgrading Company-owned street lights in each of these categories and identify the funding source(s). The Companies shall also propose a process for monthly reporting of any	March 1, 2019	Report

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		Service Address/Point of Delivery changes as the lights are upgraded to LEDs. An alternative to monthly would be a one-time conversion table of old-to-new, depending on where the Companies are in the conversion process.		
9	Demand Management Programs and Pilots	No later than June 1, 2019 the Companies are to provide additional detail on Demand Management programs and pilots as developed and report related results. DEEP supports the expansion of the UI Wi-Fi enabled Heat Pump Water Heaters program and directs the expansion be undertaken in 2019 for both UI and Eversource if pilot results are successful. Additionally, the report should propose, as needed, updates in 2019 or future years to further align the Plan’s demand management programs with work performed to advance the Distribution System Planning and Grid Modernization actions described in PURA dockets on those topics.	June 1, 2019	Report
10	Modernization Initiatives (Early Retirement/Post-Useful Life)	DEEP is supportive of this initiative. No later than June 1, 2019 additional reporting requirements need to be carved out of normal reporting and a reporting template should be provided.	June 1, 2019	Report
11	Market Based Solutions for Mid-sized Businesses	DEEP is supportive of this initiative. No later than June 1, 2019 Eversource shall provide a discussion on the incentives and other benefits being offered in this program and how they compare to the Small Business and Energy Opportunities programs.	June 1, 2019	Report
12	HES and HES-Income Eligible Solutions	No later than June 1, 2019 the Companies shall provide an additional, detailed description of the programs, including detailed budgets that provide detail on the planning assumptions used in the Program. Detail on the percentage of budgets for multi-family work should be included. This should report on the planned evolution of HES program over next three years, expanding beyond narrative in this Plan.	June 1, 2019	Report
13	Energy Efficiency Coincidence with HVAC Installation	No later than July 1, 2019, propose a plan including a timeline for implementation to analyze market share on an annual basis and annually submit a report to DEEP for DEEP’s records to provide information on the instance of high efficiency equipment installed compared with standard equipment, using market share, municipal permits, or other reasonably reliable proxies for estimating the installation of high efficiency HVAC at residential and commercial and industrial properties. The continued	July 1, 2019	Plan Annual Reports

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		movement of product incentives to upstream locations requires different approaches to determine the status of market transformation.		
14	U.S. DOE Home Energy Score	In the 2019-2021 C&LM plan, the companies state that they will “explore the correlations between the DOE Home Energy Score and customers implementing add-on measures,” in order to better understand the effectiveness and value of including the score in HES. No later than September 1, 2019, the Companies shall perform this analysis with consideration to other effects such as funding diversions, and the February 2018 implementation of “opt-in-only” language.	September 1, 2019	Report
15	Commercial and Industrial Lighting Technologies	DEEP recognizes the importance of developing the infrastructure to promote advanced lighting technology. DEEP needs to ensure LED conversions in the retrofit market continues until the market has been saturated. This measure type provides for important winter peak savings. No later than October 1, 2019 the Companies should provide a methodology to assess remaining market potential for C&I sector retrofit and provide a discussion on this market.	October 1, 2019	Report
16	Heat Pump Technologies Specifications	No later than October 1, 2019, the Companies are to incorporate the heat pump specifications of the U.S. Department of Energy’s Regional Energy Efficiency Organization, Northeast Energy Efficiency Partnerships (NEEP), into the heat pump program or to provide a detailed analysis on why they believe these specifications are not satisfactory. This analysis should include the impact of not participating in a regional standard and its impact on the market.	October 1, 2019	Report
17	Residential Lighting Technologies	DEEP is providing an approval of a three year plan, however, since it has been noted that planning assumptions are in flux for residential programs in 2020 and 2021, these programs will require additional approvals when the Companies have reached a consensus on planning assumptions. This should be done through the Plan update process and may require the Companies to supply more detailed analysis than typically provided for Plan updates.	On-going	Plan Updates

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18	Electronic Data Coordination-DSS	The Companies shall continue to work collaboratively with the Department of Social Services and DEEP to coordinate data related to households served through energy assistance and energy conservation and weatherization programs to ensure the state is able to optimize program coordination and to fulfill its obligations to report detailed demographic and other information to federal agencies on grants received from the US Department of Health and Human Services through the Low-Income Home Energy Assistance Program and from the U.S. Department of Energy Weatherization Assistance Program for Low-Income Households.	On-going	On-going
19	Electronic Data Coordination and Accessibility—DEEP and Municipalities	The Companies shall cooperate and collaborate with DEEP to continue to coordinate electronic data availability and connectivity related to the Companies’ statutory requirements pursuant to CGS Sec. 16-245ii to maintain building energy data, that can be made available to the public, in a format compatible for uploading to the United States Environmental Protection Agency's Energy Star Portfolio Manager or similar system. Such similar system includes the state’s energy management platform specified by DEEP and DAS for use by state facilities, pursuant to CGS Sec. 16a-38i.	On-going	On-going