

## APPENDIX A

### Summary of E3 Phase 1 Comments and Revisions

This Summary of E3 Phase 1 Comments and revisions provides a high-level summary of comments received both during the initial public comment period which ended in October 2020 and the Phase 1 Draft Determination comment period which ended in June 2021. This document also provides a summary of changes made to the Draft Determination that resulted in the Final E3 Determination. Due to the scope of comments received in Phase I of the E3 Proceeding, DEEP has incorporated many, but not all, of those comments in the Final Determination. However, because the E3 Proceeding is both a flexible and iterative process, comments not incorporated in this Final Determination may still be considered and incorporated in subsequent phases.

In addition to the changes summarized below, several overarching changes were made to the Final Determination including:

- Narrative simplification and restructuring of the document to be clearer and more action-oriented
- Removal of background research and summary of comments under each proposed recommendation (now “Goal”) to streamline document content.
- Improved document hierarchy
- Introduction of a E3 Phase 1 Progress Report to track interim advancement toward outlined actions

#### Goal 1: Embed greater equity in decision-making

##### Summary of Comments:

- Regarding the DEI consultant, DEEP should seek a person of color who has worked with and is committed to working with Black organizations, Indigenous organizations, or organizations representing people of color, racial, environmental justice or frontline community members or organizations.<sup>1</sup>
- DEEP should consider attributes such as age, professional background, gender, race, and ethnic background in their process to solicit board nominations.<sup>2</sup>
- DEI Consultant should be a long-term, multi-year position to cover all phases of E3.<sup>3</sup>
- Need more segmentation of low-income and other stakeholder groups on the EEB.<sup>4</sup>
- Compensate EEB members to encourage participation from non-traditional groups.<sup>5</sup>

##### Summary of Changes:

- Provided more clarity on the process for hiring a DEI Consultant, including an opportunity for public comment during which stakeholders will be able to comment on whether the draft RFP reflects the comments above.
- Noted the new Board recruitment process already in place for 2021 and the two additional Board seats that were created in Public Act No. 21-139.

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1 See Comments from Efficiency For All, Conservation Law Foundation and Sierra Club, available [here](#)

2 See Comments from Energy Solutions, available [here](#)

3 See Comments from Energy Solutions, available [here](#)

4 See Comments from Operation Fuel, available [here](#)

5 See id.

## Goal 2: Enhance tracking of equity indicators in C&LM programs

### Summary of Comments:

- Develop an equity performance management incentive (PMI) to incentivize attainment of equity metrics.<sup>6</sup>
- Track participation and measuring energy savings of participants by demographic characteristics, including race, ethnicity, and primary language.<sup>7</sup>
- Track and report participation in HES/HES-IE by people who are behind on bills, enrolled in social assistance programs, or have high energy burden (greater than 6 percent of income is spent on utility bills).<sup>8</sup>
- Consider other units, besides census tracts, for data collection, including household-level or zip code data<sup>9</sup>
- Prioritize and select specific equity tracking opportunities/metrics to include in the tracking plan.<sup>10</sup>
- Equity tracking plan should also assess participation among homes with limited English, single parent households, owners vs renters.<sup>11</sup>
- Use existing definitions and resources to characterize “high-need” communities, including DECD definitions and companies’ customer participation studies.<sup>12</sup>
- Develop a workflow for data tracking that includes all relevant stakeholders and actors, well-defined and measurable goals, clear and comprehensive scope, and regular timelines.<sup>13</sup>
- Look beyond activity metrics and utilize additional data collection tools like surveys.<sup>14</sup>
- Edit and clarify proposed metrics, including expanding definitions for EJ and asthma census tracts.<sup>15</sup>

### Summary of Changes:

- Narrowed down the list of data tracking opportunities to three indicators: 1) high energy burdens, 2) communities of color, 3) areas with high rates of arrearages and utility shutoffs.
- Clarified that this additional data tracking will occur in the Equitable Distribution Report. DEEP will report on these indicators with assistance from the utilities.
- Added a new Action to make equity data more accessible by updating the Equitable Distribution Reporting process.

## Goal 3: Develop metrics and goals to assess equitable distribution of energy efficiency funding

### Summary of Comments:

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6 See Comments from Center For Children’s Advocacy, United Illuminating, Town Of Vernon, Energy Efficiency Board, Sierra Club, Operation Fuel, New England Smart Energy Group, VEIC, Clean Water Action, and Eversource, [available here](#)

7 See Comments from Energy Solutions, Eversource and United Illuminating, Operation Fuel, and Mark Mitchell, [available here](#)

8 The Fisher Sheehan & Colton Home Energy Affordability Gap analysis is commonly used to assess energy affordability. The 6% threshold assumes that energy costs should not exceed 20% of total shelter costs, and total shelter costs should not exceed 30% of income (20% of 30% is 6%). This threshold is widely cited in literature and has been used in other jurisdictions, including New York’s Energy Affordability Policy. See Fisher Sheehan & Colton, Home Energy Affordability Gap, [available here](#)

9 See Comments from Energy Solutions, Eversource and United Illuminating, Operation Fuel, and Mark Mitchell, [available here](#)

10 See Comments from the Energy Efficiency Board, Kathy Fay, Operation Fuel, and Eversource and United Illuminating, [available here](#)

11 See Comments from Conservation Law Foundation and Energy Solutions, [available here](#)

12 See Comments from Eversource and United Illuminating, [available here](#)

13 See Comments from Eversource and United Illuminating and the Energy Efficiency Board, [available here](#)

14 See Comments from Energy Solutions and the Energy Efficiency Board, [available here](#)

15 See Comments from Conservation Law Foundation and the Energy Efficiency Board, [available here](#)

- Align equity goals and metrics with the three-year C&LM terms.<sup>16</sup>
- To increase accessibility to these materials, it would be helpful if materials were posted as separate PDFs in addition to being included in the full-length C&LM documents.<sup>17</sup>
- Expand secondary equity beyond MPP and report regularly on E3b metric.<sup>18</sup>
- Make reporting on equity metrics accessible to a wider audience.<sup>19</sup>

### Summary of Changes:

- Narrowed the scope of the Actions under this Goal to align with the changes to Goal 2.
- Proposed using the DEI Consultant called for in Goal 1 to develop new metrics, as necessary, based on the analysis described in Goal 2.

## Goal 4: Improve program participation and impacts among moderate-income customers

### Summary of Comments:

- Create a universal definition for low-income, moderate-income, energy affordability, and weatherization, and agree on the definitions used to describe who is served and who needs to be served in Connecticut.<sup>20</sup>
- Identify barriers that moderate-income customers face to accessing energy efficiency<sup>21</sup>
- Revisit assumptions about moderate-income customers to compare moderate-income participation to other customer classes.<sup>22</sup>
- If necessary, expand certain low-income programs or incentives to moderate-income customers.<sup>23</sup>
- Maintain state median income as the qualifying criteria in alignment with other programs<sup>24</sup>
- Use ALICE definitions or some other measure besides SMI to qualify participants.<sup>25</sup>
- Better characterize the reasons why moderate-income customers don't participate in programs, using surveys or other means.<sup>26</sup>

### Summary of Changes:

- Developed a definition of moderate income that uses state median income as its basis. Under this definition, moderate income is defined as those households with incomes at or below 80 percent of the state median income (SMI) and greater than 60 percent SMI.
- Clarified that the analysis of moderate-income participation will take place in the Equitable Distribution Report.
- Dismissed the proposal regarding vendor coverage of reimbursable upfront costs.

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<sup>16</sup> See Comments from Eversource and United Illuminating, [available here](#)

<sup>17</sup> See Comments from Conservation Law Foundation, [available here](#)

<sup>18</sup> See id.

<sup>19</sup> See id.

<sup>20</sup> See Comments from the Energy Efficiency Board, New England Smart Energy Group, United Illuminating, Eversource, Energy Efficiency Board, and Operation Fuel [available here](#)

<sup>21</sup> See id.

<sup>22</sup> See id.

<sup>23</sup> See id.

<sup>24</sup> See Comments from Eversource and United Illuminating, [available here](#)

<sup>25</sup> See Comments from Kathy Fay, Efficiency For All, Conservation Law Foundation and Operation. Fuel, [available here](#)

<sup>26</sup> See Comments from Energy Efficiency Board, Conservation Law Foundation, and, = and Operation. Fuel, [available here](#)

## Goal 5: Streamline the eligibility process for low-income programs

### Summary of Comments:

- Improved information-sharing between DEEP and DSS could further streamline HES-IE eligibility if participation in certain DSS programs could serve as an additional eligibility criterium.<sup>27</sup>
- It can be difficult for low-income households, particularly residents of multifamily housing, to gather the necessary eligibility documentation in a timely manner. Adding more census tracts that receive automatic eligibility would help to overcome this barrier and increase participation in high-need, high-impact areas.<sup>28</sup>
- Develop a tool for verifying customer eligibility that incorporates best practices from other jurisdictions and strong consumer protections.<sup>29</sup>
- Provide methods of assistance with qualification paperwork.<sup>30</sup>
- Consider proxies other than income as a qualifier for low-income programs.<sup>31</sup>
- Better communicate HES-IE eligibility criteria.<sup>32</sup>

### Summary of Changes:

- Changed the streamlining eligibility working group into a workshop to lower the barrier for entry and make participation more open.
- Added information about the utilities LINQ tool, which will help to identify eligible customers.

## Goal 6: Improve outreach to high-need or high-impact populations

### Summary of Comments:

- Through its energy affordability and arrearage forgiveness dockets, PURA has identified that many low- and moderate-income customers do not participate in utility programs for which they are eligible.<sup>33</sup>
- This proceeding should develop strategies to target communication to LMI customers in order to increase the number of program participants.<sup>34</sup>
- Improved information-sharing between state agencies, DSS in particular, could help to identify customers that would benefit from participating in HES-IE.<sup>35</sup>
- Effective strategies prioritize local outreach and work with trusted local representatives and established community groups, in particular, Community Action Agencies and local Energy Task Forces.<sup>36</sup>
- It is important to meet people where they are; conducting outreach from schools, community centers, food banks, churches, and other frequented areas.<sup>37</sup>

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27 See Comments from PURA Office of Education, Outreach, and Enforcement, Energy Solutions, and Energy Efficiency Board, [available here](#)

28 See Comment from New England Smart Energy Group, [available here](#)

29 See Comments from New England Smart Energy Group, Eversource and United Illuminating, Conservation Law Foundation, and Energy Efficiency Board, [available here](#)

30 See Comments from Energy Solutions, [available here](#)

31 See Comments from the Energy Efficiency Board, [available here](#)

32 See Comments from Conservation Law Foundation, [available here](#)

33 See Comments from PURA Office of Education, Outreach, and Enforcement, [available here](#)

34 See id.

35 See id.

36 See Comments from Clean Water Action, VEIC, United Illuminating, Office Of Consumer Counsel, NHS New Haven, and Energy & Resource Solutions, [available here](#)

37 See Comments from Clean Water Action and New England Conservation Services, [available here](#)

- An effective outreach strategy will target income-eligible participants through local municipal departments, commissions, public services, schools, neighborhood associations, local energy task forces and commissions, affordable housing organizations, and resident-run community-based organizations and advocacy groups.<sup>38</sup>
- Identifying, training, and funding local trusted community members to serve as liaisons, coordinate outreach efforts and help monitor progress would serve as a unique workforce development opportunity as well as to build trusted partnerships.<sup>39</sup>
- Develop programs for non-English speakers, focusing on the most spoken languages in Connecticut: Spanish, Portuguese, and Polish.<sup>40</sup>
- Create youth-centered educational programs focused on the science of climate change and the importance of energy efficiency measures, including the distribution of energy efficiency toolkits to students.<sup>41</sup>
- Encourage individuals to participate in public processes and engagement opportunities, including through incentives.<sup>42</sup>
- Explore new and additional means of communication, including social media, billboards, in-person events, and others to make program information more widely available.<sup>43</sup>
- Make Community Engagement Plan available in both English and Spanish and hold public meetings for people to comment on the Plan.<sup>44</sup>

### Summary of Changes:

- Listed guiding principles to direct the development of a community engagement plan.
- Added detail on the utilities' Community Partnership for Energy Efficiency Engagement Initiative and its alignment with the E3 Proceeding.
- Consolidated actions around social media engagement.

## Goal 7: Address health and safety barriers to low-income weatherization access

### Summary of Comments:

- Support cross-sector networks like Building for Health and provide conditions that make collaboration possible. The Building for Health program uses a streamlined income qualification process that removes barriers to participation by pre-qualifying households based on census tract. The initiative also uses a “no wrong door” approach so each program can work with families to resolve their initial concerns and refer them to other programs for additional support.<sup>45</sup>
- Consider funding sources such as external grants from the Department of Energy or the Regional Greenhouse Gas Initiative, LIHEAP funds, WAP funds, FCM funds, C&LM funds, Medicaid or a revolving loan fund for indoor health barrier removal, such as the heat loan funds.<sup>46</sup>

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38 See Comments from Center For Children's Advocacy, [available here](#)

39 See Comments from Clean Water Action, [available here](#)

40 See Languages in Connecticut, Statistical Atlas, [available here](#)

41 See Comments from Efficiency For All, Operation Fuel, and Energy & Resource Solutions, [available here](#)

42 See Comments from Energy Efficiency Board, [available here](#)

43 See Comments from Efficiency For All, Operation Fuel, and Energy Solutions, Energy Efficiency Board, Sierra Club, and Conservation Law Foundation, [available here](#)

44 See Comments from Conservation Law Foundation, [available here](#)

45 See Comments from Connecticut Children's Medical Center and Eversource, [available here](#)

46 See Comments from United Illuminating, E4TheFuture, Sierra Club, Efficiency for All, and New England Smart Energy Group, [available here](#)

- Develop a more coordinated system for addressing health and safety barriers including a state concierge service for universal intake and specialized contractor deployment; coordination with grassroots groups, healthcare organizations, and other community agencies; and better communication between state agencies and other relevant actors.<sup>47</sup>
- Use the 2020 over-recovery to fund a \$10 million grant and loan program for health and safety barrier mitigation.<sup>48</sup>
- Work with the Green Bank to develop financing options for barrier mitigation for market-rate customers.<sup>49</sup>
- DEEP should be the recipient and administrator of LIHEAP/ARPA funds for weatherization barriers.<sup>50</sup>

### Summary of Changes:

- Consolidated actions around the development of a program for weatherization barrier remediation.
- Added current information about the use of LIHEAP and ARPA funds for a weatherization barrier remediation program.

## Goal 8: Address and remove barriers to participation among renters

### Summary of Comments:

- Connecticut law states that tenants are not required to get permission from their landlords in order to access certain measures. Therefore, the property owner agreement portion of the HES-IE application should be removed<sup>51</sup>
- As part of this Proceeding, DEEP should investigate whether the property owner agreement is in conflict with Conn. Gen. Stat. § 47a-13a.<sup>52</sup>
- Incentivize landlord participation, including (1) providing insulation incentives to landlords for multi-unit buildings and (2) developing “green leases” and other means to reward landlords for investing in these programs without transferring costs to tenants.<sup>53</sup>
- “To serve customers who are renters, it is important for Eversource to continue to engage landlords and property owners/managers with energy efficiency programs. To this end, it is important that Eversource continue to explore rental market and property management events to connect with rental property decision-makers to promote energy efficiency programs.”<sup>54</sup>
- Require landlords that participate in state-funded housing reimbursement programs be required to provide prospective tenants an estimated heating and electrical cost for the property.<sup>55</sup>
- Require an energy-usage baseline be established for these rental properties. This would hold landlord accountable for providing energy efficient rentals. The process could be overseen by a 3rd party reviewer that estimates the costs and develops a baseline.<sup>56</sup>

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<sup>47</sup> See Comments from Center for Children’s Advocacy, VEIC, United Illuminating, Clean Water Action, Sierra Club, and New England Smart Energy Group, available [here](#)

<sup>48</sup> See Comments from Home Comfort Practice, available [here](#)

<sup>49</sup> See Comments from the Energy Efficiency Board, available [here](#)

<sup>50</sup> See id,

<sup>51</sup> See Comments from Center for Children’s Advocacy, available [here](#)

<sup>52</sup> See Comments from PURA Office of Education, Outreach, and Enforcement, available [here](#)

<sup>53</sup> See Comments from Clean Water Action and Energy & Resource Solutions, available [here](#)

<sup>54</sup> See Comments from Eversource, available [here](#)

<sup>55</sup> See Comments from Town of Vernon, available [here](#)

<sup>56</sup> See id.

- Create engagement strategies specifically for tenants to better understand any perceived barriers to participation and communicate the benefits and process for program participation. Engagement strategies should be tailored to different kinds of tenants.<sup>57</sup>
- Consider the implications that efficiency improvements could have on market-rate housing (i.e. raising rents). Review best practices to counteract this.<sup>58</sup>
- Create engagement strategies specifically for landlords to better understand any perceived barriers to participation and communicate the benefits and process for program participation.<sup>59</sup> Engagement strategies should be tailored to different kinds of landlords/property owners.<sup>60</sup>
- Consider the implications that efficiency improvements could have on market-rate housing (i.e. raising rents). Review best practices to counteract this.<sup>61</sup>
- “Structural” measures are only those things that would affect the structural integrity of the house.<sup>62</sup>
- Rental agreements should disclose energy information.<sup>63</sup>

### Summary of Changes:

- Updated the section on landlord roundtables to reflect the utilities’ progress and plans to hold additional roundtables.
- Added detail on outreach strategies for renters and landlords.
- Updated actions to reflect the passage of Public Act 21-48 and its potential for addressing the renter market.
- Maintained the property owner agreement while the utilities’ gather additional data on projects that do not proceed due to lack of landlord approval.
- Dismissed the proposal of differentiating structural and non-structural measures.

## Scope, Vision Statement, Prioritization

### Summary of Comments:

- Revise the Vision Statement for Equity in Energy Efficiency, specifically, the first bulleted item “Reduce energy burdens for all customers.”<sup>64</sup>
- Recommendations 1-3 and 6 are priorities because they can be implemented in the short term. Recommendations 5 and 7 are also priorities because they will increase access.<sup>65</sup>
- Develop recommendations for the commercial sector, segmenting this customer class as appropriate.<sup>66</sup>
- Develop better science, climate, energy, etc. education programs to create more meaningful and informed public engagement.<sup>67</sup>

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57 See Comments from Operation Fuel, Center for Children’s Advocacy and Neighborhood Housing Services of New Haven, [available here](#)

58 See Comments from Energy Solutions, [available here](#)

59 See Comments from Energy Solutions and the Energy Efficiency Board, [available here](#)

60 See Comments from Center for Children's Advocacy, Neighborhood Housing Services of New Haven, Conservation Law Foundation, Efficiency For All, and Operation Fuel, [available here](#)

61 See Comments from Energy Solutions, [available here](#)

62 See Comments from Center for Children’s Advocacy, [available here](#)

63 See Comments from Operation Fuel, [available here](#)

64 See Comments from Sierra Club, Conservation Law Foundation, Efficiency For All, and Operation Fuel, [available here](#)

65 See Comments from Energy Solutions, [available here](#)

66 See Comments from Operation Fuel, Energy Solutions, and Efficiency For All during DEEP’s 5/20/21 E3 Phase 1 Technical Meeting, [available here](#)

67 See Comments from Kathy Fay and Efficiency For All during DEEP’s 5/20/21 E3 Phase 1 Technical Meeting, [available here](#)

- Explore equitable delivery of whole home solutions (i.e., weatherization/efficiency + clean energy) to high-need, high-impact populations.<sup>68</sup>
- Include hot water heater temperature settings in HES/HES-IE safety inspection.<sup>69</sup>

### Summary of Changes:

- Revised the vision statement to better reflect core concepts of equity.
- Started a list of items to include in future phases of this Proceeding.

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<sup>68</sup> See Comments from Efficiency For All during DEEP's 5/20/21 E3 Phase 1 Technical Meeting, available [here](#)

<sup>69</sup> See id.