

DEEP Determination: 2022-2024 Conservation and Load Management Plan
 Attachment A: Schedule of Conditions of Approval

Item #	Program or Topic	Condition of Approval	Due Date	Action	Carry-Over
1	Responding to New Funding Sources	<p>The Utilities are directed to identify specific Infrastructure Investment and Jobs Act (IIJA funding) opportunities that are relevant to the C&LM programs and for which they are eligible to apply. The Utilities should submit a preliminary list of these opportunities to DEEP by June 30, 2022. In recognition of the fact that guidance is not yet available for all IIJA funding opportunities, this list should be treated as a living document and updated at regular intervals to respond to new guidance.</p> <p>DEEP will lead coordination efforts associated with IIJA opportunities, which may include meetings, data requests, and the co-development of response strategies with stakeholders, including the Utilities.</p>	June 30, 2022 (with updates as necessary)	List	
2	Enhanced Residential Concierge Service	<p>Pursuant to Section III.i. of DEEP’s Determination regarding the 2022-2024 C&LM Plan, DEEP directs the Utilities to develop a Request for Information (RFI) regarding best practices for residential energy concierge services. This should be submitted to DEEP for review by July 18, 2022. Following DEEP review, the RFI should be submitted to a variety of expert parties, including those named in the Determination, no later than August 8, 2022.</p> <p>To the extent necessary, the Utilities are also directed to work with DEEP to explore potential funding sources for this service.</p>	<p>July 18, 2022</p> <p>August 8, 2022</p>	<p>Draft RFI</p> <p>Final RFI</p>	

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3	Condensing Gas Equipment Incentives	<p>In the proposed 2022-2024 Plan, the utilities committed to investigating the continued need to incentivize certain high-efficiency natural gas furnaces and boilers in the Residential and C&I portfolios. The utilities will work with the Evaluation Administrator on this investigation and are specifically directed to apply findings from other jurisdictions, specifically Massachusetts, on this issue.</p> <p>As part of this investigation, the Utilities should also study how the programs will determine the baselines for measures with upstream market models and the potential impact on low-to-moderate income customers if such incentives were eliminated.</p> <p>The Utilities should report the findings of this investigation to the Energy Efficiency Board no later than their July 2022 meeting and submit to DEEP for approval shortly thereafter.</p>	July 13, 2022	Report	
4	Parity Analysis	<p>The Utilities are directed to perform a parity analysis, similar to those included in Appendix E.2 of the proposed 2022-2024 C&LM Plan, that further disaggregates C&I customers by size using the four quartiles that are employed for the C&I secondary equity metric. This analysis should demonstrate budgets and revenues for each C&I customer quartile.</p> <p>The Utilities are also directed to expand the analysis for the gas sector, included as Appendix E.5 in the proposed 2022-2024 C&LM Plan. This analysis should include budgets and revenues by customer class (further disaggregated for C&I customers, as described above) over the three-year term.</p>	June 30, 2022	Report	

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5	Equitable Distribution Reporting	Pursuant to CGS Sec. 16-245ee, each EDC must annually submit to DEEP and the Energy Efficiency Board (EEB) 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 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)).	Annually on July 1	Reporting	2019-2021 C&LM Plan #2

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6	Heat Pump Installer Network	<p>To track progress of trainings offered through the new Heat Pump Installer Network (HPIN), the utilities are directed to:</p> <ol style="list-style-type: none"> 1. Semi-annually (by July 1 and December 31) submit a report providing an inventory of the trainings planned for the following six months related to heat pumps and how they compare to those offered by other Northeastern states. Specify what the companies are doing to ensure that building electrification training programs in Connecticut are consistent with the best practices from regional neighbors. When comparing programs, please indicate: <ol style="list-style-type: none"> a. Whether trainings are in-person vs. virtual; b. The hours required to complete the course; c. Who developed the training (e.g., a manufacturer, or utility staff); d. The purpose of the training; e. The extent to which the Connecticut-based training will diverge from the best-in-class training and why; and f. Cost to offer the training. 2. Submit a quarterly report to DEEP containing the following information: <ol style="list-style-type: none"> a. Number of contractors/installers registered on the HPIN b. Trainings completed per installer <p>Individual contractor participation in each training</p>	December 31, 2022, then semi-annually and quarterly	Report	
7	Evaluation Data Dictionary and Standardization	<p>With the understanding that UI is currently working to develop a new data management system, they are directed to take the following interim steps to improve the quality and timeliness of their evaluation data:</p> <ul style="list-style-type: none"> • Produce an accurate data dictionary for review by the Evaluation Administrator prior to the September 12, 2022 Evaluation Committee meeting. <p>Work with the Evaluation Administrator to produce standard data requests for impact and process evaluations, with accurate variable names, suitable for every major program.</p>	September 12, 2022	Data dictionary Standardized data requests	

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8	Commercial and Industrial Project Verification	The utilities shall lead a collaborative process, working with C&I customers, EEB Technical Consultants, and the Evaluation Administrator, to develop a proposal for an alternative verification pathway in instances where the customer is able to provide reliable calculated savings. This proposal should set clear parameters for projects that are eligible for the alternative pathway and ensure that there is no undue burden on the Evaluation Administrator. This proposal should be presented to the EEB C&I Committee no later than their July 2022 meeting.	July 12, 2022	Proposal	
9	Residential Pay-for-Performance Pilot	In response to Condition of Approval #3 of the 2021 C&LM Plan Update, the utilities submitted a straw proposal for a residential energy efficiency pay-for-performance pilot program. ¹ DEEP approves that proposal and directs the companies to submit an implementation plan that includes a timeline and process for the proposed RFP and a pilot study plan that includes specific research questions, metrics, and a timeline for implementation as well as a regular reporting schedule by August 1, 2022. The Utilities are encouraged to work with the Energy Efficiency Board and Evaluation Administrator on their assessment of this pilot.	August 1, 2022	Plan	

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10	Workforce Development Progress Reporting	<p>To ensure that progress is being tracked to support the development and expansion of a robust energy efficiency workforce in Connecticut, the Companies shall develop a workforce development and education strategy that includes the following:</p> <ul style="list-style-type: none"> • A list of measurable goals for the Education, Outreach and Workforce Portfolio of programs. Where possible, these goals should be informed by the recommendations of the ILLUME evaluation study. • An indication of projected rates of increase for these goals for each program year • Metrics to track quantifiable progress towards these goals; providing specific goals and quantifiable metrics for program deployment in distressed municipalities • Near, mid-, and long-term actions, estimated costs, and gaps that need to be filled by other stakeholders to meet these goals. <p>For the GreenSTEP program specifically, this report should include:</p> <ul style="list-style-type: none"> • Programmatic or policy-based recommendations on how to increase participation in the GreenSTEP programs • An outreach plan to include students from the public school system in the after school/ summer GreenSTEP program <p>This report should be submitted to DEEP by August 15, 2022. After the submission of the initial report, DEEP will work with the utilities to develop a regular reporting process to track progress towards the identified workforce development goals.</p>	August 15, 2022	Report	

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11	Updated Incentives	<p>The Utilities are directed to submit a proposal outlining any changes to incentives resulting from DEEP’s guidance on fuel-switching, as outlined in Section III.f. of the Determination, and changes to the cost-effectiveness test, as outlined in Section III.g. and Attachment B of the Determination. This proposal should re-evaluate and propose new levels for all incentives that will be impacted by these directives.</p> <p>Where applicable, it should also indicate if there are any new measures not currently incentivized through C&LM that may now be cost-effective, given the changes made in this Determination. Specifically, the proposal should address the potential for incentivizing integrated controls and new renewable thermal measures including solar hot water.</p> <p>With respect to heat pump and heat pump water heater incentives specifically, the proposal should also explore the potential for providing enhanced incentives when these measures are paired with other measures, including weatherization, demand response, and integrated controls, as well as incentive structures that differentiate pull v. partial displacement scenarios.</p> <p>In developing this proposal, the Utilities are directed to prioritize incentives that produce energy savings irrespective of fuel type, support customer choice and affordability, and align with state policy goals, including the Global Warming Solutions Act. It should also consider appropriate, fuel-neutral baselines and accounting methods to allocate costs equitably among programs, in accordance with Public Act 18-50.</p> <p>This proposal should be submitted to DEEP and the EEB for review and approval by September 1, 2022, with the intention that these new incentives will be incorporated into the 2023 Plan Update.</p>	September 1, 2022	Proposal	

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12	Communities RFP	<p>In its review of the 2021 C&LM Plan Update, DEEP examined the Utilities’ new community outreach strategy. Part of this strategy would become the Community Partnership Initiative. There was a second component of this strategy that involved the issuance of an RFP for targeted community outreach, which DEEP directed the Utilities to pause in its Conditional Approval.ⁱⁱ</p> <p>After completing two rounds of the CPI, the Utilities will be directed to submit to DEEP a proposal for the RFP offering that applies lessons learned from the first and second rounds of CPI and targets underserved/overburdened communities, including those identified in the Equitable Energy Efficiency Proceeding.ⁱⁱⁱ This proposal should be developed with guidance from the EEB’s Diversity, Equity, and Inclusion Consultant. To ensure that the Utilities have time to incorporate lessons learned from two rounds of the CPI into their proposal, DEEP will establish a deadline for the submission of this proposal in 2023.</p>	2023	Proposal	
13	All Electric Residential New Construction	<p>The Utilities are directed to develop a proposal for transitioning the Residential New Construction program into an all-electric offering that will begin accepting projects no later than July 2023. This proposal should include:</p> <ul style="list-style-type: none"> • Interim targets for increasing the proportion of all-electric projects completed through the Residential New Construction program • Any necessary changes to incentive structures or levels <p>Any perceived barriers to an all-electric new construction offering, including workforce development, education, and customer outreach needs and proposed solutions to those barriers.</p>	October 15, 2022	Proposal	

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14	Community Partnership Initiative	<p>The Utilities launched the first round of the Community Partnership Initiative (CPI) in August 2021 and selected applicants in early 2022.^{iv} The Utilities are directed to use future rounds of the CPI to serve the C&LM Plan’s three priorities: equity, decarbonization, and affordability, and further goals that are not already being accomplished through standard program delivery. For example, the CPI should not simply seek to increase enrollment in programs that already have strong participation rates Future rounds of the CPI may include goals such as:</p> <ol style="list-style-type: none"> 1. Increase the adoption of heat pumps among low-income customers 2. Specific targeting of small and microbusinesses in low-income and environmental justice areas 3. Outreach goals aimed at increasing deployment of programs to rental properties and multi-unit dwellings 4. Outreach goals aimed at increasing uptake of demand response and deep energy saving measures <p>The Utilities are also directed to consult with the EEB’s Diversity, Equity, and Inclusion Consultant on subsequent rounds of the CPI, as outlined in the EEB’s Request for Proposals.^v</p>	<p>Regular reporting</p> <p>Directives incorporated in time for Round 2</p>	Modification	
15	WAP Coordination	<p>The Utilities are directed to coordinate with DEEP and other relevant stakeholders to develop approaches to braid funding between the C&LM programs and the federally funded Weatherization Assistance Program (WAP), in order to leverage increased funding available through IIJA and other sources.</p> <p>DEEP will lead these coordination efforts, which may include meetings, data requests, and the co-development of strategies with stakeholders, including the Utilities.</p>	Ongoing	Coordination	

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16	Technical Meeting – Heat Pump Adoption Strategic Plan	<p>Pursuant to Section III.h.ii. of DEEP’s Determination on the 2022-2024 C&LM Plan, DEEP will be convening a Technical Meeting to collect stakeholder feedback on barriers to and best practices for heat pump adoption. The Utilities are directed to participate in the Technical Meeting and may be asked to present on or discuss any of the items listed in Section III.h.ii. Following that Technical Meeting, the Utilities will be directed to produce a strategic plan for addressing barriers to heat pump adoption that incorporates findings from the Technical Meeting. This strategic plan should be developed as a standalone document and completed in time for it to be incorporated into the 2023 C&LM Plan Update.</p> <p>DEEP will organize the Technical Meeting and coordinate with the Utilities on scheduling and presenting.</p>	TBD	Technical Meeting, Strategic Plan	
17	Technical Meeting – Demand Response	<p>Pursuant to Section III.k. of DEEP’s determination on the 2022-2024 C&LM Plan, DEEP will be convening a Technical Meeting to collect stakeholder feedback on new opportunities to leverage advanced metering infrastructure (AMI) to optimize active demand response and pay-for-performance offerings in the C&LM Plan. The Utilities are directed to participate in the Technical Meeting and may be asked to present. Following the Technical Meeting, the Utilities are directed to incorporate any applicable findings and recommendations into the 2023 C&LM Plan Update.</p> <p>DEEP will organize the Technical Meeting and coordinate with the Utilities on scheduling and presenting.</p>	TBD	Technical Meeting	
18	Financial and Operational Audits	The utilities will continue the annual process for conducting Operational Audits of the Conservation and Load Management programs following the Agreed Upon Procedures that were established in response to Condition of Approval #3 of the 2019-2021 C&LM Plan. ^{vi}	Ongoing	Reporting	2019-2021 C&LM Plan #3

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19	Data Coordination	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.	Ongoing	N/A	2019-2021 C&LM Plan #18
20	Program Reporting	<p>The Utilities are instructed to continue the schedule of regular program reporting established in their response to Condition of Approval No. 18 of DEEP's Determination regarding the 2020 C&LM Plan Update.^{vii} The Utilities should continue to follow the reporting requirements and timeline outlined in that response. In addition to the items listed in that response, DEEP may direct the Utilities to include additional items in these reports as needed during the 2022-2024 Plan term.</p> <p>Starting with the 2022 Q2 report, the Utilities are directed to report on the percentage of HES and HES-IE projects that accept and install each category of add-on measures under their respective programs, broken out by single-family and multifamily projects.</p>	Ongoing	Reporting	2020 Plan Update #18 (modified)
21	Equitable Modern Grid Decisions	The Utilities are instructed to propose updates to DEEP for review and approval, as needed, to align the Plan programs with the Distribution System Planning and Grid Modernization actions described in PURA dockets on those topics.	Ongoing	N/A	2021 Plan Update #13

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22	Heat Pump Pilot	<p>In their comments on DEEP’s Draft Determination regarding the 2022-2024 C&LM Plan, the Utilities indicated that they planned to transition the Heat Pump Pilot into a standard program offering by December 31, 2022.^{viii} Pursuant to Condition of Approval #17 of the 2020 C&LM Plan Update, the utilities should continue quarterly reporting to DEEP regarding the Heat Pump Pilot program for any quarters in the 2022-2024 C&LM Plan term during which the Pilot was operational.^{ix}</p> <p>The Utilities should provide a report of any findings resulting from the Heat Pump Pilot program to the Energy Efficiency Board and DEEP no more than two months after the conclusion of the Pilot.</p>	Ongoing	Reporting	2020 Plan Update #17 (modified)
23	Electric Resistance Conversions	Pursuant to Condition of Approval #9 of the 2021 C&LM Plan Update, the utilities should continue quarterly reporting regarding the conversion of electric resistance customers to heat pumps. ^x	Ongoing	Reporting	2021 Plan Update #9 (modified)
24	Targeted Outreach for Arrearage/Shutoff Customers	Pursuant to Condition of Approval #18 of the 2021 C&LM Plan Update, the utilities are instructed to prioritize the targeting of HES and HES-IE programs to those with the largest arrearages and the most frequent shut-offs. ^{xi} The utilities shall continue quarterly reporting on these targeted outreach efforts.	Ongoing	Reporting	2021 Plan Update #18 (modified)
25	Ongoing Evaluation Data Improvements	<p>The Evaluation Administrator’s memo to DEEP identified specific areas of improvement that would bring Eversource and Avangrid’s data into alignment with industry standards. Throughout the 2022-2024 Plan term, the utilities are directed to work with the Evaluation Administrator to address these issues, with the expectation that they will make significant progress by the end of the Plan term.</p> <p>The Evaluation Administrator and utilities should report bi-annually to the Evaluation Committee on their progress, beginning at their July 11, 2022 meeting.</p>	Ongoing	Reporting	

ⁱ See Utilities’ response to Condition of Approval No. 3 of the 2021 C&LM Plan Update, March 25, 2021, *available at*: <http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/8525797c00471adb852586a30069e413?OpenDocument>

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- ⁱⁱ See DEEP Determination: Approval with Conditions of the 2021 Plan Update to the 2019-2021 Conservation and Load Management Plan, March 4, 2021, *available at*: [http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/d80f7ae5059c5efc8525868e00598e40/\\$FILE/Determination_Approval%20with%20Conditions%202021%20Plan%20Update%20%202020%20PMI%20Adjustment%20\(002\).pdf](http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/d80f7ae5059c5efc8525868e00598e40/$FILE/Determination_Approval%20with%20Conditions%202021%20Plan%20Update%20%202020%20PMI%20Adjustment%20(002).pdf)
- ⁱⁱⁱ See DEEP Final Determination, Equitable Energy Efficiency Proceeding: Phase I Goals and Actions, July 21, 2021, *available at*: <https://portal.ct.gov/-/media/DEEP/energy/ConserLoadMgmt/Final-E3-Phase-I-Determination.pdf>
- ^{iv} See Energize CT, Community Partnership for Energy Efficiency Engagement Initiative: Round 1 Application for Interested Parties, August 4, 2021, *available at*: https://energizect.com/sites/default/files/2021-08/20210804%20REVISED%20Community%20Partnership%20Application_p1-8.pdf
- ^v See EEB Request for Proposals: Consultant on Diversity, Equity, and Inclusion to the CT Energy Efficiency Board, November 17, 2021, *available at*: <https://energizect.com/sites/default/files/2021-12/DEI%20Consultant%20RFP.pdf>
- ^{vi} See DEEP Conditional Approval of the 2019-2021 C&LM Plan, Attachment A: Schedule of Conditions of Approval, December 20, 2018, *available at*: <https://portal.ct.gov/-/media/DEEP/energy/ConserLoadMgmt/AttachmentAScheduleofComplianceConditionsofApprovalof20192021CLMPlanFinal121918pdf.pdf?la=en&hash=BF8647A8C1BE168FA7C93619D7171469>
- ^{vii} See Utilities' response to Condition of Approval No. 18 of the 2020 C&LM Plan Update, June 30, 2020, *available at*: <http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/23661838715798ce85258597006ce1e1?OpenDocument>
- ^{viii} See Eversource Energy and Avangrid Networks, Inc. comments in response to DEEP's Draft Determination regarding the 2022-2024 C&LM Plan, April 27, 2022, *available at*: <http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/a3a4beb1919a550d8525883e006e1a87?OpenDocument>
- ^{ix} See DEEP's Conditional Approval of the 2020 C&LM Plan Update (Appendix A), February 11, 2020, *available at*: <http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/16d2e80a4a780ab78525850b0057ec6a?OpenDocument>
- ^x See DEEP Determination: Approval with Conditions of the 2021 Plan Update to the 2019-2021 Conservation and Load Management Plan, March 4, 2021, *available at*: [http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/d80f7ae5059c5efc8525868e00598e40/\\$FILE/Determination_Approval%20with%20Conditions%202021%20Plan%20Update%20%202020%20PMI%20Adjustment%20\(002\).pdf](http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/d80f7ae5059c5efc8525868e00598e40/$FILE/Determination_Approval%20with%20Conditions%202021%20Plan%20Update%20%202020%20PMI%20Adjustment%20(002).pdf)
- ^{xi} See Id.