

DEEP Determination: 2022-2024 C&LM Plan

Attachment C – Summarized Public Comments Regarding the 2022-2024 C&LM Plan

The table below contains summarized public comments that were submitted to DEEP as written comments or presented verbally during the public comment portions of the public meetings that DEEP held on November 16, 17, and 18, 2021. These comments are organized alphabetically by topic. Complete written comments that were submitted to DEEP by December 3, 2021 are available on DEEP's [Energy Filings page](#). Comments presented verbally are available in the [November 16](#), [November 17](#), and [November 18](#) public meeting recordings.

Additionally, DEEP's review of the 2022-2024 C&LM Plan also considered comments that were submitted to the Energy Efficiency Board (EEB) as part of their August 2021 public input process. Those comments are available on the [EEB website](#) and responses to those comments are included in Appendix D of the [2022-2024 C&LM Plan](#).

Commenter	Date Received	Comment Summary	Topic
Commercial Contractor Consortium	12/3/2021	Streamline processes to lower the number of projects that need to be placed in the longer lead-time engineering queue, which requires more significant design review and should only be used where its warranted.	C&I project review
Commercial Contractor Consortium	12/3/2021	Need more consistency/streamlining around processes, especially post-inspection and contract documentation. Consider tools such as DocuSign.	C&I project review
Commercial Contractor Consortium	12/3/2021	Allow for savings calculations based on existing conditions rather than code.	C&I project review
Commercial Contractor Consortium	12/3/2021	CCC requests for a bi-annual review with the utilities around processes and programs, outside the standard meetings.	C&I project review
Connecticut Industrial Energy Consumers	12/3/2021	Uncertainty around C&LM incentives that will be available 12 months from now (project planning timeline) often causes C&LM incentives to be excluded from project economic analyses, leading to less favorable results and potential to not receive internal approval.	C&I project review

Commenter	Date Received	Comment Summary	Topic
Connecticut Industrial Energy Consumers	12/3/2021	CIEC recommends that the determination of annual incentive caps be modified to support customer decision making and budget planning for energy efficiency investments. Specifically, the annual incentive cap for individual customers should be aligned to the greater of (i) the utility's current annual incentive cap per federal tax id (i.e., \$2 million for Eversource, \$0.5 million for UI), or (ii) the customer's C&LM contributions on a rolling three-year average basis.	C&I project review
Connecticut Industrial Energy Consumers	12/3/2021	There should be a clearly defined process whereby companies may seek approval to exceed the applicable annual incentive cap. DEEP would specify the circumstances under which this could happen (i.e., if the utilities project that they won't meet their budget/savings goals)	C&I project review
Connecticut Industrial Energy Consumers	12/3/2021	At least 12 months' notice should be given before changes are made to the incentive structures and annual utility caps.	C&I project review
Connecticut Industrial Energy Consumers	12/3/2021	Funding for energy efficiency programs and services under the Proposed C&LM Plan should be collected, at least in part, on the basis of demand, and not solely on a volumetric basis. Does not make sense to recover costs for ADR using a per-kWh charge.	C&I project review
Connecticut Industrial Energy Consumers	12/3/2021	Volumetric charges are unfair to manufacturing and commercial sectors and put Connecticut businesses at a disadvantage compared to other states.	C&I project review
Northeast Energy Efficiency Partnerships	12/3/2021	Replicate the National Grid (RI) building code savings attribution program, which provides support for: training, circuit riders, stakeholder engagement, resource development and delivery, and third-party compliance support.	Codes and standards
Northeast Energy Efficiency Partnerships	12/3/2021	Implement appliance standards, using resources like NEEP's State Appliance Standards Database.	Codes and standards

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Northeast Energy Efficiency Partnerships	12/3/2021	Make code training program accessible to workers statewide. For example, include quarterly up-to-date, free-of-charge CEU credit-accruing workshops and classes to architects, contractors, manufacturers, code officials, inspectors, builders, and related design and construction professionals. Additionally, create a training platform for online and on-demand training.	Codes and standards; workforce and outreach
Kimberly Stoner	11/17/2021	Improve education and outreach	Education and outreach
Diane Lentokis	11/17/2021	Educate about the energy efficiency programs through TV and mobilize EnergizeCT.	Education and outreach
Robert Maddox, U.S. Building Council	11/17/2021	Need to hand hold to make sure the programs are getting to customers.	Education and outreach
Save the Sound	11/15/2021	Improve consumer outreach and education around heat pump systems	Education and outreach; heat pumps
CT Green Building Council	12/3/2021	Since LMI communities pay a larger share of their income towards energy bills in the state, as much as 25% of income for those at or below poverty level, they should also receive a larger share of the fund allocation.	EEJ
Northeast Energy Efficiency Partnerships	12/3/2021	Consider using energy burden to qualify income-eligible customers - use the Vermont/LEAD tool model.	EEJ
Northeast Energy Efficiency Partnerships	12/3/2021	Allow contractors to qualify income-eligible customers at the community level to ease the administrative barriers for customers and utilities.	EEJ
Melissa Kops, CT Building Council	11/17/2021	Allocation of EE benefits seems incorrect; low-income residents should get a larger percentage of benefits because they have the highest burdens	EEJ
Kimberly Stoner	11/17/2021	Only 14% of funds go to income-eligible households; Plan doesn't do enough to address equity	EEJ

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CT Green Building Council	12/3/2021	Electric-heated homes have lower fuel use and emissions (even if electricity comes from NG) than NG homes, but delivery cost for electricity is higher. Could we reduce rates for fully electric homes?	Electrification and decarbonization
CT Green Building Council	12/3/2021	Look at Maryland Commission on Climate Change Buildings Energy Transition Plan as an example of how to meet statewide emissions goals.	Electrification and decarbonization
People's Action for Clean Energy (PACE)	12/3/2021	Incorporate the following into the C&LM: A statement that acknowledges the lifecycle climate impact of natural gas	Electrification and decarbonization
People's Action for Clean Energy (PACE)	12/3/2021	Incorporate the following into the C&LM: Express a goal of moving deliberately to a future where gas is only used in scenarios where electrification is not feasible.	Electrification and decarbonization
Conservation Law Foundation	12/3/2021	Methane leaks offset any potential natural gas emissions benefits relative to other fuels.	Electrification and decarbonization
Various Organizations - Joint Comment	12/3/2021	Rising gas prices support the case for electrification.	Electrification and decarbonization
Various Organizations - Joint Comment	12/3/2021	Refer to Massachusetts' three-year energy efficiency plan and Maryland Building Energy Transition Plan as examples of how other jurisdictions are reducing emissions from their buildings sectors.	Electrification and decarbonization
Dwayne Escola	12/3/2021	There is an opportunity to use the 2022-2024 C&LM Plan to help electrify building heating systems (provided estimates for emissions savings from heat pumps in the residential sector).	Electrification and decarbonization
Dwayne Escola	12/3/2021	Notify residents of the estimated Life Cycle CO2 emissions for heating equipment types sold in CT and add these comparisons to all utility advertising, including the utility cost comparison apps.	Electrification and decarbonization
Dwayne Escola	12/3/2021	Launch a major campaign to discourage use of fossil fuel equipment and encourage heat pumps.	Electrification and decarbonization
Henry Auer	12/3/2021	Connecticut needs to implement ambitious efficiency retrofit policies for both LMI households and the housing stock at large	Electrification and decarbonization

Commenter	Date Received	Comment Summary	Topic
Henry Auer	12/3/2021	Plan must integrate the Retrofit Grant Program into its proposal; C&LM and the Retrofit program have similar goals, and the two should collaborate with each other to achieve their goals	Electrification and decarbonization
Kristen Earls & John Miscione	12/3/2021	Witnessed a "reprehensible absence of utility preparation for an energy transition" at the 11/17/21 Technical Meeting	Electrification and decarbonization
Kris Kuhn	12/3/2021	Witnessed a "reprehensible absence of utility preparation for an energy transition" at the 11/17/21 Technical Meeting	Electrification and decarbonization
Melissa Leanord, Naugatuck Conservation Commission	11/16/2021	CT not on track to meet GHG reduction targets. Gas appliances are no longer efficient under EPA standards.	Electrification and decarbonization
Diane Lentokis	11/17/2021	Prioritize decarbonization. Energy efficiency is a critical tool to decrease the electricity demand and lower GHG emissions. Emphasize actions that decrease gas consumption. Must reject any plan that does not significantly reduce fossil fuel use.	Electrification and decarbonization
Kimberly Stoner	11/17/2021	Plan needs to take urgent action given the climate crisis; Plan needs to address the goals that have been identified by the State. Invest more in weatherization.	Electrification and decarbonization
Shannon Laun, Conservation Law Foundation	11/18/2021	MA took radical actions to align their plan with state climate goals, and CT should do the same. Replace fossil fuels with electric alternatives	Electrification and decarbonization
Peter Millman	11/18/2021	The Utilities have a bias towards natural gas. There is therefore a conflict of interest that the utilities write the C&LM plan. DEEP said there should be third-party competition for administering EE programs – should explore this avenue.	Electrification and decarbonization
Ashita Gona	11/18/2021	Invest more in weatherization/comprehensive retrofit programs	Electrification and decarbonization
Eugene DeJoannis	12/3/2021	In order to address concerns/reservations individuals may have about air-to-air heat pumps, the State or the Green Bank should publish a guide for homeowners that details the topic of conversion to non-fossil fuel heat and addresses common concerns.	Electrification and decarbonization; education and outreach; heat pumps

Commenter	Date Received	Comment Summary	Topic
Dwayne Escola	12/3/2021	Refocus the Performance Management Incentive (PMI) to reward the utility companies for the “life cycle CO2 reduction” of the heat pump equipment installed during the 2022-2024 C&LM Plan period	Electrification and decarbonization; heat pumps
Save the Sound	11/15/2021	Increase the deployment of heat pumps systems to replace fossil-fuel heating systems	Electrification and decarbonization; heat pumps
Shannon Laun, Conservation Law Foundation	11/18/2021	HP pilot program should be implemented as a full-scale program, and should be based on GHG savings, not cost savings (except in the income-eligible program)	Electrification and decarbonization; heat pumps
People's Action for Clean Energy (PACE)	12/3/2021	PACE provides sample language on natural gas high-efficiency furnaces, boilers, and boiler water circulator pumps that reflects the above comments to be incorporated into the Plan on pg. 1 of their written comments	Electrification and decarbonization; incentives
Commercial Contractor Consortium	12/3/2021	Heat pump technology is not where it needs to be for C&I customers to go fully electric. Eliminating fossil fuel incentives could cause these customers to pick less efficient alternatives.	Electrification and decarbonization; incentives
Conservation Law Foundation	12/3/2021	Incentivizing gas use is inconsistent with CT's statutory climate targets and policies to rapidly electrify the buildings sector (and GC3 recommendations).	Electrification and decarbonization; incentives
Conservation Law Foundation	12/3/2021	Gas prices are volatile and have risen significantly, and the State should not incentivize gas appliances that lock in higher costs and emissions. Instead, ramp up heat pump incentives like MA and MD.	Electrification and decarbonization; incentives
Conservation Law Foundation	12/3/2021	The companies have not offered any compelling reasons for continuing to incentivize gas appliances.	Electrification and decarbonization; incentives
Conservation Law Foundation	12/3/2021	Remove all fossil fuel incentives and expand incentives for heat pumps.	Electrification and decarbonization; incentives

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Various Organizations - Joint Comment	12/3/2021	End incentives for all residential, commercial, new construction, and retail gas equipment in the C&LM Plan.	Electrification and decarbonization; incentives
Nicolette Doukas	12/3/2021	Strong objection to the continued incentives for gas equipment. It is critical that DEEP and Connecticut does everything in the power to reduce carbon emissions, and discontinuing these incentives is an important step.	Electrification and decarbonization; incentives
Dwayne Escola	12/3/2021	Eliminate all incentives for natural gas or other fossil fuel burning equipment.	Electrification and decarbonization; incentives
Groton Conservation Advocates	12/3/2021	Any incentives for efficient natural gas appliances should be limited to those that will be installed in buildings that had natural gas service prior to 2019 so as to not encourage additional conversions to natural gas. Recent conversions should already have high efficiency components and therefore do not need these incentives.	Electrification and decarbonization; incentives
Save the Sound	11/15/2021	Discontinue subsidies for fossil-fuel fired heating equipment and appliances	Electrification and decarbonization; incentives
Elizabeth Raisbeck	12/3/2021	End all gas incentives; provide incentives to energy providers and others to pivot away from fossil fuels	Electrification and decarbonization; Incentives
Henry Auer	12/3/2021	Eliminate incentives for natural gas space heating and water heaters; incentives should be applied only for "renewable thermal technologies" (e.g., heat pumps)	Electrification and decarbonization; incentives
Kristen Earls & John Miscione	12/3/2021	End incentives for all gas equipment in the Plan.	Electrification and decarbonization; incentives

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Kris Kuhn	12/3/2021	End incentives for all gas equipment in the Plan.	Electrification and decarbonization; incentives
Vincent Giordano	12/2/2021	All subsidies and incentives should be directed towards replacing fossil fuels with energy efficient electrical equipment	Electrification and decarbonization; incentives
Tom Swan, Connecticut Citizen Action Group (CCAG)	12/3/2021	Reject the current plan and make it consistent with the State's climate goals, including by eliminating any incentives for gas and encouraging the use of other technologies like heat pumps.	Electrification and decarbonization; incentives
Eugene DeJoannis	12/3/2021	Stop incentivizing the expansion of the natural gas distribution system	Electrification and decarbonization; incentives
Eugene DeJoannis	12/3/2021	Stop incentivizing replacement of existing gas appliances with higher efficiency appliances of the same type	Electrification and decarbonization; incentives
Jason Hine	12/3/2021	End incentives for all gas equipment in the Plan.	Electrification and decarbonization; incentives
Samantha Dynowski, Sierra Club Connecticut	11/16/2021	Reject the current plan as drafted. Remove incentives for gas appliances. We need to meet our GHG goals and take critical climate action. New construction is the lowest hanging fruit, natural gas equipment should therefore at minimum, not be incentivized there.	Electrification and decarbonization; incentives
Cary Lyncg, CT Chapter of the Nature Conservancy	11/16/2021	Expressed concerns over subsidies for gas appliances. CT not on track to meeting GHG goals. Natural gas is not as cost effective as it once was, and costs will increase.	Electrification and decarbonization; incentives
Laura Bozzi, Yale Center of Climate Change and Health	11/16/2021	Plan should not support conversion to gas appliances or replacement of gas appliances.	Electrification and decarbonization; incentives

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Melissa Kops, CT Building Council	11/17/2021	Incentives for gas appliances and equipment are counter to our state goals.	Electrification and decarbonization; incentives
Kimberly Stoner	11/17/2021	Discontinue fossil fuel incentives	Electrification and decarbonization; incentives
Ashita Gona	11/18/2021	Streamline incentives to promote all-electric new construction	Electrification and decarbonization; incentives
Ashita Gona	11/18/2021	End fossil fuel incentives and offer zero/low financing for electric systems	Electrification and decarbonization; incentives; financing
Eugene DeJoannis	12/3/2021	Start incentivizing the installation of electric air source heat pumps in all new homes	Electrification and decarbonization; incentives; heat pumps
Eugene DeJoannis	12/3/2021	Incentivize conversion of existing homes to air source heat pumps. There are currently no electric air-to-water heat pumps that are drop-in replacements for CT homes with steam or hot water boilers; there are only low temperature hot water heat pumps that require the replacement of the entire heat distribution system with low temperature equipment, which is expensive and disruptive	Electrification and decarbonization; incentives; heat pumps

Commenter	Date Received	Comment Summary	Topic
Laura Bozzi, Yale Center of Climate Change and Health	11/16/2021	CT should be incentivizing heat pumps at scale. Can use LIHEAP dollars. Should look to Maine as a guide.	Electrification and decarbonization; incentives; heat pumps
Shannon Laun, Conservation Law Foundation	11/18/2021	Eliminate gas incentives. Expand incentives for heat pumps; current incentives for HPs are inadequate	Electrification and decarbonization; incentives; heat pumps
Joel Gordes	11/18/2021	We should be incentivizing ductless mini split HPs and other low or zero carbon options that are under development but may not be on the market. End fossil fuel incentives.	Electrification and decarbonization; incentives; heat pumps
Peter Millman	11/18/2021	Need more incentives for heat pumps. Too many incentives for gas.	Electrification and decarbonization; incentives; heat pumps
Northeast Energy Efficiency Partnerships	12/3/2021	Use tariffed on-bill model, inclusive utility financing, or pay-as-you-save as alternative financing mechanisms to loans.	Financing; EEJ
Heather Deese, Dandelion Energy	12/3/2021	The EnergizeCT Heating Loan product should offer a maximum loan amount of \$25,000 for GHP customers (current cap is \$15,000) and the savings calculations should be modified to more accurately reflect GHP savings. Doing so would mirror neighboring states such as NY and MA. Current cap does not cover full cost of equipment.	Financing; metrics; heat pumps
Connecticut Industrial Energy Consumers	12/3/2021	CIEC members periodically have been declined incentives for proposed efficiency projects because they were deemed to be “fuel switching” projects that cannot receive C&LM program incentives.	Fuel switching

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Connecticut Industrial Energy Consumers	12/3/2021	CIEC recommends that DEEP reconsider and eliminate current restrictions on the use of C&LM Plan program funds for fuel switching projects if analyses show an increase in efficiency and a reduction in GHG emissions.	Fuel switching
Vincent Giordano	11/17/2021	There is nothing in the Plan about bi-directional charging; this needs to be included in the plan, as it is an up-and-coming technology and will be seen across the market within the next three years	Grid modernization
Commercial Contractor Consortium	12/3/2021	As more renewables along with battery storage are added to the grid, the ability to go non-fossil fuels will become more viable.	Grid modernization
Commercial Contractor Consortium	12/3/2021	CCC members are rolling out EV charging projects (not part of C&LM) and would like more communication/collaboration with utilities on the development of the upcoming EV charging program (maybe a committee).	Grid modernization
PURA	12/3/2021	EDCs are required to offer a Managed Charging Program to residential customers. Their proposed program was developed through a Managed Charging Working Group.	Grid modernization; demand response
PURA	12/3/2021	New storage program (as proposed) would have upfront and performance-based incentives for customers.	Grid modernization; demand response
CT Green Building Council	12/3/2021	Perform a hygrothermal analysis after insulation installs to ensure that the building has sufficient drying capacity to prevent mold.	Health and Safety
Groton Conservation Advocates	12/3/2021	Connecticut trails other states in applying the maximum amount of LIHEAP funding permitted to be used for health and safety issues.	Health and safety
Save the Sound	11/15/2021	Address removal of health and safety barriers to energy efficiency upgrades	Health and safety

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Samantha Dynowski, Sierra Club Connecticut	11/16/2021	Applauds health and safety barrier remediation action.	Health and safety
Cary Lyncg, CT Chapter of the Nature Conservancy	11/16/2021	Incentivizing gas stoves/appliances will downplay health risks – increases risk of respiratory illness.	Health and safety
Melissa Kops, CT Building Council	11/17/2021	We spend more than 90% of our time indoors. Buildings affect health, and fossil fuels indoors are harmful to health and cause risk of asthma.	Health and safety
Kimberly Stoner	11/17/2021	Address health and safety barriers	Health and safety
CT Green Building Council	12/3/2021	Indoor air quality - home electrification programs should prioritize retrofitting homes in environmental justice communities to guarantee an immediate reduction in household pollution exposure in these areas while the grid gets cleaner	Health and Safety, EEJ
Heather Deese, Dandelion Energy	12/3/2021	A typical 2,500 square foot home in Connecticut with a heating oil furnace and central air conditioning will see a 47% reduction in total energy costs when switching to a geothermal heating and cooling system	Heat pumps
Northeast Energy Efficiency Partnerships	12/3/2021	NEEP recommends DEEP and Utilities consider a Qualified Products List that promotes heat pumps capable of near-full displacement of home heating load, to reduce reliance on backup fossil fuel heat.	Heat pumps
Northeast Energy Efficiency Partnerships	12/3/2021	NEEP encourages the Utilities to reference NEEP's ccASHSP Specification (Version 3.1) to establish heat pump specifications or refer to the ENERGY STAR Version 6.1 standard (when available).	Heat pumps
Heather Deese, Dandelion Energy	11/18/2021	Geothermal is the most efficient way to heat/cool, and the lowest cost option.	Heat pumps
Heather Deese, Dandelion Energy	12/3/2021	Since Dandelion entered the market less than 18 months ago: 1) More than 230 CT homeowners have signed contracts with Dandelion to have a GHP system installed on their property. 2) 70 of these homeowners have had their systems installed 3) 15,700 CT homeowners have expressed interest through Dandelion's on-line portal	Heat pumps; workforce and outreach

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People's Action for Clean Energy (PACE)	12/3/2021	Set minimum efficiency requirements instead of incentives for high efficiency equipment	Incentives
People's Action for Clean Energy (PACE)	12/3/2021	Do not incorporate incentives for gas equipment with a EUL of 15-20 years.	Incentives
James Furlong	12/3/2021	End all gas incentives	Incentives
Vincent Giordano	12/2/2021	All subsidy and incentive programs should be easy to find, minimize bureaucracy, and scaled for energy efficiency	Incentives
Robert Maddox, U.S. Building Council	11/17/2021	Supports addition of incentives for induction stoves.	Incentives
Henry Auer	11/17/2021	Need to create incentives for landlords to undertake upgrades.	Incentives
CT Green Building Council	12/3/2021	Expand whole-building incentives to include integrated design (Energy Conscious Blueprint) for projects smaller than 20,000 GSF.	Incentives; C&I project review
Henry Auer	12/3/2021	Plan must articulate creative incentives for landlords re: retrofits. Plan should describe the outreach methods and incentive programs to be used to find landlords and bring them on board	Incentives; education and outreach
Heather Deese, Dandelion Energy	12/3/2021	Incentives for GHPs in CT spurred Dandelion's move to do business in CT, and further incentives are critical to advance greater adoption	Incentives; heat pumps
Heather Deese, Dandelion Energy	12/3/2021	Due to the continued presence of incentives and strong market demand from Connecticut homeowners, Dandelion plans to significantly increase its presence in the state and pace of installs during the 2022-2024 period	Incentives; heat pumps
Heather Deese, Dandelion Energy	12/3/2021	Per-ton rebates for geothermal heat pumps (GHP) should be available for new construction in addition to retrofits. Of the 230 signed contracts to date in Connecticut, only 2, or ~1% have been for new construction projects. In neighboring markets such as New York where per-ton incentives for new construction exist, Dandelion sees 19% of signed contracts going towards new construction projects for individual homeowners.	Incentives; heat pumps

Commenter	Date Received	Comment Summary	Topic
Heather Deese, Dandelion Energy	12/3/2021	Rebates should be available for ductless Variable Refrigerant Flow (VRF) GHP equipment, as they are for VRF air source heat pumps. This equipment allows customers without sufficient ductwork in their home to install a GHP system; allowing this equipment will greatly expand the pool of potential GHP customers in CT, particularly for older homes. In NY, these systems are approved on a pilot basis as a special version of existing prescriptive incentives for GHPs pending their inclusion in the next version of the NY TRM; this approach could work for CT.	Incentives; heat pumps
People's Action for Clean Energy (PACE)	12/3/2021	Current midstream incentives for heat pumps are administered by wholesale companies and are based on many variables, making it difficult to understand or predict, including by HVAC contractors	Incentives; heat pumps
People's Action for Clean Energy (PACE)	12/3/2021	The EnergizeCT website is incorrect in its discussion of flat dollar per ton incentives for heat pumps, and the list of available products and incentive dollar calculations are not transparent	Incentives; heat pumps
Dwayne Escola	12/3/2021	Add as much as possible to the incentives for air source ductless or ducted (central air) heat pump systems. (Note: no new incentives should be added to ground source heat pumps as they are much more expensive and are not needed to capture the CO2 savings indicated above for homes).	Incentives; heat pumps
Groton Conservation Advocates	12/3/2021	Heat pump incentives should match those offered in neighboring states.	Incentives; heat pumps
Heather Deese, Dandelion Energy	11/18/2021	Thanked DEEP for increasing incentives for geothermal. Saw increase in demand in 2020; 15,000 homeowners have shown interest, and this demand needs to be met	Incentives; heat pumps
People's Action for Clean Energy (PACE)	12/3/2021	Simplify the heat pump incentive structure and tie incentive awards to decarbonization goals	Incentives; heat pumps; electrification and decarbonization
CT Green Building Council	12/3/2021	Use meaningful metrics: define weatherization; how many homes are weatherized each year.	Metrics

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Heather Deese, Dandelion Energy	12/3/2021	The savings calculation method for the EnergizeCT Heating Loan product should take the home's heating load and avoided HVAC equipment costs into account to accurately reflect customer savings; this is done in NY.	Metrics
People's Action for Clean Energy (PACE)	12/3/2021	Include state energy consumption in basic units; incorporate statewide statistics of CCF and kWh consumed over time and into the future that have a 10-year lookback and 3-year forecast period	Metrics
Henry Auer	12/3/2021	Plan should show the number of projects in commensurate with the required retrofits needed/year in order to meet the GWSA goals	Metrics
CT Green Building Council	12/3/2021	Establish an embodied carbon evaluation metric for the utility incentive programs.	Metrics; electrification and decarbonization
Heather Deese, Dandelion Energy	12/3/2021	Benefit cost calculations should properly value the reduction in greenhouse gas emissions from electrification technologies such as GHPs; TRC should be used as primary test for all programs. NY's and MA's BCT places a value on carbon based on the social cost of carbon.	Metrics; electrification and decarbonization
Vincent Giordano	12/2/2021	Institute a carbon metric so that we can measure progress towards carbon emission reductions	Metrics; electrification and decarbonization
Melissa Leanord, Naugatuck Conservation Commission	11/16/2021	Supports smart, numeric goals, accountability measures, and consequences if decarbonization goals are not met	Metrics; electrification and decarbonization
Robert Maddox, U.S. Building Council	11/17/2021	Carbon savings should be included as a metric.	Metrics; electrification and decarbonization
Shannon Laun, Conservation Law Foundation	11/18/2021	Add tracking and reporting on emissions reductions to Plan	Metrics; electrification and decarbonization
Heather Deese, Dandelion Energy	11/18/2021	Cost effectiveness test should include full savings from carbon emissions; TRC should be adopted for all programs	Metrics; electrification and decarbonization

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Heather Deese, Dandelion Energy	12/3/2021	Savings calculation inputs for GHPs should be updated using industry standard methods to more accurately value system savings; current residential GHP system input values for the EFLH are much lower than expected for CT's climate, which may be leading to an underestimation of savings.	Metrics; heat pumps
People's Action for Clean Energy (PACE)	12/3/2021	PACE provides sample language on metrics for tracking energy consumption and simplifying the heat pump incentive structure that reflects the above comments to be incorporated into the Plan on pg. 2 of their written comments	Metrics; heat pumps; incentives
Connecticut Industrial Energy Consumers	12/3/2021	EDCs should rely on energy savings estimates calculated by customer PEs/CEMs as a pre-requisite for incentive approval. Customer engineers have specialized knowledge of operations, sometimes EDC-determined incentives mean project ROIs fall short.	Program Savings Document
Connecticut Industrial Energy Consumers	12/3/2021	Project energy savings should be estimated with reference to the replaced equipment and not with reference to the Code Baseline.	Program Savings Document
Connecticut Industrial Energy Consumers	12/3/2021	Require that C&I customers are included in the annual review process for the PSD so that they can provide feedback.	Program Savings Document
Connecticut Industrial Energy Consumers	12/3/2021	DEEP should direct the EDCs to begin a collaborative process for the development of an alternate pathway to demonstrate project energy savings that uses post-commissioning M&V instead of pre-commissioning estimates (but only if PE/CEM savings calculations are accepted without stringent EDC review)	Program Savings Document
Connecticut Industrial Energy Consumers	12/3/2021	Direct the utilities to commence a collaborative process with C&I customers after DEEP issues its final determination to develop a proposal for pre- and post-project savings verification within 60 days of determination.	Program Savings Document

Commenter	Date Received	Comment Summary	Topic
Heather Deese, Dandelion Energy	12/3/2021	The calculated values for EFLH for heating and cooling in the 2022 Program Savings document should accurately predict energy requirements for a home and follow calculation guidelines from the International Ground Source Heat Pump Association (IGSHPA) manual. Using these numbers would effectively double the savings predictions of a GSHP system in CT. NY uses such a system.	Program Savings Document; heat pumps
Lynne Bonnett	12/3/2021	Multifamily initiative does not address 1–4-unit households.	Residential programs
Lynne Bonnett	12/3/2021	UI has had a poor track record of delivering programs in New Haven (sometimes because of health and safety barriers). What level of oversight do we have to ensure that the companies are delivering programs effectively?	Residential programs
Lynne Bonnett	12/3/2021	How are landlords encouraged to contribute to upgrading their buildings?	Residential programs
Groton Conservation Advocates	12/3/2021	Landlords are hesitant to use programs for fear of finding code violations or due to the lack of financial benefit to them for making their properties more efficient.	Residential programs
Henry Auer	12/3/2021	Plan should maximize support for HES and HES-IE	Residential programs
Vincent Giordano	12/2/2021	Vincent gives a detailed description in his written comments of his troubling experience trying to get a rebate through these programs (the 2021 Residential Heating and Cooling system rebate and Eversource's ASHP pilot program) that ultimately led him to receiving no financial assistance in obtaining a heat pump	Residential programs
Vincent Giordano	12/2/2021	Application forms for programs (in particular for the 2021 Residential Heating and Cooling system rebate and ASHP pilot program) need to be readily available and easy to find on the Eversource site	Residential programs
Vincent Giordano	12/2/2021	Reduce the documentation bureaucracy for programs (in particular for the 2021 Residential Heating and Cooling system rebate and ASHP pilot program)	Residential programs
Vincent Giordano	12/2/2021	Vincent provided documentation on his old heating system	Residential programs

Commenter	Date Received	Comment Summary	Topic
Vincent Giordano	12/2/2021	Vincent provided documentation on the new heat pump system he will be installing (that he will get no financial compensation for given he did not meet the requirements of the 2021 Residential Heating and Cooling system rebate or ASHP pilot program)	Residential programs
Vincent Giordano	11/17/2021	Same comments as made in written comments. Discussed his experience with the ASHP program. His AC met end of life this year. Difficult for him to find energy efficiency programs available from Eversource. Level of documentation is too extensive. Ultimately found out he was ineligible after a long process. Recommendation: make the programs easier to find and include minimal documentation requirements.	Residential programs
Northeast Energy Efficiency Partnerships	12/3/2021	NEEP cautions that requiring the “opt in” in writing to release Home Energy Score data to the MLS creates an additional barrier to provide and access this information for customers and potential buyers. More contractor and customer education is needed.	Residential programs; Home Energy Score
Commercial Contractor Consortium	12/3/2021	Materials and labor costs have increased between 10-20% since mid-year 2020. The utilities should consider input on these increases from distributors and manufacturers and make an adjustment to the prescriptive price levels	Supply chain
Samantha Dynowski, Sierra Club Connecticut	11/16/2021	Urges a robust WFD training plan.	Workforce
Heather Deese, Dandelion Energy	12/3/2021	DEEP and the State of Connecticut should prioritize workforce and education initiatives in order to alleviate significant bottlenecks and reduce installation wait times for customers; lack of qualified installers in CT is one of the largest barriers of growth for Dandelion's work in CT. Currently, there are not enough licensed professionals (licensed drillers and HVAC installers) to meet customer demand; this can cause delays of multiple months for installations.	Workforce and outreach

Commenter	Date Received	Comment Summary	Topic
People's Action for Clean Energy (PACE)	12/3/2021	DEEP should review the NYSERDA process that requires contractors to undergo decarbonization training, adhere to installation protocols, and provide consumer training in order to receive incentives (program information available here: https://www.nyserdera.ny.gov/All-Programs/Heat-Pump-Program)	Workforce and outreach
Save the Sound	11/15/2021	Invest in weatherization and workforce training programs	Workforce and outreach
Henry Auer	12/3/2021	Plan should maximize support for expanded workforce development and outreach	Workforce and outreach
Henry Auer	11/17/2021	Continue workforce development and outreach efforts for HES and HES-IE programs	Workforce and outreach
Kimberly Stoner	11/17/2021	Invest in workforce development	Workforce and outreach
CT Green Building Council	12/3/2021	Ramp up programs with a proven track record of successfully training and employing those in disadvantaged communities, such as the program developed and implemented by Efficiency for All	Workforce and outreach; EEJ
Northeast Energy Efficiency Partnerships	12/3/2021	Create a heat-pump focused contractor database/platform and implement initiatives to broaden the contractor network and increase its diversity.	Workforce and outreach; heat pumps
Northeast Energy Efficiency Partnerships	12/3/2021	Refer to existing manufacturer trainings (Mitsubishi) or NYSERDA training for the development of heat pump training platform. Also consider partnering with new NEEP workforce project.	Workforce and outreach; heat pumps
Heather Deese, Dandelion Energy	11/18/2021	Education and workforce initiatives are critical for success of geothermal, particularly for GHP installation. Dandelion is facing challenges finding qualified employees.	Workforce and outreach; heat pumps

Commenter	Date Received	Comment Summary	Topic
Heather Deese, Dandelion Energy	12/3/2021	Dandelion opened a warehouse in Hartford in 2021 and is actively hiring for multiple positions. Dandelion plans to have 25 employees working out of Hartford when fully staffed in 2022. Dandelion employs an additional 22 people who live in Connecticut and either work from a home office, or out of an office in New York and expects this number to increase in 2022 and beyond.	Workforce; heat pumps
People's Action for Clean Energy (PACE)	12/3/2021	Heat pump contractors should operate within a specific program that has explicit goals to decarbonize heating	Workforce; heat pumps; electrification and decarbonization