

## DEEP Determination: 2022-2024 C&amp;LM Plan

## Attachment E – Summarized Public Comments Regarding the 2022-2024 C&amp;LM Plan

The table below contains summarized public comments that were submitted to DEEP as written comments or presented verbally during the public comment portion of the public meeting that DEEP held on April 21, 2022. These comments are organized in alphabetical order by topic. Complete written comments that were submitted to DEEP by April 27, 2022 are available on DEEP's [Energy Filings page](#). Comments presented verbally are available in the April 21, 2022 public meeting [recording](#).

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](#).

Affiliation	Date	Subject	Sub-Topic	Comment Summary
Clean Water Action/Clean Water Fund	4/27/2022	Affordability	New and Additional Funding	For energy affordability, they will continue to support DEEP in EEB meetings in trying to find sustainable funding streams.
Acadia Center	4/27/2022	Affordability	New and Additional Funding	DEEP should create a process to identify ways to create a seamless and effective path for coordinating the WAP and C&LM programs. There should be clear timelines describing how this process will occur.
Acadia Center	4/27/2022	Affordability	New and Additional Funding	Provided a list of potential funding sources for health and safety barrier mitigation, including LIHEAP, WAP, ARPA, IJJA, state appropriations and fuel fees, philanthropic funds, RGGI funds, and utility program funding.
Connecticut Industrial Energy Consumers	4/27/2022	Affordability	Equitable Distribution	The C&LM Plan should promote energy affordability offering robust opportunities to support C&I projects that enable customers to achieve energy usage and cost savings, and to receive benefits that are at least commensurate with their contributions to the C&LM program.
Save the Sound	4/27/2022	Affordability	Weatherization Definition	Regarding the weatherization definition, Save the Sound urges a long-term plan be developed for sustainably funding the program at the levels commensurate to the need.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Affordability	Cost-Effectiveness Testing	Wait for the non-energy impact study (X1942) to be completed before adding the utility system impact of educed arrearages, collection costs, debt write-offs, or administrative costs.

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Connecticut Industrial Energy Consumers	4/21/2022	Commercial & Industrial	Other	CIEC is happy with the provided fuel-switching incentives. They point out corporations have decarb (C&I) agendas, and requests that we work together to align C&LM with corporate initiatives (so they can pursue their internal goals (talk to C&I customers). Regarding condition 8, the process should not be only an "alternative" if there is a breakdown between the customers and utilities, but an alternative in general.
Connecticut Industrial Energy Consumers	4/27/2022	Commercial & Industrial	Other	The stipulation in Condition of Approval #8 that the alternative verification pathway should only be pursued "in instances where there are unresolvable differences between the utility- and customer-calculated savings" would exacerbate the burden on customers. DEEP should amend this condition to allow eligible customers with qualifying projects the option to choose between the current and alternative application processes from the outset.
Connecticut Industrial Energy Consumers	4/27/2022	Commercial & Industrial	Equitable Distribution	DEEP should avoid programmatic changes that would engineer a material disparity between revenues collected from, and programs designed for, C&I customers. If DEEP concludes that incentives available to C&I customers should not be roughly commensurate with their contributions to the C&LM Plan, then DEEP should also moderate the compartmentalization of program budgets so that C&I customers can access the unused portions of other program budgets if the reduced C&I budget is not sufficient to meet C&I customer demand.
Connecticut Energy Efficiency Board	4/27/2022	Commercial & Industrial	Other	With respect to COA #8, the EEB seeks guidance on whether the alternative pathway proposed by this COA can be applied before the project begins, rather than after the project is complete.
Dandelion Energy	4/21/2022	Decarbonization	Updated Incentives	Dandelion is happy for fuel switching incentives/new emissions test/coordination with WAP for heat pumps; can we combine incentives? They recommend adding incentives for advanced duct sealing, which pairs well with heat pumps. They would like to join technical meetings on heat pumps if appropriate. Regarding workforce development, they would like a heat pump specific HVAC license to be included, will write to us. Dandelion would also like the type of heat pump considered when determining impacts on the grid, and for heat pump incentives to be revisited this year. Finally, they would like DEEP to revisit the calculations for heat pump incentives.

Affiliation	Date	Subject	Sub-Topic	Comment Summary
CT Green building council	4/21/2022	Decarbonization	Outreach and Engagement	CGBC would like DEEP to track how many heat pumps we hope to deploy and are happy with plan for barriers to heat pump deployment (page 17 bullets). They ask if one technical meeting is enough and if there will be follow up working sessions. They would like a date for the technical meeting.
Clean Water Action/Clean Water Fund	4/27/2022	Decarbonization	Updated Incentives	For decarbonization, they recommend (1) phasing out residential methane gas incentives and (2) prioritizing leveraging financial incentives for energy efficient heating/cooling, water use and appliances for low and moderate-income residents with the possibility of adding scorecard reports or certification processes for landlords.
Dandelion Energy	4/27/2022	Decarbonization	Updated Incentives	Dandelion Energy comments recognize DEEP's efforts and seek to identify remaining barriers in the state for heat pump adoption. First, Dandelion strongly encourages DEEP and the utilities to revisit the heat pump incentives immediately for 2022, as opposed to the proposed January 1, 2023 date. They also point out The Draft Determination does not address the savings calculation input issues raised by Dandelion Energy in their C&LM comments; these calculations have the potential to cause the incentive rates for geothermal heat pumps to be up to 50% below what they should be under the existing cost tests.
People's Action for Clean Energy	4/27/2022	Decarbonization	Updated Incentives	PACE first recommends that the Heat Pump Pilot program is moved from a pilot to a Heat Pump Program and that this program be marketed to increase uptake. Regarding barriers to heat pump adoption, they recommend for certain small barriers (e.g., gas leaks) that the HES program offer on the spot credits up to \$300 (for example) to have them repaired; they will discuss more at the technical meeting.
Acadia Center	4/27/2022	Decarbonization	Equitable Distribution	The C&LM Plan should prioritize the highest-emitting buildings. The "leakiest" 25% of Connecticut homes produce more than half of emissions from the housing sector, indicating that building shell improvements are essential. The highest-emitting homes are disproportionately low-income, and these homes can be more expensive to live in. The programs should proactively target higher-emitting, low-income homes.

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Acadia Center	4/27/2022	Decarbonization	Updated Incentives	Pairing weatherization with electrification is essential. Weatherization reduces up front and operating costs of heat pump systems. Presented data demonstrating savings resulting from whole-home electrification across heating fuel replacement scenarios. DEEP should add a Condition of Approval to create enhanced incentives to electrify buildings that are already weatherized, as well as to offer greater incentives for implementing weatherization measures before electrification occurs.
Acadia Center	4/27/2022	Decarbonization	Other	DEEP should set enforceable statewide targets for clean heating deployment and weatherization of buildings, particularly for lower-income homes to help improve health outcomes and lower energy burdens.
Acadia Center	4/27/2022	Decarbonization	Cost-Effectiveness Testing	Utilize the AESC social cost of carbon valuation at the recommended level of \$128/short ton for all measures except installation of new fossil fuel infrastructure.
Acadia Center	4/27/2022	Decarbonization	Cost-Effectiveness Testing	Connecticut should work towards using a societal cost test or at least a total resource cost test that can capture emissions, health and safety, and other program impacts.
Acadia Center	4/27/2022	Decarbonization	Cost-Effectiveness Testing	Northeast states should study and ultimately adopt an Emissions Impact Metric and Social Impact Metric as secondary tests.
Connecticut Industrial Energy Consumers	4/27/2022	Decarbonization	Updated Incentives	If C&I programs are modified to support state decarbonization goals, DEEP and the utilities should develop those modifications in consultation with C&I customers and with consideration for corporate sustainability goals.
Northeast Energy Efficiency Partnerships	4/27/2022	Decarbonization	Fuel Neutrality	Fuel neutrality is a key first step in aligning goals and incentives with state climate policy. Provided New York as an example of a fuel-neutral state that has supported a robust heat pump program.
The Nature Conservancy	4/27/2022	Decarbonization	Updated Incentives	The Nature Conservancy supports CT DEEP's efforts to establish a timeline for a phase out of natural gas appliance incentives. They also support strengthening workforce development and customer education to remove barriers to heat pump adoption. The Nature Conservancy supports the goals of the Residential New Construction program which promotes all-electric new construction, limiting natural gas expansion for residential heating and appliances.

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Save the Sound	4/27/2022	Decarbonization	Updated Incentives	Save the Sound supports CT DEEP's efforts to establish a timeline for a phase out of natural gas appliance incentives and appreciates that the Draft Determination recognizes the need to transition away from fossil fuels and towards renewable thermal technologies (heat pumps). They would like to see additional heat pump programs (with a focus on these programs). Regarding the barriers to heat pump deployment, they recommend the utilities develop uniform, fuel-neutral informational materials comparing the benefits and performance of different heating technology options available to consumers through the C&LM programs, and that such materials be provided by the utilities to all customers.
Save the Sound	4/27/2022	Decarbonization	Fuel Neutrality	Save the Sound We appreciates the Draft Determination's emphasis on enabling customers to choose the most cost-effective and efficient upgrades on a fuel-neutral basis, allowing oil and propane heated homes to participate fully in energy efficiency programs.
Connecticut Green Building Council	4/27/2022	Decarbonization	Outreach and Engagement	The CGBC appreciates the move away from incentivizing fossil fuels and towards electrification. They are concerned that one technical meeting is not enough, and that instead asks DEEP to consider a series of technical meetings. Alternatively, they suggest de-coupling the broader categories and conducting a deep-dive review of effective marketing, education, and consumer support as a stand-alone discussion vs. bundled with other topics.
Connecticut Green Building Council	4/27/2022	Decarbonization	Updated Incentives	They also support transitioning to an all-electric new construction offering for the residential market.
Northeast Energy Efficiency Partnerships	4/27/2022	Decarbonization	Updated Incentives	NEEP would like to be involved in the development of a comprehensive plan to address barriers to heat pump adoption.
Northeast Energy Efficiency Partnerships	4/27/2022	Decarbonization	Other	The Utilities should use a regional Qualified Products List for heat pumps, such as NEEP's Cold Climate Air Source Heat Pump (ccASHP) Product List. Alternatively, if Connecticut uses a state-specific Qualified Products List, this list should promote heat pumps that can handle a full heating load for a near-full displacement of legacy fossil fuel systems.

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Northeast Energy Efficiency Partnerships	4/27/2022	Decarbonization	Workforce Development	Consider a regional heat pump workforce development effort, partnering with states like Maine and New York. Highlighted a DOE-funded NEEP workforce development program for whole-home retrofits.
Northeast Energy Efficiency Partnerships	4/27/2022	Decarbonization	Workforce Development	NEEP has developed resources for heat pump installation and product selection that would potentially be valuable for the Heat Pump Installer Network.
Sierra Club Connecticut	4/27/2022	Decarbonization	Other	Sierra Club strongly supports phasing out residential methane gas incentives over the course of the 2022-2024 C&LM Plan.
Sierra Club Connecticut	4/27/2022	Decarbonization	Updated Incentives	An all-electric residential new construction program is an important first step and feasible in the timeline provided. DEEP should further specify that non-gas incentives should not be allowed for new residential construction being built with gas outside of the all-electric program.
Sierra Club Connecticut	4/27/2022	Decarbonization	Updated Incentives	Condition #3 calls for “investigating the continued need to incentivize certain high efficiency natural gas furnaces, boilers, and boiler water circulator pumps.” Such investigation should outline steps for replacing gas incentives with all-electric incentives. Sierra Club recommends that all gas incentives be eliminated over the course of the 2022-2024 plan.
Sierra Club Connecticut	4/27/2022	Decarbonization	Fuel Neutrality	Sierra Club supports DEEP’s recommendation for fuel-neutral efficiency upgrades (Condition #11) that will allow customers to select more efficient equipment regardless of their fuel source.
Sierra Club Connecticut	4/27/2022	Decarbonization	Updated Incentives	Sierra Club supports strategies to bring down the operating cost of heat pumps and prioritizing the co-delivery of electrification and other supportive measures, such as weatherization, solar, and battery storage.
Sierra Club Connecticut	4/27/2022	Decarbonization	Cost-Effectiveness Testing	Supports the addition of avoided greenhouse gas emissions as a first step in updating the cost-effectiveness test. DEEP should continue to update the cost-effectiveness test to capture the broad benefits of energy efficiency measures.
Sierra Club Connecticut	4/27/2022	Decarbonization	Weatherization Definition	Sierra Club shares the concern of others that a basic definition of weatherization should serve as a baseline as it is not adequate to achieve our state’s climate goals.

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CMC Energy Services, New England Smart Energy, HE Energy Services	4/28/2022	Decarbonization	Cost-Effectiveness Testing	In agreement that the recommendation to update our state's cost-effectiveness testing aligns with and incorporates state policy goals and will help maintain Connecticut as one of the Nation's energy efficiency leaders.
Connecticut Energy Efficiency Board	4/27/2022	Decarbonization	Updated Incentives	Need additional clarification regarding the timeline and measures that will be affected by the proposed phase-out of natural gas incentives.
Connecticut Energy Efficiency Board	4/27/2022	Decarbonization	Updated Incentives	The timeline for the development of an all-electric Residential New Construction program is feasible; however, maintaining current levels of participation, at least initially, may be unrealistic and there should be reasonable participation expectations set as the revised program design is implemented.
Connecticut Energy Efficiency Board	4/27/2022	Decarbonization	Updated Incentives	The Board seeks clarification from DEEP on whether COA #3 applies to the commercial and industrial programs. Separately, although the turnaround time frame on this study seems to be quick, the EEB would like DEEP to consider that the following be considered as part of that 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.
Connecticut Energy Efficiency Board	4/27/2022	Decarbonization	Updated Incentives	The Board recognizes that the updated incentives may assist with the adoption of electrification and more specifically heat pumps and would request that DEEP clarify whether this effort also extends to the Heat Pump Water Heater measure.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Outreach and Engagement	The Companies have contracted with an implementation vendor to provide a variety of services that will drive and support the adoption and quality installation of heat pumps throughout Connecticut. This vendor will provide virtual, no-cost heat pump consultations, community webinars, develop educational brochures and resources for customers and contractors, and manage the Energize CT Heat Pump Installer Network.

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Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Outreach and Engagement	With respect to COA #6, the Companies request that reporting for the Heat Pump Installer Network start after December 31, 2022, as there will not be enough data ready for a July 1, 2022, report since the Companies are finalizing development and are in the early stages of deployment.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Updated Incentives	The Companies note that “boiler water circulator pumps” referenced in Condition of Approval No. 3 are an electric saving measure and should not be phased out of the HVAC & Water Heating Equipment program.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Updated Incentives	The Draft Determination sets a goal of phasing out residential natural gas incentives and transitioning to an all-electric Residential New Construction (“RNC”) program by July 2023. The Companies do not believe developing a proposal to (1) phase out the RNC program’s natural gas incentives for new homes being constructed with natural gas heating equipment and (2) transition the RNC program to an all-electric offering is warranted at this time.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Updated Incentives	The Companies recommend an evaluation/cost study that examines the impacts to customers (including operational cost savings) from transitioning the new construction market from fossil fuels (predominately natural gas) to all-electric.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Updated Incentives	The R1968 study is expected to be completed by the end of 2022 so the Companies do not expect the results to take effect until 2024. If the Companies are required to transition to an all-electric program in July 2023, then the scope of the baseline evaluation study [R1968 SF RNC Baseline Study] should be changed or amended to include the impacts of the transition to an all-electric RNC program.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Updated Incentives	The Companies propose to transition the current air source heat pump pilot for oil and propane heated homes to a standard program offering before December 31, 2022.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Decarbonization	Cost-Effectiveness Testing	The Companies support the modification of the primary CTET to capture avoided greenhouse gas emissions (“GHGs”). The Companies plan to add non-embedded emissions, including GHGs, associated with measures that saves natural gas, oil, and propane to the CTET, which will result in additional benefits and improve the programs’ Benefit-to-Cost Ratios (“BCRs”), note these benefits were already included in the TRC test.



Affiliation	Date	Subject	Sub-Topic	Comment Summary
PACE	4/21/2022	Equity	Outreach and Engagement	PACE would like the community partnership initiative (CPI) to be an extension of HES and not a separate program. (Extra elements of, not replacements for existing programs). Regarding the heat pump pilot, PACE recommends we make it a program instead of a pilot and make it more visible; they have found people are unaware of the pilot.
Jane Bourdeau	4/21/2022	Equity	Other	I thought that I heard phasing out fossil fuel incentives. In the next slide you are focusing on people behind on the electric bill or have a shut off notice. How will adding electrification to these people, and doing away with their current heat source help them financially and paying their bills? (Jane B)
Clean Water Action/Clean Water Fund	4/27/2022	Equity	Outreach and Engagement	The Clean Water Fund applauds the three main goals of equity, decarbonization and affordability and has a brief comment on each. For equity, they recommend funding be expanded for outreach and education, specifically recommending (1) participation in The Community Partnership Energy Efficiency Engagement Initiative, and (2) providing long-term funding for a local energy efficiency outreach coordinator from the community.
Acadia Center	4/27/2022	Equity	Equitable Distribution	Programs have not delivered services adequately across all income levels and communities. Twenty-three percent of homes face health and safety barriers.
Acadia Center	4/27/2022	Equity	Cost-Effectiveness Testing	State regulators should allow program administrator to identify an amount of funding used for engagement with environmental justice communities and either leave this funding out of the cost-effectiveness test or count it as a benefit when engagement is successful.
Kathy Fay	4/27/2022	Equity	Outreach and Engagement	It is extremely important to have outreach teams rooted in local organizations and coaching to make sure that can access available resources.
Northeast Energy Efficiency Partnerships	4/27/2022	Equity	Equitable Distribution	Include a stakeholder process to ensure engagement from underserved and overburdened communities with the program, using the Community Engagement to Ownership Spectrum as a model.
Northeast Energy Efficiency Partnerships	4/27/2022	Equity	Equitable Distribution	When investing resources in historically under-resourced communities, programs should look to remediate the fact that these communities have been historically underserved in the past by centering the design around community needs and ensuring purposeful investment that builds wealth.

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Northeast Energy Efficiency Partnerships	4/27/2022	Equity	New and Additional Funding	RGGI funds could potentially be used to help with the braiding priority discussed in Finding E and work in conjunction with the Weatherization Barriers Remediation Program. Provided the Pre-Weatherize Delaware program as an example of a successful program.
Northeast Energy Efficiency Partnerships	4/27/2022	Equity	Equitable Distribution	Connecticut should undertake equity mapping and gap analysis exercises that have been successful in other New England states.
Connecticut Green Building Council	4/27/2022	Equity	New and Additional Funding	CGBC recommends expanding the HES/HESIE program budgets to meet need, suggesting that WAP funds and funds from Public Act 21-48 may be able to help.
Connecticut Green Building Council	4/27/2022	Equity	Other	CGBC appreciates the move to re-assess the equitable distribution to income levels within a rate class.
Northeast Energy Efficiency Partnerships	4/27/2022	Equity	Workforce Development	DEEP should consider the development of a community-based workforce development program designed to reach underserved communities, including paid internship/apprenticeship/training opportunities. Provided Massachusetts Clean Energy Pathways program as an example.
Sierra Club Connecticut	4/27/2022	Equity	Updated Incentives	Higher incentives should be available for low-income customers in the all-electric residential new construction program.
Sierra Club Connecticut	4/27/2022	Equity	Outreach and Engagement	Sierra Club recommends that DEEP explicitly adopt the principle that equity in efficiency (and electrification) funding distribution will be assessed in terms of vertical equity, which “requires that the distribution of assistance be explicitly varied to reflect differences in needs.
Sierra Club Connecticut	4/27/2022	Equity	Outreach and Engagement	Community outreach should be focused on residents and businesses in communities where energy burden and poverty and energy insecurity are all high; this data needs to be compiled to identify communities to be the priority of the next round of the Community Partnership Initiative.
Sierra Club Connecticut	4/27/2022	Equity	Outreach and Engagement	The Community Partnership Initiative should outline clear metrics and identify equity outcomes, including cost savings, kWh savings, carbon reduction, and energy burden.
Sierra Club Connecticut	4/27/2022	Equity	Workforce Development	Equity metrics must be established to ensure equitable outcomes in workforce training.

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Connecticut Energy Efficiency Board	4/27/2022	Equity	Equitable Distribution	The Board notes the importance of reporting on program participation by Census tract, customer segment, and customer type; however, it also recognizes that there may be time between projects depending on the capital investment required, Companies' budgets, and economic times, such as those experienced during COVID. Therefore, the Board seeks clarification as to whether participation reporting will be on an annual basis or on a rolling average. If the latter, the Board respectfully recommends using a five or 10-year rolling average to allow for consideration of impacts of factors which may vary participation by year and by customer segment.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Equity	Outreach and Engagement	The Companies request that DEEP postpone the RFP process discussed in COA #12 until the 2023 Plan Year (if needed) and after multiple rounds of the Community Partnership Initiative have been conducted.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Equity	Outreach and Engagement	The Companies recommend that they work with the Diversity, Equity, and Inclusion ("DEI") consultant to engage community-based organizations and develop achievable goals in the new, additional target areas outlined in Condition of Approval #14 The Companies are concerned that applications for a Round 2 of the Community Partnership Initiative ("Partnership") will be extremely limited if the goals are changed to those requested in the Draft Determination.
PACE	4/21/2022	Other	New and Additional Funding	PACE wants us to expand budget and focus on using funds efficiently. Since money was borrowed from CLM we might be able to borrow some money to expand programs.
CT Green building council	4/21/2022	Other	Accountability and Transparency	The C&LM plan felt more accessible, easier to digest (attachments were useful), the scheduled conditions of approval were accessible, and the executive summary was accessible/easy to understand.
Dandelion Energy	4/27/2022	Other	Workforce Development	Regarding workforce training, Dandelion has developed a set of recommendations to improve the licensing process and training opportunities for HVAC contractors with a specific interest in supporting heat pump installations, included in an appendix.
Dandelion Energy	4/27/2022	Other	Other	They would also like the impact of different heat pump technologies on peak electric load as a topic of discussion during the planned Technical Meeting. They would like to discuss Mass Save's "whole home" and "partial home" approach to co-delivery of weatherization and heat pumps at the planned Technical Meeting as well.

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People's Action for Clean Energy	4/27/2022	Other	Outreach and Engagement	PACE works in two communities in The Community Partnership Initiative. They recommend that the new DEEP priorities continue to include HES and HES IE as foundational components of the CPI. Due to difficulty of access to certain aspects of HES/HES-IE (such as contacting landlords), they recommend the utilities take part in the partnerships/outreach.
Northeast Energy Efficiency Partnerships	4/27/2022	Other	Cost-Effectiveness Testing	DEEP should convene a stakeholder process to work through updates to the cost-effectiveness testing. The test should consider the additional of other metrics, including the real time cost of energy and other non-energy impacts for participants, such as comfort, health, and safety. Provided NEEP resources on cost-effectiveness testing.
Northeast Energy Efficiency Partnerships	4/27/2022	Other	Demand Flexibility and Pay for Performance	Support the convening of a Technical Meeting is discuss opportunities for demand flexibility and pay-for-performance and would like to participate.
Northeast Energy Efficiency Partnerships	4/27/2022	Other	Workforce Development	Develop a strategic plan for workforce development that includes a robust stakeholder process.
Northeast Energy Efficiency Partnerships	4/27/2022	Other	Workforce Development	DEEP and Utilities could consider providing continuing education and training to code officials, inspectors, and design professionals, and developing energy-related vocational training in high schools and post-secondary institutions.
Northeast Energy Efficiency Partnerships	4/27/2022	Other	Workforce Development	DEEP and the Utilities should track the following workforce development metrics: demographic data, training opportunities offered, and amount invested, outreach to underserved and environmental justice communities.
Connecticut Energy Efficiency Board	4/27/2022	Other	Accountability and Transparency	DEEP should provide additional clarification regarding the dates for ongoing reports and consider the development of standardized templates to report the information requested. This effort may help to reduce the administrative burden that may arise from increased reporting requirements.

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Connecticut Energy Efficiency Board	4/27/2022	Other	Outreach and Engagement	The Board appreciates the guidelines set forth for the Companies in Round 2 of the Community Partnership Initiative. Respectfully, the EEB seeks additional guidance from DEEP on the timing of Round 2 and how efforts from Round 1 should be addressed after it concludes.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Other	Evaluation Data	With respect to COA #7, the Companies respectfully request an extension for this Condition of Approval to September 1, 2022. The Companies want to ensure that they have the time to develop and finalize the Evaluation Data Dictionary.
PACE	4/21/2022	Residential	Weatherization Definition	PACE thinks DEEP can help by discussing the use of the weatherization definition: how will we be getting to 80%? Ex: If we find something not weatherized, we can prioritize that thing? PACE would also like it to be called basic weatherization, we need to get to climate weatherization (weatherization must not stop).
Kathy Fay	4/21/2022	Residential	Weatherization Definition	Are we open to a two-tiered approach to weatherization definition? For example, tier 1: existing criteria/program, 2. climate ready program
CT Green building council	4/21/2022	Residential	Weatherization Definition	Seconding tiered definition; basic weatherization and climate weatherization. Question: how do we build metrics into educational programs (green buildings)?
Aeroseal LLC	4/27/2022	Residential	Weatherization Definition	Aeroseal LLC supports CT DEEP's general approach to weatherization but recommends slight changes to each of the three weatherization pathways in the definition. For the Home Energy Solutions (HES) pathway, they recommend requiring all HES vendors to be trained and certified to deliver Advanced Duct Sealing services. For the Prescriptive pathway, they recommend that the requirements apply to both outside and inside conditioned spaces rather than just unconditioned spaces. Additionally, for the Prescriptive pathway, they recommend the prescriptive requirements be more stringent and aligned with recent IECC standards. Specifically, they recommend (1) the requirement for air leakage to be set at 3 ACH @ 50 Pascals, and (2) requirements for duct leakage to be set at (a) 4 CFM @ 25 pascals per 100 sq foot for ducts outside conditioned spaces (b) 8 CFM @ 25 pascals per 100 sq foot for ducts inside conditioned spaces. For the Flexible pathway, they recommend homes constructed after 2012, rather than 2000, be considered weatherized since the 2009 IECC standards were not adopted until 2011 by CT.

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Dandelion Energy	4/27/2022	Residential	Weatherization Definition	Dandelion also strongly encourages DEEP to take an approach that offers enhanced incentives for weatherization, while still allowing for stand-alone heat pump installation (a tiered approach to weatherization).
People's Action for Clean Energy	4/27/2022	Residential	Weatherization Definition	Regarding the weatherization definition, they ask for a dedicated technical meeting to discuss; they would like to know specifically how the definition will and will not be used. They also suggest that the first HES pathway not be used as a definition but rather be used as a pathway to achieve weatherization (they point out you can be weatherized without insulating). They feel the HES program is not sufficient to be considered weatherized. It is important to PACE that we discuss how the weatherization status is reported, stored, and distributed. They also believe it is possible that the definition allows for a two-tiered approach in which a home is either basically weatherized or climate ready weatherized.
Michael Uhl		Residential	Updated Incentives	Michael Uhl supports the clear phase-out of residential gas incentives but points out that hydronically heated homes are not ready for the transition. In residential new construction (RNC) and existing buildings (EB), boiler systems are still designed for 160-200F supply temperatures; Instead, he recommends every RNC with hydronic heating be designed for a maximum supply temperature of 130F (allowing gas to be left out). He claims this will allow contractors to gain access to more cost-competitive products at distributors, resulting in lower entry points for the more complex designs of EB (lowering the cost).
Michael Uhl		Residential	Outreach and Engagement	While Michael generally supports The Community Partnership Initiative (CPI), they recommend linking CPI with Residential Energy Concierge (Concierge) programs around the state. They warn against the concierge “selling” products or features instead of primarily trying to solve the goals of the resident.

Affiliation	Date	Subject	Sub-Topic	Comment Summary
Michael Uhl		Residential	Weatherization Definition	Regarding the weatherization definition, Michael Uhl expresses that the R5 standards for weatherization will not help homes become climate ready; these standards are close to current codes and need to be updated. They feel that participation in HES/HES-IE alone is not an indicator of whether a home is weatherized. They are also concerned that a home can pass the weatherization standards today but have the status revoked in the future if health and safety barriers are identified. For the prescriptive pathway in the weatherization definition, Michael states that meeting 5+ of the prescriptive requirements is meaningful for homes without ductwork and recommends 7+. They also acknowledge that REM/Rate is not the only sufficient software model to comply with qualifying a home as weatherization and offer alternatives. Michael recommends that the companies should be required to provide the sufficient data for completing the energy modeling for a customer in the industry-standard format (HPXML) and released to third parties, when approved by the customer. Finally, Michael recommends the WAP pathways be applied to multi-family properties as well.
Kathy Fay	4/27/2022	Residential	Weatherization Definition	More clarity is required on the purpose of the weatherization definition. The pathways differ widely as to not be meaningful in assessing progress towards greenhouse gas emissions goals.
Kathy Fay	4/27/2022	Residential	Outreach and Engagement	DEEP should work with the DEI Consultant and other stakeholders on the development of an enhanced concierge service.
Kathy Fay	4/27/2022	Residential	New and Additional Funding	Coordinating with the WAP program will be critical to achieving increased participation in underserved communities. It is extremely disappointing that the comment process for C&LM and WAP are happening concurrently, as the two would inform each other well.
Northeast Energy Efficiency Partnerships	4/27/2022	Residential	New and Additional Funding	Provided examples successful programs that take a comprehensive approach to affordable housing retrofits and align with the goals of Finding D.
Save the Sound	4/27/2022	Residential	Updated Incentives	Regarding decarbonization in general, Save the Sound supports transitioning to an all-electric new construction offering for the residential market.

Affiliation	Date	Subject	Sub-Topic	Comment Summary
Connecticut Green Building Council	4/27/2022	Residential	Weatherization Definition	CGBC states the proposed definition of weatherization is a basic minimum standard that does not align with the other legislated goals for reducing greenhouse gas emissions; they worry that homes will have to be retrofitted again by 2050. They also recognize the value of performing sweeping energy audits to gather data on our residential building stock and identifying the homes that are in most need of energy-efficiency retrofits and propose thinking of this shorter-term weatherization goal as more of an audit baseline. Additionally, they recommend that a second standard for “climate ready” weatherization should be issued concurrently that represents the ideal target for energy retrofit work to meet climate targets and equity goals and propose a technical meeting to discuss.
The Center for Children’s Advocacy	4/27/2022	Residential	Equitable Distribution	CCA states that the requirement of a landlord signature for HES/HESIE programs is in direct violation to existing Connecticut law, which makes clear that those tenants are not required to get permission from their landlord to access certain energy efficiency measures (§ 47a-13a(a)). The tenant is only required to provide written notice. They state that requiring the landlord signature does not align with E3 goals. They recommend that DEEP direct the utilities to lift this requirement.
Northeast Energy Efficiency Partnerships	4/27/2022	Residential	Outreach and Engagement	Energy coaching or individualized support programs can be effective in reaching low-income or underserved households. Provided examples from Philadelphia and Massachusetts.
Northeast Energy Efficiency Partnerships	4/27/2022	Residential	Weatherization Definition	Support the development of a weatherization definition.
CMC Energy Services, New England Smart Energy, HE Energy Services	4/28/2022	Residential	New and Additional Funding	DEEP should consider an alternative pathway to braid Federal WAP dollars with the existing utility administered HES-IE program. Potentially an RFP process whereby additional entities can accept the Federal WAP dollars to service more customers and ensure the funds are utilized. A program where the funds are braided, but available to all players (contractors and CAA agencies) as seamlessly as possible, making it easier for contractors and customers to access incentive dollars and get meaningful work done.



Affiliation	Date	Subject	Sub-Topic	Comment Summary
CMC Energy Services, New England Smart Energy, HE Energy Services	4/28/2022	Residential	Weatherization Definition	Remove the provision of the weatherization definition that considers homes weatherized even if they did not receive a blower door test if guided air sealing was performed. Blower door guided air-sealing should be included in the criteria in the HES/HES-IE program for being deemed weatherized.
CMC Energy Services, New England Smart Energy, HE Energy Services	4/28/2022	Residential	Weatherization Definition	What entity would verify that a home is compliant with 5+ requirements, and how would this be reported?
CMC Energy Services, New England Smart Energy, HE Energy Services	4/28/2022	Residential	Weatherization Definition	Requirements of the prescriptive pathway are not strong enough from a building performance standpoint. Almost every home today meets the window criteria of having double pane or single pane with storm. Duct leakage at 16 CFM @25 Pascals per 100 sq. ft. would result in significantly reduced delivered efficiency versus the factory-designed efficiency. As an example, a designed 20 SEER system would be operating at around 15.4 SEER, or a 90% AFUE system would be operating around 77% AFUE with the acceptable duct leakage provided. The criteria should be in line with 2015 IECC or better. Prescriptive requirements would also then align with making homes more heat pump/electrification ready.
CMC Energy Services, New England Smart Energy, HE Energy Services	4/28/2022	Residential	Weatherization Definition	A Home Energy Score of 5 is not an acceptable pathway to weatherization. There are too many variances in homes and the size of a home could impact the Score.
Connecticut Energy Efficiency Board	4/27/2022	Residential	Accountability and Transparency	For reporting of the Home Energy Solutions and Home Energy Solutions Income Eligible Programs, it would be useful if the Companies provided the percentage of homes that accept and install each category of add-measures under the respective programs, broken out by single family and multifamily, given the level of interest in the performance of these programs.

Affiliation	Date	Subject	Sub-Topic	Comment Summary
Connecticut Energy Efficiency Board	4/27/2022	Residential	Weatherization Definition	The standards proposed under the various pathways vary significantly. In particular, the Prescriptive and Flexible Pathways are more stringent than the Home Energy Solutions Pathway in terms of wall and ceiling insulation and double pane (or single pane and storm) windows, which are typically considered envelope measures. It is unclear to the Board if there is a minimum level of weatherization that must be achieved as part of this definition given the varying requirements between the programs under which one could qualify.
Connecticut Energy Efficiency Board	4/27/2022	Residential	Weatherization Definition	Does DEEP intend to align the requirements offered under the Weatherization Assistance Program with those provided in Table 2 Prescriptive approach to core weatherization requirements?
Connecticut Energy Efficiency Board	4/27/2022	Residential	Weatherization Definition	Has DEEP considered utilizing average post Home Energy Solution and Home Energy Solutions Income Eligible participation scores for air and duct leakage to establish the Prescriptive Requirements and Performance approach?
Connecticut Energy Efficiency Board	4/27/2022	Residential	Weatherization Definition	Is DEEP able to provide a timeline on when a standard weatherization definition for multi-family properties may be developed?
Connecticut Energy Efficiency Board	4/27/2022	Residential	Demand Flexibility and Pay for Performance	The EEB seeks clarification on the allowed timeframe for the residential pay-for-performance pilot, including when results should be provided for review, and quantifiable goals that DEEP would like to see achieved by this pilot. Furthermore, it would be beneficial for DEEP to clarify the engagement of the Evaluator Administrators in developing the evaluation, measurement, and verification components of the pilot.
Connecticut Energy Efficiency Board	4/27/2022	Residential	Updated Incentives	The Board requests that DEEP clarify the timing on the length of the Heat Pump Pilot, including when the Companies should provide their respective findings from the completion of the pilot.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Residential	Outreach and Engagement	Recognizing that the Companies have investigated a concierge service offering and are currently working to accomplish this objective, the Companies respectfully request that the Request for Information (“RFI”) requested in Condition of Approval No. 2 be delayed until after the Companies have launched the activities under development and are able to report on the effectiveness of those activities.

Affiliation	Date	Subject	Sub-Topic	Comment Summary
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Residential	Weatherization Definition	The description of HES services on page 4 and in Table 1 need to be corrected. Light bulbs are no longer provided through the HES program.
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Residential	Weatherization Definition	While REM/Rate™ is a popular modeling tool, it should not be the only tool specified as there are other RESNET-approved energy modeling software products that are popular and used in Connecticut for energy modeling. The Companies suggest changing the requirement to “RESNET approved modeling software.”
Eversource Energy and Avangrid Networks, Inc.	4/27/2022	Residential	Weatherization Definition	The Companies support making the home construction date requirement January 1, 2000, or later. Additionally, the Companies note this date is also being proposed in Massachusetts when determining that a home is considered “sufficiently weatherized” to receive an enhanced heat pump incentive.