



1-4 Unit Weatherization Assistance Program Program Year 2025 Public Comment

April 11, 2025

Thank you for the opportunity to provide comments on the WAP Program Year 2025. CET's (Center for EcoTechnology's) mission is to innovate, implement, and scale the environmental solutions that communities need to thrive, and we envision a world that has embraced and advanced just and resilient climate solutions. We do this by helping people and businesses save energy and reduce waste.

CET is currently working across Connecticut on a variety of projects to help the state decarbonize. There are several programs underway to address wasted food, including a contract with CT DEEP to help businesses and institutions comply with the state's food waste law. CET is contracted with Eversource and Avangrid to administer the Weatherization Bootcamp program and is a subcontractor to Abode to administer the HPIN program and provide commercial heat pump consultations. For CT DEEP, CET is contracted to administer the WAP program for Region 2. This contract has been in place for just over a year, and we are pleased to note an increasing number of project completions in recent months. We look forward to continued progress and provide the following comments for consideration.

1) Health and Safety Allocation

In PY24, nearly all homes served by CET (in Region 2) required support for H&S measures. Based on deferral rates (65-72%) and homes receiving H&S funding, the housing stock in CT being served by WAP can be considered in poor condition. Increasing the H&S budget will ensure that required H&S measures are implemented, making it safe and cost-effective to install weatherization measures for residents, and reduce barriers to meeting PY25 unit goals.

In PY24 (to-date), homes received an average of \$2,000 in H&S measures. HVAC related H&S measures are more expensive than this average, with replacements averaging between \$5,000-\$8,000. Increasing the H&S budget will allow more HVAC-related H&S measures to be supported under the WAP program.

A modest increase of the H&S budget from 15% to 20% is recommended.



2) WAP Measures

CET believes that heat pumps and solar should be included in the program, provided that the ACPU is adequately expanded to cover these costs. Based on PY24 average costs for existing WAP measures, most homes served by WAP (in Region 2) use the majority of the ACPU. The WAP budget under existing ACPU controls will not be able to accommodate single measures (such as heat pump) for which average costs are greater than the current ACPU level. Assuming an appropriate ACPU adjustment could be made, there could be great benefit to homeowners to include solar and heat pumps, particularly in cases where the homeowner heats with delivered fuel or electric baseboard. Conversions to heat pumps in combination with weatherization would improve comfort and could reduce energy costs. Further, anticipated new heat pump programs like the New England Heat Pump Accelerator could positively change the cost of this measure in ways that are unknown at this time. If DEEP can provide an option for including heat pumps, it will at least leave open the possibility of leveraging that funding source for the benefit of WAP participants.

For lighting, LED will be effective if it replaced CFL or incandescent to LED. We do not recommend LED to LED replacement as it will not be cost effective.

Water measures will yield modest savings, but are worthwhile. The following measures are recommended: aerators, shower heads are replaced from 2.5 gpm to 1.5 or 1.0 gpm along with pipe wrap.

Refrigerators can qualify for replacement according to DOE if they're 10 years old or greater, and would be a beneficial addition to the program.

3) Weatherization Readiness Funds

Major electrical issues, mold, asbestos, roof leaks, plumbing leaks, pests, knob & tube are some of the issues that are present in 72% of the CT Housing stock that prevents the WAP program from servicing clients. Any modifications to WRF measures must be accompanied by appropriate financial, training, and insurance allowances to support agencies who are increasing scope.

4) Other CET Comments

With nearly a year of implementation experience, CET is excited about the trajectory of the program and pipeline of projects in Region 2. Despite a deferral rate that we understand to be



one of the highest in the country, CET is on track to help a significant number of homes enjoy the benefits of WAP services in PY24. The level of effort to navigate the complexities of the housing stock has been unexpectedly high and challenging financially. Any changes to the implementation of WAP services in PY25 must be accompanied by appropriate financial support, sufficient training (provided by DEEP or a third party) and training budget, and adequate time and funds to address impacts on procurement, subcontractors, or insurance. The beneficial impact of the recommendations will need time and resources to ensure successful implementation by agencies delivering these services.

Respectfully submitted by:

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