



PROGRAM YEAR 2024 1-4 UNIT WEATHERIZATION ASSISTANCE PROGRAM (WAP)

INTRODUCTION

Purpose of WAP: To increase the energy efficiency of dwellings owned or occupied by income-eligible persons and to improve their health and safety, especially for individuals and households identified as vulnerable

In Compliance with Federal Regulations

- 10 CFR 440 (Program)
- 2 CFR 200 (Financial)

The draft Plan we are discussing today is for federal formula funds only (the 1-4 unit weatherization program)

- Plans and budget for federal Bipartisan Infrastructure Law (BIL) WAP (the multifamily program) can be viewed on DEEP's webpage.

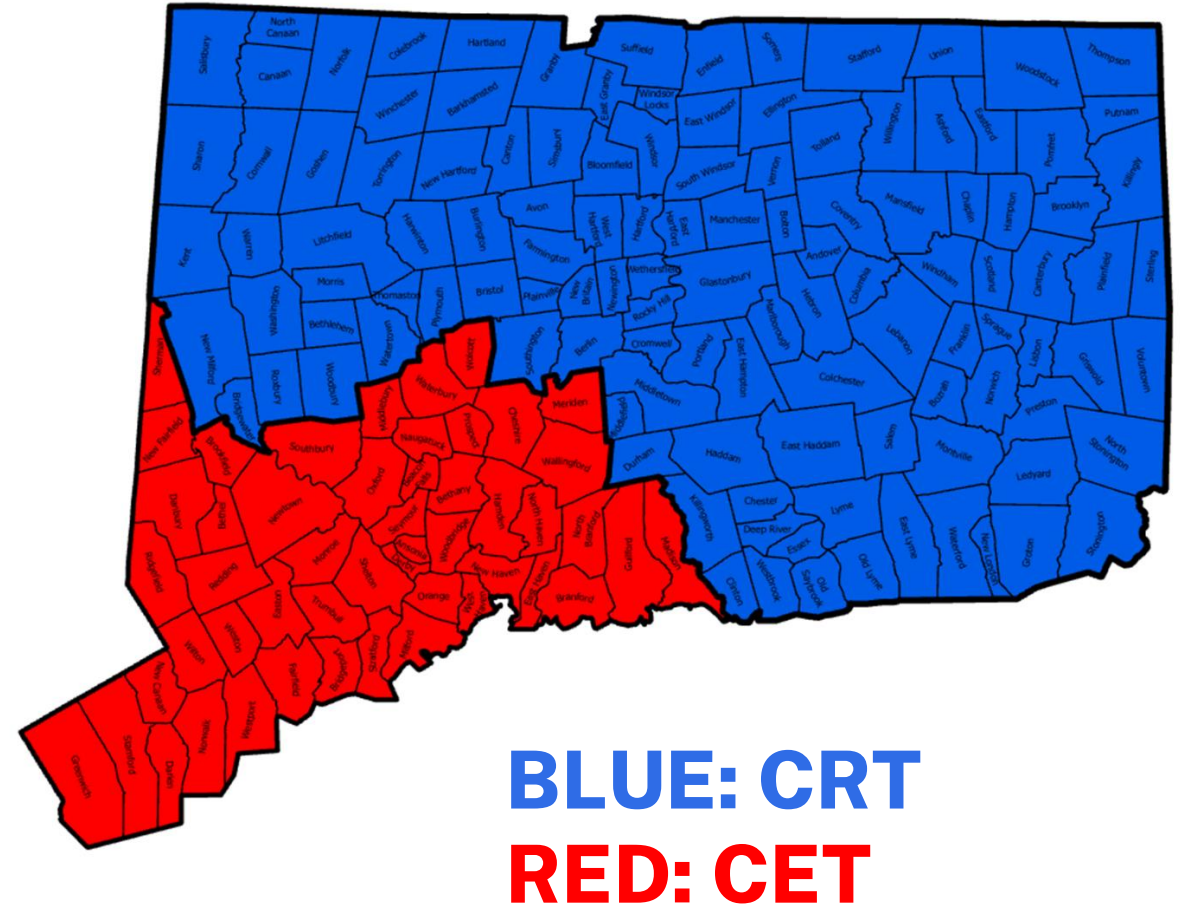
BUDGET

Federal Allocation PY 24	
Program	\$2,996,244
Training and Technical Assistance	\$651,548
Weatherization Readiness Funds	\$380,474
Total	\$4,028,266

Grantee Distribution	
DEEP Admin	\$100,707
DEEP T&TA (includes field and desk monitoring activities)	\$503,533
Grantee Total	\$604,240
Subgrantee Distribution	
Admin	\$503,533
Program Operations	\$2,040,874
Health & Safety	\$306,130
Training and Technical Assistance	\$90,000
Financial Audits	\$15,000
Insurance	\$30,000
Wx Readiness Funds	\$63,750
Subgrantee Total	\$3,049,287

PY 2024: CT WAP Regions Map

Each region has approximately the same population of households that meet the 60% SMI definition of low-income.



PROGRAM CHANGES FOR PY2024

New Subgrantees

- As a result of last year's RFP DEEP has competitively selected the Center for EcoTechnology (CET) and the Community Renewal Team (CRT) as subgrantees for the 1-4 unit WAP
- Selected subgrantees have contracts that extend through PY25

Weatherization Readiness Funding (WRF)

- CT DEEP will continue to give the majority of WRF to the Residential Energy Preparation Services (REPS) program to address Health & Safety (H&S) barriers to weatherization
- The Subgrantees will also be given a smaller portion of the WRF funds to address minor H&S items and whole home ventilation requirements

Software Transition

- In PY24 DEEP will transition to DOE's WA Web Suite of Software including NEAT/MHEA - this software suite is cloud-based allowing for more streamlined yet secure access – this transition is required by DOE.
- CT WAP will pursue the use of Hancock's Energy Audit Tool: MINT. This energy audit tool connects with the program's data management software

PRODUCTION GOALS



Region 1	Region 2	Total
121 units	120 units	241 units

NEW TECHNICAL CONSULTANT / MONITORS

CT WAP is in contract negotiations with Association for Energy Affordability (AEA) for Desk Consultant services

- Desk reviews
- Waiver reviews
- Technical writing

CT WAP is in contract negotiations with True View Consultants (TVC) for Field Monitor services

- In-progress monitoring
- Final inspections
- Annual technical monitoring

PUBLIC COMMENTS RECEIVED WITH DEEP RESPONSES TO-DATE

Commentator Name	Affiliation	Written/Oral	Date Received	Subject	Changes Made to the Application (Y/N)
Center for EcoTechnology (CET)	CET	Written	4/9/24	General	Y
Comment Summary	<ol style="list-style-type: none"> 1. CET is hopeful that state-level adjustment to the plan language can make continual service more achievable in Connecticut. 2. The current period of 2 years seems reasonable for rent increase protections. 3. Fuel switching should be allowed and encouraged. In the case of oil and propane conversions to high-efficiency heat pumps, any and all barriers should be removed to promote this form of fuel switching as the operating costs to the residents should be lower, and the environmental and comfort benefits are well documented. For customers converting from Natural Gas, fuel switching should be pursued assuming the customer has access to a low-income discount rate for electricity that would make the switch cost-neutral or better. 4. WAP should support access to heat pumps and heat pump hot water heaters by supplementing incentives available from Energize CT and the Inflation Reduction Act's (IRA's) Home Efficiency Rebate (HER)/Home Electrification & Appliance Rebate (HEAR) programs. These technologies are proven effective in cold climates and there is a readily available no-cost heat pump consultation service provided by Energize CT to help residents make informed decisions about heat pump choices. CET already works closely with the vendor for the residential heat pump consultation program and would be excited to explore integrating these services with WAP for the best possible customer experience. 				

PUBLIC COMMENTS RECEIVED WITH DEEP RESPONSES TO-DATE

DEEP Response to CET Comments

- 1. Avoiding Bureaucratic Delays:** By signing three-year contracts with current service providers, DEEP has been able to explicitly name selected service providers within the Program Year 2024 WAP 1-4 Unit State Plan. Providing this information to the U.S. Department of Energy (DOE) upfront should avoid approval delays for Program Year 2024.
- 2. Seeking Additional Input:** Thank you for the response to this question. DEEP is hoping to get responses to this question from entities or persons who can also represent landlord and/or renter perspectives before determining if changes should or should not be made to the current 2-year requirement.
- 3. & 4. Added commitments to explore fuel switching and alternative efficiency measures in PY24:** DEEP has added the following commitments to the Program Year 2024 1-4Unit WAP State Plan (these commitments are listed under the Miscellaneous Section of the Plan): “In PY24, CT WAP will apply to DOE for the ability to perform fuel switching and to install alternative energy efficiency measures (such as LEDs, heat pump water heaters, etc.) within the CT WAP formula and WAP BIL allocations. CT WAP will follow the submittal requirements for fuel switching approval detailed in WPN 23-6 Attachment 5 and for alternative measure approval detailed in WPN 23-6 Attachment 6. To attain fuel switching approval, CT WAP will pursue the second option laid out in WPN 23-6 Attachment 5: as a policy administered by the Grantee. CT WAP will work with the program subgrantees to determine how best to incorporate fuel switching into the program and to submit the required submission documents to DOE. CT WAP will ensure that utility bill impacts are evaluated prior to recommending fuel switching to a program participant. In PY24, CT WAP will also work with the selected subgrantees to explore incorporating solar PV, as allowed by WPN 23-6, into both the formula and BIL programs. CT WAP will use the information gathered during this exploration process to determine if applying for approval from DOE to incorporate solar into the program is appropriate in future program years.”

PUBLIC COMMENTS RECEIVED WITH DEEP RESPONSES TO-DATE

Commentator Name	Affiliation	Written/Oral	Date Received	Subject	Changes Made to the Application (Y/N)
Claire Coleman	Low-Income Energy Advisory Board (LIEAB)/ Office of Consumer Counsel (OCC)	Oral	4/4/24	General	N
Comment Summary	General comments were provided about the use of various federal funding sources to address health and safety barriers in low-income households via the Residential Energy Preparation Services (REPS) program.				
DEEP Response	DEEP intends to utilize a variety of federal funding sources, including American Rescue Plan Act (ARPA), Low-Income Home Energy Assistance Plan (LIHEAP), and WAP Health and Safety and Weatherization Readiness Funds (WRF), to address health and safety barriers in WAP households. While the majority of WAP WRF funding is proposed to be allocated to REPS to address health and safety barriers in WAP homes through a referral process, a small portion is proposed for the WAP Subgrantees to address items such as whole-house ventilation needs. DEEP is seeking public input on whether CT WAP should allocate more of the WRF funding to the WAP Subgrantees and less funding towards REPS in Program Year 2024.				

PUBLIC COMMENTS RECEIVED WITH DEEP RESPONSES TO-DATE

Commentator Name	Affiliation	Written/Oral	Date Received	Subject	Changes Made to the Application (Y/N)
Chris Herb	Low-Income Energy Advisory Board (LIEAB)/ Connecticut Energy Marketers Association (CEMA)	Oral	4/4/24	Fuel Conversion	Y
Comment Summary	General comments were provided that questioned whether energy efficiency is gained by fuel switching and requested clarification on how fuel switching is related to energy efficiency.				
DEEP Response	<p>In the second draft of the Program Year 2024 WAP 1-4 Unit State Plan, DEEP has added the following language to better explain the connection between fuel switching and energy efficiency:</p> <p>“Converting fossil fuel-based heating systems to all-electric heat pumps does improve the energy efficiency of a home’s HVAC system. While fossil fuel-based heating systems can achieve 90+% efficiency, these systems rely on fuel combustion to create the heat that is delivered to a home. In contrast, heat pumps move heat from outside the home (they do not generate the heat used in the system). Therefore, heat pumps can regularly achieve 100+% efficiency (i.e., they move more heat energy than the energy needed to operate the unit). However, due to different prices for different energy sources – electricity, natural gas, oil, and propane – a home’s heating/cooling bills may or may not be reduced with a conversion to a heat pump. Therefore, DEEP commits to working with DOE and the WAP Subgrantees to determine WAP program rules that will ensure conversions to heat pumps are only recommended when bill reductions are reasonably assured.”</p>				

OTHER CHANGES MADE TO THE PY24 WAP STATE PLAN

On Page 20 under
Multi-Family
Section

- Removed sentence discussing the PY 23 Small Multi-Family service goal.

On Page 26 under
Administrative
Allocation

- Added statement regarding distribution of admin. funding between subgrantee and grantee in future program years

OTHER CHANGES MADE TO THE PY 24 WAP STATE PLAN

On Page 34 Under
Training & Technical
Assistance (T&TA)
approach and activities

- Added statement regarding DEEP currently holding a contract with Green Jobs Academy

On Pages 35-36
Fuel Switching and
Alternative Technologies

- Added statement in the Misc. Section of the State Plan regarding CT WAP's commitment to fuel switching, heat pumps, and Solar PV

OPPORTUNITIES FOR PUBLIC INPUT

- DEEP has issued a request for written public comments on the second draft of the PY24 1-4 unit WAP State Plan
- Written Comments on the second draft of the Plan are due by April 29th, 2024 at 11:59 pm

DEEP is seeking public input on the length of time a renter is protected from rent increases due to weatherization

CT WAP seeks public input regarding fuel switching and transitioning to newer more efficient technologies

CT WAP seeks public input on the allocation of WRF funding to REPS and WAP Subgrantees for addressing health and safety concerns

- Send written comments to: deep.energybureau@ct.gov
- Full notice available on the www.ct.gov/DEEP/Weatherization webpage

WEATHERIZATION PROGRAM NOTICE 22-13

AS IT RELATES TO RENTAL UNITS

DOE requires that all Grantees ensure that the benefits of weatherization to occupants of rental units are protected in accordance with 10 CFR 440.22(b) which states that regardless of housing type the Grantee's procedures for rental units shall at the minimum ensure that:

- **Written permission of the building owner or authorized agent is obtained before commencing work**
- **Benefits of the services accrue primarily to the low-income tenants residing in such units**
- **For a reasonable [emphasis added] period of time after completion, the household will not be subjected to rent increases (unless those increases are demonstrably related to other matters other than the weatherization work being performed)**
- **There are adequate procedures whereby the Grantee can receive tenant complaints and owners can appeal, should rental increases occur**
- **No undue or excessive enhancement shall occur to the value of the dwelling unit**
 - **A properly executed energy audit resulting in the installation of common energy conservation measures (ECM's) with and SIR of 1 or greater with necessary health and safety and incidental repairs would not constitute an undue enhancement.**

CT WAP is seeking input specifically on what constitutes a "reasonable period of time" for protection from rent increases due to weatherization – historically WAP has used 2 years.

WEATHERIZATION PROGRAM NOTICE 23-6

AS IT RELATES TO FUEL-SWITCHING

DOE allows fuel-switching as an Energy Conservation Measure when meeting a Savings to Investment ratio of 1.0 or better

Fuel-switching may also be completed as a health and safety measure

The process of allowing fuel-switching in the CT WAP involves seeking approval from DOE by demonstrating competence at the Grantee and Subgrantee level

- Provide sample audits to DOE for review
- Update libraries in the energy audit software

CT WAP is proposing to work throughout PY24 to seek approval from DOE to administer fuel-switching in our program.

DEEP is seeking public input on how to best ensure fuel switching does not negatively impact low-income energy bills, including access to energy assistance

WEATHERIZATION PROGRAM NOTICE 23-4

AS IT RELATES TO WRF FUNDING

Per HR 2471. The Consolidated Appropriations Act , 2022 allowed for the creation of set-aside funding for a "Weatherization Readiness Fund"

The Purpose of the WRF is to allow WAP to address necessary repairs (Health and Safety, Structural, etc.) in dwelling units that have been deferred from receiving weatherization services. Specifically, this funding is targeted to reduce the frequency of deferred homes that require services outside the scope of weatherization before the weatherization services can commence.

All units receiving WRF must result in a DOE completion defined as "A dwelling on which a DOE approved energy audit or priority list has been applied and weatherization work has been completed"

CT WAP is seeking input into how much of the Weatherization Readiness Funding should be allocated to the WAP Subgrantees and the Residential Energy Preparation Services (REPS) program.

REPS is tasked with addressing barriers to Weatherization, while WAP Subgrantees will be tasked with installing additional or minor Health and Safety measures where needed

PUBLIC HEARINGS

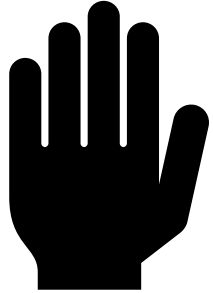
(Today) Monday, April 29, 2024

- Hearing 1: 10:00 AM – 11:00 AM
- Hearing 2: 5:00 PM to 6:00 PM
- Both are Hybrid – DEEP Public Hearing Room 2 (10 Franklin Square New Britain, CT) & on Teams
- The second draft of the Plan is posted on www.ct.gov/DEEP/Weatherization.

Written Comments on the second draft Plan are due by April 29, 2024 at 11:59pm

Comments may be addressed to: deep.energybureau@ct.gov

PUBLIC COMMENT OPPORTUNITY



Please raise your hand (virtual or in-person) and you will be called on in order



Please state your name and affiliation prior to giving your public comments

THANK YOU FOR JOINING!

