

Commentor Name	Affiliation	Written/ Oral	Date	Comment Subject	Comment Summary	Change made to State Plan?	DEEP Response
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Climate	CT needs to maximize emission reduction opportunities where feasible within the WAP regulations to help meet the state GHG emission goals.	No	DEEP continues to work to align programs with the state's GHG reduction targets. DEEP will continue to look for opportunities to increase emission reductions where possible.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Climate	Encourage DEEP to request approval from DOE to administer a fuel-switching program under WAP and to include specific language in the plan to allow fuel-switching. Fuel-switching should be included in the Miscellaneous section of the Annual File in the state's full application.	No	DEEP is exploring the possibility of fuel switching and may include fuel switching language in future Annual Files.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Climate	DEEP should consider including the social cost of carbon (SCC) in CT's cost effectiveness test for WAP proposals. CT should align the WAP Plan with the C&LM policy of Modified Utility Cost Test and incorporating the impact of avoided GHG emissions resulting from the program. CT should request that SCC be included in the energy modeling in their application and work with DOE to define a procedure.	No	For this program, the cost benefit analysis is established by the federal Department of Energy.

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<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Workforce	<p>WAP State Plan needs to include a plan for workforce development and should use T&amp;TA funds for it. The workforce plan should include:</p> <ul style="list-style-type: none"> <li>* Adherence to the Justice40 Initiative in the implementation of workforce training efforts, including outreach and promotion.</li> <li>* Technical training on electrification and pre-electrification interventions in a home to help increase the qualified workforce in CT that will assist in the implementation of fuel-switching electrification initiatives.</li> <li>* Prioritization of training individuals historically under-represented in the clean energy and weatherization fields, and using trainers from such communities.</li> <li>* Partnerships with high quality training models, prioritizing Black Americans and people of color, women-, and veteran-owned or led businesses or organizations, local unions, community colleges, community based organizations with a track record of successful implementation.</li> <li>* Conduct outreach through community colleges, technical schools, and high schools to capitalize on strengthening the trades workforce. Explore partnerships with Climate Corps and AmeriCorps. Prioritization should be made to schools where the student populations that are served align with Justice40 criteria.</li> </ul>	Yes	Text added to State Plan to address this. See V.8.4 Training and Technical Assistance Approach and Activities.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Budgeting	<p>CT should use DOE's recently released guidance on "leveraging activities" to seek funding and partnerships in service of increasing low-income funding and delivering more comprehensive retrofits. Indicate an intention to perform leveraging activities with WAP funds in the Annual File of the application.</p>	Yes	Text added to State Plan to address this. See V.6 Weatherization Analysis of Effectiveness.

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<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Equity and Justice40	<p>Recommend CT DEEP consider the four core concepts of equity from the Equity and Environmental Justice Working Group's report to the Governor's Council on Climate Change (GC3). Specifically:</p> <ul style="list-style-type: none"> <li>* Evaluate the equity and racial justice of populations served by CT WAP.</li> <li>* Create and maintain a system to analyze the WAP program delivery for equity and racial justice.</li> <li>* Evaluate the CT WAP to identify barriers to access the program to ensure equitable outcomes.</li> <li>* Establish intentional outreach and educational strategies to engage culturally specific and culturally responsive organizations to ensure communities of color are aware of and have the ability to access weatherization services.</li> <li>*Collaborate with DOE to find pathways within the confines of the program to prioritize and provide services to underserved populations</li> </ul>	Yes	Text added to State Plan to address this. See V.2 Selection of Areas to be Served.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Equity and Justice40	<p>Priority should be given to homes located in environmental justice communities as defined by CT (census block groups where 30% or more of the population have an income below 200% of the federal poverty level or are a distressed municipality as defined by DECD) and aligned with the goals of the federal Justice40 Initiative. CT DEEP should work closely with DOE on Justice40 implementation.</p>	Yes	Text added to State Plan to address this. See V.2 Selection of Areas to be Served.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Equity and Justice40	<p>Recommend that CT DEEP ensure the Renewable Thermal Technology (RTT) pilot program adheres to the Justice40 initiative in its implementation.</p>	Yes	Text added to State Plan to address this. See V.8.4 Training and Technical Assistance Approach and Activities.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Priorities	<p>Recommend that prioritization of those applicants having waited the longest for WAP be included in the priorities section of the WAP State Plan.</p>	Yes	Text added to State Plan to address this. See V.3 Priorities.

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<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Health and Safety	Recommend CT DEEP establish and submit a distinct and separate health and safety cost category in their budget to ensure State can meet current and ongoing demands of the Weatherization Barriers Remediation Program and to serve families that are not eligible to receive health and safety funds from this program. Health and safety funds would then be able to be excluded from ACPU calculations and cost justification requirements to allow a greater investment in a residence to address more holistic interventions.	No	H&S is a separate budget item and is not included in ACPU calculations.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Health and Safety	Recommend CT DEEP request more than 15% for the health and safety budget to address deferrals.	No	DEEP's new weatherization barrier removal program – the residential energy preparation services (REPS) program – works to address deferrals including measures such as asbestos, mold, and vermiculite that the H&S funds cannot cover. DEEP plans to reevaluate the need for additional H&S funding after evaluating the impact of the new REPS program on deferrals.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Weatherizing through LIHEAP	Increase LIHEAP weatherization allocation to 15%, with 10% a minimum (up from current 4%).	No	CT WAP doesn't currently receive LIHEAP funding. DEEP has shared this recommendation with the Low Income Energy Assistance Board (LIEAB) for their consideration in determining the use of LIHEAP funding.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Ongoing Consultation with Stakeholders	Recommend CT DEEP do outreach with and engage community-based organizations, unions and community colleges committed to workforce development, diversity, energy justice, and particularly those that represent underserved communities throughout the period of performance to improve WAP and the BIL Plan.	Yes	Text added to State Plan to address this. See V.2 Selection of Areas to Be Served.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Deferral of Service	Recommend CT DEEP increase the time frame for addressing health and safety concerns	Yes	Increased from 60 days to six months.

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<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Deferral of Service	Recommend CT DEEP ensure applications for the Program Year 2022 Weatherization Readiness Funds are complete and submitted. These funds are specifically designed to avoid deferrals by funding critical pre-weatherization interventions like health and safety measures to prevent deferrals.	No	Applications for the Weatherization Readiness Funds were submitted with the Formula Funds application in May 2022.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Rent Protection	Urge greater protection for tenants from rent increases by including a penalty for non-compliance, process that requires landlords to report rent increases, and verification of the reason for rent increase	No	The program's service provider(s) will be responsible for sharing information with both the building owner and the tenant about a tenant's rights towards rent increases.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Utilize funding for whole home retrofit approach	Recommend that WAP BIL funds be used to ensure that homes receiving services are receiving a whole home retrofit approach that includes treating the dwelling as an integrated complex system where the shell, mechanical, and occupants all interact and affect the energy usage. Subgrantees should ensure each household has received the maximum amount of services available within the expenditure limitations to maximize energy savings. Subgrantees should mobilize all funding available to deliver the highest level of energy and efficiency improvements in a holistic approach on each dwelling weatherized.	Yes	Text added to State Plan to address this. See V.6 Weatherization Analysis of Effectiveness.
<b>Samantha Dynowski and Sharonda Williams-Tack</b>	Sierra Club	Written	9/27/2022	Feedback from WAP recipients	Recommend thank you letters from or about people whose homes were weatherized received by subgrantees be submitted to DEEP and then forwarded to DOE to bolster efforts to promote weatherization and give a human face to people receiving weatherization assistance.	No	DEEP greatly values first-hand accounts from program participants and will continue to share these accounts with interested stakeholders, including DOE, when possible.
<b>None given</b>	ICAST	Written	9/20/22	Using WAP funding for Multifamily	Benefits of utilizing WAP funds in multifamily include: <ul style="list-style-type: none"> <li>* An easy and fast way to scale with new infrastructure funding</li> <li>* Leveraging of WAP funding for greater impact (serving more income qualified families with the</li> </ul>	No	DEEP's WAP-BIL State Plan specifically includes multifamily buildings.

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					same budget) * Easy to scale up and down		
None given	ICAST	Written	9/20/22	Recruiting a 3rd party multifamily WAP implementer /subgrantee	Most states that serve multifamily with their WAP funding have hired a third-party implementer to manage the program.	No	This State Plan is for BIL funding only and is focused on multifamily buildings. DEEP is not issuing an RFP for single family using BIL funds, however we reserve the right to use BIL funding for single family should the need arise during the 5-year cycle.
Chad Ihrig	Google Nest	Written	9/19/22	Using smart thermostat in WAP	Encourage DEEP to make smart thermostats a priority measure within the CT WAP.	No	Smart thermostats are an installed measure for CT WAP.
Gannon Long	Operation Fuel	Oral	9/28/22	Multifamily building eligibility	Two-thirds of tenants must be income eligible, but how will a building know to apply? May be hard to reach tenants because DEEP will probably be interacting with property owners and they may not know their tenant's eligibility well.	No	DEEP will ensure that the program service provider(s) will work with both tenants and building owners on understanding program eligibility.
Gannon Long	Operation Fuel	Oral	9/28/22	How benefits accrue	Services are provided to owner-occupied and rental properties alike with no priorities given to either, but also DEEP is trying to ensure that the benefits of weatherization in rental units accrue primarily to the low-income residents residing therein. Need to make sure this is all compatible.	No	DEEP will be exploring ways for the multifamily program to ensure benefits of weatherization of rental units, especially in master metered buildings, accrue to residents.

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Gannon Long	Operation Fuel	Oral	9/28/22	Protection for tenants	There needs to be really strong protections in place for tenants living in weatherized buildings to not be kicked out once the upgrades happen. The burden of proof to raise the rent should be on the property owner. Need to protect tenants from liens. Need to make sure that the tenants know what protections they have and who is going to be enforcing them.	No	The program's service provider(s) will be responsible for sharing information with both the building owner and the tenant about a tenant's rights towards rent increases.
Gannon Long	Operation Fuel	Oral	9/28/22	Definition of children	Definition of children is below age 6, but should be under 18.	No	Question answered during Public Hearing.
Gannon Long	Operation Fuel	Oral	9/28/22	Environmental justice	DEEP should review how environmental justice communities are defined in the State Statute. There are limitations within that definition and need to make sure that some communities aren't being left out.	No	DEEP is reviewing this.
Gannon Long	Operation Fuel	Oral	9/28/22	Workforce and job certification	There is extra training that CT requires but it does not mean that people are qualified to do this work. It is very important to make sure that we have a streamlined process because it is very complicated to get all these different certifications and they should work in concert as opposed to against each other.	No	The ability to make this change lies with the Department of Labor of Consumer Protection, not DEEP/WAP.
Gannon Long	Operation Fuel	Oral	9/28/22	Electricity rates	Electricity is expensive year-round and is a big energy-related crisis facing low-income households, in addition to inoperable heating systems.	No	DEEP encourages low-income households to enroll (enrollment is expected to open no later than Jan. 1, 2024) in an upcoming electric Low-Income Discount Rate. To find other resources for managing energy costs such as bill payment plans, a customer should contact their local utility.
Gannon Long	Operation Fuel	Oral	9/28/22	Liquid assets for CEAP applicants	DSS eliminated the liquid asset requirement in March 2021, so people don't have to share their assets when they apply for weatherization assistance.	Yes	Asset test language removed from State Plan.
Sam Dynowski	Sierra Club	Oral	9/28/22	Comment period	Very little time between the comment period and the public hearing and submission of the plan. Hope DEEP has the opportunity and time to include changes and suggestions.	No	DEEP will work to increase the time next round. DEEP has requested to add public comments in during the revision period with DOE.

