

**CT WAP Comment Matrix on Draft State Plan - LIEAB**

| 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                                     |
| <b>Comment Summary</b>         | <ol style="list-style-type: none"> <li>1) CET is hopeful that state-level adjustment to the plan language can make continual service more achievable in Connecticut.</li> <li>2) The current period of 2 years seems reasonable for rent increase protections.</li> <li>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.</li> <li>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 &amp; 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.</li> </ol>   |              |               |         |                                       |
| <b>DEEP Response</b>           | <ol style="list-style-type: none"> <li>1) 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.</li> <li>2) 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.</li> <li>3) 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."</li> </ol> |              |               |         |                                       |

| <b>Commentator Name</b> | <b>Affiliation</b>  | <b>Written/Oral</b> | <b>Date Received</b> | <b>Subject</b> | <b>Changes Made to the Application (Y/N)</b> |
|-------------------------|---|---------------------|----------------------|----------------|--|
| Claire Coleman          | Low-Income Energy Advisory Board (LIEAB)/ Office of Consumer Counsel (OCC)  | Oral                | 4/4/24               | General        | N  |
| <b>Comment Summary</b>  | 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 Services Preparation (REPS) program.  |                     |                      |                |  |
| <b>DEEP Response</b>    | 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. |                     |                      |                |  |

| <b>Commentator Name</b> | <b>Affiliation</b>  | <b>Written/Oral</b> | <b>Date Received</b> | <b>Subject</b>  | <b>Changes Made to the Application (Y/N)</b> |
|-------------------------|---|---------------------|----------------------|-----------------|--|
| Chris Herb              | Low-Income Energy Advisory Board (LIEAB)/ Connecticut Energy Marketers Association (CEMA)   | Oral                | 4/4/24               | Fuel Conversion | Y  |
| <b>Comment Summary</b>  | 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.   |                     |                      |                 |  |
| <b>DEEP Response</b>    | 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: “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.” |                     |                      |                 |  |

| <b>Definitions</b> |  |
|--------------------|--|
| <b>CET</b>         | Center for EcoTechnology (A CT WAP Subgrantee for Program Year 2024) |

|               |  |
|---------------|--|
| <b>IRA</b>    | Inflation Reduction Act                            |
| <b>HER</b>    | Home Efficiency Rebates Program                    |
| <b>HEAR</b>   | Home Electrification and Appliance Rebates Program |
| <b>WAP</b>    | Connecticut Weatherization Assistance Program      |
| <b>LIEAB</b>  | Connecticut Low-Income Energy Advisory Board       |
| <b>OCC</b>    | Office of Consumer Counsel                         |
| <b>REPS</b>   | Residential Energy Preparation Services            |
| <b>ARPA</b>   | American Rescue Plan Act                           |
| <b>LIHEAP</b> | Low-Income Energy Assistance Program               |
| <b>WRF</b>    | Weatherization Readiness Fund                      |
| <b>CEMA</b>   | Connecticut Energy Marketers Association           |