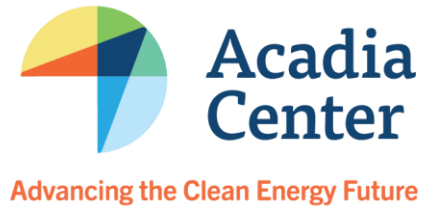


Comments by Acadia Center on the 2024 Conservation and Load Management Plan Updates



Before the Connecticut Energy Efficiency Board and Department of Energy and Environmental Protection

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Acadia Center thanks the Connecticut Energy Efficiency Board (“EEB”) and the Department of Energy and Environmental Protection (“DEEP”) for the opportunity to provide public comment on the updated 2024 Conservation and Load Management (“C&LM”) Plan. Acadia Center is also appreciative to learn about the progress, findings, and recommendations from the Diversity, Equity, and Inclusion (“DEI”) consultant, with particular interest in the soon-to-be publicly accessible database on equity to serve as a transparent repository on how the EEB is incorporating DEI on the C&LM.

In the 2024 C&LM Plan Update, Acadia Center supports the inclusion of standardized efficiency criteria for air-to-water heat pumps across Connecticut and Massachusetts, as stated in Section 2.1.1 Heat Pumps and Heat Pump Water Heaters. Within Section 2.2.1 Residential New Construction, Acadia Center is pleased to see that as of July 1, 2023, no further applications will be accepted for fossil gas incentives or claim savings for envelope improvements in homes that use delivered fuels for heat, domestic hot water, or cooking. Additionally, in Section 2.2.2 Residential Products, Acadia Center supports the standalone rebate for heat recovery ventilation (HRV) and energy recovery ventilation (ERV) in the 2024 C&LM Plan Update. In Section 2.2.3, Acadia Center supports the 2024 C&LM Plan Update to offer the Department of Energy Home Energy Score (Initial Score) to all Home Energy Solutions - Income Eligible (“HES-IE”) participants.

Alongside the support of these progressions, Acadia Center has recommendations to align the C&LM Plan Update with the organization’s Next Generation Energy Efficiency¹ goals of addressing 1) sub-standard housing quality, 2) climate mitigation, 3) clean heating and whole-house electrification, and 4) sustaining investments in efficiency as the leading energy resource option.

Section 2.2.3 Home Energy Solutions and HES-Income Eligible Programs

Transparency in decision-making is critical to ensuring an equitable process for the 2024 C&LM Plan Update. Section 2.2.3 HES and HES-IE Programs states that “the Companies will implement a cap on heat pump incentives for the HES-IE program to ensure that more customers can be served with weatherization and comprehensive work.” (p.14) Through the 2024 C&LM Plan Update, the Companies should be encouraged to share their cap targets on the heat pump incentives for HES-IE participants to keep sight of the intended outcome of “ensuring more customers can be served with weatherization services and comprehensive work.” (p.30) The 2024 C&LM Plan Update should specify definitions of the Companies’ vision of “comprehensive work” and that when referring to “more customers,” they are

¹ Acadia Center, 2021. “Next Generation Energy Efficiency, Pivoting Energy Efficiency to Address Climate Change, Environmental Justice, and Underserved Consumers.” <https://acadiacenter.org/resource/next-generation-energy-efficiency-brief/>

committed to providing the intended “weatherization services and comprehensive work” to more customers in the HES-IE program. Any changes or potential savings from the HES-IE program as incentives evolve, including the Companies’ removal of screw-in energy efficiency lighting from the HES-IE program, should be reinvested in the HES-IE program.

Equity Metrics, Outreach and Engagement, and Commitment to Funding Community Partners

Acadia Center supports the enhancement of equity metrics as they relate to energy efficiency measures, outreach and engagement, and commitment to funding community partners. Geographic categorization of energy efficiency data would allow for coordination with municipal-level programs and create an understanding of outreach completed or needs by area. Meaningful inclusion of metrics based on geographic areas could include zip codes, census tracts, and specific attention to Connecticut’s distressed municipalities and environmental justice communities. There is potential to align energy efficiency program metrics and targets in distressed municipalities and environmental justice communities with the Justice40 Initiative². For example, the 2024 C&LM Plan Update should encourage the Companies to have at least 40% of HES assessments and 40% of weatherization services and comprehensive work conducted in environmental justice communities. The full scope of this recommendation is that the number of HES assessments and weatherization services reported in the Plan Update by the Companies hold little meaning without referral to the size and geographic area, number of eligible customers in the area, and a target goal for the year, especially when factoring in distressed municipalities and environmental justice communities.

The 2024 C&LM Plan Update should encourage the Companies to share specific, measurable metrics that show the conversion rate from HES assessments to weatherization by setting annual targets for assessments and weatherization participation. These metrics should be reported quarterly and include the percentage achievement toward the annual target. Again, there is an opportunity to align these metrics with Justice40 and ensure that 40% of HES assessments in environmental justice communities are converted to weatherization services. Additional metrics should establish targets for outreach and engagement within distressed municipalities and environmental justice communities. Attention should be directed towards ensuring renters and landlords of housing units in distressed municipalities and environmental justice communities benefit from the available HES assessments, resolution of pre-weatherization barriers, weatherization services, and comprehensive services.

The progression of community engagement through the Community Partnership Initiative must reflect the scale and urgency of ensuring an equitable 2024 C&LM Plan Update process. It was stated in the last EEB meeting on August 9, 2023, that Round 2 of the Community Partnership Initiative, which was supposed to take place in 2023, will be pushed to 2024. However, the Community Partnership Initiative website has not been updated to reflect the current status of the initiative since applications were due in March 2023. The commitment to the Community Partnership Initiative through measurable metrics and targets should remain a top priority for the outreach and engagement efforts in the 2024 C&LM Plan Update. Metrics on the Community Partnership Initiative’s success could include the distribution of outreach events in environmental justice communities and the number of referrals to the HES assessment from local community groups and nonprofit organizations in the initiative.

² U.S. Department of Energy Office of Economic Impact and Diversity, 2021. “Justice 40 Initiative” <https://www.energy.gov/diversity/justice40-initiative>

Through the development of the equity metrics, the EEB and the public should have the opportunity to review, provide feedback, and share recommendations on the metrics for energy efficiency measures and outreach and engagement.

Sustaining and Layering Funding

Through its Next Generation Energy Efficiency principles, Acadia Center supports sustaining investments in energy efficiency as the leading cost-effective way to reduce greenhouse gas emissions. Echoing the testaments of climate and energy advocates at the August 9, 2023 EEB meeting, there are opportunities to layer the C&LM plan with funding available through the Weatherization Barrier Remediation Plan, Residential Energy Preparation Services, the Inflation Reduction Act, and the Housing Environmental Improvement Revolving Loan Fund.

Additional Comments

Acadia Center supports the point made at the August 9, 2023, EEB meeting to incorporate the social cost of carbon in cost-benefit analyses. Including the social cost of carbon would factor in health impacts, mitigation, adaptation costs, and savings associated with climate change and fossil fuel use. The social cost of carbon, including the current and future burden and cost to society, should be considered. Further opportunities to encourage progress in the 2024 C&LM Plan Update occur in Section 2.1.3 Review of Natural Gas Incentives, which states, “the Companies will begin a review of natural gas incentives to look for opportunities for scaling back gas.” The review of natural gas incentives could begin much quicker to completely phase out the incentives without waiting for the end of 2024. Last, the work of the DEI consultant should ensure clear definitions are in place to develop funding and program priorities with equity metrics and targets in alignment with Justice40.

Thank you again for the opportunity to provide written comment on the 2024 C&LM Plan Update. Acadia Center looks forward to providing more feedback and recommendations in this and subsequent hearings.

Sincerely,

A handwritten signature in black ink, reading "Daniel L. Sosland". The signature is fluid and cursive, with the first name "Daniel" and last name "Sosland" clearly legible.

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