Conservation
Law Foundation

March 13, 2025

Connecticut Department of Energy and Environmental Protection
Bureau of Energy and Technology Policy
10 Franklin Square New Britain, CT 06051
Electronically filed via email to DEEP.EnergyBureau@ct.gov

RE: Project SunBridge Written Comments

We, the undersigned, a group of public interest advocacy organizations, respectfully submit these comments in response to the Department of Energy and Environmental Protection's (DEEP) Notice of Request for Written Comments regarding Project SunBridge.

1. What are the main barriers to solar photovoltaics and energy storage system deployment for Solar for All eligible communities?

Solar for All eligible communities require greater access to information about rooftop solar. Limited access to information about the benefits of systems, bill savings, space requirements, permitting processes, and existing programs inhibit such communities from participating.[1] Further, the upfront costs associated with rooftop solar installation remains high for low-income customers, which include permitting and installation costs.[2] Moreover, buildings in low-income and disadvantaged communities likely require upgrades to meet installation requirements for rooftop arrays.[3] Customers in such communities are also likely to be renters and thus experience limited control over their source of electricity.[4] Lastly, low-income and disadvantaged communities experience more adverse effects of natural disasters and subsequent economic hardships.[5] Thus, customers in such communities may have difficulty maintaining rooftop arrays in the long-term. Customers also lack access to alternative programs like community solar through which multiple participants may share the economic and environmental benefits of solar photovoltaic systems.

4. What health and safety barriers to weatherization can happen simultaneously with enabling upgrades like roof replacements? Are there any weatherization barriers that cannot happen simultaneously and need to happen either before or after roof replacement?

[1] Jenny Heeter, *et al.*, *Affordable and Accessible Solar for All: Barriers, Solutions, and On-Site Adoption Potential*, NAT'L RENEWABLE ENERGY LAB'Y, 4 (Sept. 2021), https://www.nrel.gov/docs/fy21osti/80532.pdf.
[2] *Id.* at 3.
[3] *Id.* at 4.
[4] *Id.*
[5] *Id.* at 6.

Enabling upgrades should occur simultaneously with weatherization barrier remediation where possible. Connecticut homes, particularly those in low-income and disadvantaged communities, often require electrical system upgrades, structural building repairs, and energy efficiency upgrades before weatherization and installing rooftop solar. Such barriers include asbestos, mold, poor roof conditions, limited roof space, and faulty wiring.[6] To the extent practicable, DEEP should incentivize barrier remediation and enabling upgrades to occur simultaneously. DEEP should design Project SunBridge to stack funding opportunities, such as the Weatherization Assistance Program, Residential Energy Preparation Services Program (REPS), and the Affordable Multifamily Housing Retrofit Loan Program, to fund enabling upgrades and access opportunities to weatherize homes.[7] Rapid deployment of rooftop solar remains crucial for lowering emissions and energy bills. Barrier remediation and enabling upgrades will increase the number of energy efficient homes in the state and reduce the rising costs of energy bills for low-income and disadvantaged communities.

5. Can solar be installed as soon as a roof is replaced, or should all other weatherization barrier remediation and weatherization be completed before solar is installed?

See response to Question 4. Additionally, if an upgrade is sufficient, DEEP should support installation of solar arrays.

6. Can weatherization and solar installation happen at the same time or does one need to come first?

See response to Question 4. Ideally, DEEP would take a whole home retrofit approach—weatherizing to maximize energy efficiency and upgrading for solar installation should occur simultaneously to increase the number of energy efficient homes and reduce project costs and energy bills.[8]

7. Are there any enabling upgrades that should not be covered by Solar for All? Please explain.

To maximize time and funding, DEEP should prioritize enabling upgrades required for solar array installation, for example, roof and electrical system upgrades.

8. What consumer protection measures should be taken to ensure that customers eligible for Project SunBridge are not taken advantage of by bad actors?

To protect customers eligible for Project SunBridge, DEEP should create a customer education campaign, develop standard contracts, implement workforce guidelines, and establish

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[6] *Id.*

[7] *2023 Annual Report*, Dep't Energy and Env't Prot., (2023) https://portal.ct.gov/-/media/deep/energy/weatherization/misc_documents/deep-affordable-housing-energy-retrofits-2023-legislative-report.pdf.

[8] Connecticut's weatherization barrier remediation program, REPS, currently lacks sufficient funding. Consequently, DEEP will likely need to prioritize enabling upgrades at this time but should restructure its priorities when that funding becomes available again. In structuring and prioritizing its retrofit pathways, DEEP should ensure that Project SunBridge provides the most benefit and least impact on its participants, while maximizing emissions reduction now and in the future.

grievance procedures.[9] Customers benefit from educational campaigns that break down contact terms, financing options, and government policies. DEEP should create a customer education campaign that explains the type of contracts available, financing options, and local and state laws that govern the projects to protect customers from fraudulent practices. DEEP should further develop standard contract terms and guidelines that require credentialed workers. DEEP should involve the Connecticut Green Bank to review and approve project proposals to ensure fair practices. DEEP should coordinate with the Connecticut Solar and Storage Association to create a list of authorized contractors and installers. DEEP should implement grievance procedures to report fraudulent practices in collaboration with the Office of the Attorney General. Grievances should be made public to inform future customers. These measures in tandem will protect customers eligible for Project SunBridge.

9. How can Project SunBridge maximize funding for enabling upgrades for single-family homes?

DEEP should provide customers interested in solar-related programs with information related to other energy efficiency and clean energy programs provided by the state to maximize funding for enabling upgrades for single-family homes. DEEP should leverage current programs supporting distributed solar and storage, such as the Residential Renewable Energy Solutions (RRES) and Energy Storage Solutions (ESS) programs, and barriers to installation, like the REPS Program, Affordable Multifamily Retrofit Program, and Weatherization Assistance Program. DEEP should encourage referrals between agency-sponsored programs, like the Weatherization Assistance Program,[10] and create opt-out notifications to consumers of their eligibility for such programs where possible. DEEP should also set limits for projects, like roof and electric system upgrades, to maximize the funding available.

11. What are the key strengths and weaknesses of the two strategies described in Section IV for deploying solar pv and solar pv paired with energy storage for single-family homes?

DEEP identified solar leases and smart e-loans for deploying solar photovoltaics and solar photovoltaics paired with energy storage for single-family homes. Solar leases benefit customers, particularly in low-income and disadvantaged communities, by eliminating upfront costs, avoiding tax credit limitations, and lowering monthly payments. Conversely, solar leases provide lessees with no equity, disqualify lessees from the Solar Investment Tax Credit, limit lessees' flexibility to modify or upgrade systems, and expose lessees to fees for early termination or difficulties with home sale. Smart e-loan programs assist customers by providing ownership of the system and thus qualifying for federal tax credits. Smart e-loan programs may also be used for enabling upgrades and providing more flexibility with contractors and interest rates. Such programs, however, require credit checks, expose customers to upfront costs, and place system maintenance and repair onto customers. DEEP must consider both upfront costs *and* exit costs of these financial tools to low-income and disadvantaged communities, particularly costs associated with early termination and home sale.

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[9] *Solar Consumer Protection*, Nat'l Renewable Energy Lab'y, https://www.nrel.gov/state-local-tribal/solar-consumer-protection.html#:~:text=Solar%20consumer%20protections%20broadly%20include,have%20access%20to%20this%20information (last accessed Mar. 7, 2025).

[10] *See*, *Weatherization in Connecticut*, DEP'T ENERGY ENV'T PROT., https://portal.ct.gov/deep/energy/weatherization/weatherization-in-connecticut (last accessed Aug. 22, 2024).

15. How can Project SunBridge maximize funding for enabling upgrades for multifamily homes?

See response to Questions 4, 9, 17, 18, and 24. Multifamily homes likely require additional technical support to navigate challenges associated with landlord-tenant relations.

17. How should Project SunBridge communicate with tenants?

To reach tenants, Project SunBridge should ask landlords or property managers to pass communications along to tenants via established communication pathways; mail physical communications to each unit in a building; and connect with tenant unions and organizations like the Connecticut Tenant Union. Posting a notice or solicitation on a building is an additional option but may not reach all residents depending on the entrance they use. Communications should be provided in English, Spanish, and any other language known to be spoken by residents of the building or that is spoken by 15% or more of the population in the census tract in which the building is located. These communications should include the value Project SunBridge adds for tenants.

18. What landlord or multifamily affordable housing owner networks already exist that could be used to gather feedback for program design and inform building owners of the financial assistance available through Protect SunBridge?

We recommend Neighborhood Housing Services of New Haven and suggest connecting with Kathy Fay, Director of Community Sustainability, at kfay@nhsofnewhaven.org. We also recommend North Hartford Partnership and suggest connecting with Brenda Watson, Executive Director, at bwatson@northhartfordpartnership.org.

19. What were the strengths and weaknesses of past Solarize campaigns, both in Connecticut and elsewhere?

Strengths of previous Solarize campaigns included bulk purchasing to reduce installation costs and simplifying processes for homeowners like vetting installers. Previous campaigns produced higher conversion rates when compared to traditional solar marketing. Such campaigns were community driven, which increased transparency and built trust among consumers. Previous campaigns, however, forced homeowners to make quick decisions due to their deadline-driven models. These campaigns limited customer flexibility for installers if restricted to vetted options. Low and middle-income customers had limited access due to credit requirements and high upfront costs. The success of such campaigns depended largely on the availability of incentives and favorability of local policies. These campaigns should be repeated every several years, as conditions change significantly in this market (e.g., prices, incentives, technology).

20. What resources or technical support would consumers like to see community-based organizations provide for: (a) General education about solar pv and energy storage technologies; (b) Outreach about solar pv and energy storage financing options; (c) Technical assistance to support uptake of solar pv and energy storage financing options.

We support technical assistance that will increase consumer education and increase participation. DEEP should develop free workshops and webinars to educate potential customers about solar and storage systems, particularly how they function and the benefits they provide. Such materials should be provided in multiple languages, recorded, and linked on the Project Sunbridge webpage. DEEP should consider creating a resource through which customers can ask questions such as a call center or hotline. DEEP should prepare comparisons of financing options and compile incentives for interested customers. DEEP should lastly provide one-on-one consultations to educate customers and provide continued support as customers complete loan applications, tax credit forms, incentive paperwork, and permitting applications.

DEEP should consider conducting targeted outreach to favorable candidates for solar based on analysis of available socioeconomic and GIS data. For example, DEEP could identify environmental justice census blocks and track adoption in those blocks. DEEP should also align themselves with existing community campaigns such as HeatSmart and Clean Water Action HES campaigns. Such campaigns mobilize community groups, task forces, commissions, and others to help reach residents. DEEP should also consider prioritizing households with electric heat which almost always creates a high energy burden.

21. What are the most effective strategies for public education regarding solar pv and energy storage technologies? Please also include any strategies specific to different audiences, such as renters, homeowners, elderly populations, etc.

We encourage DEEP to utilize a variety of media to best reach a diversity of audiences. DEEP should prioritize outreach in environmental justice communities as defined in Connecticut General Statutes Section 22a-20a to ensure that the benefits of the program are dispersed to the communities that will most benefit from clean energy technology. Messages should be posted physically throughout the relevant neighborhoods, in local and ethnic news media, on municipal websites, and on social media. Such messages should be developed and tested with community members and organizations prior to finalization. Communications should be available in English, Spanish, and any other language spoken by 15% or more of the relevant census block.

DEEP should also consider convening public meetings to share information, especially in environmental justice communities. DEEP should provide notice of any such meetings at least 30 days in advance of opportunities to participate via the media listed above. We recommend providing both virtual and in-person meetings or hybrid meetings as the most accessible and inclusive. Translation services should be provided if 15% or more of the surrounding neighborhoods speak a language other than English. In-person meetings should be held in a location that is easily accessible (preferably by public transit) to members of the affected community and ideally should be offered at multiple times to accommodate varying schedules. Meetings scheduled in the evening should provide food and childcare options to best support community involvement.

DEEP should consider educational campaigns that address barriers to participation. Specifically, DEEP should provide educational materials that break down system types and requirements, financing options, and permitting processes. Additionally, DEEP should create solar and storage calculators to help estimate savings and identify incentives. DEEP should also gather

and share testimonials, provide one-on-one consultations with homeowners, create an installation and maintenance guide, and share information about community solar. A referral program is another effective way to enlist participation. Previous campaigns demonstrate that word-of-mouth and neighbor-to-neighbor communication effectively increase adoption.

22. What resources or technical support would be helpful for municipalities to support residential solar pv installations? (a) Is permitting for residential solar photovoltaic installations a significant barrier or might it be a significant barrier in the future?

Solar for All eligible communities need access to more information about permitting processes. Customers in low-income and disadvantaged communities benefit from educational materials about permitting and associated criteria like space requirements specific to their needs. Such customers also face high upfront costs that include preparation for and completion of permitting processes, like pre-installation assessments and permitting fees. Municipalities should implement clear and consistent permitting guidelines and provide online permitting tools and trackers. SolarApp+ provides a uniform approach that may be adopted by Connecticut municipalities to remove such barriers. Municipalities also require additional support to facilitate safe, rapid, and reliable grid connectivity for new solar projects.

24. What organizations are viewed by homeowners, tenants, and/or building owners as trusted partners through whom the coalition should seek to engage? (i.e. who would be our best channel partners to reach residents.)

Organizations positively viewed by homeowners, tenants, and building owners as trusted partners include Connecticut Coalition for Economic and Environmental Justice, Connecticut Fair Housing Center, Operation Fuel, Interreligious Eco-Justice Network and other faith-based organizations, North Hartford Partnership, Non-Profit Accountability Group, People's Action for Clean Energy, Neighborhood Revitalization Zones, Connecticut Tenants Union and homeowner associations.

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