



# SIERRA CLUB

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September 7, 2021

Department of Energy and Environmental Protection  
Energy Bureau  
10 Franklin Square  
New Britain, CT 06051  
via email: DEEP.EnergyBureau@ct.gov,

On behalf of the Sierra Club and our more than 40,000 members and supporters in Connecticut, thank you for the opportunity to comment on DEEP's Draft RFP for a Weatherization Barrier Remediation Program Operator.

We applaud DEEP for its efforts to remediate weatherization barriers including this draft RFP that will kick start Connecticut's Weather Barrier Remediation Program. Remediating weatherization barriers is critically important to achieving equity in Connecticut's energy efficiency programs allowing barriered residents to have full access to the economic, health and environmental benefits of the EnergizeCT energy efficiency program, and to the emerging whole home retrofit program for low-income housing created by Senate Bill 356.

Weatherization barriers include problems like the presence of asbestos, gas leaks, carbon monoxide, lead, vermiculite, knob and tube wiring, and poor structural integrity. Homes with these hazards must go through remediation before other energy efficiency measures like insulation, window replacement, HVAC, and renewable energy installation can be conducted.

We recognize the years-long advocacy of energy efficiency vendors; vendors identified weatherization barriers a number of years ago. Then in May 2016, United Illuminating (UI) began to track barriers, in 2017, Yale issued a report on weatherization barriers to energy efficiency, and in December 2020, Energy Futures Group issued a paper "Overcoming Weatherization Barriers." Through these collective efforts, the scope of this problem has been quantified; the 2020 report reviewed EnergizeCT program data from 2017 to 2019 and found 9% of Home Energy Solutions (HES) and 23% of HES-Income Eligible (HES-IE) were barriered.

The draft RFP signals an important development in addressing weatherization barriers, and we are pleased to be able to respond to DEEP's questions on the RFP.

***Q. Does the Scope of Service Description found in Section II.C. adequately illustrate key program expectations for a Weatherization Barrier Remediation Program Operator?***

In addition to the listed "Core Components of Service", the program operator should be expected to create a positive client experience. The engagement between the client and the program operator will be critical to the success of the program and to scaling up.

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We also recommend clarifying eligibility requirements of the program operator and of the eligible households. Regarding the program operator, the draft RFP gives preference for “non- profit agency, community action agency, local government.” We suggest modifying this language so any organization with experience in energy efficiency or health and safety repairs is eligible to apply in the definition of “eligible entity”, but that preference will be given to non-profits (removing the word “agency” from the current text), community action agencies, or local governments. Regarding eligible households, we recommend that the RFP clarify that eligible households must be eligible for either LIHEAP or the HES-IE program. The draft RFP only references LIHEAP eligible households, which would potentially exclude certain HES-IE low-income customers deferred from the program. While the current LIHEAP and HES-IE income eligibility criteria align, that could change in future years. For the program to maximize its potential and avoid confusion, the program design should allow both LIHEAP and HES-IE eligible customers to participate.

A “building hygienist” is identified as a core component of the service. Because there is no state, federal, or industry credential for a “building hygienist” and therefore the use of this term could drastically hinder the development of the program, we recommend modifying the RFP to deemphasize this term and instead focus on the credentials needed to identify and assess weatherization barriers.

Finally, we concur that the program operator should coordinate with other entities, and suggest that DEEP, in its technical assistance role, assist in coordination with expansion in mind to later incorporate the emerging low-income comprehensive building program enacted in Senate Bill 356.

***2. Do the Performance Measures listed in Section II.D. capture all relevant performance metrics for a Weatherization Barrier Remediation Program Operator?***

We urge DEEP to set a more ambitious goal to serve 1,000 to 1,250 units over the 3 years. The draft RFP requests that the selected program operator serve a minimum of 100 homes during the first 12 months of full operation.

Additionally, because of the importance of the client experience to the success of the program and future growth, we recommend that client satisfaction should be included as a performance metric.

***3. Do the Evaluation Criteria (and Weights) listed in Section III.B.4 effectively capture program priorities and establish objective and meaningful standards for proposal evaluation?***

We have several recommendations to the Evaluation Criteria and Weights to ensure the program operator has the skills and capacity to run the program and that the funds are used to advance state goals around energy efficiency and equity.

DEEP should provide points and reward bidders with statewide reach, and a history of managing projects across the state. This, combined with the preferences for teams and organizations that have

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existing relationships with Connecticut contractors and for allocating points for organizations that can leverage other funds, will help the program to get started quickly and scale up to increase the number and type of homes served.

We recommend that DEEP provide added points to bidders that are women- or minority-owned or -operated and/or commit to hiring or provide a preference to hire minority- and women-owned businesses to help the state achieve greater equity, advance Diversity, Equity, and Inclusion goals in alignment with the recommendations of the DEEP E3 proceedings.

**4. Do the Main Proposal Submission Requirements in Section IV.D include an exhaustive list of requirements needed for comprehensive and effective evaluation?**

In addition to the data reporting metrics already listed, we recommend that racial demographics be collected as an important data point for measuring equity. We also suggest some way for the program operator to collect and report findings from vendors that could help improve the program over time. Vendors are very likely to identify challenges and opportunities for improvement through their direct interactions with clients.

Thank you for the consideration of our comments.

Sincerely,

Samantha Dynowski, State Director  
Sierra Club Connecticut