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

Thank you for the opportunity to comment on Equitable Energy Efficiency in the 2019 – 2021 Conservation and Load Management Plan.

The Connecticut Energy Efficiency Fund has a proven track record of success advancing the efficient use of energy and reducing carbon dioxide emissions. However, following local and national calls for racial justice, it is important to take a fresh look at Connecticut's successful energy efficiency program and ask tough questions about racism and equity. We welcome the opportunity presented by DEEP to examine inequity in the state's energy efficiency program and identify ways to improve it.

We believe that by making meaningful changes in program priorities and decision making, the Connecticut Energy Efficiency Fund can continue to save consumers money, reduce energy demand, avoid emissions, and create jobs while also repairing harm done to communities affected by structural racial and economic oppression. We offer the following recommendations to the structure, policy, and practices of the Conservation and Load Management (CL & M) Plan for your consideration.

Definitions - In the 2016 - 2017 Report on the Equitable Distribution of Conservation and Load Management and Renewable Energy Funds in Connecticut¹ DEEP measured equity as the amount of conservation program funds assessed and the amount of incentives expended in distressed census tracts. This measurement is more in line with *equality* which implies that each group should receive the same that they put into the program. *Equity* would calculate that some groups have greater needs than others, and would focus on providing greater resources to address them. The difference between equality and equity is critically important; below we suggest ways that CL & M funds could be more equitably distributed to address the impact of decades of intentional structural racism, disinvestment, red lining, discrimination, segregation, etc. that communities have suffered. While these injustices are challenging to address and reverse, establishing equitable planning, investment and opportunities in the use of CL & M funds is an important goal.

¹ <https://portal.ct.gov/-/media/DEEP/energy/ConserLoadMgmt/equitabledistributionyears20162017pdf.pdf>

A standard definition of Energy Affordability should also be defined and used across all programs and agencies. Energy is affordable when the burden of energy costs are 6% or less of income.²

Prioritize who is served by Connecticut Energy Efficiency Fund programs - Low-income households face a disproportionately higher energy burden³, are least able to afford energy efficiency upgrades, and are more likely to experience health and safety barriers to energy efficiency upgrades.⁴ Factors such as race, ethnicity, disability, geographic location, transportation burdens and housing burden are also likely to impact the access and uptake of energy efficiency programs.

To equitably distribute CL & M funds to address these disparities, we recommend the following:

- Require that at least 40% of all funds across all CL & M programs be spent serving low and moderate income (LMI) residents
- Establish low, or ideally no co-pays for LMI households
- Create and distribute program information to underserved communities in consultation and collaboration residents from those communities, organizations that serve underserved communities, and municipalities

Comprehensive Approach to Energy Efficiency, Health & Safety, and Electrification - Various studies have documented the significant frequency of health and safety barriers that limit access to energy efficiency and weatherization programs for low-income customers. Common barriers include asbestos, vermiculite, vermin, mold, knob and tube wiring, lead, high CO2 and gas leaks. Unmitigated, these conditions result in unhealthy homes and unnecessary production of energy. Fossil fuel combusting equipment and appliances also threaten human health and the climate.

We recommend that DEEP build comprehensive measures into the CL & M Home Energy Solutions and Home Energy Solutions Income-Eligible programs to couple energy efficiency retrofits with water conservation, removal of health and safety barriers, and replacement of fossil fuel burning equipment and appliances with high efficiency electric alternatives. A comprehensive program that combines efficiency and weatherization with these measures will address equity issues while aligning with the climate goals of the state. It will also reduce energy and health costs. As noted in the 2018 Comprehensive Energy Strategy, an estimated \$54 million in hospitalizations and emergency room visits for acute asthma treatment alone can be attributed to home-based environmental hazards.⁵

DEEP should coordinate within and across programs to ensure that when health and safety barriers are identified during a Home Energy Solutions audit, that existing funds already

² <https://www.aceee.org/sites/default/files/energy-affordability.pdf>

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<https://www.energy.gov/eere/slsc/low-income-community-energy-solutions#:~:text=Low%2Dincome%20households%20face%20disproportionately%20higher%20energy%20burden.&text=According%20to%20the%20U.S.%20Department,which%20is%20estimated%20at%203%25>

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<https://efficiencyforall.org/wordpress/wp-content/uploads/2020/08/Health-and-Safety-Barriers-study-final-report3-17-17.pdf>

⁵ <https://portal.ct.gov/-/media/DEEP/energy/CES/BuildingsSectorpdf.pdf>

allocated to address health and safety barriers can be accessed for remediation. In 2020, underspent CL & M funds should be used to address health and safety barriers.

DEEP should investigate additional funding sources to address health and safety barriers, and work with other state agencies as needed to access funds. One such source are federal LIHEAP funds. Connecticut has been underspending federal LIHEAP funds and is carrying over a balance.⁶ Connecticut's LIHEAP spending shows that only 3% of LIHEAP funds were used for weatherization in 2019, compared with 15% in New York and Rhode Island. Another potential funding source is Medicaid. In Rhode Island, Medicaid funds can be used to replace windows for lead-poisoned children.⁷

Additionally, the Department of Social Services (DSS) served over 80,000 households with energy assistance through LIHEAP funding, but only 286 with weatherization assistance in 2018. DEEP should prioritize coordinating with DSS to reach CEAP eligible households with comprehensive energy efficiency through the Home Energy Solutions program.

DEEP should also create an optional, voluntary affordability component that caps the percentage of income that a customer spends on energy to 6% if the customer meets requirements for income and program participation such as:

- Income at or below 75% of state median income.
- Participating in an energy efficiency and weatherization program offered through EnergizeCT, which shall include an annual audit of energy usage;
- Participating in an energy education and training program including annual energy usage and behavioral assessments; and
- Agreeing to any data access and sharing policies necessary to provide the program with information regarding the applicant's energy usage and payment activities with the electric utility provider both at the time of application and throughout participation in this comprehensive program.

Renters are a hard to reach LMI group, and DEEP should investigate ways to require and possibly incentivize landlords of small and medium sized properties, especially those seeking Section 8 certificate, to allow renters to access a comprehensive program of energy efficiency, water conservation, health and safety remediation, and zero-emission appliances and equipment.

Ensure racial and economic equity in decision making - Entities making decisions about energy efficiency funds including DEEP and the Energy Efficiency Board should increase the representation of Black, Indigenous and People of Color (BIPOC) and LMI voices including residents, vendors, and municipal representatives. A balance between BIPOC and LMI voices and special interests at the decision-making level is necessary to disrupt inequity in structure, program and practice and make meaningful transformation.

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[http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/586f3a15db57b4fd8525857c006dc295/\\$FILE/Pro%20Track%201%20Report.pdf](http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/586f3a15db57b4fd8525857c006dc295/$FILE/Pro%20Track%201%20Report.pdf)

⁷ <https://www.nashp.org/wp-content/uploads/2018/09/Rhode-Island-Lead-Case-Study.pdf>

The same is necessary for public input. Currently input on program decisions appears to largely be from parties that have the time and resources to follow the process, attend meetings and submit comments. Most are doing so in their professional capacity and therefore getting paid. If input is to be gained from underserved populations, it is essential for those living in or near poverty design input opportunities. Demographic data on input should be tracked and modifications made when input is determined to be inequitable.

DEEP should use consulting dollars to pay BIPOC and LMI volunteers for providing input or as a member of decision making bodies. By providing input and/or serving as a Board member, unpaid volunteers are providing consulting services that the programs need. DEEP should investigate consulting payments such as cash, stipends, gift cards, credits on electric bills.

Establish timeframes, goals, measurable metrics - Finally, we recommend DEEP establish clear goals, timeframes and measures to make progress towards equity.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Samantha Dynowski". The signature is written in a cursive, flowing style.

Samantha Dynowski, State Director
Sierra Club Connecticut