

June 15, 2022

Mr. Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Dear Mr. Gaudiosi,

We, the undersigned environmental, environmental justice, labor, housing, and social justice organizations submit the following comments in response to PURA's [Notice of Request for Written Comments](#) in Docket No. 17-12-03RE11 PURA Investigation into Distribution System Planning of the Electric Distribution Companies - New Rate Design and Rates Review.

Our organizations are in strong support of an equitable low-income discount rate of electricity as a critical part of a larger strategy to make energy more affordable for low-income, energy burdened households as Connecticut moves toward a cleaner and more efficient grid.

Connecticut has one of the highest electricity rates in the nation, and the impact of high rates is inequitable. The statewide average energy burden (household energy expenditures like electric, gas, heating fuel divided by annual household income) is 3%, while most of our cities experience rates of 6% or higher. Household energy burden that's higher than 6% is considered energy burdened and anything above 10% is considered severe.

Low-income households, renters and homes with older appliances, and electric heating, are more likely to experience higher energy burden. This can mean choosing between food and electricity bills. Two studies in the last year have illustrated the impacts of high energy burden in Connecticut. The Trinity College Action Lab reported on the energy burden in Hartford's Upper Albany neighborhood where the average energy is 7.6% but can be as high as 27%.¹ "Energy Insecurity in Connecticut," a study coordinated by Operation Fuel, Vermont Law School and Yale University, further explores the data on energy burdened residents and the impact energy burden has on health and well-being.² Both studies interviewed residents to learn the impact of energy burden on individuals.

Additionally, the health and climate costs associated with burning fuels inside buildings is also disproportionately felt by low-income households.

To address these issues, we offer the following recommendations as you continue to develop this policy:

PURA should establish an equitable low-income discount rate

Connecticut should join other states in establishing a low-income discount rate. We recommend that PURA set a lower target for energy burden. PURA established a target that enables residential customers to spend no more than six percent of their household income on building

¹<https://action-lab.org/energyburdenhtfd/files/2022/01/Energy-Burden-in-Hartford-CT.-A-report-for-Sierra-Club-and-the-Community-2021-.pdf>

² <https://ct-n.com/ctnplayer.asp?odID=19715>

energy costs. A six percent energy burden target would not be an equitable outcome, and would not lessen social inequities. It would maintain the disproportionate impact of energy burden. We urge PURA to aim for a more equitable three percent target.

Low-income discount rate should be easily accessible

We urge PURA to ensure that low-income customers can easily access the low-income discount rate, such as automatic enrollment for residents enrolled in other means-tested programs.

Other energy assistance programs should not be reduced

The establishment of a low-income discount rate should be an addition to existing energy assistance programs, not a replacement for any existing programs.

PURA should minimize the impact on rates through energy efficiency and other mechanisms

PURA has decided other ratepayers will absorb the costs associated with the discount rate; to lessen the impact on rates, we urge PURA to require the utilities to drive down consumption through energy efficiency and other mechanisms.

Pairing energy efficiency with the low-income discount rate will further reduce costs for low-income customers and will also reduce the overall impact to rates. Energy burdened households are keenly aware of what needs to be done to reduce electricity use, but often have little control over the efficiency of their homes either because they rent or because they cannot afford the upfront costs of energy saving home upgrades and new, more efficient appliances. The utilities should provide services through the energy efficiency program and by fully funding the cost of resilience based energy retrofits (such as home energy audit, weatherization, insulation, appliance and space and water heater replacement). Efficiency upgrades should include replacement of any appliances and equipment determined to be inefficient with the most efficient, all-electric alternatives. Doing so will have the added benefits of helping to meet Connecticut's greenhouse gas reduction law, and reduce indoor air pollution and associated health costs.

We also recommend that PURA explore other mechanisms to reduce energy use to coordinate with the low-income discount rate.

PURA should end reconnection fees

Reconnection fees are unnecessary penalties on people already struggling to pay their bills. We urge PURA to end the practice of reconnection fees.

PURA should consider an all-electric discount rate

Due to our state's high electric rates, fuel switching from natural gas to using electric heat pumps often results in higher utility bills (unless combined with solar). In the majority of the country, the opposite is true; electrification with heat pumps results in lower energy bills. Regardless of utility rates, electrification results in lower energy consumption, lower fossil fuel emissions, and reduced health impacts from which our disadvantaged communities can benefit the most. Because fuel switching provides our state so many benefits, PURA should investigate ways to make this an attractive and financially sustainable option for our residents to implement solar and heat pump combinations which will allow energy equity and protect both people and the environment we live in

Thank you for your consideration of our comments.

Sincerely,

Sierra Club Connecticut
Transport Hartford Academy at the Center for Latino Progress
Neighborhood Housing Services of New Haven, Inc.
Efficiency For All, CT
Yale Center for Environmental Justice
Green Eco Warriors, Inc.
Connecticut Citizen Action Group (CCAG)
New Haven Climate Movement
New Haven Leon Sister City Project
Windsor Climate Action
Nonprofit Accountability Group
Meadows Management
Eastern CT Green Action
No More Dirty Power in Killingly
Hampton Green Energy Committee
Connecticut Roundtable on Climate and Jobs
Vote Solar
The Nature Conservancy in CT
CT Coalition for Economic and Environmental Justice
IBEW Local Union 488
Joel N. Gordes, Energy & Environmental Security Strategist
Wilton Quaker Meeting
Ashford Clean Energy Task Force
New Haven Energy Task Force
Clean Water Action
Operation Fuel
Acadia Center
Sustainable Westport
Sustained Advantage, Inc.
People's Action for Clean Energy
C3M
Portland Clean Energy Task Force
Building Decarbonization Coalition
State Rep David Michel (Stamford - 146)
Windham Area Interfaith Ministry
LISC