

June 23, 2023

Via Electronic Mail

Christopher Bernard
Manager, Regulatory Policy & Strategy, CT
As Agent for CL&P and Yankee Gas Services Company
d/b/a Eversource Energy

Stephen J. Bruno
Director, Conservation and Load Management
Eversource Energy

Hammad Chaudhry
Senior Manager, Conservation and Load Management
UIL Holdings Corporation

Re: 2022-2024 Conservation and Load Management Plan – Conditions of Approval #1, #10, #13, #14

Dear Mr. Bernard, Mr. Bruno, and Mr. Chaudry:

On June 1, 2022, the Connecticut Department of Energy and Environmental Protection (DEEP) approved the 2022-2024 Conservation and Load Management Plan (C&LM Plan), subject to conditions.¹ The C&LM Plan was submitted by Eversource Energy (Eversource), The United Illuminating Company (UI), Connecticut Natural Gas Corporation, and The Southern Connecticut Gas Company (collectively, the Utilities), on November 1, 2021, pursuant to Conn. Gen. Stat. § 16-245m, in consultation with the Connecticut Energy Efficiency Board (EEB).

COA # 1

COA #1, in the 2022-2024 Conservation and Load Management Plan Final Determination, stated:²

¹ See DEEP Final Determination regarding the 2022-2024 Conservation and Load Management Plan, June 1, 2022, available

at <https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b?OpenDocument>.

² See DEEP Final Determination regarding the 2022-2024 Conservation and Load Management Plan (Attachment A – Schedule of Conditions of Approval), June 1, 2022, available

at [www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b/\\$FILE/Attachment%20A%20-%20Schedule%20of%202022-2024%20Conditions%20of%20Approval.pdf](http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b/$FILE/Attachment%20A%20-%20Schedule%20of%202022-2024%20Conditions%20of%20Approval.pdf).

The Utilities are directed to identify specific Infrastructure Investment and Jobs Act (IIJA funding) opportunities that are relevant to the C&LM programs and for which they are eligible to apply. The Utilities should submit a preliminary list of these opportunities to DEEP by June 30, 2022. In recognition of the fact that guidance is not yet available for all IIJA funding opportunities, this list should be treated as a living document and updated at regular intervals to respond to new guidance. DEEP will lead coordination efforts associated with IIJA opportunities, which may include meetings, data requests, and the co-development of response strategies with stakeholders, including the Utilities.

On June 30, 2022, the Utilities submitted their response to this Condition including a list of IIJA Funding Opportunity Announcements (FOAs) relevant to the 2022-2024 C&LM Plan and programs.³ Subsequently, the Inflation Reduction Act (IRA) became effective on August 16, 2022.⁴

Given the opportunities presented by the enactment of the IRA, DEEP modified COA #1 as such:

The Utilities are directed to provide regular updates regarding the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA) funding opportunities that are relevant to the C&LM programs and for which they are eligible to apply. The Utilities should submit an updated list of these opportunities, new requests for information issued by the federal Department of Energy (DOE), and any proposals for how new funds could be used in C&LM programs to DEEP at least every 2 weeks, with additional updates as needed in order to meet DOE deadlines.

The Utilities are also directed to provide a proposal to DEEP regarding how they will institutionalize their response to new funding from IIJA and IRA by February 1, 2023. This proposal should include the following:

- 1. The Utilities' plan to regularly engage with DEEP, the EEB, the Connecticut Green Bank, and other stakeholders, regarding new funding opportunities.;*
- 2. Mechanisms for tracking funding opportunities and reporting to DEEP every other week and as-needed.;*
- 3. Methods for seeking DEEP's approval on applications to DOE, Energize CT website updates, and other actions the Utilities may take regarding federal funding; and*
- 4. Recommendations regarding a tool on the Energize CT website that developers, contractors, and customers can use to determine their eligibility for all rebates, tax incentives, and other programs they may be qualified for, including programs funded by IIJA, IRA, and any other Utility programs.*

³ See Utilities' response to Condition of Approval No. 1 of the 2022-2024 C&LM Plan, June 30, 2022, available at <https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047e5bf/929d74fc827eedee8525888a006c0b4d?OpenDocument>.

⁴ See Public Law 117-169, An Act To Provide for Reconciliation Pursuant to Title II of S. Con. Res. 14, August 16, 2022, available at: <http://www.congress.gov/117/plaws/publ169/PLAW-117publ169.pdf> <https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf>.

On February 3, 2023, the Utilities provided a proposal regarding how they will institutionalize their response to new funding sources available through the IJA and IRA. DEEP approves the Utilities' proposal. The schedule of conditions has been modified to reflect ongoing reporting requirements set forth in COA #1.

COA # 10

COA # 10, in the 2022-2024 Conservation and Load Management Plan Final Determination, stated:⁵

To ensure that progress is being tracked to support the development and expansion of a robust energy efficiency workforce in Connecticut, the Companies shall develop a workforce development and education strategy that includes the following:

- *A list of measurable goals for the Education, Outreach and Workforce Portfolio of programs. Where possible, these goals should be informed by the recommendations of the ILLUME evaluation study.*
- *An indication of projected rates of increase for these goals for each program year.*
- *Metrics to track quantifiable progress towards these goals; providing specific goals and quantifiable metrics for program deployment in distressed municipalities.*
- *Near, mid-, and long-term actions, estimated costs, and gaps that need to be filled by other stakeholders to meet these goals.*

For the GreenSTEP program specifically, this report should include:

- *Programmatic or policy-based recommendations on how to increase participation in the GreenSTEP programs.*
- *An outreach plan to include students from the public school system in the after school/ summer GreenSTEP program.*

This report should be submitted to DEEP by August 15, 2022. After the submission of the initial report, DEEP will work with the utilities to develop a regular reporting process to track progress towards the identified workforce development goals.

On August 15, 2022, the Utilities filed a response to Condition #10.⁶ DEEP found the response insufficient and modified the COA to reflect additional requirements and a new due date. The modified COA stated:⁷

⁵ See DEEP Final Determination regarding the 2022-2024 Conservation and Load Management Plan (Attachment A – Schedule of Conditions of Approval), June 1, 2022, available at [https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b/\\$FILE/Attachment%20A%20-%20Schedule%20of%202022-2024%20Conditions%20of%20Approval.pdf](https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b/$FILE/Attachment%20A%20-%20Schedule%20of%202022-2024%20Conditions%20of%20Approval.pdf).

⁶ See Utilities' response to Condition of Approval No. 10 of the 2022-2024 C&LM Plan, August 15, 2022, available at [DEEP COA 10 Workforce Dev Progress Reporting \(8-15-22\).docx \(live.com\)](#)

⁷ See DEEP Letter Regarding Condition 10, February 14, 2023, available at [DEEP letter regarding condition 10.pdf \(state.ct.us\)](#)

To ensure that progress is being tracked to support the development and expansion of a robust energy efficiency workforce in Connecticut, the Companies shall develop a workforce development and education strategy that includes the following:

- *A list of measurable goals for the Education, Outreach and Workforce Portfolio of programs. Where possible, these goals should be informed by the recommendations of the ILLUME evaluation study.*
- *An indication of projected rates of increase for these goals for each program year.*
- *Metrics to track quantifiable progress towards these goals; providing specific goals and quantifiable metrics for program deployment in distressed municipalities.*
- *Near, mid-, and long-term actions, estimated costs, and gaps that need to be filled by other stakeholders to meet these goals.*

For the GreenSTEP program specifically, this report should include:

- *Programmatic or policy-based recommendations on how to increase participation in the GreenSTEP programs*
- *An update to the outreach plan to include students from the public school system in the after school/ summer GreenSTEP program that includes a list of all Connecticut school districts, clearly identifies which districts serve Distressed Municipalities, and indicates which of the steps laid out in the Utilities' response to Condition #10 from August 15, 2022 have been completed or are ongoing in each district.*

This report should be submitted to DEEP by March 31, 2023. After the submission of the initial report, DEEP will work with the utilities to develop a regular reporting process to track progress towards the identified workforce development goals.

On March 31, 2023, the Utilities provided an updated workforce development and education strategy.⁸ DEEP approves the Utilities' proposed strategy. The schedule of conditions has been modified. The Utilities are to develop a proposal for how they will track and report progress towards the identified workforce development goals and metrics identified in their March 31, 2023, submission. DEEP requests that the goals of the workforce development strategy be clearly laid out in the reporting proposal, and that these goals include measurable outcomes (I.e., specific numbers corresponding to each goal). This proposal should be submitted to DEEP no later than October 1, 2023.

⁸ See Utilities' response to Condition of Approval No. 10 of the 2022-2024 C&LM Plan, March 31, 2023, available at [DEEP COA 10 Workforce Dev Progress Reporting \(3-31-23\).pdf \(state.ct.us\)](https://www.deep.state.ct.us/DEEP_COA_10_Workforce_Dev_Progress_Reporting_(3-31-23).pdf)

COA # 13

COA # 13, in the 2022-2024 Conservation and Load Management Plan Final Determination, stated:⁹

The Companies are directed to develop a proposal for transitioning the Residential New Construction (“RNC”) program into an all-electric offering that will begin accepting projects no later than July 2023. This proposal shall include:

1. *Interim targets for increasing the proportion of all-electric projects through the RNC program.;*
2. *Any necessary changes to incentive structures or levels; and*
3. *Any perceived barriers to an all-electric new construction offering, including workforce development, education, and customer outreach needs and proposed solutions to those barriers.*

On October 14, 2022, the Utilities submitted their response to this Condition with a proposal for transitioning to an all-electric program for low-rise single family and single-family attached projects.¹⁰ In this transitional proposal, the all-electric RNC program will accept project applications beginning July 1, 2023, and applications received after that date will not be eligible for incentives if they are not all-electric. The proposal did not include an all-electric requirement for multifamily projects due to Utility concerns regarding technological and financial feasibility.

On November 9, 2022, the EEB submitted feedback on the proposed all-electric RNC program in responses to DEEP’s November 2, 2022, Notice of Request for Written Comments.¹¹

After reviewing the Utilities’ proposal in response to Condition of Approval #13 and the Board’s feedback, DEEP directed the Utilities to work with the EEB’s Technical Consultants to update their proposal in a manner that addresses the recommendations and questions in the EEB’s November 2022 comments. DEEP directed the Utilities to re-file this updated proposal with DEEP by January 20, 2023.¹²

⁹ See DEEP Final Determination regarding the 2022-2024 Conservation and Load Management Plan (Attachment A – Schedule of Conditions of Approval), June 1, 2022, *available* at <https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b?OpenDocument>.

¹⁰ See Utilities’ response to 2022 Condition of Approval #13, October 14, 2022, *available* at <https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/2c98df6a1a3114f4852588de004b913a?OpenDocument>.

¹¹ See Energy Efficiency Board comments regarding the 2023 Update to the 2022-2024 Conservation and Load Management Plan, November 9, 2022, *available* at <https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/6939d0997c6391dc85258902006240f1?OpenDocument>.

¹² See DEEP’s Letter Regarding Condition of Approval No. 13 of the 2022-2024 C&LM Plan, December 20, 2022, *available* at [www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/e7f3569187a653528525891e004f71f4/\\$FILE/DEEP%20Letter%20Regarding%202022%20Condition%2013.pdf](http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/e7f3569187a653528525891e004f71f4/$FILE/DEEP%20Letter%20Regarding%202022%20Condition%2013.pdf).

On January 20, 2023, after working with the Board’s Technical Consultants, the Utilities re-filed their proposal.¹³ DEEP approves this filing, and looks forward to continued engagement on developing a successful all-electric program for new residential construction.

COA #14

COA # 14, in the 2022-2024 Conservation and Load Management Plan Final Determination, stated:¹⁴

The Utilities launched the first round of the Community Partnership Initiative (CPI) in August 2021 and selected applicants in early 2022.¹⁵ The Utilities are directed to use future rounds of the CPI to serve the C&LM Plan’s three priorities: equity, decarbonization, and affordability, and further goals that are not already being accomplished through standard program delivery. For example, the CPI should not simply seek to increase enrollment in programs that already have strong participation rates. Future rounds of the CPI may include goals such as:

- 1. Increase the adoption of heat pumps among low-income customers.*
- 2. Specific targeting of small and microbusinesses in low-income and environmental justice areas.*
- 3. Outreach goals aimed at increasing deployment of programs to rental properties and multi-unit dwellings.*
- 4. Outreach goals aimed at increasing uptake of demand response and deep energy saving measures.*

The Utilities are also directed to consult with the EEB’s Diversity, Equity, and Inclusion Consultant on subsequent rounds of the CPI, as outlined in the EEB’s Request for Proposals.

On December 15, 2022, the Utilities issued the Round 2 application for the CPI.¹⁶ The application listed five areas of Project Focus:

1. Project Focus 1: Demonstrating actions that will lead to an increase in homes participating in Home Energy Solutions - Income Eligible (through the municipality’s Energize CT utility sponsor).

¹³ See Utilities’ response to Condition of Approval No. 13 of the 2022-2024 C&LM Plan, January 20, 2023, available

at <https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/8825883d00757f468525893d0068f2aa?OpenDocument>.

¹⁴ See DEEP Final Determination regarding the 2022-2024 Conservation and Load Management Plan (Attachment A – Schedule of Conditions of Approval), June 1, 2022, available

at [www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b/\\$FILE/Attachment%20A%20-%20Schedule%20of%202022-2024%20Conditions%20of%20Approval.pdf](http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/92c11f8776277ac0852588550070059b/$FILE/Attachment%20A%20-%20Schedule%20of%202022-2024%20Conditions%20of%20Approval.pdf).

¹⁵ See Energize CT, Community Partnership for Energy Efficiency Engagement Initiative: Round 1 Application for Interested Parties, August 4, 2021, available at https://energizect.com/sites/default/files/2021-08/20210804%20REVISED%20Community%20Partnership%20Application_p1-8.pdf.

¹⁶ See Energize CT, Community Partnership Initiative Round 2 Application for Interested Parties, December 15, 2022, available at http://energizect.com/sites/default/files/2022-11/20221215%20Community%20Partnership%20Initiative%20Round%20%20Application%20FINAL_2.pdf.

2. Project Focus 2: Demonstrating actions that will lead to an increase in the adoption of heat pumps among income-eligible customers. Note: Qualifying customers must also enroll in Home Energy Solutions – Income Eligible.
3. Project Focus 3: Demonstrating actions that will specifically target and increase the participation of small and microbusinesses in low-income and environmental justice areas in Small Business Energy Advantage.
4. Project Focus 4: Demonstrating actions that aim to increase deployment of energy efficiency programs to rental properties and multi-unit dwellings through coordinated outreach to multifamily property owners and managers.
5. Project Focus 5: Demonstrating actions that aim to increase uptake of demand response and deep energy-saving measures.

On January 3, 2023, DEEP, with an interest in continuing to monitor the CPI to ensure the success of the program, modified Condition #14 to read:¹⁷

The Utilities are directed to issue a response to DEEP indicating the intention behind Project Focus 1. DEEP is interested to hear specific concerns with participation that this Project Focus is designed to address, given historic participation in the HES-IE program in 2022. This response should be filed by February 1, 2023.

Upon receiving and reviewing Round 2 applications, the Utilities must propose the following to DEEP by May 31, 2023:

1. *The selected projects;*
2. *Memorandums of Understanding (MOUs) for each of the selected projects; and*
3. *Target goals and success metrics for each selected project, which shall be included in the MOU. The Utilities must collaborate with the EEB's Diversity, Equity, and Inclusion consultant, to determine appropriate and equitable goals and metrics.*

On February 1, 2023, the Utilities provided a response clarifying their intention behind Project Focus 1.¹⁸ DEEP approves this filing.

On May 31, 2023, the Utilities provided a response to the modified COA.¹⁹ This response included the projects selected, MOUs for selected projects, and target goals and metrics for the selected projects. Goals and metrics included:

- Selected Project Focus(es) for each respective project along with an expectation of outreach activities.;

¹⁷ See DEEP Letter Regarding Condition #14 of the 2022-2024 C&LM Plan, January 3, 2023, available at [https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/9b0f077dd8226f098525892c0067ed4c/\\$FILE/DEEP%20Letter%20Regarding%20Condition%2014.pdf](https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/9b0f077dd8226f098525892c0067ed4c/$FILE/DEEP%20Letter%20Regarding%20Condition%2014.pdf).

¹⁸ See Utilities' response to Condition of Approval No. 14 of the 2022-2024 C&LM Plan, February 1, 2023, available at [DEEP COA #14 CPI.docx \(live.com\)](#).

¹⁹ See Utilities' response to Condition of Approval No. 14 of the 2022-2024 C&LM Plan, May 31, 2023, available at [DEEP Energy Filing Form \(state.ct.us\)](#).

- Previous participation data (by community) in an effort to guide the Partnership Round 2 projects for their selected Program Term, calibrate them for success, measure participation progress, and coordinate the community/organization's outreach strategies with the Companies' ongoing efforts.;
- Administrative and reporting requirements.;
- Fiduciary and project leader responsibilities.;
- Support resources from the Companies; and
- Funding amounts and how to obtain the monetary award.

DEEP appreciates the Utilities' response, and approves the May 31, 2023, filing. The schedule of conditions has been modified. The Utilities are directed to submit to DEEP a proposal for tracking and reporting on progress towards meeting the goals and metrics listed above. The Utilities are to provide this proposal to DEEP no later than October 1, 2023.

If you have any questions, please contact Benjamin McMillan at benjamin.mcmillan@ct.gov.
Thank you,



Shubhada Kambli
Director, Office of Building and Transportation Decarbonization

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