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Ms. Debra Morrell
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**RE: COMMENTS REGARDING THE REVISED REVIEW DRAFT
WEATHERIZATION BASELINE STUDY**

The Office of Consumer Counsel (“OCC”) hereby provides its comments on the Weatherization Baseline Assessment Revised Review Draft (“Study”). OCC has reviewed the study and appreciates the valuable information it has brought forth, as well as the opportunity to offer comments.

Public Act 11-80 amended Conn. Gen. Stat. § 16-245m to include a requirement that the C&LM Plan include “steps that would be needed to achieve the goal of weatherization of eighty percent of the state’s residential units by 2030.” However, this legislative language does not include a definition of “weatherization.” As stated in its October 10, 2013 comments, OCC continues to believe that it’s important to carefully consider how we define what constitutes a “weatherized” home. Eighty percent is not a small number of homes, thus, we need to be realistic about how much we can achieve in each of the homes included in this

percentage. There is a cap on how much ratepayer money can be spent on the C&LM programs, and we should not be unrealistic about how much money the average homeowner is going to want to contribute to the weatherization of their own home. It is important not to create a weatherization standard that conflicts with the realities of homeowners' own goals and budgets for weatherizing their homes. With all of these factors in mind, the weatherization standard should set a bar that is reasonably achievable.

OCC believes that whatever long-term weatherization standard is used must allow for the majority of homes that have gone through the Home Energy Solutions ("HES") program to meet the standard.

OCC agrees with the recommendation to address the issue of basements in the weatherization standard. Because the classification of a basement being "conditioned" or "unconditioned" can have a significant impact on whether or not a home is weatherized, those definitions as well as the overall standard should be examined. Again, a realistic approach should be taken, as homeowners may not spend the money to make complicated insulation retrofits.

OCC has previously agreed with the recommendation to target older homes, and agrees with the more specific suggestion for the HES program to target non-electrically heated homes built prior to 1980 while continuing to offer deeper energy savings opportunities in electrically-heated homes. This approach would not only capture a percentage of low-income homes, it would allow for a large number of homes to go through the HES program. Targeting older homes through the HES program, combined with a standard that allows such homes to be considered weatherized after participation, will greatly

assist in both reaching the 80% goal and achieving greater program and participant savings. With only ten percent of the 180 homes in this study having already participated in the HES program, there may be a large untouched population of homes yet to be served by this program.

OCC believes that the presence of asbestos or mold is an instant barrier to participation in some aspects of the HES program, and agrees with the approach of having the Companies to work with other agencies to address these issues. OCC does not agree with having the EEB and DEEP consider offering financing to HES households and HES-IE landlords and rebates to HES-IE homeowners to fund abatement of these problems. OCC believes that by incentivizing efficiency upgrades, a homeowner may very well be incentivized to clean up any mold or asbestos present, especially given that it poses a general health concern to the occupants of the home. In any case, electric and gas ratepayers should not have to subsidize remediation of health issues, and, in fact, subsidization of such non-energy related measures is contrary to the statutory mandates regarding cost effectiveness in § 16-245m. Additionally, diverting money intended for the goal of energy reduction to other social goals would reduce overall energy savings achievable within allowed budgets, and thus have impacts on reliability, as energy efficiency programs are increasingly relied upon for system planning purposes.

Rather than diverting energy efficiency funds to non-energy related programs, OCC suggests building exceptions into the definition of weatherization for homes with physical impediments which prevent the implementation of certain types of measures. Alternatively, program implementation could be done jointly with existing programs aimed at remediating lead and asbestos and other health concerns in limited income homes. In sum, OCC is


concerned that requiring all homes to meet a given standard, without exception based on the circumstances within the home, would likely render the 80% goal unachievable for the reasons set forth above.

OCC continues to agree with the recommendation to remove the slab insulation requirement that currently exists within the weatherization standard. According to the results, this requirement is preventing the verification of “the presence, type, and R-value of slab insulation existing in homes.” OCC views this as an unnecessary barrier to a large number of homes in the state achieving the weatherization standard.

OCC also believes that, from a practical perspective, any standard developed needs to be inherently flexible in order to be achievable.

Respectfully submitted,

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