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Affirmative Action/Equal Opportunity Employer

Conn. Gen. Stat. § 16-245m(d) 2022-2024 Conservation and Load Management Plan April 12, 2022

NOTICE OF PUBLIC MEETING AND REQUEST FOR WRITTEN COMMENTS

I. BACKGROUND

Pursuant to Conn. Gen. Stat. § 16-245m(d), the proposed 2022-2024 Conservation and Load Management Plan (C&LM Plan) was submitted to the Connecticut Department of Energy and Environmental Protection (DEEP) for approval on November 1, 2021 by Eversource Energy (Eversource), The United Illuminating Company (UI), Connecticut Natural Gas Corporation (CNG) and The Southern Connecticut Gas Company (SCG) (collectively the Utilities), in consultation with the Energy Efficiency Board (EEB). DEEP is required, in an uncontested proceeding, to approve, modify or reject the three-year C&LM Plan and the detailed budget submitted with the Plan, including any annual updates submitted by the Utilities.

On December 22, 2021, DEEP issued an Interim Decision approving the total budget as proposed in the 2022-2024 C&LM Plan that was filed with DEEP on November 1, 2021.² The budget was approved subject to DEEP's further review of the Plan text and the resulting Determination and Conditions of Approval.

On March 1, 2022, the Utilities submitted to DEEP a 2022 Update of the 2022-2024 C&LM Plan and 2022 Program Savings Document (PSD) that reflects updated Utility budgets based on actual 2021 revenues and spending and adjusts realization rates based on the latest PSD.³

II. DRAFT DETERMINATION AND REQUEST FOR WRITTEN COMMENTS

On April 12, 2022, DEEP released a Draft Determination and Conditions of Approval for the 2022-2024 C&LM Plan and is seeking public comment. The Draft Determination was informed by DEEP and EEB public processes held throughout 2021, and includes narrative findings on several components of the 2022-2024 Plan. There are also Attachments to the Draft Determination, including:

¹ See 2022-2024 Conservation & Load Management Plan and Program Savings Document, November 1, 2021, available at:

http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/04d115cb68d338b785258788007091c9?OpenDocument.

² See DEEP Approval and Determination of 2022-2024 Conservation and Load Management Plan Budget, December 22, 2021, available at:

 $[\]frac{http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/871ac6d7479e1de8852587b80}{0409cf8?OpenDocument}.$

³ See 2022 Update to the 2022-2024 Conservation & Load Management Plan, March 1, 2022, available at: http://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/cf59b4f99ec97597852587fb00021000?OpenDocument.

- A. Schedule of Conditions of Approval
- B. Draft Updates to C&LM Cost-Effectiveness Testing
- C. Summary of Public Comments
- D. Draft Standard for Weatherization of Single-Family Homes

All Attachments to the Draft Determination are subject to change following DEEP's public comment period. DEEP may finalize any of the above attachments with the issuance of its Final Determination on the 2022-2024 C&LM Plan or through a separate Determination.

DEEP welcomes written comments on all aspects of the Draft Determination and Attachments. In addition, DEEP specifically seeks comment regarding the following questions:

- 1. The Draft Determination sets a goal of phasing out residential natural gas incentives over the course of the 2022-2024 C&LM Plan.
 - a. Are the interim steps described in the Draft Determination sufficient to achieve a complete phase-out of residential natural gas incentives during this Plan term?
 - b. Does the proposal to transition to an all-electric new construction program by July 2023 provide a reasonable timeframe to develop the program and start accepting projects? Why or why not?
- 2. What specific items should be included in the regular reporting described in Condition of Approval #20?
- 3. Condition of Approval #14 directs the Utilities to reach certain communities and goals in future rounds of the Community Partnership Initiative.
 - a. What are the most cost-effective uses of Community Partnership Initiative funds to reach overburdened and underserved communities?
 - b. How can the Community Partnership Initiative prioritize areas of low program demand?
- 4. Does the approach to cost-effectiveness testing described in Attachment B adequately capture C&LM program impacts related to greenhouse gas emissions and administrative costs?
 - a. Which of the non-embedded greenhouse gas emissions costs included in the
 Avoided Energy Supply Component (AESC) Study (and described in Attachment
 B) are most appropriate for capturing the impact of greenhouse gas emissions in
 Connecticut's cost-effectiveness test?
 - b. What is an appropriate non-energy impact (NEI) value for quantifying the system impact of reduced arrearages, collection costs, debt write-offs, and/or administrative costs?
- 5. Comment on the pathways described in Attachment D and whether they provide an accurate, reasonable, and measurable standard for weatherization in single family homes? Describe any specific adjustments that should be made to the proposed pathways and standard.

Please submit comments to DEEP at <u>DEEP.EnergyBureau@ct.gov</u> by Wednesday, April 27 at 5:00 p.m. Any questions regarding the public comment process may be sent by email to Kate Donatelli at <u>kate.donatelli@ct.gov</u>.

DEEP will hold a virtual public meeting regarding its Draft Determination on the 2022-2024 C&LM Plan on April 21 from 12:30-2:00 p.m. This meeting will include a brief presentation from DEEP and opportunities for members of the public to make public comments. Feedback received during this meeting will be considered in DEEP's preparation of its Final Determination on the 2022-2024 C&LM Plan.

Register <u>here</u> to attend the April 21 public meeting. A recording of this meeting will be posted on DEEP's <u>C&LM</u> webpage. Any questions about the public meeting may be sent by email to <u>kate.donatelli@ct.gov</u>.

The 2022-2024 C&LM Plan (updated March 1, 2022) is available on the <u>DEEP Energy Filings</u> page and <u>C&LM webpage</u>. Public comments and Requests for Information that informed this Draft Determination can also be found on the <u>Energy Filings page</u>, alongside public comments received in response to this Notice.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act. Please contact us at (860) 418-5910 or deep.accommodations@ct.gov if you: have a disability and need a communication aid or service; have limited proficiency in English and may need information in another language; or if you wish to file an ADA or Title VI discrimination complaint. Any person needing a hearing accommodation may call the State of Connecticut relay number - 711. Requests for accommodations must be made at least two weeks prior to any agency hearing, program, or event.