



October 28, 2020

Via Email to deep.energybureau@ct.gov

October 21, 2020 Notice of to Comment on DEEP's 2019-2021 Conservation and Load Management Plan and Budget

Ms. Vicki Hackett
Deputy Commissioner – Energy
Connecticut Department of Energy and Environmental Protection
10 Franklin Square, New Britain, CT 06051

Re: October 21, 2020 Notice to Comment on the Department of Energy and Environmental Protection's (DEEP) 2019-2021 Conservation and Load Management Plan and Budget

Dear Ms. Hackett:

The Building Performance Association (BPA) appreciates the opportunity to provide comments on the DEEP's 2019-2021 Conservation and Load Management Plan ("C&LM Plan") and the budget issues discussed during public meetings on October 21, 2020 and October 28, 2020. BPA salutes DEEP for its commitment of time and resources to engaging in a comprehensive dialogue with impacted small businesses through the Contractor Technical Advisory Committee (CTAC), its public meetings and other stakeholder engagement programs designed to gather input and feedback from energy efficiency businesses and entrepreneurs.

Background on the Building Performance Association

BPA is a membership-driven 501(c)(6) industry association focused on the home and building performance industry - delivering improved energy efficiency, health, safety, and environmental outcomes. BPA supports home performance contractors, state and regional organizations, weatherization agencies and training centers, manufacturers and local non-profits focused on residential and commercial energy efficiency. BPA's members and affiliates provide the "nuts and bolts" of efficiency upgrades to homes and buildings across Connecticut and the United States. We salute the high-quality services that members and affiliates deliver and the skilled jobs that they create in communities across the state and are proud to be affiliated with membership driven organizations like Efficiency for All in Connecticut. We support and concur in the comments previously submitted by Efficiency for All in this matter.

Connecticut's Skilled Energy Efficiency Workforce Remains Ready to Meet the State's Clean Energy Goals

The energy efficiency industry supports over 35,397 energy efficiency jobs in Connecticut, most of which are part of a highly skilled workforce. BPA's members and affiliates including members Efficiency for All provide energy efficiency services across the state. Connecticut cannot meet its climate, energy, and cost cutting goals in the 2019-2021 CL&M Plan without the trained energy efficiency workforce. In addition, Governor Lamont's September 2019 Executive Order Number 3, created a target of achieving a zero-carbon electricity sector by 2040.¹ Meeting this target would be impossible without a skilled energy efficiency workforce and the dedicated funding that the Connecticut legislature has allocated towards this purpose. BPA's members and allies in Connecticut remain ready to meet the state's ambitious energy, climate and environmental goals while also growing the local economy.

The \$36 Million in C&LM Spending Will Provide Multiple Benefits

BPA believes an accelerated plan to "catch up" on the number of homes that will be retrofitted in 2021 and 2022 factoring in construction time losses due to COVID is the best use of the \$36 million in C&LM funding. The same amount of energy efficiency retrofit work will be needed to be completed before 2040 to meet Governor Lamont's September 2019 Executive Order Number 3. As highlighted and detailed in the Efficiency For All comments, residential building consumption and energy usage represents 17% of Connecticut's energy demand. Executive Order Number 3's climate and energy goals have not been waived or excused due to COVID and now is the time to plan for a rapid transition back to a functioning and expanding energy efficiency construction economy across Connecticut.

While delivery of services and expenditures in the face of the COVID -19 challenge has continued in earnest, energy efficiency services will need to ramp up higher than previously scheduled to meet Connecticut's long-term goals. That will certainly require the \$36 million in funding to be deployed to build momentum and to avoid any delays in meeting Connecticut's climate goals.

Equally important, the rapid redeployment of energy efficiency programs during and post-COVID will provide many economic stimulus benefits to Connecticut. BPA has seen in states across the country that properly designed and implemented energy efficiency programs to be the lowest cost, most predictable and most immediate method to manage energy demand, create local jobs, provide opportunities for small business energy efficiency entrepreneurs while also providing health and comfort benefits to consumers and lower utility bills in the long term. In the post-Covid economic environment, the "non-energy benefits" of job creation and additional spending money in the economy coupled with the added health and comfort benefits for customers will make the

¹ <https://portal.ct.gov/-/media/Office-of-the-Governor/Executive-Orders/Lamont-Executive-Orders/Executive-Order-No-3.pdf>

\$36 million investment a valuable economic stimulus asset that post-COVID will be more important than ever.

Conclusion

BPA appreciates this opportunity to provide comments on DEEP's 2019-2021 C&LM Plan. There are often difficult and complex tradeoffs and calculations necessary to make policy choices when implementing a long-term climate mitigation and economic development strategy. This is not one of those occasions. Moving forward expeditiously with the implementation of the 2019-2021 C&LM Plan through the allocation of existing funding is the right thing to do.

Please feel free to contact BPA via my email listed below should you have any questions about the research and policy information described in these comments.

Respectfully Submitted,



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