

**Comments of the Connecticut Roundtable on Climate and Jobs  
for the  
2015 Conservation and Load Management Plan - Public Input Session  
organized by the CT Energy Efficiency Board**

**May 2014**

Thank you for the opportunity to provide comments and recommendations for improving Connecticut's energy efficiency programs as outlined in the Conservation and Load Management Plan.

The Connecticut Roundtable on Climate and Jobs (Roundtable) is a diverse group of people from labor unions, community organizations, religious groups, the business community, and environmental organizations, who are joined by a common interest in climate and jobs. We are deeply concerned about the need to build a sustainable economy with good-paying jobs here at home while reducing the threat of climate disruption here and around the world. We believe that right now Connecticut faces an important opportunity to address both the economic crisis and the climate crisis.

We strongly support the state's goal of achieving all cost-effective efficiency and meeting the target of weatherizing 80% of homes by the year 2030 as one of the most effective means for reducing greenhouse gas emissions. We also believe that the home performance industry can become a more vibrant source of high-quality jobs leading to careers in a thriving climate-safe economy.

On November 20, 2013, the Roundtable convened a gathering focused on "Deeper Energy Efficiency," bringing together 60 participants from all across the state and representing all parts of our diverse constituencies, including the Building Trades and other unions, local religious congregations, religious and environmental groups that have been actively engaged in promoting the Home Energy Solutions (HES) program, local clean energy task forces, energy efficiency contractors and other businesses. Our agenda included a presentation highlighting one contractor's successful efforts to expand service in hard-to-reach/hard-to-serve communities and increase the proportion of HES customers implementing deeper efficiency measures. We also had a presentation about the achievements of Massachusetts' Mass Save program, which incorporates responsible contractor provisions to ensure high labor standards and health and safety protections for workers.

The Roundtable steering committee submits the following recommendations, drawing upon the discussion at the November gathering and upon our own further research during the last six months.

**Job Standards and Worker Protections**

Incorporating employment standards and protections for workers will help the energy

efficiency programs ensure the highest quality of installations and maximize energy savings while becoming a source of high-quality, career-ladder jobs for CT residents, strengthening local economies and further driving demand for energy efficiency.

We recommend adopting responsible contractor provisions, similar to those that have been successfully implemented in the Mass Save program, including:

- Require that all contractors disclose any past history of violations – wage & hour laws, health & safety laws, labor law, etc. – and require them to sign an agreement stating that they are in compliance with all federal and state wage and benefit laws and regulations, as well as in compliance with federal and state workplace health and safety laws and regulations.
- Require utilities to conduct health and safety inspections in addition to quality control inspections.
- Require Building Performance Institute (BPI) certification for all contractors, which ensures contractors meet high industry standards.
- Work with utilities and contractors to establish an injury and illness prevention training program and an employer anti-retaliation whistleblower policy.

### **Intensified Outreach to Low- and Moderate-Income Communities**

- Continue expanding the use of local churches, community non-profits and other groups with connections to and credibility in the communities and allocate funding to compensate these groups for their efforts.
- Explore the feasibility of replicating Mass Save's Efficient Neighborhoods+ (EN+) program, which targets moderate-income census tracts with greater than 70% concentration of 1- to 4-unit buildings by providing more intensive outreach, lower co-pays, easier access to pre-weatherization funds and other enhanced incentives for residents with incomes in the range of 60%-120% of AMI.

### **Pre-Weatherization**

Recognizing the prevalence of environmental barriers to HES testing and energy efficiency installation (e.g. asbestos and mold contamination), we recommend taking significant steps toward improving access to abatement options:

- Systematically collect and publish data on the number of initial HES and HES-IE visits that result in deferrals due to the presence of environmental barriers; such data will help document the significance of this challenge to meeting the state's weatherization goals.
- Expand funding for pre-weatherization abatement programs to supplement programs already available to low-income residents.

- Create a hotline/referral service, with staffing supported by C&LM funds, to provide one-stop case management support for residents identified as needing pre-weatherization work. The HES contractor should provide the contact information, along with a brief description of the environmental hazards discovered during the initial inspection. The program could be incentivized by providing contractors with a small payment for filing a report of the referral and an additional payment if the customer contacts the hotline.

## Financing

- Use interest rate incentives to link boiler replacement with other efficiency measures; CHIF currently does this, but it should become standard practice across all financing options, especially as part of the state's promotion of oil-to-gas conversions.
- Expand the availability of on-bill payment to ensure that this mechanism is available as widely as possible; such expansion could include extending 0% CHIF financing to people with credit scores as low as 590, allowing on-bill repayment with good utility bill payment history.
- Expand "with-the-meter" on-bill financing beyond boiler replacement to include other efficiency measures.

## Lapsed HES Customer "Amnesty Program"

Recognizing the significant progress made in the last 2 years to improve financing and other incentives, leading to increasing proportions of HES customers implementing deeper efficiency measures, we recommend intentional outreach to earlier HES customers who did not take advantage of rebate programs.

- Create a lapsed HES customer "amnesty program" (similar to the state's delinquent tax repayment program) as a time-limited incentive, perhaps targeted to increase activity during "off-peak" periods of the year.

We look forward to participating in this stakeholder process and helping to shape a vibrant, growing energy efficiency industry.

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