



# Save the Sound<sup>®</sup>

Action for our region's environment.

**Written Comments of Save the Sound**

**On**

**PROSECUTORIAL TEAM REPORT ON**  
**DOCKET NO. 17-12-03RE01**  
**SPRINT TRACK 1**

**PURA INVESTIGATION INTO DISTRIBUTION SYSTEM PLANNING OF THE ELECTRIC  
DISTRIBUTION COMPANIES – ENERGY AFFORDABILITY**

Submitted via electronic filing

July 9, 2020

Save the Sound appreciates the opportunity to provide these written comments on the Prosecutorial Team (“PRO”) Sprint Track 1 Report in Docket No. 17-12-03RE01 regarding Energy Affordability. We support the recommendations contained in the report, and are glad to see many of the suggestions we raised in the underlying Docket addressed.

As the report itself clearly identifies and thoroughly discusses the issues and opportunities for improvement related to the energy challenges facing low and moderate income residents and the barriers to participating in energy assistance and energy efficiency programs, there is no need to provide detailed commentary on the report. However, we would like to emphasize our support for the following recommendations.

**EDCs should proactively discuss weatherization.** We couldn't agree more that weatherization services, as well as energy efficiency improvements, should be part of any conversation with customers that are having difficulty with their energy bills, or that are expressing concern about their ability to manage their energy bills. In addition to directly assisting individuals most in need of such assistance with managing

their energy costs, expanding weatherization and access to deep energy efficiency improvements is a critical element of ensuring that Connecticut meets its greenhouse gas reduction and clean energy goals.

**PURA should advocate for review of Energy Efficiency and Weatherization Programs and the components of a customer's bill.** We have long argued that the existing health and safety barriers to low and moderate income households being able to realize the full benefits of the state's energy efficiency programs, including HES-IE, need to be eliminated. Other building energy services such as the Weatherization Assistance Program and the CT Green Bank's Low-E loan program dedicate funds to remediating health and safety barriers that would otherwise prevent deep efficiency improvements. It is absolutely critical that we ensure that any low and moderate income household that *can* benefit from energy efficiency improvements *is able to* benefit from them. Just as all electricity customers contribute to the funding of our energy efficiency programs, so should they all be able to access those programs in a meaningful way.

**The EDCs and other SPRINT participants should prioritize low-income customer participation in the Shared Clean Energy Facility (SCEF) program.** We agree, and note that the Final SCEF Program Rules approved by PURA greatly enhanced the opportunity for low and moderate income customers to benefit from the program by streamlining the subscription process to reduce the administrative burden on both customers and project developers by adopting an "opt-out" subscription model through the electric distribution companies. It also eliminated penalty and damages provisions associated with a customer's cancellation of participation.

With respect to the twenty percent (20%) "opt-in" portion of a SCEF's estimated annual output, we recommended, in line with PRO's suggestion, that the utilities proactively engage and partner with municipalities, non-profit service providers (such as community action agencies), and others to assist with the identification and recruitment of subscribers for the voluntary "opt-in" portion of a project's output. As part of the process of developing specific guidelines to govern the identification and enrollment of subscribers, the utilities have been holding regular working group meetings, and have just recently issued their draft recommendations, which we will be reviewing and commenting on in order to ensure a robust outreach effort that guarantees the benefits of the program accrue to those it was designed to assist.

Thank you for the opportunity to share these comments. Save the Sound looks forward to continuing to work with PURA and other participants in this Docket as we identify and implement solutions to the state's energy affordability issues.

Respectfully submitted,

/s/ Charles J. Rothenberger

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#### **CERTIFICATE OF SERVICE**

This is to certify that on this 9<sup>h</sup> day of July, 2020, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list in the applicable proceedings in accordance with R.C.S.A. Section 16-1-15.

/s/ Charles J. Rothenberger