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**TESTIMONY OF ENE (ENVIRONMENT NORTHEAST)  
TO THE ENERGY AND TECHNOLOGY COMMITTEE**

S.B. No. 415 (RAISED) AN ACT CONCERNING THE OPERATIONS OF THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION, THE ESTABLISHMENT OF A COMMERCIAL PROPERTY ASSESSED CLEAN ENERGY PROGRAM, WATER CONSERVATION AND THE OPERATIONS OF THE CLEAN ENERGY FINANCE AND INVESTMENT AUTHORITY

March 15, 2012

Good afternoon Senator Fonfara, Representative Nardello and members of the committee. My name is Jamie Howland and I am a Policy Analyst for ENE (Environment Northeast), a non-profit research and advocacy organization that focuses on energy, air quality and climate change solutions for New England and Eastern Canada. I serve as the designee for ENE's seat on the Energy Conservation Management Board (ECMB) and on the Fuel Oil Conservation Board. ENE appreciates the opportunity to provide testimony to the Energy and Technology Committee on *S.B. No. 415 (RAISED) AN ACT CONCERNING THE OPERATIONS OF THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION, THE ESTABLISHMENT OF A COMMERCIAL PROPERTY ASSESSED CLEAN ENERGY PROGRAM, WATER CONSERVATION AND THE OPERATIONS OF THE CLEAN ENERGY FINANCE AND INVESTMENT AUTHORITY.*

**Sections 11 and 37: Electric Energy Efficiency Program Plans**

ENE fully supports the integration of electric and gas conservation programs. Because the programs themselves are now fully integrated, a single plan and review process is clearly appropriate. ENE is also encouraged to see the change from a one year to a three year planning process, which will provide a smoother flow of programs from year to year as well as reduce expenses for both the planning and review process. ENE also supports the inclusion of any energy savings when testing efficiency programs for cost effectiveness. These energy savings, as well as environmental and economic benefits to State residents, cannot be ignored when determining the effectiveness of programs.

**Section 51: Home Energy Solutions Program**

The proposed modifications to this section will not provide additional funding for efficiency programs that serve residential customers that heat their homes with fuel oil. ENE recommends at a minimum, a one year suspension of the \$500,000 restriction on funding for heating oil customers so that programs may continue uninterrupted until a longer term solution for funding for heating oil (and propane) can be achieved.

**Section 56: Property Assessed Clean Energy (PACE)**

A successful implementation of PACE programs in the State will provide additional options for customers seeking to make energy efficiency improvements to their buildings. ENE supports

this section in general, but recommends that some of the program details, such as consent versus notice to mortgage holders upon a new PACE assessment, prepayment penalties, and non-acceleration in the event of a default, be decided at the program implementation level rather than in statute in order to ensure programs that can be designed to meet current and changing market conditions.

In order to ensure that all towns will have equal access to PACE programs, ENE recommends a statewide approach as opposed to one that requires each municipality to administer its own program.

**Sections 58-62: Water Efficiency and Rate Decoupling**

ENE fully supports the creation of water efficiency programs in the State and the modification of rate design so that any disincentives to water companies for reduced sales volumes are removed. ENE recommends uniform statewide water efficiency programs rather than a patchwork of policies. The language should be modified to ensure that programs are fully coordinated with the existing Energy Efficiency Fund programs. In many cases a water efficiency measures can be delivered through the same vendors and at the same time as energy efficiency measures, thus increasing market penetration and lowering administrative costs.

ENE appreciates the leadership of the E&T Committee and its membership in recognizing the need to invest in more efficiency and more comprehensive, as well as a need to support green jobs in this State. We look forward to working with this Committee, and are always available as a resource to provide further information if requested, on this issue. Thank you for the opportunity to testify.

For more information contact:

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