

*Testimony before the Energy and Technology Committee
Roderick L. Bremby, Commissioner
March 17, 2015*

Good morning, Senator Doyle, Representative Reed and distinguished members of the Energy and Technology Committee. My name is Roderick Bremby and I am the Commissioner of the Department of Social Services. I am here before you today to testify on a bill that impacts the Department.

S.B. No. 565 (COMM) AN ACT CONCERNING ENERGY AUDITS AND HEATING ASSISTANCE.

This bill seeks to improve the efficiency of home heating assistance and home energy audit programs by consolidating the application form for the Low Income Home Energy Assistance Program (LIHEAP), the U.S. Department of Education funded Weatherization Program, Home Energy Solutions program, Home Energy Solutions-Income Eligible program, and Home Performance with Energy Star program. The bill also seeks to require the creation of an on-line application process for these programs. The Department will also be required to launch an Internet website to serve as a database and as an electronic record and filing storage.

This proposal seeks to improve efficiency, but it does not adequately address important federal requirements and other program considerations such as protecting client confidentiality, ensuring applicant income verification, and maintaining compliance with federal Assurances (i.e. requirements) governing LIHEAP. It likewise fails to address federal requirements to maintain a Winter Crisis Assistance program, which relates to low-income households that use a deliverable fuel, such as home heating oil.

The passage of this bill would also necessitate the dramatic modification or abandonment of the software currently used for LIHEAP, and would charge the Department of Social Services with the responsibility of creating a complex on-line application system in an amount of time that is not feasible.

Some of the technical problems that implementation of this bill would present include:

- Utility company services areas differ from community action agency service areas.
- Some definitions used in the bill are not clear, e.g., ‘Energy Assistance Program.’
- The resulting application would in some cases be used for households with incomes above the maximum income threshold allowed for LIHEAP.

- The bill ignores the application/benefit provision of LIHEAP awards for deliverable fuel heated households.
- The practicality and value of DSS receiving application alerts is unclear.
- The bill does not speak to participation of municipal utility companies.
- Currently, the LIHEAP application is used by the Weatherization Program as a determination of income eligibility only. Records of previously received conservation services of eligible households is not included.
- Fair Hearing procedures are well defined for LIHEAP applicants, and are federally mandated. It is uncertain how complicated it would be to adapt these processes to other programs specified in this bill.
- Program dates for LIHEAP are determined each year in accordance with federal requirements and may not dovetail with timelines of other programs specified in this bill.
- DSS has an unwavering responsibility to safeguard the confidential client information of LIHEAP applicants. Sharing a database as conceived in this bill would risk the disclosure of client information by companies outside of the direct control of DSS.
- DSS does not screen and review energy assistance applications, as the bill infers. The state contracts with community action agencies to perform this process.
- The bill does not make clear which agencies would be responsible for reviewing state and federally funded weatherization programs, but focuses rather on those programs funded by utility companies.
- The timeline included in the bill is not sufficient for the development, building and testing of the new internet system.

It is important for the Department to note that the Governor's proposed budget does not allocate funding for these changes.

The Department is willing to meet with the proponents of this bill to discuss ways to improve efficiency within home heating and energy assistance programs, however as written the Department is unable to support this bill.