



March 4, 2021

Co-Chair Norman Needleman  
Co-Chair David Arconti  
Senator Paul Formica  
Representative Charles Ferraro

Energy Committee:

We are submitting testimony on S.B. 882 AN ACT CONCERNING CLIMATE CHANGE MITIGATION AND HOME ENERGY AFFORDABILITY.

We are concerned about language in section 3 of the bill that would allow DEEP to adopt regulations that would exceed the Home Energy Rating System Index Score or ENERGY STAR Score. Allowing DEEP to create boutique standards that only apply to Connecticut, that depart from national standards, will not serve the public and would like this language to be removed from the bill.

Energy consumption is a result of several different drivers – the efficiency of the heating/cooling system, home performance (ie. weatherization), weather, and the behavior of the occupants.

Above all, the behavior of the occupants of the dwelling will determine energy consumption. For example, a family of five where the parents are at work and the children are at school, used much less energy in 2019 than they did in 2020 when they worked from home and went to school online because of COVID. Energy usage data shows more about how the prior owner used energy in the home, than it does about the home itself.

While our members routinely provide fuel usage data to our customers when they are selling their home, it can be a very misleading to a homebuyer. Historic energy usage is merely a snap shot of what happened at that time, and is not a good predictor of how much energy will be used in the future.

For instance, if a family of four is looking at two different homes that are of similar size in the same neighborhood, but one house is occupied by a senior citizen and the other house has a family of four living in it, the energy consumption of those homes will not accurately determine energy costs. In this example, for a potential homebuyer to base their decision to purchase a home based on this data it would be misleading.

Additionally, approximately a third of deliverable fuel (heating oil, propane, etc.) customers do business with multiple fuel retailers. Unlike the utilities who are the sole provider of electricity to a home, a consumer can shop from deliver to delivery which means that many homes will have incomplete data which would fail to accurately demonstrate fuel usage.

Finally, energy usage data can be skewed significantly by appliances that are used for space heating or cooling. Electric space heaters and air conditioners that are not a part of the central heating or cooling system can drive up energy usage significantly, again misleading a potential buyers about the cost of energy for a particular home.

CEMA is supportive of the language in the bill that would require disclosure of energy usage, but is opposed to allowing DEEP to create a scoring system that could be used to unfairly taint homes that use fuels that they do not favor.

DEEP has been picking winner and losers in the energy sector since they came up with the natural gas expansion and conversion program several years ago. After ratepayers incurred millions of dollars in costs as they converted to gas, now DEEP is telling the public they need to convert to electricity. Giving them authority to draft regulations that can be used to favor one fuel over another is dangerous and we ask that the language in section four be removed.

Lastly, we ask that when requiring fuel retailers to provide energy data to consumers, it be strictly confined to the customer and not a third party.

We ask that the Energy Committee add language to S.B. 882 AN ACT CONCERNING CLIMATE CHANGE MITIGATION AND HOME ENERGY AFFORDABILITY.

Respectfully,

Christian A. Herb  
President