



June __, 2020

VIA Email and Electronic Filing

Mr. Jeffrey Gaudiosi
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, Connecticut 06051

Re: DOCKET NO. 20-03-15, Emergency Petition of William Tong, Attorney General for the State of Connecticut, for a Proceeding to Establish a State of Emergency Utility Shut-Off Moratorium

Dear Mr. Gaudiosi:

Thank you for considering these written comments in response to the Connecticut Industrial Energy Consumers (CIEC) Petition filed on April 16, 2020 at DOCKET NO. 20-03-15. We are writing as members and allies of the Building Performance Association (BPA) to oppose the CIEC Petition and for the reasons described below, we strongly recommend that PURA reject the CIEC Petition.

We are part of the workforce that provides the “nuts and bolts” of efficiency upgrades to homes and buildings across Connecticut. We are proud of the high-quality services that our colleagues and allies deliver and the skilled jobs that they create in communities across Connecticut. We see firsthand every day that our customers value the energy efficiency programs that add new insulation in homes, upgrade lighting in schools, and install new equipment in manufacturing facilities and help residents and businesses save money on their utility bills.

We oppose the CIEC Petition because now is the wrong time to put a hold on energy efficiency funding and the implementation of energy efficiency programs. We believe there are better ways to work through the obstacles posed by the COVID crisis and we are ready to return to work in earnest when COVID health and safety protocols are established. There is already a process in place where contractors and industry allies are working through these COVID safety issues with the relevant Connecticut agencies and the CEIC Petition is attempting to make and end run around those proceedings.

Instead of cutting programs and funding, PURA should preserve energy efficiency programs because safe, properly designed and implemented energy efficiency programs are the lowest

cost, most predictable and most immediate method to manage energy demand, create local jobs, provide opportunities for energy efficiency entrepreneurs while also providing health and comfort benefits to consumers and lower utility bills to customers in the long term.

In a post-COVID Connecticut economic environment, energy efficiency programs will help drive economic recovery by creating new jobs and aiding existing workforces, boosting economic activity in key labor-intensive business sectors, and delivering benefits for all ratepayers.

When it is safe for our industry and safe for our customers, we are ready to return to work and help achieve the goals of the 2019-2021 Conservation and Load Management Plan. Now is not the time to grant the Petition and cut support for energy efficiency.

SIGNATURES LISTED BELOW