A Community Development Corporation

FAIRFIELD COUNTY

COMMUNITY ACTION AGENCIES

ABCD, CTE, NEON

PROGRAM DESIGN TO MEET
PRODUCTION REQUIREMENTS OF THE
AMERICAN RECOVERY & REINVESTMENT ACT:
WEATHERIZATION INVESTMENTS

May 2009

STRATEGY& IMPLEMENTATION – FAIRFIELD COUNTY CAA LEADERSHIP IN ARRA WEATHERIZATION INVESTMENT

Principles:

- Overarching Themes:
  - Role of Weatherization ARRA Investment in job creation, business development, economic recovery and the growth of the green economy. Sustainability of the investment is dependent upon the CAAs ability to lead in business and job growth while raising the awareness of the public concerning the economic impact Energy Conservation has on their family budget.
  - Low- income families will become financially stable through the sustainability movement and investment in green jobs and businesses.
  - The CAA leadership role is as much based on wide geographical coverage and outreach to vast numbers of Fairfield County families of low and moderate income levels as it is based on their ability to realize the economic potential inherent in the creation of jobs and business development across the county.
- All three program goals must be implemented simultaneously starting immediately:
  - Shaping Weatherization ARRA investment strategies county- & state-wide.
  - Improving Service Delivery System to achieve high performance across the county
  - Creating Strong Infrastructure through broad-based alliances including private sector for training, job creation, business development & placement
- The process requires considerable convening of partners: US & State agencies, The WorkPlace, Inc. (WIB), Utilities, green businesses and business associations, unions, education establishment, financial institutions, municipalities, US Congress delegation.

Next Steps in order to achieve the above:

- Immediately select a Project Manager to coordinate, with Fairfield County CAAs & county-wide committee, the strategies necessary to achieve the three goals.
- Immediately establish an Action Committee: Fairfield County CAAs & the Project Manager to convene a county-wide coalition to create and implement a strategic plan for appropriate Workforce and Business Development needed to achieve Weatherization goals, create Green jobs and sustain the advantages of the ARRA investment.
- Develop communications campaign to accompany the project with emphasis on jobs creation in energy conservation and other Green Jobs.

- Train, Train, Train: this is a Workforce & Business Development issue

Progress towards goals:

The first step has been taken towards creating a comprehensive strategic plan for the creation of Green Jobs (including those in Weatherization) and the promotion and support of growth of Green businesses. The CAAs of Fairfield County held a county-wide collaborative organizational meeting and formed a County-wide steering committee on Friday, May 1st, 2009. The broad based group will be called the Fairfield County Green Jobs Collaborative. Meeting attendees included CAAs of Ffld. County, utilities, community colleges, technical high schools, CT Energy-Saving Companies, The WorkPlace, Inc. (our workforce investment board), housing authorities, principal city administrations, and sustainability institutes. A Steering Committee was form reflecting the wide interests of those assembled for the meeting. Please see the Registry of attendees.

The Mayors of the 3 principal cities of the county will meet on May 27th. It is the intention of the collaborative to prepare a plan outline to present to them.

One of the chief challenges will be to develop and implement a comprehensive plan while moving to production rapidly enough to meet ARRA goals. Moreover the plan must provide for post-ARRA sustainability.

According to the discussions of the collaborative, the plan and program must include the following:

Emphasis on Outreach: to minority communities, small & minority businesses, potential trainees from different levels of expertise (low-income, returning offenders, older workers, disabled workers, unemployed tradesmen, union members, high school students, immigrant workers, women in non-traditional occupations, SNAP participants, Welfare-to-Work participants)

Increased role of Municipalities: funding, involvement in providing jobs. Implementation of Energy block grant objectives should create jobs for trained individuals and contractors. Step up Investment Grade Audits and leverage retro-fit funding.

Complete Asset Map for Ffld. County: Outreach, support services for trainees, training programs, potential trainers, contractors, green enterprises & businesses.

Data Collection: evaluate and publish results of programs

Integrate Media at all levels: outreach, information, publicize programs and their impact on communities and family self-sufficiency

Multi-faceted Curriculum Development: adapted to many audiences and levels of expertise
- Community colleges, CAAs, high schools, VoTech high schools
- Involve contractors in training process from outset: OJT, shadowing, employment

Integration of Competencies in Training: Lead, Asbestos, Weatherization, Mold – from entry-level through higher level technicians, inspectors, teachers, auditors, management and administration.

Certifications: Offer courses that lead up to and include nationally recognized certifications such as those offered by the Building Performance Institute and Department of Energy

Process for Strategic Plan Development and Implementation: web site for connectivity, information, data & resource access; themed meetings; steering committee and sub-committees, hire a Project Manager as soon as possible.

While the initial meeting of the coalition brought together a broad-based group, there are still other actors to include:

- Unions, Heating Oil companies, Alternative Schools, SCORE, PMI, and Funders

Funding the strategic plan, implementation, outreach and training:

The CAAs of Fairfield County request that $2M of the ARRA funds be set aside for a three-year program covering:

- Project Management
- Development, documentation and implementation of a comprehensive strategic plan.
- Outreach and media plan
- Curriculum development
- Training
- Creation of an institute
- Sustainability plan
- Evaluation

Registry	
Fairfield County Green Jobs Coalition	
Organization Meeting: May 1, 2009	
John Greeno	New England Conservation Services
Eduardo Jaru	New England Conservation Services
Doug Cahill	Competitive Resources, Inc.
Jacek Bigosinski	Norwalk Community College
Jolanda Betancourt	Bridgeport Housing Authority
David Cooper	Dean Sustainibility Studies - Gateway CC
Chris Ehlert	United Illuminating
Peter Curtis	Adjunct Prof. Gateway CC
George Kincade	Black Chamber of Commerce
Leigh Roberts	Housatonic CC
Treva Franks	CTE, Inc.
Adrienne Parkmond	Vice Pres. The WorkPlace, Inc.
Tim Beeble	City of Stamford - Community Development
Jean William	5MillionGreeJobs.com
Diane Damino	United Illuminating
Veronica Ortiz	City of Bridgeport Social Services
Iris Molina	City of Bridgeport Social Services
Kate Norton	Bullard Havens Technical High School
Mike McCarthy	Vice Pres. The WorkPlace, Inc.
Deborah A Caviness	City of Bpt. Small, Minority Contracting
Carolyn Vermont	ABCD, Inc.
Shante Hanks	Congressman Jim Himes Recovery Director
Katherine Pytleski	City of Norwalk - Central Grants Director
Chip Anderson	NEON, Inc.
Neal Brodsky	Norwalk Housing Authority
Bill Bevacqua	ABCD, Inc.
Denise Hanks	ABCD, Inc.
James A. Crispino	United Way of Coastal Ffld. County
Bill Leahy	Eastern CT State University
Cathy Lezon	CL&P - Yankee Gas
Stephanie Moore	African American Affairs Commission
Jeff Leichtman	Global Logictics (BRBC, City of Bpt.)
Dean Rab Thornton	Housatonic CC
Jonas DeGuzman	Bridgeport Housing Authority
Charles Tisdale	ABCD, Inc.
Phillip McKain	CTE, Inc.
Joe Mann	NEON, Inc.
Adrienne Farrar Houel	Greater Bpt. Community Enterprises, Inc.

ARRA WEATHERIZATION FUNDING – CAA STRATEGY, FAIRFIELD COUNTY

Mission:
Fairfield County CAAs effectively & efficiently deliver Weatherization services to 770 low- & moderate- income homes in 2 years & collaborate with DECD for delivery of services to state-owned public housing residents.

Objective:
Based on Fairfield County system, model state-wide system for managing ARRA Weatherization Funding through CAAs & partners.

Goals:
1. Help state officials shape ARRA Weatherization program design; input for May 12th deadline
2. Create service delivery system required to meet ARRA goals that will be adopted state-wide
3. Create adequate Infrastructure to handle market growth: creating and administer training programs for Weatherization Workforce needed to meet ARRA goals; integrate graduates into CAAs & contracting teams
4. Create sustainable plan for Weatherization program and Green Jobs creation post-ARRA

Deliverables:
1. Establishment of county-wide collaborative: interact with Project Manager in planning & implementing program
2. Documentation of present system and production capacity
3. Description of new, green market opportunities; market size & characteristics
4. Definition of Workforce needed; size and characteristics
5. Documentation of county-wide plan to deliver ARRA Weatherization objectives including CAA staffing structure & requirements
6. Definition of private industry role and integration into plan: business development, contracting, job creation, training, OJT
7. Accredited and Certified Training programs for Weatherization career ladder; Creation of Fairfield County Training Institute for Energy Conservation (model for state-wide institute)
8. Stronger Infrastructure for service delivery: small business creation & expansion, greater CAA delivery capacity, pipeline established to produce professionals at all levels, involvement and partnership of public and private sectors as well as education establishment.
9. Creation and documentation of plan for sustainability
10. Evaluation of each development phase, program implementation and results

ARRA WEATHERIZATION FUNDING – CAA STRATEGY, FAIRFIELD COUNTY

Goal	Task	Process/ Steps	Partners
Goal 1: Shape CT ARRA Provisions	Actively shape program through presentation of viable program solutions	Create & staff Collaborative; work to determine county plan for ARRA investments; plan communications campaign & materials	Fairfield County CAAs & broad collaborative
		Stay in loop concerning ARRA information from DC & Htfd; meetings, webinars, telecoms; report to Collaborative	DSS, OMB, CT DOE, Governor's Office, US DOE
		Draw up document to present to partners, governor's ARRA committee	
		Draw up letter to Legislative Delegation & US Congressional delegation; FU meetings	
Goal 2: Improve Service Delivery System	Assessment of Current Situation: funding, staffing, contracting force, communications system capacity	Align organization structure and staffing to meet ARRA production requirements	CAFCA, CAAs, CT DOE, DSS, Utilities
		Determine size & characteristics of Workforce needed compared to existing	Add DOL & The Workplace
	Design and Document System for delivery of Weatherization Services according to ARRA guidelines	Design plan for Ffld. County CAAs Weatherization expansion: staffing structure, job descriptions, procedures and training for new and related staff	Fairfield County CAAs, US DOE, CT DOE, DSS, DOL & WIBs, Utilities
		Set up organizational chart and process flow; produce procedures manual and forms	
		Document expanded CAA roles in Community Outreach, Information and Referrals; county-wide coverage	
	Program Implementation	Set up management coordinating team & install new CAA staff	
		Make modifications to communications systems as needed;	

ARRA WEATHERIZATION FUNDING – CAA STRATEGY, FAIRFIELD COUNTY

		Design and Implement In-Service Training for CAA staff managing program	
Goal 3: Create Strong Infrastructure; alliance w/private sector: job creation, training & placement	Create industry/CAA/Education/Private sector partnerships to increase #s of contractors ready for new market; increase #s of technicians, auditors & inspectors needed for both public & private organizations	*Outreach* to inform industry actors of new market opportunities; catalogue those interested in training, certification and employing qualified workers, supervisors, auditors and inspectors *Outreach* to minority communities, small & minority businesses, potential trainees from different levels of expertise – including wide range of low-income individuals, older workers, high school students, returning offenders, disabled, unemployed tradesmen, union members, women, SNAP & welfare-to-work participants.	Add Unions, Mfg Alliances, state registered home improvement companies, NEMSDC, CBIA, local chambers, small/minority business organizations
		Establish Accredited/Certified Training Programs to meet workforce needs for program implementation (create CT Energy Conservation training institute)	Add VoTech & Community Colleges, CDFI's with training components (CEDF & ComCap, for instance)
		Training/Employment Grid: Focus on Auditors, Trainers, Supervisors . Career ladder Weatherization Technician, Auditor, Inspector, engineers… . Trades people, small businesses, unemployed low-income population . Establish OJT opportunities with larger employers; place graduates with CAAs & CAA/utilities' contractors	Add small to large companies as potential training partners and employers
	Create Sustainability Plan	With all agencies & groups encountered in process establish a collaborative that creates 3-year plan for post ARRA funding	CAAs, government agencies, private industry & educational institutions

The Green Team - AdH 5/04/09

Timeline - ARRA Strategy

Goal	Task	Step	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10
#1	Present Solutions	Create Broad Coalbn										
		Create ARRA Planutline										
		Information Gather										
		Start Communicatis Campaign										
#2	Assessment	Current Programs										
		Current Systems										
		Production Capaci										
		ID new market										
		ID capacity of contctors										
		ID capacity of CAA										
		Determine workfor needs										
	Design System	Determine roles of encies										
		Organization Chart										
		Process Flow Char										
		Produce proceduranual										
		Determine apportionment										
		Design CAA staff sicture										
		Test										
	Implement Prog	Set up Coordinatedlgmt										
		Set up CAA staff										
		Modify systems (IT										
		Publish manual										
		In-service TrainingAA staff										
		Evaluation										
#3	Partnerships for	Outreach & Informan										
	Growth	Develop Curriculum										
		Train Trainers & Servisors										
		Train Technicians										
		Train Auditors & Inectors										
		Train Business owrs										
		Establish OJT opportunities										
		Placement										
		Follow up, Evaluatic Control										
		Develop Sustainaby Plan										
		Develop Institute										

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THE WORKPLACE, INC.
Southwestern Connecticut's Regional Workforce Development Board

Michael McCarthy
Assistant Vice President for New Business
The WorkPlace, Inc.

May 5, 2009

TESTIMONY REGARDING THE PROPOSED WEATHERIZATION ASSISTANCE FOR LOW INCOME PERSONS PROGRAM STATE PLAN, THROUGH THE AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) OF 2009, PUBLIC LAW 111-5

Thank you to the Connecticut Department of Social Services for the opportunity to testify today regarding the proposed state plan for Weatherization Assistance to Low Income Persons.

I am here today as representative of The WorkPlace, Inc., Southwestern Connecticut's Regional Workforce Development Board. The WorkPlace, Inc. administers workforce development funds and coordinates providers of job training and education programs to meet the needs of residents and employers in the Southwestern Connecticut region. Our mission is to develop a well educated, well trained, and self-sufficient workforce that can compete in the changing global marketplace. Essential to our mission is the creation of a seamless, coordinated system of education, training and employment that is customer centered and easily accessible; meets the needs both of employers for employable people and of persons who face barriers to the kind of employment that provides economic self-sufficiency; has a high level of commitment and collaboration from business, education, government and community agencies including economic development, employment and training, and human services; and has defined goals and performance standards.

The Southwestern Connecticut region is comprised of the following 20 communities: Ansonia, Beacon Falls, Bridgeport, Darien, Derby, Easton, Fairfield, Greenwich, Monroe, New Canaan, Norwalk, Oxford, Seymour, Shelton, Stamford, Stratford, Trumbull, Weston, Westport and Wilton.

I am here this morning to discuss one of our programs that is highly relevant to the matter before you called the Bridgeport Jobs Funnel. I should note that we work closely with Community Action Projects, community colleges and vocational technical schools in our region and that my testimony today in no way diminishes our support for these very worthwhile and important programs. The purpose of my testimony is to strongly advocate for incorporating job training and education into the Weatherization Assistance Program (WAP) program. I can envision this program helping thousands of low-income homeowners to make their homes more energy efficient and I can see this program benefiting those very homeowners by building pathways out of poverty for them by creating jobs and work in their community. As Van Jones, the guru of Green jobs, so articulately stated "I want people to buy a hybrid, I want people to put solar panels on their second homes. But the people struggling for bus fare in this county, they have a place in the new economy."

> "Try this experiment. Go knock on someone's door in West Oakland, Watts or Newark and say: 'We gotta really big problem!' They say: 'We do? We do?' 'Yeah, we gotta really big problem!' 'We do? We do?' 'Yeah, we gotta save the polar bears! You may not make it out of this neighborhood alive, but we gotta save the polar bears!'
>
> We need a different on-ramp for people from disadvantaged communities. The leaders of the climate establishment came in through one door and now they want to squeeze everyone through that same door. It's not going to work. If we want to have a broad-based environmental movement, we need more entry points. ...
>
> You can't take a building you want to weatherize, put it on a ship to China and then have them do it and send it back. So we are going to have to put people to work in this country—weatherizing millions of buildings, putting up solar panels, constructing wind farms. Those green-collar jobs can provide a pathway out of poverty for someone who has not gone to college.

Remember, a big chunk of the African-American community is economically stranded. The blue-collar, stepping-stone, manufacturing jobs are leaving. And they're not being replaced by anything. So you have this whole generation of young blacks who are basically in economic free fall.

If we can get these youth in on the ground floor of the solar industry now, where they can be installers today, they'll become managers in five years and owners in 10. And then they become inventors. The green economy has the power to deliver new sources of work, wealth and health to low-income people—while honoring the Earth. If you can do that, you just wiped out a whole bunch of problems. We can make what is good for poor black kids good for the polar bears and good for the country."

Van Jones, as told to Thomas Friedman in the Oct. 17, 2007 issue of *The New York Times*

I want to tell you about the Bridgeport Jobs Funnel which takes this concept and puts into practice right here in our city. The Jobs Funnel is a result of several key stakeholders in the City of Bridgeport including the Office of the Mayor, Career Resources, Anne Casey Foundation, the Fairfield County Foundation, the Bridgeport Child Advocacy Coalition, Local Carpenters Union 210 and other community, business and trade organizations. Some of our partners may be here today. Our program was seeded with an investment of $75,000 from the State of Connecticut, Department of Labor in early 2009.

Job Funnel projects like Bridgeport's are well-established in other Connecticut municipalities, including Hartford, New Haven and Waterbury. The state's One-Stop Career Center system plays an integral role in the outreach and recruitment of participants, as well as provides access to training, and supportive services. Participants receive work readiness skills training and educational remediation, making them job ready in all aspects to meet the needs of the employer and to retain employment.

Funnel projects are designed so that residents benefit from economic development initiatives. By adapting this project to the WAP initiative, residents of the low-income

communities that are in most need of weatherization assistance and who are also in most need of job development and training will benefit in two ways.

I have had the privilege of managing the Bridgeport Jobs Funnel project over the last several months. Its focus has been to train individuals to enter jobs in the construction industry, and take advantage of ongoing and planned economic development in and around Bridgeport. The program is designed to give participants a well-rounded training and education experience to make them as work-ready as possible. The same can be done with a Weatherization industry focus.

For instance, the Bridgeport Jobs Funnel has enjoyed the cooperation of the Carpenters' Local 210, which provides training on awareness of construction safety and health concerns in the construction industry, as well as terminology, tool and materials identification, basic math/measuring and work ethic/job site procedures. The services of a private training group (EMGC, Inc. of Shelton) were also included to give participants training in Hazwoper, Asbestos Abatement and Lead-based Paint training. By partnering with Career Resources, the STRIVE program was administered through an intensive multi-week job readiness workshop, with a focus on helping graduates obtaining entry-level employment.

A Job Funnel model also allows for the formation and expertise of a steering committee, which allows for input on program development from a cross-section of the community, and a feeling of connection to the program through multiple channels and interests.

I will be happy to answer any additional questions about the Bridgeport Job Funnel program or other aspects of The WorkPlace, Inc. Thank you. *–Michael J. McCarthy*

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Bpt

Testimony of William P. Villano
Executive Director, Workforce Alliance
May 5, 2009

On behalf of Workforce Alliance, I am pleased to offer these comments in support of the American Recovery and Reinvestment Act (ARRA) Weatherization Assistance Program Draft Connecticut Plan set forth by the Connecticut Department of Social Services. Workforce Alliance is one of five Workforce Investment Boards in Connecticut, providing education, employment and training services to businesses and employers in thirty cities and towns in the south central part of the state. We are located in New Haven, and our four One-stop Career Centers are located in New Haven, Hamden, Meriden and Middletown. Because of the economic downturn, when compared to last year, these centers are seeing an increase of over 40% of customers looking for work.

Based on our conversations with DSS and other partners, the ARRA funding is meant to stimulate the economy by creating new weatherization training programs and projects that will lead to new and sustainable jobs. Connecticut anticipates weatherizing approximately 7,500 units. For the South Central region, this presents a tremendous opportunity to put people back to work in auditing the homes as well as in performing the actual weatherization work.

We are pleased that the plan recognizes that training of subcontractors and their staff will need to be greatly augmented due to the volume and type of work to be

performed. Contractors will need to hire additional workers, and those workers will need to be trained. The plan specifically names the Workforce Investment Boards as a proposed program training and recruitment partner. The Workforce Investment Boards are well-suited to coordinate the training and supportive services for these new workers. Our one-stop service delivery system has the infrastructure in place to proactively recruit individuals who are interested in weatherization jobs, screen them according to employer-established standards, assess their readiness for skills or hands-on training and, where necessary, provide remedial skills prior to training. We also have extensive experience in partnering with and coordinating with the educational entities described in the plan. In addition, we are able to provide ongoing supportive services to the individuals while they are in training, and ongoing support and follow-up after they become employed.

The jobs that will be created through this effort are very attractive to the workforce investment system because they are available, they are attainable, and they will produce living wages. In addition, the highly marketable skills that the workers will receive that will be portable in their future career plans after the life of this project.

We are pleased to support this plan and we look forward to working with DSS and all the partners in this effort to insure good jobs and a better quality of life for all that will participate in the South Central Region. Thank you.

Bpt 4

Comments of the Connecticut Fund for the Environment
Re: ARRA Weatherization Assistance Program
Proposed Connecticut State Plan
By Curt Johnson
Program Director and Senior Attorney
cjohnson@cfenv.org
203 787 0646/ext. 111

Submitted to the Department of Social Services

The Connecticut Fund for the Environment ("CFE") submits the following comments as part of the hearing record on the Proposed Connecticut State Plan for Weatherization Assistance (the "Weatherization Plan" or "Plan"). CFE is a non-profit environmental advocacy organization with approximately 5,500 members state-wide. We submit these comments recognizing the key role energy efficiency investments will play in meeting the global warming reduction mandates now incorporated as state law, as a result of the passage of P.A. 08-98.

In brief, CFE is pleased that DSS has moved forward relatively quickly with a framework for investing the unprecedented increase in weatherization assistance being made available by the ARRA. The total of $64.3 million over three years marks at least an order of magnitude increase in energy efficiency targeted to support lower income residents. CFE supports the many potential cross-benefits this investment can make in our State. The program has the potential to reduce greenhouse gas emissions significantly, save lower income residents far more than $64 million over the next decade in energy savings, and help create and train a green workforce.

We offer the following comments on the program:

Include Development of Protocol for Documenting Energy Savings
We urge DSS to set-aside and invest a modest amount of funding (in the range of $1 million) for working with key partners (the utility companies, DECD, the CT Energy Efficiency and Load Management Fund) to develop a single, unified and coordinated data system that documents the total energy savings, and by association, total greenhouse gas (GHG) reductions delivered by this program over the next three years. *Investing in such a system is likely to reap real financial benefits for the state and the weatherization providers, and help the state meet its legally mandated greenhouse gas reduction targets.*

There are three parallel efforts that require energy and GHG accounting, at least two of which have the potential of creating financial reward systems for early energy and GHG reductions from programs such as this one.

The first is the previously mentioned P.A. 08-98, that mandates aggressive state reductions in GHG emissions in Connecticut. Our DEP is now working on a state wide inventory of GHG emissions statewide. The DEP is beginning to wrestle with the concept that this inventory should be designed in a way so that it will be able to interact

with a protocol for demonstrated reductions in building energy use. The contact for this effort is Ms. Tracy Babbidge of the DEP Air Bureau.

The second is the State mandate that requires electric generation companies to purchase increasing levels of renewable energy credits as part of their portfolio of electricity delivered to Connecticut residents. Saving electricity through weatherization efforts is a potential source of these credits, if a protocol for documenting electricity savings is developed. These credits have an economic value.

Finally, on the national level, a federal cap-and-trade program is being actively debated in Congress. Many are talking about the need to incorporate into these program tradable credits for early GHG reductions – like the reductions that will be achieved by the state weatherization program.

It is important that DSS work with the other major energy efficiency providers in the state (most notably the DEP, the electric utilities and the Energy Efficiency and Load Management Fund board, and DECD as a partner in the overall weatherization program) in developing this common protocol. The effort must be done in coordination with the DEP's GHG inventory system; so that the inventory system can reflect the GHG reductions achieved over time through building efficiency investments. The $1 million investment in developing and launching this program could come from the "special projects" fund, or administrative fees recommended by this Weatherization Plan.

Importance of Coordinating Weatherization with other Parallel Programs

CFE is pleased to see the level of coordinated discussion that has already gone into developing this plan. It makes sense to begin the program using the CL&P WRAP Home Check Energy Audit tool. This will allow for flexibility to work with private sector energy efficiency companies who already have extensive experience utilizing this tool as part of delivering energy efficiency services under the Home Energy Solutions program. Beginning with a single audit system should also assist in coordinating the needed energy and GHG reduction accounting that we believe is essential.

Development of an audit protocol for the multi-family state-financed portfolio of public housing may be required. We recommend that this development be made so that the energy and GHG reductions can be clearly documented for all the reasons previously mentioned.

Investment Protocol

We support the Plan's comments that the DSS encourages use of renewable, alternative and other "green" practices and proposes installing renewable energy systems and green building materials through this program (Plan, p. 4). Having said that, we believe it is important for the base weatherization program to invest in the most cost-effective measures first, which generally fall within the list provide on page 4 of the Plan.

The Plan should include a clear intent to look at investing in "green" alternatives for energy efficiency material, where feasible. For example, establishing a protocol for preference of insulation materials that come from recycled products (such as cellulose and denim-based cotton insulation) is preferable, all things being equal, to use of petroleum based products. Furthermore, the program should specify that insulation materials used in their program should be free of, or very low emitter of formaldehyde and volatile organic compounds. These types of preferences within the base, core areas of efficiency investments (here, insulation) could have a major impact for total GHG emissions as well as the health of the citizens benefiting from the investment.

The Plan should also clarify that before investing in renewable or alternative energy systems, the WAP program will first reduce energy demand through feasible energy efficiency investments. Given the proposed general dwelling unit investment limit of $10,000 (under the WAP), we recommend that an advanced efficiency investment and renewable energy "set-aside" of $2 to $4 million be included as part of the $7.1 million "as needed" funding of the Incentive Pool (Plan, p. 8). These funds could be administered under the Clean Energy Fund or Energy Efficiency and Load Management Funds as lower income demonstration projects.

Thank you for the opportunity to submit these comments on the hearing record

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