# SHARED CLEAN ENERGY FACILITY PROGRAM

## **Customer Enrollment Appendices**

Appendix C: Customer Identification Appendix D: Customer Verification Appendix E: Customer Enrollment Appendix F: Customer Engagement

VERSION 2.0 REV. 12/31/2023 EVERSOURCE ENERGY AND THE UNITED ILLUMINATING COMPANY

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## Acronyms

The following acronyms are used in this filing:

- CAA: Community Action Agency
- CEAP: Connecticut Energy Assistance Program
- EDC: Electric Distribution Company
- EJC: Environmental Justice Community
- EE: Energy Efficiency
- ES: Eversource Energy
- HES-IE: Home Energy Assistance-Income Eligible
- HUD: U.S. Department of Housing and Urban Development
- LISO: Low-income Service Organization
- LMI: Low or Moderate Income
- SCEF: Shared Clean Energy Facility/Shared Clean Energy Facilities
- SEF: Subscriber Enrollment Form
- SMI: State Median Income
- UI: The United Illuminating Company

## 1 SCEF PROGRAM ALLOCATION REQUIREMENTS

Participation in the SCEF program is limited to certain eligible customer types. Eligible Customers include:

- Low- and Moderate-Income ("LMI") Customers
- Small Business Customers
- Low-Income Service Organizations
- Affordable housing landlords, entities, and facilities
- State and Municipal Customers
- Commercial Customers
- Residential Customers, other than LMI Customers, who either: (1) reside in a rental or leased property where the Customer does not control the property's roof; or (2) reside in their own property but are unable to install on-site solar.<sup>1</sup>

The SCEF Program Manual also specifies that each SCEF's energy output be allocated amongst certain customer types and via differing enrollment methods. SCEF subscriptions for Projects procured in Years 1-4 of the SCEF Program are allocated to the different subscriber categories in accordance with the following table:

Subscriber Category	SCEF Output Allocation Percentage	Subscription Model
Low-Income Customers	20%	Opt-Out
Small Business Customers	20%	Opt-Out
Low-and Moderate-Income Customers, Low-Income Service Organizations, Affordable Housing Landlords, Entities and Facilities ("LMI Category")	40%	Opt-Out
Any Eligible Customer	20%	Voluntary Enrollment ("Opt-In")

SCEF subscriptions for Projects procured beginning in Year 5 and all subsequent procurements of the SCEF Program are allocated to the different subscriber categories in accordance with the following table:

<sup>&</sup>lt;sup>1</sup> SCEF Program Manual

Subscriber Category	SCEF Output Allocation Percentage	Subscription Model
Low-Income Customers	50%	Opt-Out
Small Business Customers	20%	Opt-Out
Low-and Moderate-Income Customers, Low-Income Service Organizations, Affordable Housing Landlords, Entities and Facilities ("LMI Category")	20%	Opt-Out
Any Eligible Customer	10%	Voluntary Enrollment ("Opt-In")

Customers eligible for an opt-out subscription are pre-identified by the EDCs but may also apply to the program for consideration for an opt-in subscription. Customers that are only eligible for an opt-in subscription must apply to the program to be considered for a SCEF subscription.<sup>2</sup>

Appendices C-E to the SCEF Program Manual detail how the EDCs identify SCEF eligible customers, verify customer eligibility and enroll customers in the SCEF program. Appendix F outlines the EDCs customer engagement activities for the program.

<sup>&</sup>lt;sup>2</sup> Customers that are only eligible for an opt-in subscription include State and Municipal customers, Commercial customers and non-LMI Residential customers that cannot install on-site solar.

## 2 APPENDIX C: CUSTOMER IDENTIFICATION

## 2.1 IDENTIFICATION OF LOW-INCOME CUSTOMERS

Low-Income Customers are defined in the SCEF Program Manual and Section 16-244z(a)(1)(C) of the Connecticut General Statutes, modified by Public Act 22-14 (P.A. 22-14), as:

# "Low-income customer" means an in-state retail end user of an electric distribution company (i) whose income does not exceed sixty per cent of the state median income, adjusted for family size, or (ii) that is an affordable housing facility.<sup>3</sup>

For the purposes of the SCEF program, an income-eligible low-income customer refers to customers that meet the definition of a low-income customer by having an income that does not exceed sixty per cent of state median income. Income-eligible low-income Customers can participate in the SCEF Program in the Low-Income opt-out category, the LMI opt-out category and the voluntary enrollment category, if they complete a Subscriber Enrollment Form.

Income-eligible low-income customers shall be identified as eligible for an 'opt-out' SCEF subscription through any of the following mechanisms:

- 1. Participation in an income-eligible utility program
- 2. Income-verification performed by the customer's EDC

## IDENTIFICATION OF INCOME-ELIGIBLE LOW-INCOME CUSTOMERS MEETING HARDSHIP AND UTILITY ASSISTANCE <u>PROGRAM CRITERIA</u>

Customers that participate in the EDCs income-eligible utility assistance programs are automatically eligible for low-income customer SCEF subscriptions.<sup>4</sup> A quarterly list of low-income customers is developed based on customer participation in one of the below income-eligible utility assistance programs.

<sup>&</sup>lt;sup>3</sup> Public Act 22-14

<sup>&</sup>lt;sup>4</sup> The EDCs use an income threshold of 60% of State Median Income for their income-eligible utility assistance programs.

Program		Program Description	Eligibility Criteria
Hardship Status		A Financial hardship	Customers at or below
		status prevents shut off	60% SMI
		for non payment and	
		Late Payment Charges	
		during the winter	
		moratorium (November	
		1 to May 1)	
Electric Discount I	Rate	Electric bill discount of	Customers at or below
		10% or 50% granted to	60% of SMI. Higher
		income-qualifying	discount provided to
		Customers	customers at or below
			160% of federal poverty
			guidelines
	Eversource Matching	Provides Matching	Customers at or below
Hardship and	Payment Plan ("ES	Payments to Customers	60% SMI
Discount Rate	MPP")/UI Matching	receiving Connecticut	
Customers	Payment Program <sup>5,6</sup>	Energy Assistance	
include		Program ("CEAP")	
Customers		benefits	
participating in	Eversource New Start/UI	Provides a payment	Customers at or below
Income-Eligible	Bill Forgiveness Plan	match (UI) or arrearage	60% SMI
Payment Plans	("BFP") <sup>7,8</sup>	forgiveness (Eversource)	
Fayment Flans		to electric customers	
		with a past due balance	
Home Energy Solu	itions- Income Eligible ("HES-	Energize Connecticut	Customers at or below
IE") <sup>9</sup>		low-income	60% SMI
		weatherization program	

#### Table 2-1. EDC INCOME-BASED PROGRAMS AND ELIGIBILITY CRITERIA

<sup>&</sup>lt;sup>5</sup> Eversource Matching Payment Program

<sup>&</sup>lt;sup>6</sup> UI Matching Payment Program

<sup>&</sup>lt;sup>7</sup> Eversource New Start

<sup>&</sup>lt;sup>8</sup> UI Bill Forgiveness Program

<sup>&</sup>lt;sup>9</sup> HES participation includes both customers that have received HES-IE benefits, as well as those that attempted to access the HES-IE program but were unable to due to either weatherization health and safety barriers or lack of consent to complete weatherization work from the customer's landlord.

#### IDENTIFICATION OF INCOME-ELIGIBLE LOW-INCOME CUSTOMERS THROUGH SUBSCRIBER ENROLLMENT FORM

Customers may apply to the SCEF program directly with their utility company using a Subscriber Enrollment Form.<sup>10</sup> Customers that are identified as low-income customers through a Subscriber Enrollment Form will be considered for a SCEF subscription in both the opt-out and opt-in selection categories.

The following table provides an overview of the process steps for identifying opt-out eligible low-income customers.

Step No.	Process Step	Frequency
1	Develop query to identify known low-income financial hardship and electric discount rate customers in EDC customer database	One-time
2	Run query on EDC low-income hardship and electric discount customers	Quarterly
3	Run query on EDC HES-IE customers	Quarterly
4	Combine EDC Hardship, electric discount rate and HES-IE datasets	Quarterly
5	Append to dataset low-income customers that self-identified via the Subscriber Enrollment Form ("SEF") <sup>11</sup> and were deemed eligible for a low-income SCEF subscription.	Quarterly

#### Table 2-2. Process Steps for Identifying Opt-Out Income-Qualified Low-Income Customers

# 2.2 IDENTIFICATION OF AFFORDABLE HOUSING LANDLORDS, ENTITIES AND FACILITIES

Affordable housing landlords, entities and facilities shall be identified as eligible for an 'opt-out' SCEF subscription through one of the following mechanisms:

**Tier I:** Multifamily properties that are on a list of properties identified by the Agencies<sup>12</sup> as either participating in the Low-Income Housing Tax Credit Program ("LIHTC") or that contain a majority of households earning 80% or less of AMI as set by HUD<sup>13</sup>

**Tier II:** Multifamily properties with 5 or more units that are identified by the EDCs as properties where more than 66% of the residents have a household income at or below 60% of SMI<sup>14</sup>

<sup>12</sup> The "Agencies" consist of the Department of Energy and Environmental Protection (DEEP), the Connecticut Green Bank (CGB), the Department of Housing (DOH) and the Connecticut Housing Finance Authority (CHFA) <sup>13</sup> I.d.

<sup>&</sup>lt;sup>10</sup> The Subscriber Enrollment Form ("SEF") is further described in Appendix F

<sup>&</sup>lt;sup>11</sup> The Subscriber Enrollment Form ("SEF") is further described in Appendix F

<sup>&</sup>lt;sup>14</sup> I.d. These properties will be identified through the EnergizeCT Multifamily Initiative

**Tier III:** Multifamily properties that apply for review by the Agencies, <sup>15</sup> are determined to meet the eligibility requirements of an affordable multifamily dwelling by the Agencies, and are approved as an affordable housing facility by PURA <sup>16</sup>

Properties identified as eligible for Tier I will be published quarterly in the appropriate annual review docket for the Residential Renewable Energy Solutions Program and on the EDCs websites.<sup>17</sup> Properties identified as eligible for Tier II will be published annually in the appropriate annual review docket for the Residential Renewable Energy Solutions Program and on the EDCs websites.

## 2.3 IDENTIFICATION OF MODERATE-INCOME CUSTOMERS

Moderate-income customers are defined in Section 16-244z(a)(1)(C), modified by P.A. 22-14 of the Connecticut General Statutes as:

"Moderate-income customer" means an in-state retail end user of an electric distribution company whose income is between sixty per cent and one hundred per cent of the state median income as defined by the United States Department of Housing and Urban Development, adjusted for family size.<sup>18</sup>

Moderate-income customers can participate in the SCEF Program as either opt-out customers or in the voluntary enrollment category.

Moderate-income customers shall be identified as eligible for an 'opt-out' SCEF subscription through the following channels:

- 1. Income-verification performed by Operation Fuel
- 2. Income-verification performed by the customer's EDC

#### **IDENTIFICATION MODERATE-INCOME CUSTOMERS THROUGH OPERATION FUEL**

Moderate-Income customers are identified by Operation Fuel. Operation Fuel evaluates customers that seek Operation Fuel assistance against the SCEF moderate-income threshold of 100% of SMI. When Operation Fuel provides assistance to or engages with a customer whose household income is between 60-100% of SMI they provide the customer's information to the appropriate EDC so that the customer is considered for a SCEF subscription in the moderate-income opt-out customer category.

#### IDENTIFICATION MODERATE-INCOME CUSTOMERS THROUGH SUBSCRIBER ENROLLMENT FORM

<sup>16</sup> I.d.

<sup>&</sup>lt;sup>15</sup> I.d.

<sup>&</sup>lt;sup>17</sup> I.e., 22-08-02 and subsequent annual proceedings.

<sup>&</sup>lt;sup>18</sup> Public Act 22-14

Customers may apply to the SCEF program directly with their utility company using the Subscriber Enrollment Form. Customers that are identified as moderate-income customers through a Subscriber Enrollment Form will be considered for a SCEF subscription in the opt-out and opt-in selection categories.

In addition, Moderate-income customers may be identified in the process of applying for other utility assistance programs through the EDCs. Customers who apply to those programs but did not meet the income qualification thresholds will be directed to the Subscriber Enrollment Form to apply to the SCEF program.

Moderate-Income Customers are identified through the following process steps:

Step No.	Process Step	Frequency
1	Operation Fuel identifies customers as moderate Income when verified against SCEF program thresholds and share lists of identified customers with the EDCs on a quarterly basis	Quarterly
3	Append to dataset moderate-income customers that self-identified via the Subscriber Enrollment Form ("SEF") and were deemed income- eligible for a moderate-income SCEF subscription.	Quarterly

#### Table 2-3. PROCESS FOR IDENTIFYING MODERATE-INCOME CUSTOMERS

## 2.4 IDENTIFICATION OF LOW-INCOME SERVICE ORGANIZATIONS

Low-Income Service Organizations ("LISOs") are defined in the SCEF Program Manual as

## "a for-profit or nonprofit organization that provides service or assistance to low-income individuals."<sup>19</sup>

Low-Income Service Organizations ("LISOs") are eligible to participate in the SCEF Program in both the LMI opt-out category and the voluntary enrollment category.

Low-Income Service Organizations shall be identified as eligible for an opt-out SCEF subscription through any of the following methods:

- 1. Organizations that were identified as LISOs through the EDC-led SCEF stakeholder process and filed with the Authority in Docket 19-07-01RE01 as Order 1 Compliance on December 1, 2021.
- 2. Organizations that have been verified as LISOs and provided to the EDCs by the United Way
- 3. Organizations that apply to the SCEF program using the Subscriber Enrollment Form and meet the eligibility requirements of a LISO

The following table provides the process steps required to identify LISOs:

<sup>&</sup>lt;sup>19</sup> SCEF Program Manual

Table 2-4, PROCESS FOR IDENTIFYII	NG LOW-INCOME SERVICE ORGANIZATIONS
	TO LOW INCOME SERVICE ONGANIZATIONS

Step No.	Process Step	Frequency
1	Compile list of LISOs on EDC SCEF distribution list	One-time process
2	Execute data sharing agreement with United Way	One-time process
3	Make request to United Way for list of additional LISOs not on EDC distribution list	Annually
4	Combine EDC dataset with United Way LISO list	Annually
5	Append to dataset LISOs that self-identified via the Subscriber Enrollment Form.	Quarterly

## 2.5 IDENTIFICATION OF SMALL BUSINESS CUSTOMERS

Small business customers are defined in the SCEF Program Manual as

#### "a commercial or industrial electric customer with less than a 200 kW peak load."<sup>20</sup>

Small business customers shall be identified as eligible for an opt-out SCEF subscription through one of the following methods:

- 1. For Eversource, all customers on Rates 30 and 35<sup>21</sup>
- 2. For UI, customers on Rates GS, GST and LPT that have a peak demand below 200kW qualify as Small Business Customers<sup>22</sup>

The following table provides the process steps for identifying Small Business Customers.

Step No.	Process Step	Frequency
1	Develop query to identify customers on Rate 30 or Rate 35 for Eversource, or Rate GS, GST and LPT for UI in EDC Customer Information System	One-time
2	Run query as needed	Quarterly
2a	UI to conduct additional segmenting by billed demand	Quarterly

<sup>&</sup>lt;sup>20</sup> SCEF Program Manual

<sup>&</sup>lt;sup>21</sup> Rates 30 and 35 have 200 kW demand limits. Non-business customers on these rates will not qualify under the Small Business Category but will be considered under other categories for which they may be eligible.

<sup>&</sup>lt;sup>22</sup> Customers on Rate GS have a maximum billed demand of 100 kW, customers on rates GST and LPT have a billed demand over 100 kW but would need to be segmented to identify and verify customers with billed demand up to 200kW. Non-business customers on these rates will not qualify under the Small Business Category but will be considered under other categories for which they may be eligible.

## 2.6 IDENTIFICATION OF VOLUNTARY ENROLLMENT ("OPT-IN") CUSTOMERS

Voluntary enrollment customers must complete a Subscriber Enrollment Form to be considered for a SCEF subscription. Customers that are deemed eligible for the SCEF program through a Subscriber Enrollment Form will be added to the pool of opt-out customers considered for a SCEF subscription during enrollment events. Any customer eligible for an opt-in subscription that applies to the program using the SEF will be considered in the Opt-Out and Opt-In enrollment processes.

## **3** APPENDIX D: ELIGIBILITY VERIFICATION

## 3.1 LOW-INCOME CUSTOMERS ELIGIBILITY VERIFICATION

#### INCOME-ELIGIBLE LOW-INCOME CUSTOMER VERIFICATION THROUGH PROGRAM PARTICIPATION AND PARTNER AGENCIES

Income-eligible low-income customers are eligible for the SCEF Program if they meet any of the following criteria:

- 1. The customer is currently enrolled in the respective EDC's financial hardship or electric discount rate program, including customers that:
  - Currently receive Connecticut Energy Assistance Program ("CEAP") benefits,
  - Are currently enrolled in Eversource's Matching Payment Plan or New Start, or UI's Matching Payment Program or Bill Forgiveness Program
- 2. The customer has participated in or has been income-verified by the HES-IE program in the past three years

## INCOME-ELIGIBLE LOW-INCOME CUSTOMER VERIFICATION BY EDC SCREENING PROCESS

Customers may apply to their EDC to be verified as an income-eligible low-income customer using a Subscriber Enrollment Form. Customers must provide documentation to demonstrate their household income with their Subscriber Enrollment Form. Acceptable proof of income documentation includes the following:

Table 3-1. PROOF OF INCOME DOCUMENTATION FOR LOW-INCOME CUSTOMERS

Qualification	Documentation
CHIP; HUSKY B	Letter proving qualifying benefit
Medicare Savings Programs (MSP)	Letter proving qualifying benefit
Energy Assistance	Energy Award Letter
Supplemental Security Income (SSI)/Social Security Disability Income (SSDI)	Letter proving qualifying benefit
Temporary Assistance to Need Families (TANF)	Letter proving qualifying benefit
State Administered General Assistance (SAGA)	Letter proving qualifying benefit
DSS State Cash Assistance	Letter proving qualifying benefit
Women Infants and Children (WIC)	Letter proving qualifying benefit
Supplemental Nutrition Assistance Program (SNAP)	Letter proving qualifying benefit
Medicaid or Access Health; HUSKY A, C, D	Letter proving qualifying benefit
State Husky B	Letter proving qualifying benefit
State HUSKY A	Letter proving qualifying benefit
Medicare Savings Programs (MSP)	Letter proving qualifying benefit
Refugee Cash Assistance and Refugee Medical Assistance	Letter proving qualifying benefit
Connecticut Free or Reduced Lunch Program	Letter proving qualifying benefit
Head Start	Letter proving qualifying benefit
Section 8 Housing; Rental Assistance Program (RAP)	Voucher
Unemployment	Unemployment Benefit Letter Most recent bank statement showing direct deposit of unemployment
Job	Paid Weekly - Last 4 consecutive pay stubs Paid Bi-Weekly - Last 2 consecutive pay stubs

Self-Employment	Most recent 1099 Tax Form
Child Support, Pension, Other	Benefit Letter Most recent bank statement showing direct deposit of unemployment Documentation the recipient's sole source of income is Social Security, such as a Social Security budget sheet

Table 3-2 shows the process steps for verifying income-qualified low-income customers through an EDC income verification process.

Table 3-2. EDC INCOME VERIFICATION PROCESS FOR LOW INCOME CUSTOMERS APPLYING TO SCEF PRO	CARAM
	2010 001

Step No.	Process Step	Frequency
1	Customer completes a Subscriber Enrollment Form ("SEF"), including supporting documentation	Per Customer
2	EDC staff evaluates customer's income against SCEF Program income thresholds	Per Customer
3	If customer's income is ≤60% SMI EDC places customer on SCEF low- income eligible customer list	

## 3.2 AFFORDABLE HOUSING LANDLORD, ENTITIES AND FACILITIES ELIGIBILITY VERIFICATION PROCESS

Affordable housing landlords, facilities and entities will be verified as eligible for the SCEF program if they are on the list of Tier I, Tier II or Tier III affordable housing facilities filed in the annual review docket for the Residential Renewable Energy Solutions program and as posted on the EDCs' websites.<sup>23</sup>

## 3.3 MODERATE-INCOME CUSTOMERS ELIGIBILITY VERIFICATION

#### MODERATE-INCOME CUSTOMER VERIFICATION THROUGH PARTNER AGENCY

Moderate-Income Customers are eligible for the SCEF Program if they have been income-verified by Operation Fuel as meeting the SCEF moderate-income criteria of 60%-100% of SMI.

<sup>&</sup>lt;sup>23</sup> The Annual Review Docket for the Residential Renewable Energy Solutions Program is XX-08-02, with "XX" corresponding to the program year (e.g., "23" for Program Year 2023)

#### MODERATE-INCOME CUSTOMER VERIFICATION BY EDC SCREENING PROCESS

Customers may apply to their EDC to be verified as a moderate-income customer using a Subscriber Enrollment Form.

Customers seeking qualification for the SCEF program as a moderate-income customer must provide proof of income for all forms of income received by the household with their Subscriber Enrollment Form. Acceptable proof of income includes the following types of documentation:

Table 3-3. PROOF OF INCOME DOCUMENTATION FOR MODERATE-INCOME CUSTOMERS

#### Income Documentation (provide proof of all applicable income sources):

Alimony/Spousal Support

**Child Support** 

Employment - 2 Consecutive pay stubs if paid bi-weekly, 4 Consecutive pay stubs if paid weekly

**Employment Disability** 

Family and Friends Support (applicants must complete a Financial Support from Family and Friends form)<sup>24</sup>

Long term disability

No income (applicant must complete a Self-Declaration Zero income form)<sup>24</sup>

Odd Jobs

Pension

Rental Income

**Retirement Annuity** 

Self-Employment (applicant must complete a Self-Employment worksheet)<sup>24</sup>

Short Term Disability

Social Security Retirement

Tax Form – Prior Year 1040 or 1099

**Tribal Stipend** 

Unemployment

Veteran Compensation Benefits

<sup>&</sup>lt;sup>24</sup> Available at: <u>https://operationfuel.org/fbforms/</u>

#### Workers Compensation

#### Table 3-4. EDC MODERATE-INCOME VERIFICATION PROCESS FOR CUSTOMERS APPLYING TO SCEF PROGRAM

Step No.	Process Step	Frequency
1	Customer completes a Subscriber Enrollment Form ("SEF"), including supporting documentation	Per Customer
2	EDC staff evaluates customer's income against SCEF Program income thresholds	
3	If customer's income is between 60-100% of SMI EDC places customer on SCEF moderate-income eligible customer list	Per Customer

## 3.4 LOW-INCOME SERVICE ORGANIZATION ELIGIBILITY VERIFICATION

Low-Income Service Organizations that participate in the United Way's Connecticut 2-1-1 service provider database are automatically eligible for the SCEF program and do not need to apply to the program to be considered for a SCEF subscription.<sup>25</sup>

Low-Income Service Organizations that do not participate in the 2-1-1 service provider database can apply to the SCEF program through a Subscriber Enrollment Form. These applicants must demonstrate that they meet the eligibility requirements of a LISO by providing services at no cost, or low cost primarily to low-income clients or clients in environmental justice communities.<sup>26</sup>

Low-Income Service Organizations applying to the SCEF program must complete a self-declaration form<sup>27</sup> and submit it with their Subscriber Enrollment Form. Once the organization submits their Subscriber Enrollment Form and accompanying documentation, the EDCs will review the information provided with the customer's application to determine whether it meets the criteria for a LISO.

Table 3-5. EDC VERIFICATION PROCESS FOR CUSTOMERS ON UNITED WAY 211 LISO LIST

<sup>&</sup>lt;sup>25</sup> Note, not all organizations in the United Way's Connecticut 2-1-1 service database are eligible for the SCEF program. Only organizations that have been determined to be a LISO by the United Way are eligible. Organizations in the 2-1-1 database may inquire with their EDC to find out of if they are listed as a LISO in the United Way database.

<sup>&</sup>lt;sup>26</sup> "Environmental Justice Community" means (A) a United States census block group, as determined in accordance with the most recent United States census, for which thirty (30) per cent or more of the population consists of low-income persons who are not institutionalized and have an income below two hundred (200) per cent of the federal poverty level, or (B) a distressed municipality, as defined in subsection (b) of section 32-9p of the General Statutes <sup>27</sup> Available on the EDCs websites

Step No.	Process Step	Frequency
1	EDCs formalize data sharing agreement with United Way 211 One-time pr	
2	Request List from United Way 211	Appually
3	EDCs receive list from United Way	Annually

#### Table 3-6. EDC VERIFICATION PROCESS FOR LISO CUSTOMERS THAT COMPLETE A SUBSCRIBER ENROLLMENT FORM

Step No.	Process Step	Frequency
1	LISO completes SEF and attaches Self-Declaration Form	
2	EDCs evaluate LISO SEF and verify eligibility	Per LISO
If LISO is deemed eligible for the SCEF program, LISO is placed on list		PELLISO
5	of eligible subscribers for enrollment	

## 3.5 SMALL BUSINESS CUSTOMER ELIGIBILITY VERIFICATION

Small Business customers in Eversource's service territory are eligible for the SCEF program if they are on Rate 30 or 35.<sup>28</sup>

Small Business customers in United Illuminating's service territory are eligible for the SCEF program if they are on Rate GS, GST or LPT and their peak demand is below 200kW.<sup>29</sup>

## 3.6 STATE AND MUNICIPAL CUSTOMERS ELIGIBILITY VERIFICATION

State and Municipal Customers are eligible to participate in the SCEF Program as part of the voluntary enrollment category. State and Municipal Customers are defined as:<sup>30</sup>

*"Municipal Customer" means a retail end user of electric service located in the service territory of the EDC that is a Municipality.* and,

"State Customer" means a retail end user of electric service located in the service territory of the EDC that belongs to any office, department, board, council, commission, institution, constituent unit of the state system of higher education,

<sup>&</sup>lt;sup>28</sup> Non-business customers on these rates will not qualify under the Small Business Category but will be considered under other categories for which they may be eligible.

<sup>&</sup>lt;sup>29</sup> Non-business customers on these rates will not qualify under the Small Business Category but will be considered under other categories for which they may be eligible.

<sup>&</sup>lt;sup>30</sup> The SCEF Statute does not define State or Municipal Customers. As a result, the EDCs established these definitions.

## technical high school or other agency in the executive, legislative or judicial branches of state government of Connecticut.<sup>31</sup>

State and Municipal customers in Eversource's service territory are eligible for the SCEF program if the Legal Classification Code on their electric account identifies them as a State or Municipal customer.

State and Municipal customers in UI's service territory will be verified as eligible for the SCEF program through the Company's Energy Efficiency Tracking system. This list will be appended with State and Municipal accounts managed by UI Account Managers.

State and Municipal Customers can only participate in the SCEF Program on an opt-in basis and must submit a Subscriber Enrollment Form to be considered for a SCEF subscription. Once their Subscriber Enrollment Form is received, Eversource will determine whether the customer is coded with a state and municipal code in the Eversource's billing system or has provided the requisite documentation for UI.

## **3.7** COMMERCIAL CUSTOMER ELIGIBILITY VERIFICATION

Commercial Customers other than Small Business Customers are eligible to participate in the SCEF Program in the voluntary enrollment category. Commercial Customers are defined as:<sup>32</sup>

## "Commercial Customer" means a retail end user of electric service located in the service territory of the EDC that has commercial usage.<sup>33</sup>

Commercial Customers in Eversource's service territory are eligible for the SCEF Program if they are on Rate 55, 56, 57, or 58 and have a North American Industry Classification System ("NAICS") code that identifies them as a commercial customer.

Commercial customers in UI's service territory are eligible for the SCEF Program if they are on Rates GST or LPT.

As an opt-in only eligible customer class, Commercial Customers must submit a Subscriber Enrollment Form. Once their Subscriber Enrollment Form is received, the EDCs will determine whether they are on a commercial electric rate code, and whether they are coded as a commercial customer in the EDCs databases.

<sup>&</sup>lt;sup>31</sup> Docket No. 19-07-01 Compliance Order No. 1 filed April 24, 2020, Attachment 6A, Draft Shared Clean Energy Facility Rider Attachment 1: Subscriber Terms and Conditions

<sup>&</sup>lt;sup>32</sup> The SCEF Program Manual and SCEF Statute do not define Commercial Customers. As a result, the EDCs established these definitions.

<sup>&</sup>lt;sup>33</sup> Docket No. 19-07-01 Compliance Order No. 1 filed April 24, 2020, Attachment 6A, Draft Shared Clean Energy Facility Rider Attachment 1: Subscriber Terms and Conditions

## 3.8 NON-LMI RESIDENTIAL CUSTOMERS – RENTERS OR CUSTOMERS WITHOUT ROOF CONTROL ELIGIBILITY VERIFICATION

Non-LMI residential customers that are either renters or do not have control of their roof are eligible to participate in the voluntary enrollment SCEF Program category. The definition of eligibility for this customer class is:

# A residential electric Customer who is not low or moderate income and resides in a rental or leased property, or a property where the customer does not control the property's roof, such as a multi-unit condominium<sup>34</sup>

Non-LMI customers who do not have control of their roof must submit a Subscriber Enrollment Form for the SCEF Program with supporting documentation indicating they do not have roof control. Acceptable documentation to submit includes:

- For renters: a copy of their most recent lease agreement, or rent bill/statement with monetary figures redacted; or,
- For Property Owners without Roof Control: A signed letter from a condominium association or other entity limiting roof control attesting to the applicant's lack of control of their residence's roof.

Once the EDC receives the customer's Subscriber Enrollment the EDC will review the customer's supporting documentation to verify that they are a renter or property owner without roof control, and that the customer is on a residential electric rate.

## 3.9 NON-LMI RESIDENTIAL CUSTOMERS – UNABLE TO INSTALL ON-SITE SOLAR ELIGIBILITY VERIFICATION

Non-LMI customers that are unable to install on-site solar are eligible to participate in the SCEF Program as part of the voluntary enrollment category. The eligibility definition for this customer class is:

# Solar Non-Feasible Customer: A residential electric Customer who is not low or moderate income, and whose property has been evaluated by a licensed residential solar contractor and is deemed unable to install on-site solar.<sup>35</sup>

Non-LMI customers who cannot install on-site solar must submit a Subscriber Enrollment Form for the SCEF Program accompanied by a Non-Feasible Solar Self-Attestation Form<sup>36</sup>. The EDCs will review the submitted

<sup>&</sup>lt;sup>34</sup> See Decision, December 18, 2019, Exhibit B - Modified Program Requirements, Section 6 page 13.

<sup>&</sup>lt;sup>35</sup> EDC definition of eligibility based on December 18, 2019, Exhibit B - Modified Program Requirements, Section 6 page 13.

<sup>&</sup>lt;sup>36</sup> EDC Form available at: www.eversource.com/scef and www.uinet.com/sharedcleanenergycredit

documentation to verify that they cannot install solar on their property and that the customer is on a residential electric rate.

## 3.10 GENERAL ELIGIBILITY RULES THAT APPLY TO ALL SUBSCRIBERS

In addition to the eligibility verification process described in Sections 3.1 through 3.9 of this Appendix all subscribers are subject to the following restrictions as described in the SCEF Program Manual:

# A Subscriber may not receive, or seek to receive, any Connecticut ratepayer-funded incentives or subsidies, including, but not limited to, net metering, virtual net metering, LREC/ZREC contracts, or PA 18-50 tariffs other than those in this Program, associated with the electric load for which there is a Subscription under this Program.<sup>37</sup>

Existing participants in any of Connecticut's ratepayer-funded incentive of subsidy programs, including but not limited to, net metering, virtual net metering, LREC/ZREC contracts or PA 18-50 tariffs will not be considered for opt-out subscriptions. Customers that participated in one of these programs but who are generally eligible for the SCEF program must have load that is not associated with a ratepayer-funded incentive or subsidy program to qualify for a SCEF subscription. These customers must apply to the SCEF program using the Subscriber Enrollment Form to receive a SCEF subscription for any excess load not covered by the existing generation system. Excess load will be verified based on the customer's billing data and this data will be used as the basis for calculating the customer's SCEF subscription.

<sup>&</sup>lt;sup>37</sup> Decision, December 18, 2019 Exhibit B - Modified Program Requirements, Section 6 page 13.

## 4 APPENDIX E: CUSTOMER ENROLLMENT

## 4.1 ENROLLMENT PROCESS: OPT-OUT CUSTOMER CATEGORIES

The SCEF Program Manual dictates the percentage of SCEF subscriptions must be enrolled through an EDC-administered identification and enrollment process. According to the Program Manual, for SCEFs procured in Program Years 1-4 80% of each SCEF's capacity must be subscribed using the structure in Table 4-1 below.

Table 4-1. ELIGIBLE OPT-OUT CUSTOMER CATEGORIES AND SCEF PERCENTAGE ALLOCATIONS

Subscriber Category	SCEF Output Allocation Percentage
Low-Income Customers	20%
Small Business Customers	20%
Low-and Moderate-Income Customers, Low-Income Service Organizations, Affordable Housing Landlords, Entities and Facilities	40%

For SCEFs procured in Program Year 5 or later, 90% of each SCEF's capacity must be subscribed using the structure in Table 4-2 below.

Table 4-2. ELIGIBLE OPT-OUT CUSTOMER CATEGORIES AND SCEF PERCENTAGE ALLOCATIONS

Subscriber Category	SCEF Output Allocation Percentage
Low-Income Customers	50%
Small Business Customers	20%
Low-and Moderate-Income Customers, Low-Income Service Organizations, Affordable Housing Landlords, Entities and Facilities	20%

The method of opt-out customer enrollment in each SCEF depends on whether the SCEF is sited on a landfill or brownfield, or in a Distressed Municipality.<sup>38</sup>

<sup>&</sup>lt;sup>38</sup> <u>https://portal.ct.gov/DECD/Content/About\_DECD/Research-and-</u>

Publications/02 Review Publications/Distressed-Municipalities

## OPT-OUT CUSTOMER ENROLLMENT FOR SCEFS NOT SITED ON A LANDFILL OR BROWNFIELD OR IN A DISTRESSED MUNICIPALITY

If the SCEF is not sited on a landfill or brownfield, or located in a Distressed Municipality the EDCs will segment all eligible customers regardless of their location into cohorts based on indicators of economic vulnerability. <sup>39</sup> Customers in these cohorts will be prioritized for a SCEF subscription during the enrollment process.

The EDCs will enroll customers in these cohorts until all SCEF capacity is allocated. If additional capacity is available after all cohort customers were enrolled, the EDCs will enroll eligible customers outside of the cohort.

The cohorts are based on indicators of economic vulnerability and are defined for each customer class in Table 4-3.

#### Table 4-3. PRIORITIZATION COHORTS BASED ON INDICATORS OF ECONOMIC VULNERABILITY FOR PROJECTS NOT ON LANDFILLS OR BROWNFIELDS, OR IN A DISTRESSED MUNICIPALITY

Customer Category	Opt-Out Prioritization Cohort	Reason for Prioritization
Income-Qualified Low-Income Customers	<ul> <li>New Start/ Bill Forgiveness Program participants<sup>40</sup></li> <li>Customers located in Environmental Justice Communities<sup>41</sup></li> </ul>	<ul> <li>Customers in New Start/ Bill Forgiveness Program may not receive CEAP benefits and therefore receive lower total benefits than Low-Income Customers in other arrearage assistance programs</li> <li>Customers in EJCs may experience geographic hardship</li> </ul>
Moderate-Income Customers	Customer is in an Environmental Justice Community	<ul> <li>Customers in EJCs may experience geographic hardship</li> </ul>
Low-Income Service Organizations	<ul> <li>Customer is in an Environmental Justice Community</li> </ul>	<ul> <li>Arrearage indicates customer has trouble paying bill</li> <li>Customers in EJCs may experience geographic hardship</li> </ul>

<sup>&</sup>lt;sup>39</sup> These indicators may differ based on available customer data, customer type and program eligibility.

<sup>&</sup>lt;sup>40</sup> Programs provide Matching Payment or Arrearage Forgiveness to Customers with incomes below 60% of SMI who have a past due balances greater than \$100 that is more than 60 days past due, and who are not receiving CEAP benefits. <u>Eversource New Start, UI Bill Forgiveness Program</u>

<sup>&</sup>lt;sup>41</sup> Environmental Justice Community means (A) a United States census block group, as determined in accordance with the most recent United States census, for which thirty per cent or more of the population consists of low-income persons who are not institutionalized and have an income below two hundred per cent of the federal poverty level, or (B) a distressed municipality, as defined in subsection (b) of section 32-9p.

Affordable Housing Facility Landlords, Entities and Facilities	<ul> <li>Customer has an arrearage balance</li> <li>Facility meets criteria for a Tier I or Tier II affordable housing facility, and</li> <li>The facility is located in an environmental justice community<sup>42</sup> ("EJC"), or</li> <li>The facility is mastermetered</li> <li>In addition to these</li> </ul>	<ul> <li>Tier I and Tier II properties that are on lists publicly available through the RRES program can be pre-identified by the EDCs for Opt-Out enrollment</li> <li>Affordable housing facilities in EJCs may experience geographic hardship</li> <li>Providing a weighting for properties that undergo energy efficiency improvements may result in secondary benefits for tenants</li> <li>Prioritizing housing facilities that cannot install onsite solar through the RRES Program meets the SCEE program objective of increasing access to</li> </ul>
	<ul> <li>community<sup>42</sup> ("EJC"), or</li> <li>The facility is master- metered</li> </ul>	<ul> <li>energy efficiency improvements may result in secondary benefits for tenants</li> <li>Prioritizing housing facilities that cannot install on-</li> </ul>

<sup>&</sup>lt;sup>42</sup> Environmental Justice Community means (A) a United States census block group, as determined in accordance with the most recent United States census, for which thirty per cent or more of the population consists of low-income persons who are not institutionalized and have an income below two hundred per cent of the federal poverty level, or (B) a distressed municipality, as defined in subsection (b) of section 32-9p.

<sup>&</sup>lt;sup>43</sup> The exact weighting applied to each qualifying customer may vary depending on how many customers overall are in the prioritized cohort, and how many affordable housing facilities qualify for the weighting. The weighting will seek to increase the odds of qualifying facilities receiving a SCEF subscription to 10%.

	<ul> <li>The affordable housing facility is unable to install on-site solar<sup>44</sup></li> </ul>	
Small Businesses	<ul> <li>Customer is in an Environmental Justice Community</li> </ul>	<ul> <li>Customers in EJCs may experience geographic hardship</li> </ul>

#### OPT-OUT CUSTOMER ENROLLMENT FOR SCEFS SITED ON A LANDFILL OR BROWNFIELD OR IN A DISTRESSED MUNICIPALITY

If a SCEF is sited on a landfill or brownfield, or in a Distressed Municipality the EDCs will provide a geographic preference during enrollment. As a result of the geographic preference, the EDCs will enroll all eligible customers within the municipality where the SCEF is sited ("SCEF Host Municipality") before customers outside of the SCEF Host Municipality. If there are more eligible customers in the SCEF Host Municipality than the SCEF can serve, the EDCs will segment eligible customers into the cohorts listed in Table 4-3. The EDCs will enroll customers that meet the cohort criteria and reside in the SCEF Host Municipality. If additional SCEF capacity exists after all eligible customers in a SCEF Host Municipality are enrolled, the EDCs will expand the selection process to eligible cohort customers outside of the SCEF Host Municipality.

## 4.1.1.1 CUSTOMER ENROLLMENT PROCESS STEPS

Below are the process steps for enrolling customers in the Opt-Out SCEF Enrollment Categories. Each of these processes is initiated 30 days before a new SCEF project enters service. Table 4-4 provides the process steps for the Low-Income Opt-out category. Table 4-5 provides the process steps for the Low-Moderate Income Opt-Out category while Table 4-6 provides the process for the Small Business category.

Step No.	PROCESS STEP
1	Generate quarterly list of eligible Low-Income Customers
2 Create cohorts of customers based on indicators of economic vulnerability	
PROCESS STEPS FOR SCEFS SITED ON A LANDFILL OR BROWNFIELD OR IN A DISTRESSED MUNICIPALITY	

Table 4-4. PROCESS STEPS FOR OPT-OUT LOW-INCOME CUSTOMER CATEGORY
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<sup>&</sup>lt;sup>44</sup> To qualify for a weighting as a property that cannot install on-site solar the landlord or entity responsible for the affordable housing facility will need to complete a Subscriber Enrollment Form and provide a Non-Feasible Solar Self-Attestation Form attesting to the fact that the property is not capable of hosting on-site solar.

А	Allocate subscriptions to all eligible Low-Income Customers in SCEF Host Municipality
A.1	If there are more eligible customers in the SCEF Host Municipality than available SCEF
	subscriptions, allocate low-income SCEF subscriptions amongst cohort until the desired
	percentage of the SCEF estimated annual output is subscribed. If there are more eligible
	customers in a cohort than available SCEF subscriptions, use a lottery to select customers
	If capacity remains after all customers in cohort are selected, allocate subscriptions to
	eligible customers outside of cohort but inside SCEF Host Municipality until the desired
A.2	percentage of the SCEF estimated annual output is subscribed. If there are more eligible
	customers in the Host Municipality than remaining SCEF subscriptions, use a lottery to
	select customers.
	If capacity remains after all eligible customers in SCEF Host Municipality are selected,
	allocate subscriptions to eligible customers in the cohort anywhere in EDC territory until
A.3	the desired percentage of the SCEF estimated annual output is subscribed. If there are
	more eligible customers than available SCEF subscriptions, use a lottery to select
	customers
PROC	ESS STEPS FOR SCEFS NOT SITED ON A LANDFILL OR BROWNFIELD OR IN A DISTRESSED
	MUNICIPALITY
В	Allocate subscriptions to all eligible Low-Income Customers in cohort until the desired
	percentage of the SCEF estimated annual output is subscribed. <sup>45</sup> If there are more eligible
	customers in a cohort than available SCEF subscriptions, use a lottery to select customer
	If capacity remains after all eligible customers in cohort are selected, allocate
<b>P</b> 1	If capacity remains after all eligible customers in cohort are selected, allocate subscriptions to eligible customers outside of cohort until the desired percentage of the
B.1	

#### Table 4-5. PROCESS STEPS FOR LOW-TO-MODERATE INCOME OPT-OUT CUSTOMER CATEGORY

Step No.	PROCESS STEP
1	Remove Customers who were allocated a Subscription from the Low-Income Customer list
2	Append quarterly list of eligible Moderate-Income Customers, Low-Income Service Organizations (LISOs) and Affordable Housing Facilities
3	Create cohorts of customers based on selected indicators of economic vulnerability. Apply weighting to eligible Affordable Housing Facilities
PROCESS STEPS FOR SCEFS SITED ON A LANDFILL OR BROWNFIELD OR IN A DISTRESSED MUNICIPALITY	

<sup>&</sup>lt;sup>45</sup> Note that, due the inability to exactly match customer load with SCEF project capacity thresholds, the EDCs will allocate slightly more customer load to each opt-out category in order to meet minimum program participation thresholds.

Α	Allocate subscriptions to all eligible customers in SCEF Host Municipality
A.1	If there are more eligible customers in the SCEF Host Municipality than available SCEF
	subscriptions allocate subscriptions amongst cohorts until the desired percentage of the SCEF
	estimated annual output is subscribed. If there are more eligible customers in the cohorts
	than available SCEF subscriptions, use a lottery to select customers
	If capacity remains after all customers in cohorts are selected, allocate subscriptions to
	eligible customers outside of the cohorts but inside SCEF Host Municipality until the desired
A.2	percentage of the SCEF estimated annual output is subscribed. If there are more eligible
	customers in the Host Municipality than remaining SCEF subscriptions, use a lottery to select
	customers.
	If capacity remains after all eligible customers in SCEF Host Municipality are selected, allocate
A.3	subscriptions to eligible customers in cohorts anywhere in EDC territory until the desired
A.5	percentage of the SCEF estimated annual output is subscribed. If there are more eligible
	customers than available SCEF subscriptions, use a lottery to select customers
PR	OCESS STEPS FOR SCEFS NOT SITED ON A LANDFILL OR BROWNFIELD OR IN A DISTRESSED
	MUNICIPALITY
В	Allocate subscriptions to all eligible Customers in cohorts until the desired percentage of the
	SCEF estimated annual output is subscribed. <sup>46</sup> If there are more eligible customers in the
	cohorts than available SCEF subscriptions, use a lottery to select customers
	If capacity remains after all eligible customers in the cohorts are selected, allocate
B.1	subscriptions to eligible customers outside of cohorts until the desired percentage of the SCEF
0.1	estimated annual output is subscribed. If there are more eligible customers than available
	SCEF subscriptions, use a lottery to select customers

#### Table 4-6. PROCESS STEPS FOR SMALL BUSINESS OPT-OUT CUSTOMER CATEGORY

Step No.	PROCESS STEP	
1	Generate quarterly list of Small Business Customers	
2	Create cohort of customers based on selected indicators of economic vulnerability	
PROCESS STEPS FOR SCEFS SITED ON A LANDFILL OR BROWNFIELD		

<sup>&</sup>lt;sup>46</sup> Note that, due the inability to exactly match customer load with SCEF project capacity thresholds, the EDCs will allocate slightly more customer load to each opt-out category in order to meet minimum program participation thresholds.

Α	Allocate subscriptions to all eligible Small Business Customers in SCEF Host Municipality
A.1	If there are more eligible customers in the SCEF Host Municipality than available SCEF
	subscriptions allocate small business SCEF subscriptions amongst cohort until the desired
	percentage of the SCEF estimated annual output is subscribed. If there are more eligible
	customers in the cohorts than available SCEF subscriptions, use a lottery to select customers
	If capacity remains after all eligible customers in cohort are selected, allocate subscriptions to
	eligible customers outside of cohort but inside SCEF Host Municipality until the desired
A.2	percentage of the SCEF estimated annual output is subscribed. If there are more eligible
	customers in the Host Municipality than remaining SCEF subscriptions, use a lottery to select
	customers
	If capacity remains after all eligible customers in SCEF Host Municipality are selected, allocate
A.3	subscriptions to customers in cohort anywhere in EDC territory until the desired percentage
A.3	of the SCEF estimated annual output is subscribed. If there are more eligible customers in the
	cohorts than available SCEF subscriptions, use a lottery to select customers
PR	OCESS STEPS FOR SCEFS NOT SITED ON A LANDFILL OR BROWNFIELD OR IN A DISTRESSED
	MUNICIPALITY
В	Allocate subscriptions to all eligible Small Business Customers in cohort until the desired
	percentage of the SCEF estimated annual output is subscribed. <sup>47</sup> If there are more eligible
	customers in the cohort than available SCEF subscriptions, use a lottery to select customers
	If capacity remains after all eligible customers in cohort are selected, allocate subscriptions to
B.1	Small Business Customers outside of cohort until the desired percentage of the SCEF
D.1	estimated annual output is subscribed. If there are more eligible customers than available
	SCEF subscriptions, use a lottery to select customers

# 4.1 ENROLLMENT PROCESS: OPT-IN CUSTOMER CATEGORY (VOLUNTARY ENROLLMENT)

All opt-in SCEF subscriptions will be allocated via a random selection process. All customers that submit a Subscriber Enrollment Form and meet the qualifications of the SCEF program will be considered for a voluntary enrollment subscription.

Table A 7 DROCESS STERS FOR	20% VOLUNTARY ENROLLMENT	CUSTONAED CATECODY
TUDIE 4-7. FROCESS STEPS FOR	20% VOLONTANT LINNOLLIVILINT	COSTONER CATEGORI

Step No.	PROCES STEP
1	Customers complete a Subscriber Enrollment Form

<sup>&</sup>lt;sup>47</sup> Note that, due the inability to exactly match customer load with SCEF project capacity thresholds, the EDCs will allocate slightly more customer load to each opt-out category in order to meet minimum program participation thresholds.

2	Generate quarterly list of customers who completed a Subscriber Enrollment Form and whose eligibility was verified for voluntary enrollment <sup>48</sup>
3	Conduct a lottery to allocate any remaining SCEF capacity after the opt-out enrollment process is fully subscribed

## 4.2 SUBSCRIBER COMMUNICATIONS

The EDCs will send the following communications to customers as part of the enrollment process.

## 4.2.1 SUBSCRIBER NOTIFICATION OF ENROLLMENT

Once all customer selection processes are complete and a SCEF facility is fully subscribed, the EDC will notify enrolled subscribers that they have been selected to receive a subscription. Customers for whom the EDCs have an e-mail address and have not opted-out of electronic communications will receive an e-mail notifying them they have been selected to receive a SCEF subscription. This e-mail will contain the SCEF subscriber's Subscription Summary Contract. These customers will also receive a paper letter in the mail to their service address notifying them of their subscription. This letter will include a paper copy of the customer's Subscription Summary Contract.

Customers for whom the EDCs do not have e-mail addresses or who have opted-out of electronic communications will receive a paper letter in the mail to their service address notifying them of their subscription. This letter will include a paper copy of the customer's Subscription Summary Contract.

## 4.2.2 SUBSCRIBER OPT-OUT PROCESS

Customers will have the option to opt-out of the Program by calling their EDC. The phone number for customers to opt-out of a subscription is included in both their e-mail and paper letter notification, as well as in their Subscription Summary Contract.

Customers have three days from receipt of the paper copy of their Subscription Summary Contract to optout of their subscription. If a customer does not opt-out of their SCEF subscription within 3 days, they are considered enrolled in the program. Once a customer is fully enrolled in the SCEF Program they have the option to terminate their subscription at any time, without penalty.

## 4.2.3 ONGOING COMMUNICATIONS

One year from enrollment in their SCEF subscription and annually thereafter Subscribers will receive an email or letter, depending on their preferred communication method, reminding them of their SCEF subscription, benefit amount and how they can terminate their subscription if they so choose. This communication includes information about the project they are enrolled how to maintain their

<sup>&</sup>lt;sup>48</sup> Note customers that apply to the SCEF program through the subscriber enrollment form and are identified as eligible for an opt-out subscription will be considered for a SCEF subscription in both the opt-out and opt-in enrollment processes.

subscription if they move, and how to cancel their subscription if they no longer wish to participate in the program.

# 4.3 REALLOCATION OF OPT-OUT SUBSCRIPTIONS AND SUBSCRIPTION TERMINATIONS

If a customer selected for a SCEF subscription chooses to opt-out of their subscription, or terminates their subscription at any time, their subscription will be re-allocated. For customers that opt-out of their subscription at the time of initial selection the EDCs will re-run the enrollment process for that specific customer category to identify a new subscriber. The new subscriber will be allocated a subscription for the entire 20-year term of the tariff.

For customers that terminate their subscription at some point during their 20-year tariff the EDCs will rererun the enrollment process annually for that specific customer category to identify a new subscriber. The new subscriber will be allocated a subscription for the remaining term of the SCEF's operating period.<sup>49</sup>

<sup>&</sup>lt;sup>49</sup> Subscription re-allocation ensures that 80% of each SCEF's annual output is continuously subscribed as required in the Program Manual. However, as a result some Subscribers will receive a SCEF subscription term that is shorter than 20 years.

## 5 APPENDIX F: CUSTOMER ENGAGEMENT

This appendix details the customer engagement activities the EDCs will conduct as part of the SCEF program.

## 5.1 PROGRAM MATERIALS

The following sections describe program materials available as part of the SCEF Program. These include the Subscriber Enrollment Form, program collateral, a Non-Feasible Solar Self-Attestation Form and website content.

## 5.1.1 SUBSCRIBER ENROLLMENT FORM ("SEF")

Customers who wish to apply to the SCEF program for an opt-in subscription must complete a Subscriber Enrollment Form ("SEF"). The SEF is available as a fillable printable PDF as well as an online application. Customers that complete an SEF may also be required to submit supporting documentation to verify their eligibility for the SCEF program.

Customers that choose to apply to the program using the printable PDF must mail their supporting documentation to the applicable EDC. Eversource customers that choose the online application are sent a link to securely upload the required documentation. UI customers that apply online must submit their documentation by mail, fax or will be provided a secure link via email.

Customers may access the Subscriber Enrollment Form on the following websites: <u>www.eversource.com/SCEF</u> and <u>www.uinet.com/sharedcleanenergycredit</u>

Paper copies of the SEF are also available at local Community Action Agencies.

## 5.1.2 ONE-PAGE EDUCATIONAL PROGRAM COLLATERAL

A one-page educational program document ("one-pager') is available for customers and partner organizations to learn about and promote the SCEF Program. The one pager provides an overview of the SCEF program, the potential value of the bill credit for subscribers, the bill credit structure and eligibility requirements, information about how customers are notified if they are selected for a subscription and where customers can find additional information about the program. This document is available in both English and Spanish and may be translated into other languages in the future.

The EDCs will provide paper copies of the one-pager to Community Action Agencies and Operation Fuel. It is also provided in digital form to the entities and to solar developers. Customers can view a PDF of the one-pager online at the following websites:

www.eversource.com/SCEF and www.uinet.com/sharedcleanenergycredit

## 5.1.3 NON-FEASIBLE SOLAR SELF-ATTESTATION FORM

A non-feasible solar form is available for customers that wish to qualify for a SCEF subscription as a customer who cannot install on-site solar. This form must be completed the Electric Account Holder and include the reason property is not suitable for solar.

Customers must provide this in addition to the SEF as proof that their property is not suitable for solar.

## 5.1.4 WELCOME PACKAGES

Each customer enrolled in the SCEF program will receive a "Welcome Package" consisting of electronic and paper notifications informing them that have been selected for a SCEF subscription. These packages contain a letter welcoming the customer to the SCEF Program, the Subscriber's Summary Contract and the Program Terms and Conditions, as well as direction for the customer to visit the respective EDC website for additional information including the Subscriber Rider.

## 5.1.5 **CONTENT ON EDC WEBSITES**

Each EDC has a landing page within each of their respective websites that contains information about the SCEF Program. Information on the website is targeted for current and prospective SCEF subscribers and includes:

- General information about the SCEF Program,
- The potential SCEF bill credit and benefit/value to customers,
- How customers can qualify for a SCEF subscription and information on the customer enrollment process,
- Access to the online Subscriber Enrollment Form (online form and fillable PDF),
- Subscriber Information (SCEF Rider and Subscriber Terms and Conditions)
- Information for solar developers and partners (one-pager and the Non-Feasible Solar Self-Attestation Customer Form)

## 5.1.6 CUSTOMER CARE/CALL CENTER TRAININGS

The EDCs Customer Care/Call Center representatives are trained to provide basic information to customers about the SCEF Program, the SCEF bill credit and benefit to customers, how customers can be qualified and potentially enrolled in the program and how subscribers can terminate their subscription or transfer their subscription to a new service account in the event of a move. More complex SCEF questions will be directed to the SCEF program team.

## 5.2 SUBSCRIBER AWARENESS OUTREACH CAMPAIGNS

The following section summarizes the outreach campaigns the EDCs will implement to ensure the SCEF program is fully subscribed.

## 5.2.1 OPT-OUT SUBSCRIBER AWARENESS CAMPAIGN

The EDCs will run basic awareness campaigns for eligible SCEF customers by including educational content about SCEF within materials and communications promoting other utility programs and services. Additionally, the campaigns will include information to mitigate potential consumer protection concerns related to an opt-out program structure. The campaigns may include information about SCEF in promotional emails, postcards and/or webinars<sup>50</sup> sent to eligible customer classes to introduce the SCEF Program, its benefits and how a customer may be enrolled in the program. The EDCs will primarily leverage electronic communications to customers whenever feasible for these awareness campaigns to minimize administrative and marketing costs. The EDCs will periodically evaluate the effectiveness of these campaigns and will adjust tactics and mediums as necessary.

#### 5.2.2 OPT-IN SUBSCRIBER AWARENESS CAMPAIGNS

In addition to the subscriber awareness campaigns for the opt-out eligible customer categories, the EDCs will implement awareness campaigns for customers eligible for a voluntary enrollment SCEF subscription.

The EDCs will focus most of the initial outreach to opt-in subscribers in the three-month period before the first SCEF's estimated in-service date. These campaigns will target customers that are identified in the EDCs databases as potential voluntary enrollment customers or solar developers. The EDCs will host at minimum two (2) informational webinars, one targeted at state, municipal and commercial customers and a second for solar developers. Each webinar will inform attendees on how they may complete a Subscriber Enrollment Form for a voluntary enrollment SCEF subscription.<sup>51</sup>

The goal of the initial campaigns will be to receive and verify a target number of opt-in SCEF applications.<sup>52</sup> Eligible applicants will be put on a waitlist for enrollment. If the initial target number of applications is not achieved, the EDCs will conduct additional opt-in subscriber campaigns following the initial campaigns until the application goal is reached. Once the application goal is achieved, the EDCs will only conduct additional outreach if number of customers on the waitlist falls below a certain number of applicants or at the request of stakeholders.

## 5.3 ENGAGEMENT THROUGH PARTNER ORGANIZATIONS

## 5.3.1 COMMUNITY ACTION AGENCY ("CAA") ENGAGEMENT

Community Action Agencies will be provided with copies of the SCEF one-pager and Subscriber Enrollment Form to provide to their clients. These materials may be used to educate customers about the SCEF Program and share information with customers on how they could be considered for program enrollment. Customers who are not eligible for energy assistance through the CAA would be directed to complete a SEF through Operation Fuel or their EDC to be income-verified and considered for a SCEF subscription. Depending on the willingness of the CAA and their capacity, some CAAs may also assist customers in completing the SEF.

<sup>&</sup>lt;sup>50</sup> Materials and tactics used for each campaign may be determined individually by each EDC.

<sup>&</sup>lt;sup>51</sup> Webinars will be posted online and be made available to customers on an ongoing basis.

<sup>&</sup>lt;sup>52</sup> The EDCs will initially target 500 Opt-In SCEF applicants, and only conduct additional outreach if the number of applicants on the waitlist falls below 200. This is an initial estimate of the number of opt-in subscriptions the EDCs will have available, the EDCs may revise this target based on the total available opt-in subscriptions for the SCEFs that enter service.

## 5.3.2 **OPERATION FUEL ENGAGEMENT**

The EDCs contract with Operation Fuel to provide income verification services to identify moderateincome customers whose incomes are within the income limits of the SCEF program. Operation Fuel will income verify customers who have not qualified for utility program assistance but may be eligible for the SCEF Program as a Moderate-Income Customer. This engagement process is consistent with the proposed processes in Section 2.1.1 for Customer Identification in *Appendix C* and will allow the EDCs capture moderate-income customers for enrollment in the SCEF program.

## 5.3.3 CAA AND OPERATION FUEL TRAININGS

The EDCs will provide the CAAs and Operation Fuel with resources and training on the SCEF program. The trainings with the CAAs are provided as part of the EDCs' annual income-eligible energy program trainings which typically occur prior to the start of the winter moratorium. In addition, the SCEF Program managers for each EDC are available to answer any questions the CAAs have about the SCEF Program at any point, outside of regularly scheduled trainings.

The trainings between the EDCs, Operation Fuel and Operation Fuel's fuel banks will occur bi-annually at minimum. Additional trainings will be provided if requested by fuel banks in Operation Fuel's network.

Support resources for partner organizations include the educational one-page program collateral and income guidelines for organizations performing direct income verification for the SCEF Program outside of existing program thresholds. For organizations that intend to direct customers to their respective EDC for income verification, they are provided with information to share with clients on how to contact the EDC and complete the application process.

## 5.3.4 LOW-INCOME SERVICE ORGANIZATIONS

The EDCs works with the United Way to identify lists of eligible LISOs. The EDCs may hold webinars to increase LISO awareness of the SCEF Program and will coordinate with the United Way and Connecticut Non-profit Alliance to promote these webinars. The EDCs also present information on the SCEF Program to the Low-Income Energy Advisory Board. Attendees at webinars are directed to the EDCs to confirm whether they are on a list of pre-identified, eligible, LISOs or whether they would need to complete a SEF to become added to the EDC's qualified LISO lists.

## 5.3.5 SOLAR DEVELOPERS

The EDCs hold training sessions with residential solar developers to educate them about the SCEF Program and opportunities for non-feasible solar customers. The EDCs have extensive lists of solar developers that are active in Connecticut through the Residential Renewable Energy Solutions program. These lists are used to inform developers about the SCEF Program and to recruit developers for on-line SCEF trainings. Trainings include information about the SCEF Program, how bill credits are calculated, and how solar developers can educate the customer on how to complete the SEF. The EDCs also provide solar developers with the educational one-page program collateral to share with non-feasible solar customers.