

January 8, 2016

Lisa A. Skumatz, Ph.D.
Skumatz Economic Research Associates (SERA)
762 Eldorado Drive
Superior, CO 80027

RE: Multifamily Initiative Process Evaluation (R157)

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit this written response with regard to a draft evaluation report: *Multifamily Initiative Process Evaluation* (“Report”), December 17, 2015, NMR Group, Inc. (“Evaluator”). Eversource received the Report with a request to provide comments. The purpose of the Report was to provide actionable recommendations about how to improve the design, delivery and administration of the multifamily initiative.

Eversource understands the challenges of serving the multifamily market: it involves many different types of housing types (dormitories, group homes, high rise, etc.), market actors, barriers, and a diverse array of measures. To that point, the multifamily initiative has been re-focused to provide a number of enhancements including a more streamlined process, access to financing, contractor training, and improved quality assurance¹.

Eversource is pleased that this report and recommendations are in lockstep with current program design improvements that have either already been implemented and/or are currently being developed for 2016. Therefore, Eversource generally agrees with the findings. However, there are a few clarifications to the Report that Eversource would like to provide.

- ***The MF Initiative is designed to provide a customized approach to serving multifamily property owners and managers. (Report, page 7)***

The individual tenants/customers are missing from this statement. Tenants are the primary focus in the income eligible market.

- ***As a result, the MF Initiative leverages measures from residential retrofit programs—Home Energy Solutions (HES) and Home Energy Solutions-Income Eligible (HES-IE)—for in-unit measures, and additionally coordinates with commercial programs such as C&I Retrofit and Small Business Energy Advantage to address common-area measures. (Report, page 7)***

¹ For additional information on the Multifamily Initiative and recent enhancements, Refer to the *2016-2018 Electric and Natural Gas Conservation and Load Management Plan*, October 1, 2015.

The last part of this statement is not universally true. Eversource coordinates when the common area is on a commercial revenue code, but the vast majority of properties are on a residential revenue code where we apply commercial program savings calculations and residential program funding guidelines. For example, common area lighting savings is calculated using C&I savings methodology but HES-IE funding and the HES-IE incentive rules are applied

Because the MF Initiative is not currently promoted as an offering separate from the HES and HES-IE programs, which are explained in more detail later, and evaluation participants specifically referenced their involvement in the MF Initiative through these programs, this evaluation accordingly reports on their respective experiences with these programs. (Report, page 7)

Eversource treats MF as a segment under the HES and HES-IE programs. There is a dedicated team that works on MF and evaluates both the residential and C&I elements of the project and packages it accordingly for the seamless presentation with a single point of contact for the customer. MF initiative does fall under HES and HES-IE for budgeting purposes.

Eversource appreciates the opportunity to comment on this draft Report.

Sincerely,

Joseph Swift

Joseph Swift
Operations Supervisor, Eversource
Joseph.Swift@Eversource.com
860-665-5692