



July 16, 2020

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

Re: C1635 Impact Evaluation of PY 2016 & 2017 Energy Opportunities (EO) Program

Dear Dr. Skumatz:

The United Illuminating Company (“UI”), Connecticut Natural Gas Corporation (“CNG”) and The Southern Connecticut Gas Company (“SCG”) (collectively the “Companies”), hereby submit the following comments on the “**C1635 Impact Evaluation of PY 2016 & 2017 Energy Opportunities (EO) Program**” (“Draft”) prepared by DNV-GL dated June 30, 2020. The Draft was submitted to the Companies on July 2, 2020, with a request for comments to be provided by July 16, 2020.

The purpose of the study was to understand the extent to which program performance is meeting program and policy goals and objectives and to recommend revisions to the Program Savings Document (PSD) to improve claimed savings estimates moving forward.

In addition to the comments on specific recommendations below, please reference the accompanying document with embedded Companies comments that will require clarification.

The following are the Companies comments on the Draft Report’s recommendations;

Recommendation 2: Revise the PSD to explicitly call for the use of site-specific annual hours of use assumptions when calculating EO lighting energy savings and to use upstream lighting recommended annual hours of use by business type when site-specific assumptions do not exist.

***UIL Response:** Although not specifically stated, the 2020 Upstream lighting program for C&I is now using site specific hours based on Appendix 5 of the 2020 CT PSD.*

Recommendation 3: We recommend the PSD or companies either establish a new protocol to ensure fully populated seasonal summer peak tracking estimates and uses the realization rates in the rightmost column prospectively or use the realization rates in the second column prospectively in the event the rate of unpopulated/zero seasonal summer peak estimates is expected continue in future years.

UIL Response: Some unpopulated/zero Summer peak kW rates are correct depending upon measure and will need to be excluded.

Recommendation 9: Include delta watts assumptions in the PSD by product category so they are consistent with those that are statistically different from those used to calculate tracking savings and retain the delta watts assumptions used to calculate tracking savings for those results that are not statistically different.

UIL Response: We have worked extensively with our vendors and distributors to create an updated product table with multiple categories to use delta watt assumptions that accurately reflect market conditions. These are now included in the 2020 CT PSD.

Please advise whether clarification to anything contained within this document or the comments embedded in the Draft are needed, we will be happy to assist.

We thank you for the opportunity to review and comment on this draft evaluation report.

Sincerely,

Joel M. Kopylec



Supervisor, Conservation & Load Management
UIL Holdings Corporation