



**UIL HOLDINGS CORPORATION**

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157 Church Street, New Haven CT 06510-2100  
203-499-2000

July 31, 2014

Tracy Babbidge, Bureau Chief  
Department of Energy and Environmental Protection  
10 Franklin Square  
New Britain, CT 06051

Mr. Nicholas E. Neeley  
Acting Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

RE: Docket No. 13-03-02 - PURA/BETP Consideration of 2013-2015 Conservation and Load Management Plan - R5: Weatherization Baseline Assessment

Dear Ms. Babbidge & Mr. Neely:

The Energy Efficiency Board filed a third party program research study on June 10, 2014: "R5: Weatherization Baseline Assessment, NMR Group, Inc. (the "Report"). The United Illuminating Company ("UI"), Connecticut Natural Gas Corporation ("CNG") and The Southern Connecticut Gas Company ("SCG," and with UI and CNG, the "Companies"), hereby submit written comments on the final report.

Section 245m(d)(4) of the Connecticut General Statutes (the "Statute") requires that the Department of Energy and Environmental Protection ("DEEP") adopt an independent, comprehensive program evaluation, measurement and verification process to ensure, among other things, that "evaluation results are appropriately and accurately taken into account in program development and implementation." The Companies agree that program evaluation is important in the development and implementation of the programs and participate in the independent evaluation process as outlined in the Statute. The Companies have previously commented on the draft report. The Statute also allows the Companies, at their discretion, to comment on the final Report, this letter being the result. The Companies also participate in any technical sessions called regarding the final Report.

The Companies are dedicated to providing efficient, cost-effective programs and the evaluation process, including the evaluation results and recommendations, is an important component of this. As a result, the program administrators will use the recommendations from the Report, as well as comments of other stakeholders and any technical meeting results to analyze and update the program as necessary. The program administrators work with the Residential Technical consultant and the Residential Committee as necessary to update the program. The program updates are reflected in the Plan or Plan update that is presented and approved by the Energy Efficiency Board prior to the submittal of the Plan to DEEP. The primary objective of this study was to determine what percentage of single-family homes in CT meets the weatherization definition and the secondary



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objectives were to inform on home characteristics. The Companies feels that programmatic recommendations are not appropriate as an outcome from a baseline assessment

Similarly, any results related to the energy or demand savings calculations from the Report are used, along with other resources, within the annual update process for the Program Savings Document (PSD). The PSD is also updated and filed on an annual basis.

The recommendations and results within the Report will be handled and reflected as outlined in the above process and will be reflected in the next Plan or Plan Update the Companies file.

UIL would also like to stress the importance of a performance path for evaluating a whole “house as a system.” All homes are different and have different opportunities and obstacles that impact cost-effectiveness of energy saving measures. The importance of the performance path was also highlighted at a DEEP Technical Hearing held in December of 2012 where comments were solicited about the draft Weatherization standard in general, as well as the use of a prescriptive vs. performance path, or even a hybrid prescriptive and performance based methodology for evaluating homes. In any review of software options for assessing compliance using the performance-based approach, it is important that the cost associated with using the software to assess home performance is considered in any decision since this cost can be a significant barrier.

If you have any questions please do not hesitate to contact Donna Wells at 203 499-2053 or Pat McDonnell at 203 499-2923.

Very truly yours,

A handwritten signature in blue ink that reads "Donna Wells".

Donna Wells  
Manager, Technical Support Services