



**UIL HOLDINGS CORPORATION**

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February 16, 2016

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

Re: R4 HES/HES-IE Process Evaluation and R31 Real Time research

Dear Ms. Skumatz:

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 the following comments on R4 HES/HES-IE Process Evaluation and R31 Real Time research Drafts, dated January 29, 2015 with a request to provide comments by February 16, 2016.

We note that the date listed on the first page of the report is incorrectly listed as 2015 when it should be 2016.

The Companies feels that the evaluation vendor NMR Group, Inc. has presented draft reports that generally meets the stated goals but also does not reflect the state of the programs as of the end of 2015.

- To provide an assessments of HES and HES-IE processes, short-term persistence, net-to-gross analysis (NTG), non-energy impacts (NEIs), health and safety, contractor development, and database and document quality
- To provide an assessment of the effectiveness of performing participant surveys addressing program processes and decision making in a timeframe closer to their dates of participation.
- To provide two additional projects leveraged with R4 and R31: the R46 Project, which examined decision making and financing, and the R152 Project, which assessed the impact of the Connecticut Clean Energy Communities (CCEC) program on HES participation and deeper-measure uptake.

The Companies also want to express our need for timeliness of Evaluation results. This evaluation study was initiated back in 2012, with the Scope of work updated in December 2013. It then took two plus years to get this draft report completed. In the two year plus time period many enhancements and improvements have been implemented for both the HES and HES-IE



programs and data input and tracking. However these enhancements have not been noted in the revised draft. This lack of recognition of the program enhancements made throughout 2014 and 2015 leaves many of the comments and recommendations somewhat out of date at this point in time. Many of these enhancements are noted throughout the Companies comments below.

Given the scope and cost of these combined evaluations the Companies are disappointed that the revised draft does not incorporate most of the program changes and enhancements that have been incorporated in 2014 and 2015. By not incorporating these enhancements many of the comments and recommendations are somewhat mute at this point. As a result the number of actionable items in the revised draft is limited. An outside party reading this revised draft might be misled to think that both the HES and HES-IE programs are in need of significant updating.

Before providing our comments on the specific finding and recommendation the Companies suggest the following changes (**highlighted below**) be made to the overall program descriptions in the Executive Summary on page I.

- **Home Energy Solutions** is the “flagship” program funded by the Connecticut Energy Efficiency Fund (CEEF). Program vendors perform energy assessments of single-family and multifamily residences, providing “core services” measures such as efficient light bulbs, faucet aerators, showerheads, air sealing, and duct sealing for a **nominal fee (currently \$99)**. Vendors provide recommendations to participants on Tier II measures they could adopt to achieve deeper energy savings. These measures are usually eligible for rebates, zero- or low-interest program financing, or both.
- **Home Energy Solutions – Income Eligible** shares many characteristics with HES, but services are limited to low-income households. Participating households receive the same core services as in HES **without a copay**, but Tier II measures are generally provided for free to owner-occupants, although landlords **maybe subject** to co-pays. The list of Tier II measures differs somewhat between HES and HES-IE (e.g., HES-IE does not include central air conditioning), and HES-IE participants may simultaneously receive services from the Department of Energy’s Weatherization Assistance Program.



The report provides a variety of conclusions and recommendations. These support actions the Companies are already taking. The Companies specific comments for the Conclusions and Recommendations are as follows:

## **Overarching Conclusion and Recommendations**

### **Data collection and management.**

- **Recommendation 1:** The evaluation recommends that the Companies work closely with the program implementers and vendors to ensure that program data is entered into the tracking database correctly. Institute quality assurance/quality control procedures to verify the accuracy of data entry.

Unlike many other states that run similar programs, the Companies are the program implementers, and as program implementers, work directly with vendors to ensure to the maximum extent practicable that all data entered is accurate. This includes one of the most robust QA/QC programs in the country currently featured on DOE's Better Buildings webinar series, since it was identified as a best practice QA/QC model during a site visit by DOE in 2015.

The Company's tracking systems capture the necessary data to validate appliances and equipment assessed through the programs including manufacturer, model, type, volume, energy consumption, age, etc. Vendors are required to enter detailed information into these fields to receive authorization to proceed with appliance/equipment upgrades. The Company's rebate fulfillment vendor also performs data verification and validation prior to processing customer rebate applications. This includes reviewing replacement appliances/equipment to ensure incentive eligibility and compliance with program guidelines. Program staff conducts tracking system QA/QC on projects entered into the tracking system. The QA checks are performed monthly as part of the closeout process. The Companies will explore ways to enhance tracking system QA to the extent possible with current resources.

- **Recommendation 2:** It is critical for tracking databases to be developed/organized to account for evaluation aims as well as program implementation. Specifically, if CEEF-funded and non-CEEF-funded measures are installed in program units, it is critical to impact evaluations that the total number and type of measures installed through any funded source be listed. The study recommends working with vendors and community action agencies to develop procedures for listing all measures



installed in units regardless of the funding source in order to improve the accuracy of impact evaluations.

This is an item that has been looked into to better gauge the total impact in customers home. While the Companies appreciate the need to obtain this data, the information would come from third-party sources that are rarely subjected to the same rigorous level of oversight and evaluations as the Companies. Therefore, in order to obtain this data it would require a large investment of ratepayer funding to track non-ratepayer funded sources, which the Companies feels is not a prudent use of the ratepayer funds. The Companies will continue to work with third-party sources to identify cost-effective ways to streamline this tracking.

Currently, the Companies only track measures that are funded through HES-IE program incentives. Other measures installed as part of Weatherization Assistance Program (WAP) projects that are not subsidized by the Companies are not entered into the Companies' tracking system. The Companies may explore modifying its tracking system to capture all measures installed as part of customer energy improvement projects.

## **Program Processes**

### **Participant satisfaction.**

- **Recommendation 3:** Given this information, and the information discussed in the short-term persistence and EUL findings, it may be beneficial to reevaluate the actual materials that vendors are using for quality and utility. See Recommendation 16 below for specific recommendations on lighting.

The Companies uses ENERGY STAR® certified products to the maximum extent possible to ensure quality and energy efficiency. Our QA/QC inspectors check to ensure compliance with this requirement. The replacement bulbs used are meant to replace bulbs based on the equivalent wattage in the existing fixture. While this is not always the customer's desire, the purpose of replacing inefficient lighting is to ensure energy reductions.

In order to increase customer satisfaction and maximize energy savings related to the core services, the Companies continues to shift its offering from CFLs to LEDs. In HES in 2016, the program increased its offering from four to six LEDs at no cost to replace incandescent lamps; and HES IE now installs LEDs in high use sockets. (See response to 16).



In addition, customers are educated about the proper selection and application of energy-efficient lighting to ensure a favorable outcome. Customer education is provided by the HES/HES-IE technician responsible for installing the energy-efficient lighting as well as through the Print-on-Demand (POD) booklet given to the customer during the weatherization visit.

**Program awareness.**

- **Recommendation 4:** Participants themselves suggested that the program increase its advertising. In an effort to leverage vendors' desires to increase their own business revenues, the program may wish to engage nonparticipants through co-op marketing with vendors.

The Companies fully expended its budgets in 2015. It does not make sense to increase marketing to generate demand that exceeds budgetary supply. Beyond Energize Connecticut marketing and advertising, each program sets aside a portion of its budget for marketing and advertising. Marketing strategies and tactics are deployed strategically to ensure that the marketing is cost-effective and assists the program in fully expending its budgets.

The Companies has invested time and resources into building partnerships with municipalities, housing authorities, community groups, social services organizations, retailers, and supply houses as well as other program stakeholders. These partnerships have enabled the Companies to effectively promote the programs throughout its service territory and generate a substantial customer interest. Additional marketing and outreach initiatives are implemented on an as-needed basis depending upon program participation and as budgets allow.

**Program drivers.**



- **Recommendation 5:** Any new advertising should continue emphasizing energy and energy cost savings that the program improvements will create for them and have created for past participants. The messaging could focus on addressing customers' skepticism that there is not a need to make improvements or on their "haven't gotten around to it" attitudes by emphasizing that energy savings should be a priority. It would also be beneficial if the messaging stresses how little the assessments themselves cost, especially when compared to the value of the services provided. Landlords and property managers also suggested that the program promote possible costs/savings associated with program improvements during the solicitation process.

Energy savings have, and continue to be, the emphasis of all program marketing. The Companies also believe that comfort and safety are compelling reasons for customers to take advantage of the program, and try to work these ancillary benefits into program marketing. At the end of every single family visit, customers are provided with estimated savings figures. The "solicitation" process appears to be referring to the multi-family initiative. The multi-family initiative is an open market initiative that does not have specific vendors. Due to this, the Companies have little control over independent contractors' solicitations to landlords and property managers. Once a project is submitted to and approved by Companies, the Companies generate a letter of agreement (LOA) that clearly details the estimated energy savings itemized by measure. The LOA must be approved and executed by the property owner or authorized representative prior to beginning the project.

### **Communication.**

- **Recommendation 6:** The property managers and landlords had insightful suggestions for improving communications that the study considers worthwhile. They suggested creating a single contact for all program-related communications, communicating more clearly about timelines upfront, carrying out more direct communication as opposed to relying on third-party contractors, and clearly conveying what to expect from the technicians. The study suggests that the program address the timing issue by focusing on increasing the speed of rebate processing and communication response time with landlords.



The Companies are in the process of streamlining the Multi Family Initiative. An example of this is the development of a joint Multifamily Initiative Application form that will streamline project intake and result in improved communication between the Companies and applicants. The revised application form will include an overview of the Multifamily Initiative and provide guidance for participating. Additionally, the Companies are revamping the Project Fill-out Form (formerly known as the Vendor Fill-out Form) which is designed to provide the Companies with the necessary information pertaining to the energy improvement project to calculate incentives and prepare LOAs. The revised Project Fill-out Form will include an overview of eligible energy efficiency measures as well as data collection fields designed to ensure the submission of complete, well thought-out energy improvement projects. The submission of incomplete project proposals may cause significant delays in the review and LOA development process. The Companies make every effort to communicate with project owners as to the status of their project proposal as well as the status of funding availability.

For single family (1-4 units) projects, Vendors are required to contact the landlord or homeowner to schedule a HES-IE assessment within 48 hours of receiving a lead from the Companies. For rental units landlord consent is required as part of the application process and must be obtained in order for the project to move forward. Vendors make every effort to schedule HES-IE assessments in a timely fashion as capacity allows. The Companies' require Vendors to update the tracking system after each communication with the customer so that we may regularly monitor scheduling and assign leads to Vendors with the capacity to quickly serve customers.

## **Decision Making and Financing**

### **Program offering information.**

- **Recommendation 7:** Vendors are currently provided with resources to help them understand and explain the program to customers, including language to use when discussing the program offerings. Providing vendors with additional or more detailed talking points and materials to encourage customers to consider add-on improvements may help overcome some of the challenges some end-users have expressed with the quality of information.



The vendor field implementation manual contains sample narratives for each rebate offered through the program. The rebate forms provided to the customer then detail the requirements of the rebate, which the vendors are required to go through with the customer at the time of the visit. We are continually working to make the language on the rebates as customer friendly as possible, while still ensuring compliance with program guidelines. The Companies will continue to find ways to make this process even easier for customers to take advantage of.

- **Recommendation 8:** The program does a good job of providing both print and online materials to support customers. (The website is well-designed and informative, for example.) However, clarifying or offering additional details about program offerings in customer-facing materials and marketing efforts may also help to address customer concerns over information quality.

The Companies tries to promote details about program offerings in all materials to the maximum extent practicable, while trying to avoid overwhelming customers at any given touch point. The Companies will continue to find ways to better inform customers of all program offerings.

### **Program incentive and rebate levels.**

- **Recommendation 9:** Continue offering substantial rebates and financing for insulation because free ridership is low and participants respond positively to them.

The Companies are not proposing to reduce the insulation incentive at this time, however, the CT DEEP has in its compliance items for the 2016-2018 plan asked the Companies to analyze the feasibility of reducing this incentive to shift more cost to the customers. The Companies recognizes the success of this offering and plans to continue to offer at the current levels for eligible customers, unless required to do otherwise.

The Companies continues to support cost-effective energy efficiency measures for HES-IE customers, which includes providing lucrative financial incentives for upgrades in homes that are eligible for additional insulation. Vendors are required to evaluate attic, wall, and basement insulation opportunities in each home and submit proposals directly to the Company for all eligible homes. This continues to be a very successful process and has benefited many HES-IE customers.

- **Recommendation 10:** If cost-effective, consider increases to incentives for other measures, given the success proven with 50% insulation allowance.





The Companies tries to maximize the incentives based on cost-effectiveness for the rebates offered.

Core services are provided to HES-IE customers at no cost. The Companies continues to support additional measures (e.g., windows, appliances, insulation, HVAC, etc.) for HES-IE customers by offering incentives based on cost-effectiveness.

### **Financing materials and processes.**

- **Recommendation 11:** Provide an “everyday language” version of the loan application to accompany “legalese” documents through working with loan providers. Given that a greater percentage of Massachusetts households rated their loan application as easy to fill out (97% versus 43%), the EEB, Companies, and funding agencies may want to review the Massachusetts’ application materials for potential ideas on how to improve applications in Connecticut.

The Companies agrees that financing language should be made easier for customers. The Companies works closely with funding partners, such as the Connecticut Green Bank and CHIF to connect customers with financing sources. While the Companies work closely with the funding partners it is these partners that have the final say on the financial application language. When the language is updated for the loan applications the Companies would be happy to will help distribute them to HES customers. It is important to note here that unlike Massachusetts, where the program administrators are directly involved the development of the Massachusetts Heat Loan Program, in Connecticut the program administrator’s role in the development of the loan materials is very limited.

The HES and HES-IE PODs contain user-friendly tables explaining the financing options available for residential energy improvement projects by the Companies’ various financing partners. Vendors are provided with updates regarding new or changing financing options during quarterly meetings as well as during periodic email communications.

- **Recommendation 12:** Consider expanding on or updating existing materials that provide financing information, such as the vendor-focused Implementation Manual, or the customer-focused Print-on-Demand Booklet used during the wrap-up after the assessment. These documents already include some information and language about financing options that vendors can use, but it may be useful to provide more details or to clarify the messaging.



The Print-on-Demand Booklet (POD) contains user-friendly tables explaining the financing options available for residential energy improvement projects by the Companies' various financing partners. The POD is updated quarterly with input from financing partners (see response to Recommendation 11). The Field Implementation Guide is updated at least annually to adjust for program changes and industry changes. During these update cycles the Companies will explore ways to clarify and provide the most relevant information.

- **Recommendation 13:** Provide vendors with talking points and materials on sales methods to address initial loan rejections from customers.

Vendors don't handle the loan applications or rejections. The Companies believes that this should be addressed by financing sources and not the vendors.

#### **Financing sources vary in nomenclature.**

- **Recommendation 14:** Provide guidance to vendors, website developers, and funding agencies about preferred language to use when referring to financing. Make certain that all websites and materials—vendor, program, and funding agency—use consistent nomenclature. Keep financing option name changes to a minimum, but when changes are necessary update all program materials and websites simultaneous with rolling out the name change. Make certain the vendors and program staff use consistent language, both in informal discussions (this will make the terminology second nature) as well as in written materials, such as the vendor-targeted Implementation Manual.

The Companies agrees that financing language should be made easier for customers to understand and make informed decisions on the various options. The Companies works closely with funding partners, such as the Connecticut Green Bank and CHIF to connect customers with financing sources. The Companies believe that the various funding sources should better align nomenclature to improve customer understanding of the various options.

#### **Short-Term Persistence and EUL**

##### **On-site visits verified high short-term persistence rates on portable measures.**

- **Recommendation 15:** The study finds no evidence to justify downwardly adjusting persistence rates or measure lives for CFLs, LEDs, faucet aerators, showerheads, or



refrigerators in HES-IE multifamily units. The Companies should continue to use current assumptions as listed in the 2015 PSD in Appendix 4 at this time.

### **LEDs persistence exceeds that for CFLs.**

- **Recommendation 16:** Given the increased marginal savings achieved by LEDs over CFLs, the greater tendency for participants to keep program LEDs installed compared to CFLs, and the longer measure life for LEDs, the program should continue its efforts in the 2016 to 2018 program cycle to shift resources from CFLs to LEDs, eventually making LEDs the default standard socket lighting measure for the program. Note that the recent Lamp 2.0 specification released by ENERGY STAR means that no CFLs will be ENERGY STAR qualified as of January 2, 2017. Thus, it is likely that the switchover to LEDs will happen somewhat rapidly.

The Companies continues to shift the offerings in the program from CFLs to LEDs and acknowledges the potential impact of the Lamp 2.0 specification. The program increased its courtesy LED offering in 2016 from 4 lamps to 6 lamps, and plans to offer more in the future. This courtesy offering, however, conflicts with the encouragement of the CT DEEP to continue to shift costs to consumers. An unlimited number of LEDs are offered through the HES program at a subsidized price in conjunction with customer copay.. The program continues to encourage customers to upgrade to more LEDs, instead of CFLs.

In January 2016, the HES-IE program began offering unlimited courtesy LED replacements in high-use sockets as identified in the 2016 Connecticut Program Savings Documentation. Unlimited courtesy CFLs are to be installed in low-use sockets due to cost-effectiveness limitations.

### **Net-to-Gross**

#### **Net-to-gross (NTG) ratios.**

- **Recommendation 17:** The evaluation team suggests that the Companies consider the findings of this study when revising free ridership, spillover, and realization rates in the PSD *for the HES Program*. Some of the confidence intervals are too large to serve as specific values for the PSD. However, they do provide information that could inform future revisions. The evaluation team suggests not using the HES-IE and rebate-only net-to-gross ratios formally because HES-IE programs generally assume a net-to-gross ratio of 1.0, and sample sizes are small among rebate-only respondents.



Before incorporating the proposed Net to Gross Ratios into the CT PSD the Companies would like to better understand the sampling methodology, sample sizes and validity of the CATI sampling. For instance looking at Table 49 we find it difficult to believe that the free ridership rate for prescriptive air sealing (such as a customer buying and installing weather-stripping on their doors ) is the same as customer finding and hiring a vendor to perform blower door driven air sealing on their entire home.

### **Insulation free ridership.**

- **Recommendation 18:** Considering the low free ridership rate and also the enthusiasm among customers for the insulation rebate opportunity that vendors observe, the program will benefit from continuing to offer its generous incentive for this cost-effective measure.

(See response to Recommendation 9).

- **Recommendation 19:** Given the relatively low free ridership rates and higher adoption rates for insulation coupled with the claim by participants that would adopt more measures with deeper incentives, free ridership rates for some measures may actually decrease if the Companies increase incentives. That is, free ridership may be higher at lower incentive amounts, but higher incentive amounts really move people to adopt a measure that they otherwise would not have adopted. This would have the net effect of increasing the cost-effectiveness of higher incentives. Thus, as also stated in Recommendation 10, the Companies should consider increases to incentives or financing allowances for other measures.

(See response to Recommendation 10).

### **Non-Energy Impacts**

#### **Overall NEI values.**

- **Recommendation 20:** The evaluation suggests that the program consider adopting these NEIs as a factor in program impacts estimates.

Use of the suggested NEIs would require policy directive as the current Utility cost Test used for the HES program does not include any non-energy impacts. For HES-IEs Total Resource Cost Test this again would require some input from the appropriate policy makers on inclusion of these additional NEIs.

#### **Perceptions of NEIs.**



- **Recommendation 21:** The divergence between nonparticipants' lower expectations for NEIs and participants' actual experiences with NEIs suggests that greater emphasis on NEIs in program marketing materials may be warranted. Specifically, messaging should focus on the positive impacts on comfort and safety. This may help bring nonparticipants' expectations of NEIs to values closer to those of participants, which could potentially increase participation rates from the same expenditures on outreach, thus reducing program cost per customer sign-up.

Recommendation 5 stated that the Companies should focus on energy savings, this recommendation conversely, states that the Companies should focus on NEIs. As stated in the response to Recommendation 5, energy savings have, and continue to be, the emphasis of all program marketing. The Companies also believe that comfort and safety are compelling reasons for customers to take advantage of the program, and try to work these ancillary NEI benefits into program marketing and customer education.

### Health and Safety

- **Recommendation 22:** This is a challenging barrier to address. Continuing to provide clear and effective health and safety-oriented messaging and support to end-users, landlords, and vendors may help to address these issues over the long term. Communicating with vendors about commonly occurring issues may help to target that messaging and support.

Vendors are extremely familiar with the barriers, as they are prevented from completing weatherization services when barriers are present. The Companies are working closely with the CT DEEP to provide better data to track the prevalence of these barriers and hopefully assist in the state allocating funding to help address these issues.

The Companies works closely with various health and safety partners throughout the state to refer homes with identified health and safety barriers to these organizations for assistance. The HES-IE POD contains important information and resources for customers to access when health and safety issues are identified by the Vendor and the weatherization project is unable to move forward.

### Remediation costs.

- **Recommendation 23:** For both HES and HES-IE participants and landlords/property managers, provide more information on the financing options—including some external to the program—that cover at least part of the costs of



remediating health and safety issues. Consider creative options for financing or assisting with remediation in order to secure deeper energy savings. One idea is to have customers contractually agree to install deeper measures in return for having a portion of the remediation offset through the use of ratepayer funds.

The Companies is prohibited from using ratepayer funds to pay for the remediation of health and safety barriers, as this would require legislative action. The Companies will continue to work with financing partners to create better financing mechanisms to encourage remediation of health and safety barriers.

- **Recommendation 24:** When replacing light bulbs, make certain that the lumens duplicate or exceed the lumens of the bulb being replaced, unless doing so creates additional safety concerns (e.g., the wattage of the new bulb would be too great to use safely in the fixture). This applies to the interior and exterior of all single-family homes and multifamily buildings as well as common areas in multifamily buildings.

The Companies currently directs vendors to replace bulbs with “like” bulbs, based on the wattage equivalents. The Companies agrees that lumens are the best indicator of proper equivalency to replace the existing bulb, and will look into this strategy in the future.

## Connecticut Contractor Development

### Indicators of effects.

- **Recommendation 25:** Given these positive indicators that the program has had a positive effect on the development of contractors in the state from the perspective of vendors, the EEB may wish to conduct a larger study to quantify the extent of program market effects. A study along these lines would generally involve interviews or surveys with product distributors/ suppliers and participating and nonparticipating installation contractors.

### Program structure.

- **Recommendation 26:** Given vendors’ reliance on the program and the program’s implicit reliance on vendors to have an impact on the market (and support program participation), it is pivotal to get vendor input before deciding to make structural program changes to foster a sustainable relationship between the program and its vendors. Additionally, any changes that are made should ideally be accompanied by clear communications to the vendors regarding the reasons for the changes and the mechanics or implications of the changes.

The Companies makes every concerted attempt to obtain vendor input when considering broad programmatic changes. Information is regularly communicated to them through



email as well as periodic vendor meetings. That being said, the Companies as a fiduciary of the ratepayer funding source, places the customers' interests above all else. The upstream promotions have been extremely successful in transforming the market in Connecticut to have distributors inventory a higher percentage of high-efficiency equipment, and have seen a massive increase in customer participation and satisfaction.

## Connecticut Clean Energy Communities

### Structure and guidance for Clean Energy Communities.

- **Recommendation 27:** Foster learning between towns by developing a CEC “playbook” that can be distributed to town committees and organizing periodic conference calls of town energy committees. The playbook can include one-page descriptions of replicable activities already successfully completed by other communities. It can be updated annually to reflect additional experiences of communities or evolving program goals. Towns should be encouraged to “add your play” to the book to build the collective knowledge base. Conference calls can be used to highlight successful activities and lessons learned in conjunction with the program.

Since 2011, the CEC program administrators, in partnership with key CEC community stakeholders, have compiled resources for best practices as a guide for communities as they pursue outreach efforts and energy related events. Additionally, new innovative programs and initiatives are constantly shared between CEC partners (including but not limited to municipal leaders, department staff, school educators and energy task force members) through conference calls, electronic newsletters, in person meetings, regional and statewide workshops, award ceremonies, regional training, PowerPoint presentations and list serves communications.

In recent years, the teams have created town case studies to share success stories and steps taken to achieve such results.

The program administrators work with partners to add content to the CEC toolkit or “playbook” every year.

- **Recommendation 28:** Encourage towns to formalize CEC positions within the town municipal structure so that if a key person leaves, someone new steps into that role.

As previously stated program administrators act as a resource for communities that have voluntarily opted into the clean energy communities program including related activities such as bench marking, monitoring energy consumption and implementing energy efficiency projects. Recognizing that no local government is the same and each





district in Connecticut falls under a different set of governing ordinances as set out by the type of government, it would be inappropriate to mandate or restrict each town as they approach energy projects in their own way that best suit their town needs.

Program Administrators continuously suggest options and opportunities including sharing resources, regional working task forces, and regional procurement and even developing interdepartmental municipal positions. Committees are often commissioned by the elected officials and seats or members are re appointed based on bylaws for the local government.

## **Evaluation Data Collection**

### **Short-term data collection.**

- **Recommendation 29:** Weighing all of this information, the study recommends that the EEB and Companies strongly consider fielding **one more** short-term survey using an instrument very similar to R31 within three to six months of program participation. This survey should provide enough information to allow for a definitive recommendation of whether a continuous short-term survey effort is justified for Connecticut HES, HES-IE, and downstream residential rebate programs.

The Companies will take this recommendation under advisement and consider strategies to survey customers further from the date of participation.

### **Language barriers.**

- **Recommendation 30:** Future studies that reach out to HES-IE participants should be planned and adequately funded to ensure inclusion of non-English-speaking (primarily Spanish-speaking) customers. Providing adequate resources would allow future evaluations to hire trained bilingual technicians and interviewers, which would improve the exploration and characterization of the substantial non-English-speaking portion of the eligible population.

The Companies maintains a list of bilingual technicians operating in the HES-IE program, noting the languages spoken by each technician. When a language barrier is identified or upon customer request, the technician who can most effectively communicate with the customer is assigned to perform the HES-IE assessment. Providing adequate resources to allow future evaluations to have bilingual technicians and interviewers is a responsibility of the Evaluation Administrator, not the Companies.





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Thank you for the opportunity to provide these comments.

Very truly yours,

Richard Oswald  
Lead Engineer  
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