

# Memorandum

**To:** Scott Dimetrosky and Lisa Skumatz, Connecticut Energy Efficiency Board Evaluation Consultants

**CC:** Craig Diamond, CT EEB Executive Secretary

**From:** Glenn Reed, CT EEB Residential Technical Consultant

**Date:** January 6, 2016

**Re:** Residential Technical Consultant comments on the 12/17/15 LED Multifamily Initiative Process Evaluation Review Draft Report (R157)

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Provided below are summary and highlight comments on the December 17 review draft of the Multifamily Initiative Process Evaluation. These comments supplement those contained in the marked-up draft report that was also submitted. The comments below are largely included in the marked-up draft, but are provided here as a high level summary and for emphasis.

1. While the role of the Companies' C&I programs is noted in delivering efficiency services to the multifamily sector through the Multifamily (MF) Initiative, there is little, if any, discussion as to what specific C&I services (and incentives?) are provided and how they are delivered as an integrated offering. Are residential and C&I services in fact delivered in a "seamless manner" as noted in the report? Where any C&I program staff interviewed?
2. There is considerable discussion as to vendor and participant perceptions of the audit and audit-generated savings estimates; not all of it favorable. How are energy savings estimates derived? In particular, how are savings, costs, and incentive estimates developed for more complex measures like central heating and cooling plants and building envelope measures? If there is additional analysis for such measures beyond the initial audit, how does it affect project timelines and approvals?
3. Note explicitly that the MF Initiative is a joint electric and gas offering. Are delivered fuel measures addressed? If so, how are incentives offered and paid for? Ratepayer funds and/or other sources?
4. Little distinction is made in discussing the implementation of the HES and HES-IE MF Initiatives. Are non-CEEF program funds available for HES-IE? If so, describe the source,

the dollar amount, and any details – and restrictions - as to how these funds can and are used.

5. Similarly, the Conclusions and Recommendations discussion makes little to no distinction between the two MF Initiatives.
6. The discussion is unclear as to how successful the program is in achieving full penetration of in-unit DI measures in participating buildings. Are there differences in access depending on unit ownership, i.e., permission must be obtained if the unit is tenant owned, i.e., a condo or co-op? While there is some passing mention of the challenges of working with condo associations, issues of unit ownership and their possible impact on the Initiative are not discussed in much detail.
7. There is no discussion of how much is spent annually on MF vs. SF HES and HES-IE program activity. These data are not reported on the Energize CT Dashboard, nor are savings. They should be and this should be a recommendation.
8. Similarly, there is no discussion as to whether and how the Companies establish participation and savings goals, nor budgets, for the MF Initiatives. Initiative savings should also be tracked on the Dashboard.
9. It is my understanding that MF HES projects (HES-IE too?) require the implementation of at least one major follow-on measure. Or is this an informal Initiative goal, but not a hard and fast requirement?
10. Should the two MF Initiatives be developed into separate standalone programs distinct from the HES and HES-IE single family efforts? This would make program budgeting, goal setting, activity tracking, and branding/marketing more straightforward and easier. The Companies declined to implement such a recommendation from the Board Consultants when developing their 2016-2018 Three-Year Plan.
11. Did the evaluation team read and review the HES/HES-IE Implementation Manual in its entirety? Are there additional modifications of that document that should be made?
12. What are the key components of a typical project Letter of Agreement? Did the evaluation team review any? Should the structure and format of these LOAs be revised?
13. Consider including a detailed flow chart noting responsibilities of staff (both residential and C&I), vendors, CAAs (if involved in HES-IE MF efforts), contractors, and property managers; program/project information flows, and approvals.
14. There is insufficient discussion as to whether and how the Initiatives pursue a whole building approach and attempt to achieve comprehensive measure installations and deeper savings.
15. There were MMBtu/unit goals in place for HES MF participants that were tied to shareholder performance incentives. Were these reviewed and discussed with Company staff and with vendors? How were these goals communicated to vendors?

16. There is little discussion of specific incentive amounts and/or incentive determination. Similarly, there is little discussion of any MF financings offerings? Green Bank staff should have been interviewed.
17. The reported 40% H&S barrier prevalence seems high, even if mostly for SF participants. Are there no Company data to corroborate or refute this estimate? If not, there should be a recommendation for better tracking of these barriers. Supposedly there are tracked for SF HES (and EHS-IE?) participants.