

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

October 14, 2014

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

Re: Draft Evaluation: Single-Family Potential Study (R15)

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 submits the following comments on Draft Evaluation: *Single-Family Potential Study (R15)*, ("study"), September 5, 2014, NMR Group, Inc. ("Evaluator"). The draft study was submitted on September 11, 2014 with a request for comments to be provided by October 14, 2014.

The primary purpose of the study for was to provide DEEP, the EEB, and CL&P with estimates of potential energy savings in single-family homes in Connecticut. The study examined four scenarios of energy savings: technical, cost-effective, achievable and fuel-switching. The results of potential studies can be used to guide and support energy policy by providing estimates of potential economic impacts and environmental benefits from energy efficiency. Potential studies can also provide data to help design and optimize programs to achieve long term potential by providing critical data that can be used to determine realistic goals, funding levels and provide information on customer analysis and help guide segmentation efforts.

The Companies find this draft report to be lacking in clarity and documentation and inadequate for program planning. Rather than spend our time with detailed comments when it is clear this draft requires additional work, we request another draft be issued that provides additional detail on assumptions and calculations.

With respect to the fuel switching, the Companies respectfully offer that current conservation activities do not include fuel switching. Any changes to fund fuel switching with conservation dollars must first be made at a state policy level including changes to supporting legislation.

Thank you for the opportunity to provide these comments.



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

Very truly yours,

Donna Wells

Manager Technical Support Services

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UIL Holdings Corporation