



UIL HOLDINGS CORPORATION

157 Church Street, New Haven CT 06510-2100
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November 4, 2014

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

Re: Draft C10: CT SBEA Data Mining Report

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 t C10: CT SBEA Data Mining Report dated September 19, 2014 with comments requested by October 22, 2014.

While the Companies appreciate the evaluator’s time and effort, we find the Report to be of limited usefulness. No outside data was used for this report. As explained by the evaluation consultant “The primary “new” data is using the full C&I customer dataset from the utilities as a comparison. Having this dataset also allowed the study to find the usage of the SBEA participants. This allowed the study to calculate percent savings for SBEA participants. This important output is presented for informational purposes and could be uses by the PAs in their marketing efforts for SBEA.” What is not mentioned is that the Companies, in providing and planning for their CLM programs, regularly perform analyses of their participants and their customer base as part of the process. While this information may be useful to outside participants, the PAs already have access to this data. The Companies are uncertain of the value of using third party evaluators to analyze company data.

We appreciate the Recommendation showing “The program appears to be doing a good job of serving all customer segments. SBEA participation is a very good representation of Connecticut businesses of this size (by kW usage). Therefore, there does not seem to be underserved business segments that need to be targeted and no change is recommended regarding a change of market target.”

The other three recommendations are very general and do not appear to be well supported. They are :

- Contractors – There were a limited number of contractors who have worked on the program. The utilities have worked to develop these relationships and expand



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contractor reach in the program. Another potential avenue for increased participation is to increase the contractor participation base.

- This recommendation does not seem to be supported by any data
- The goal of the report is to find ways to garner deeper and more comprehensive energy savings, which is not the same as increased participation

- Savings – Colleges/schools, followed by entertainment/gym had the greatest mean savings, and are good potential targets for the program to increase savings per participant or cost-effectiveness.
 - this seems to reflect demand (kw) savings, rather than energy (kwhr) savings
 - Deeper savings does not always correspond to cost-effectiveness, and improving cost -effectiveness was not a goal of this study

- Diversification beyond Lighting – Given the fact that 72 percent of projects were lighting only and that projects with measures in addition to lighting had much higher savings, increasing the percent of projects with additional measure categories appears to be one of the surest ways to increase program savings.
 - The Companies have long been aware of the value of increasing additional measure categories.

Thank you for the opportunity to provide these comments.

Very truly yours,

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

Donna Wells
Manager Technical Support Services
UIL Holdings Corporation