

October 31, 2014

Craig Diamond  
Executive Secretary, CT Energy Efficiency Board  
10 Franklin Square  
New Britain, CT 06051

**RE: CL&P Review of the Small Business Data Mining Evaluation**

Dear Mr. Diamond,

The Connecticut Light and Power Company (CL&P) is pleased to submit these written comments with regard to a draft evaluation report: *Connecticut Small Business Energy Advantage Data Mining Evaluation* (Study), Draft, September 19, 2014, APPRISE (evaluators). The draft Study was submitted to CL&P on September 19, 2014 with a request for comments. The primary goal of the Study was to help program administrators make more informed decisions about how to garner deeper and more comprehensive energy savings by examining what has and has not been accomplished through the SBEA from 2007 through 2012.

CL&P appreciates the time and effort invested by evaluators. However, from a practical perspective, the Study was not as useful as CL&P had hoped, for the following reasons.

**Redundancy of Analysis**

Much of the Study consists of a summary of program tracking databases. While this portrait of the program may be helpful to external parties, CL&P constantly reviews and analyzes this data as a necessary condition of effectively administering the program. The incremental value of this summary-level analysis to program administrators is low, particularly when this analysis is inevitably dated to some degree. In fact, much of the billing data used in this evaluation was readily available for use because CL&P had already generated it and used it in its internal market segmentation efforts. In order to cover more ground, CL&P hopes to work with evaluators in the future to reduce overlap in analysis.

**Recommendations**

The recommendations in this Study lacked insight and were overly simplistic. For example, one recommendation is for the Companies to diversify beyond lighting in order to increase program savings. This recommendation was based on the observation that projects featuring non-lighting measures (i.e. comprehensive projects) typically had higher savings. CL&P has long been aware of the value of seeking comprehensive projects. In fact, the program design has modified to increase the number of comprehensive projects and measures, and CL&P has a goal of increasing comprehensive projects. A second recommendation was to increase the number of schools and college projects in the program. This recommendation was based solely on the observation that schools and colleges typically generated higher savings per project. However, the Study failed to consider that schools and colleges are may often be better served through other Commercial and Industrial programs. It is difficult for CL&P to

justify any realignment of this program based on this Study because the analysis lacks the context necessary to support its conclusions.

In hindsight, this Study may have benefitted from closer coordination with the C&I subcommittee to ensure that the results and recommendations were more relevant and meaningful. CL&P recommends that future non-impact evaluations be designed and coordinated to provide more benefit to the programs.

Thank you for the opportunity to provide these comments.

Very truly yours,

*Joseph Swift*

Joseph Swift  
Operations Supervisor