

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

March 3, 2014

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

Re: UIL Review of the Draft "Low Income and Limited English Business Owner Study", APPRISE, February 2014

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 the ""Low Income and Limited English Business Owner Study" Draft Report by APPRISE, and dated February 2014. The draft was submitted to UI on February 13, 2014 with a request for comments to be provided by March 3, 2014.

The report fails to recognize that there are existing outreach efforts in place, and provides no feedback on those efforts. In addition, interviews conducted with some entities as part of this effort could be seen as a conflict of interest and may introduce a bias in the findings of the study.

The Companies feel that the study was not well designed, and the draft report does not provide any meaningful information that wasn't already known about this hard to reach market segment.

The study at page 20 also describes organizations that would be willing to work with the companies to assist low income and limited english small business customers in the future. We request that the vender provide a list or table of the interviewed organizations and the level of assistance or involvement each said they are willing to provide.

The study at page 24 includes a section called Summary and Recommendations, but within this section there are no actionable recommendations except potential data collection needs for more in-depth analysis. There is a lack of actionable items that can be implemented to assist low income and limited english small business customers towards increased program participation.

Thanks you for the opportunity to provide these comments.

Very truly yours,

Paul M. Gray, CEM

Senior Business Development Professional

**UIL Holdings Corporation** 



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