August 12, 2022

Lisa A. Skumatz, Ph.D.

Skumatz Economic Research Associates (SERA)

762 Eldorado Drive

Superior, CO 80027

RE: R2015 Low Load and All-Electric Residential New Construction Study

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit these written comments regarding the Review Draft Evaluation Report: *R2015 Low Load and All-Electric Residential New Construction Study* (“Draft Report”), by Evergreen Economics (“Evaluator”). Eversource received the Draft Report on July 29, 2022 and were asked to provide comments by August 12, 2022. Per the Energy Efficiency Board Evaluation Road Map Process, these comments are in response to the Draft Report for consideration for inclusion in the Final Report.

The Draft Report includes findings and recommendations around best practices from industry-leading residential new construction programs outside Connecticut.

**General Comments on Draft Report Findings**

Eversource appreciates the research the Evaluator conducted on best practices for low load and all-electric residential new construction. The utility recommendations closely align with and reaffirm the direction the residential new construction program is currently going in.

**Comments on Methodology**

The Evaluator conducted interviews of implementation staff and secondary literature review of best practices of leading programs outside Connecticut. Eversource finds this methodology to be appropriate.

**Additional Comments**

1. Eversource would like to highlight the Cost Effectiveness Barriers section of the Draft Report. The Connecticut Efficiency Test includes the social cost of carbon but does not account for non-energy impacts. The inclusion of non-energy impacts for cost effectiveness testing would be greatly beneficial to the residential new construction program as it transitions to all-electric.
2. Eversource would also like to highlight and echo the discussion of technical and market acceptance challenges of all-electric end uses on page 22 of the Draft Report. There are barriers that will prevent the adoption of all-electric appliances and prevent homes from qualifying, particularly at the beginning of the program’s transition to all-electric.

Thank you for the opportunity to provide comments.

Sincerely,

Megan Errichetti

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