



August 15, 2019

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

Re: C1644 EO Net-to-Gross Study –UI, CNG, SCG Comments on Draft Final Report

Dear Ms. Skumatz:

The United Illuminating Company (“UI”), Connecticut Natural Gas Corporation (“CNG”) and The Southern Connecticut Gas Company (“SCG”) (collectively “The Companies”), hereby submit the following comments on the “**C1644 EO Net-to-Gross Study - Draft Final Report**” prepared by EMI Consulting July 1, 2019. The draft was submitted to the Companies on July 1, 2019, with a request for comments to be provided by July 15, 2019.

The overall purpose of the study was to perform a Net-to-Gross analysis study for the Connecticut Energy Opportunities (EO) programs.

The following comments refer to the draft report.

- The Companies would like to see further explanations regarding the use of “new” definitions within the context of CT Energy Efficiency Programs; “Like Spillover” and “Unlike Spillover”. We would like to see further explanation of these terms in the Final report and also how they are to be used. We would request further explanation that whole section on Spillover.
- In the past we have seen NTG studies utilize “Participant Spill-over” an “Non-Participant Spillover” with the latter being an indication of program influence outside of the programs, for entities that did not receive incentives through the program.
 - How should the PAs apply these two different spillover effects? Are they additive?
- The Companies would also like to better understand the questioning of participants in regard to both gas and electric controls.
 - Did the respondents understand the differences between standard practice controls and those incented by the program?

- As controls are a fast evolving measures where controls are advancing rapidly through the use of enhanced feedback mechanisms (digital metering), we want to ensure that participants understood the changes in available technologies.
- For the Upstream Analysis Methods section. Why were just 12 Eversource participants surveyed? Why weren't any UI/CNG/SCG participants surveyed?

Regarding the Draft Reports Recommendations The Companies provide the following thoughts and requests for clarification.

- For recommendation 1. The Companies request a clarification. Do we apply an 89% NTG to all gas measures?
- For recommendation 4. The Companies generally agree with the recommendation but also emphasize the importance of targeting underserved and hard-to-reach customer segments in addition to past participant re-engagements. We need to continue focusing on program parity efforts.
- Recommendation 5. The Companies are seeking clarification regarding the intent of this recommendation. Is it suggesting that program staff increase customer-focused marketing across the board, or that we specifically focus on marketing other programs to upstream program participants?
- Recommendations 7 and 8. Since the period covered by this evaluation the Companies have increased the amount of collection on end-user information through distributors.

Thank you for the opportunity to provide these comments.

Sincerely,

Richard Oswald

Lead Engineer
UIL Holdings