The United Illuminating Company 157 Church Street P. O. Box 1564 New Haven, CT 06506-0901 203.499.2000



December 23, 2015

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

Re: Draft R33 Observations & Recommendations from CT Residential Program Database, dated 12/4/2015

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 R33 Observations & Recommendations from CT Residential Program Database Interviews. The draft was submitted to UI on December 16, 2015 with a request for comments to be provided by December 24, 2015.

## Clarifying data requests through the use of data dictionaries. Recommendation #1:

- We recommend that the Evaluation Team work with the Connecticut Energy Efficiency Board (EEB) Evaluation Consultants and appropriate staff of both Companies to develop
  - o Lists and descriptions of the information that are most commonly requested for (1) process evaluation and (2) impact evaluation. The lists should include the variable names under which each Company stores the information. The lists should also note what values are used to denote missing data for each variable and what special values might be found in each data field that could affect analysis. (For example, the

- information that an ID number of an Eversource HES or Multifamily participant that ends in -2 supercedes an ID number that ends in -1 but is otherwise identical.)
- o Company-specific data request templates. The templates would be built on the lists of information and variable names described above. The purpose of the template would be to standardize data collection requests as much as possible.
- We recommend that Eversource consider sharing its data dictionary with select UI staff to help UI staff in planning for a UI data dictionary.
- Developing the UI-specific data request template should take UI much of the way toward putting together a data dictionary. We recommend that UI staff review Eversource's data dictionary to assess what additional work would be needed to complete a UI data dictionary.

The Company has been and continues to be very willing to work with the Evaluation team to improve the evaluation process and results. Working with the Evaluation team and developing the lists and descriptions of information that are requested for a particular evaluation and developing templates for data exchange will provide the basis for a UI "data dictionary". It will provide workable parameters to define the data to be transmitted for that study.

Improving the tracking of measure-specific inputs and providing details regarding calculations.

## Recommendation #2:

- Third-party evaluation staff, the EEB Consultant, and Companies establish an expectation that each evaluation will include at least two formal meetings about data requests: (1) A meeting at the beginning of each evaluation for third party evaluation staff to communicate directly with designated Company program database staff. The purpose of this meeting would be for evaluators to learn in an efficient and timely fashion what relevant data are available for a study and provide them with the information they need to develop complete and clear data requests for the Companies. (2) A "data request kick-off meeting" promptly after the third-party evaluator delivers the data request for a project. The purpose of the data request kick-off meeting is to encourage detailed discussion of the intent of the data request, data format, and data terminology. Both meetings would include the EEB Consultant.
- Oftentimes third-party evaluation staff have new questions once they begin cleaning or analyzing the data. These questions are typically time-sensitive. Once third-party evaluation staff and Company program database staff have had the data request kick-off meeting, the EEB consider allowing third-party evaluators and Company database staff to ask each other <u>data-specific</u> questions and provide <u>data-related clarification</u> as the need arises over the course of a study by phone and email without waiting for the EEB Consultant to be available for these ad hoc communications.
- During the evaluation planning stage, even before an evaluation one-page description is

approved, the EEB consider allowing third-party evaluation staff and Company database staff to communicate about data in the presence of the EEC Consultant, as part of formal or informal assessments of the evaluability of particular questions or programs. Assessing a study's evaluability—including the data available that are relevant to the study—before approving work plans would help EEB spend evaluation funds more effectively. The EEB should set aside budget for these evaluability assessments to ensure that evaluators are paid for the exploratory work on projects ultimately deemed "not evaluable."

The Company believes many of the issues surrounding data are simply a communication breakdown between the Company and the Evaluator. The Company is extremely pleased to finally see the recognition of the importance of the data request process to the ultimate evaluation results. The Company hopes these changes will be reflected in the Roadmap. The Company expects the previously allowed time of two weeks for data request fulfillment will also be expanded in light if this increased focus. The Company is in favor of removing the requirement of the Evaluation Administrator/Consultant presence for data clarification. The Company has seen firsthand the time impediment the current process has on resolving data questions. The Company believes discussions regarding evaluability would be helpful to the development of useful and appropriate evaluations.

Consistency between utility tracking systems for programs and measures.

## Recommendation #3:

The EEAC and Companies may wish to explore establishing a statewide residential electric and gas customer database similar to California's, to be managed by a third-party firm. This database would contain customer electric and gas use and program participation information.

The Company would like to point out this recommendation pertains to billing systems and savings tracking, not CLM databases. The Company can explore this recommendation with the Energy Conservation Management Board (ECMB) (not EEAC), however, we believe the cost and security concerns would far outweigh any usefulness of this recommendation. As noted, the Companies continue to work to increase the functionality of tying together CLM databases with billing data including across electric and gas.

Tracking of project data for multifamily buildings with consistent unit-level reporting.

The Company wishes to reiterate that the data challenges largely pertained to challenges found in correlating CLM participation data with billing data. A common practice in multifamily housing is to have an individually metered electric service and a master metered gas service. We would

like to emphasize that parsing out the usage data for master metered accounts is nearly impossible. There was no separate recommendation to comment on.

Accurate tracking of both electric and gas account numbers.

The Company continues to work on these efforts as outlined in the memo. There was no separate recommendation to comment on.

Thank you for the opportunity to provide these comments.

Very truly yours,

Patrick McDonnell

Director of Conservation and Load Management

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