May 8, 2023

Lisa A. Skumatz, Ph.D.

Skumatz Economic Research Associates (SERA)

762 Eldorado Drive

Superior, CO 80027

RE: C2014B C&I Lighting Net-to-Gross 2024-2026

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit these written comments regarding the Review Draft Report: C2014B Commercial and & Industrial Lighting Net-to-Gross 2024-2026 (“Draft Report”), by DNV (“Evaluator”). Eversource received the Draft Report on April 24, 2023, with a request to provide comments by May 8, 2023. Per the Energy Efficiency Board Evaluation Road Map Process, these comments are in response to the Draft Memo for consideration for inclusion in the Final Memo.

The main objective of this study was to establish prospective net-to-gross (NTG) ratios to be applied in the Program Savings Document (PSD) for 2024 and future program years. The Evaluator conducted participant surveys to quantify free-ridership and spillover rates for each lighting category and developed NTG ratios for prospective application in the Energy Opportunities (EO), Small Business Energy Advantage (Small Business), and Midstream programs in Connecticut.

**Comments on Draft Report Findings**

Eversource appreciates the Evaluator’s work to conduct a comprehensive NTG study for the C&I Lighting programs. Below summarizes comments on the Draft Report Eversource wishes to highlight.

1. The study applied a trend logic based on a MA consensus group process to develop the prospective NTG for 2024, 2025 and 2026 for CT. This method assumes that the MA and CT lighting programs are similar as well as the markets for each lighting category. The 2021 CT retrospective values from this study are much higher than the MA retrospective values from 2019 for two categories (high/low bay and lighting with controls), and only just slightly lower for upstream lighting. See comparison below.

Comparison of Retrospective NTG in CT and MA

|  |  |  |
| --- | --- | --- |
| **Midstream/Upstream measures** | **CT (2021 participants)** | **MA (2019 participants)** |
| Screw based | 36 %  (Reported value for ‘Upstream Lighting’) | 56% |
| Linear LED | 40% |
| LED Fixtures | 37% |
| Exterior LEDs | 27% |
| High/low bay LEDs | 81% | 53% |
| Lighting with controls | 91% | 61% |

Given the substantial differences in NTG for high/low bay and lighting with controls, is it appropriate to assume that the CT trajectory is the same as MA for these categories? While we agree about the findings on continued decline in lighting NTG across all program/measure breakouts, we are concerned that the assumed trajectory for CT might be too steep for high/low bay and lighting with controls.

1. The C&I programs will phase out LED screw-based technologies in July 2023 for Midstream (referred to as “Upstream” in the Draft Report) and in December 2023 for EO and Small Business. We recommend separating out the prospective NTG ratios for screw-based lamps to better align the NTG ratios with future program offerings.
2. In addition to separating out NTG for screw-based lamps, Eversource requests that the NTG ratios for EO and Small Business be further divided into lighting with and without controls given the substantial differences in these ratios based on Midstream results. For Midstream NTG, it would be helpful to break out the NTG ratios using the categories in the CT PSD as much as possible: LED Screw In, LED Stairwell Kit, LED Linear Lamp (TLED), LED Linear Lamp (TLED) with Controls, LED Linear Fixture, LED Linear Fixture with Controls, High Bay / Low Bay, High Bay / Low Bay with Controls, LED Exterior, LED Exterior with Controls
3. The attached document “CT C2014B\_CI Lighting NTG Report\_REVIEW\_DRAFT\_20230424\_ Eversource comments.docx” contains our redline version of the Draft Report for additional comments and suggested edits for your consideration.



Thank you for the opportunity to provide comments.

Sincerely,

Romilee Emerick

Supervisor, Energy Efficiency Evaluation, Eversource

[maromilee.emerick@eversource.com](mailto:maromilee.emerick@eversource.com)