



September 25, 2018

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

RE: R1709 Connecticut Non-Energy Impacts Literature Review, Draft Report

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit these written comments regarding the draft evaluation report: *R1709 Connecticut Non-Energy Impacts (NEI) Literature Review, Draft Report* (“Draft Report”), submitted in August 2018 by APPRISE, Inc. (“Evaluator”). Eversource received the Draft Report on September 5, 2018. Per the Energy Efficiency Board Evaluation Road Map Process, these comments are for consideration for inclusion in the Final Report.

The objective of this study was to assess how the Connecticut Energy Efficiency Board could incorporate valuation of Non-Energy Impacts (NEIs) into their evaluations and cost-effectiveness analyses. The review consisted of an examination of prior original research to assess the models used and assumptions made in calculating NEI values for residential and commercial and industrial programs, including values for occupant health and safety, operations and maintenance, economic and environmental impacts.

Comments on Findings and Recommendations

Eversource appreciates the Evaluator’s detailed review of a broad range of NEI literature, and critical assessment of the underlying assumptions and methodologies. As the report notes, it can be challenging to estimate and monetize NEIs, but they are real and their value can be significant. The results of this review should prove valuable in assessing the range of potential program benefits beyond energy savings, and in guiding and prioritizing future NEI research.

In addition, the Department of Energy and Environmental Protection (DEEP) has initiated discussions with stakeholders including Eversource to review and update CT’s cost-effectiveness test, in line with the recently issued National Standards Practice Manual for Cost-Effectiveness (NSPM).¹ The results of this NEI literature review will provide valuable information for stakeholders in assessing if, and how, to reflect NEIs in the CT cost-effectiveness test.

¹National Efficiency Screening Project. *National Standards Practice Manual*, May 2017. Available at: <https://nationalefficiencyscreening.org/national-standard-practice-manual/>.

Eversource has no concerns with the overall findings of the report, but requests two minor clarifications:

- Please clarify whether the recommended values for noise reduction and comfort are intended to be applied as an annual benefit per weatherized unit, and whether they would generally apply to all weatherization projects (income-eligible, non-income-eligible, single-family, and multi-family).
- Please clarify whether the report does or does not recommend adopting the values for health-related impacts from weatherization of \$30 to \$45 based on the sum of the WI estimates or the total estimate for CO. What underlying factors would determine whether or not these values are applicable in CT?

Thank you for the opportunity to provide comments.

Sincerely,

Miles Ingram

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