



May 11, 2023

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

RE: R1968 Residential New Construction Baseline & Code Compliance Study

Dear Dr. Skumatz,

Eversource Energy ("Eversource") is pleased to submit these written comments regarding the Review Draft Report: R1968 Residential New Construction (RNC) Baseline & Code Compliance Study ("Draft Report"), by NMR ("Evaluator"). Eversource received the Draft Report on April 27, 2023, with a request to provide comments by May 11, 2023. 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 Memo.

The objective of this study is to characterize the RNC market since 2017 and analyze the non-program baseline homes against which RNC program savings are calculated. The study included site visits to non-program homes across Connecticut to collect data on all aspects of the home's energy performance and building department visits. The study provides updated baselines for calculating savings from the RNC program and assessed code compliance of non-program and program homes

Comments on Draft Report Findings and Recommendations

Eversource appreciates the Evaluator's efforts to assess baselines and code compliance for the RNC program. This memo summarizes Eversource's key comments on the Draft Report:

1. The R1968 study design was revised to include both single family and multifamily (MF) research in the scope but the Draft Report describes a baseline for single family only. Eversource is concerned about the lack of MF-specific baseline values in the Draft Report given the vast majority of units in the program are multifamily dwellings. Please provide guidance for updating the baselines for MF. It is unclear whether the program should keep its current assumptions for MF or if it is appropriate to apply the recommended SF baselines to MF homes or if MF-specific UDRH values would be included in a follow-up study.
2. Please include baseline values specific to fossil fuel equipment in addition to the recommended blended baselines for all-electric. While the program is shifting to all-electric starting in July 2023, there will be fossil fuel projects finishing up through 2025.
3. As part of this study, Eversource had asked for baseline values that the program might be able to use for appliances. Currently, there's no mention of an appliance baseline in the Draft Report. Given that the RNC program requirements are higher for appliances than standard practice, it would be helpful to include appliance baselines to provide the program some ability to get some level of appliances savings on these projects.

4. The attached document “CT_R1968_RNC_Baseline_REVIEW_DRAFT_20230427_Eversource comments.docx” contains our redline version of the Draft Report for additional comments and questions.



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Thank you for the opportunity to provide comments.

Sincerely,

Romilee Emerick
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