



May 12, 2023

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

RE: X1942D Cross-cutting NEI Study – SBEA NEIs

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit these written comments regarding the Review Draft Report: *X1942D Cross-cutting NEI Study – SBEA NEIs* (“Draft Report”), by NMR Group (“Evaluator”). Eversource received the Draft Report on April 29, 2023 with a request to provide comments by May 12, 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 Report.

The Draft Report presents non-energy impacts (NEIs) for Small Business Energy Advantage (SBEA) non-lighting, lighting, and lighting control measures that the study was able to quantify using information from end-user surveys.

Comments on Findings and Recommendations

Eversource appreciates the Evaluator’s efforts to quantify NEIs for SBEA non-lighting, lighting, and lighting control measures. Eversource has a few questions and requests for clarification:

1. Recommendation 1 refers to the TRM but should instead refer to the CT Program Savings Document (PSD).
2. We plan to use the NEIs quantified in this study in the Total Resource Cost (TRC) cost test which is our secondary cost test.
3. To confirm, the lighting NEIs represent the average benefit of lighting measure installations across all lighting projects, so it should be applied to any participant that has lighting measures installed (i.e., it should not be applied at the lighting measure level)? This is also true for the lighting control NEI application?
4. Please provide a table with the summary of monetized non-lighting NEIs, similar to Table 0-3. If the non-lighting NEIs are on a per measure basis, please provide the NEI values per measure installed.
5. The report states that the non-lighting NEIs should only be used for information and planning purposes. We will only be using the SBEA NEIs in the TRC cost test, which is our secondary cost test. In that case, should we be including the non-lighting NEIs?
6. “Appendix A.2.1 in X1942B Cross-cutting NEI Study – Residential HP & HPWH NEIs” is referenced a number of times as to where the NEI calculation methodology can be found. Could you please include that information in this report’s appendix and refer to it within the report as opposed to directing readers to a different report?

Thank you for the opportunity to provide feedback.

Sincerely,

Megan Errichetti

Analyst, Evaluation | Energy Efficiency | Eversource

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