



**UIL HOLDINGS CORPORATION**

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157 Church Street, New Haven CT 06510-2100  
203-499-2000

August 24, 2015

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

Re: Draft Impact Evaluation: C19-Commercial & Industrial New Construction Baseline and Code Compliance Study

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 Impact Evaluation: C19-Commercial & Industrial New Construction Baseline and Code Compliance Study. The draft was submitted to UI on July 24, 2015 with a request for comments. The comment period was extended to August 24, 2015 by vote of the Committee.

- The Company again expresses concern with the timing with evaluations. The SOW for this project had the project beginning in April 2014 and the draft report being issued December 2014. The draft report was issued seven months later than planned, July, 2015.
- The Company questions that with all of the numerous issues, estimates, engineering adjustments and inferred conclusions that the recommendation regarding baselines should be so conclusive.
- The programs already provide support for LED technology and automated lighting controls; it is unclear why these would be included as recommendations.
- The Company takes issue with the comment under Findings on Page 4.
  - The researchers noted one evaluation issue for which they did not offer recommendations. This relates to the completeness and accuracy of utility program participation data. This issue is significant in the establishment of baselines but only informative in the estimation of code compliance. Furthermore, the researchers are aware that this issue is under ongoing review by the appropriate parties. For these reasons, the researchers refrained from engaging on this matter.

The Company strongly disagrees that this evaluation has identified any issue with the



completeness or accuracy of our program participation data. The evaluators never asked for data specific to this evaluation, nor did they ever solicit company help to match the site list to participation data. The evaluators purchased data from a third party. They then tried to match this data to program data the evaluators already had from previous evaluations. They had a difficult time doing so. To blame this on the utility database is a gross distortion of the facts.

- How the evaluation planned to treat program participation was never mentioned in the SOW and the draft is never explains how it planned to treat participation. The draft quotes “an international authority” and explains no further.

Determination of baseline energy efficiency, whether at the measure or site level, requires consideration of energy efficiency program impacts. Definition of “baseline” for the new construction market is not as simple as excluding some or all of the buildings that have participated in a new construction efficiency program or some other efficiency program. Ralph Prael, an international authority in the field, in reviewing the work plan for another project commented “To simply exclude buildings that participated for a particular end-use as part of the baseline would lead to an understatement of the efficiency of baseline practices in the market, as the existence of free riding means that some participating measures are part of the baseline. To simply include such participants would lead to an overstatement of the efficiency of baseline practices, as some of the participating measures were program-induced.” For this reason, the research team expended significant effort to identify energy efficiency program participation.

- While the Company was provided a list of the evaluated sites, the evaluation administrator declined to provide which sites self identified themselves as program participants
- The Company was not provided enough information to evaluate the accuracy of the program participants vs non- participant rates.
- The Company is concerned with the large percentage of multifamily in the group. The Commercial code applies to multifamily dwellings five stories and above. We are concerned the evaluation includes properties not designed or built to the commercial code.
- Is inference an accepted evaluation methodology?
  - For some measures, the sample size was too small to support a finding that the difference was statistically significant. However, for all measures where there was sufficient sample size, and by inference for the rest of the supported measures in the PSD,
- Please explain why you could not collect data on heating and cooling system data for all sites.
- Footnote 7; please explain why you excluded CMEEC sites for a new construction baseline



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study? These might have been the most appropriate samples.

- The Company would like further information in the report regarding Footnotes 16 and 17. Simply putting this information in a footnote does not provide enough attention to the impact this may have on the results. While this footnote is in regards to cooling equipment, what other areas could this sampling concern impact?
  - The sample in the two largest strata only included representatives from the multi-family end-use category. Other commercial end-uses typically have a significant penetration of chiller technology. For these strata, the distribution of cooling technology is probably not representative of the overall building stock.
  - There was only one stratum 5 site, a multifamily facility, which is likely not representative of the full mix of larger C&I buildings in terms of cooling.

Thank you for the opportunity to provide these comments. We look forward to the next draft that will address these concerns.

Very truly yours,

A handwritten signature in blue ink that reads "Donna Wells".

Donna Wells  
Manager Technical Support Services  
UIL Holdings Corporation