



The United Illuminating Company
157 Church Street
P. O. Box 1564
New Haven, CT 06506-0901
203.499.2000

December 23, 2015

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

Re: Draft R33 Observations & Recommendations from CT Residential Program Database,
dated 12/4/2015

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 R33 Observations & Recommendations from CT Residential Program Database Interviews. The draft was submitted to UI on December 16, 2015 with a request for comments to be provided by December 24, 2015.

Clarifying data requests through the use of data dictionaries.

Recommendation #1:

- *We recommend that the Evaluation Team work with the Connecticut Energy Efficiency Board (EEB) Evaluation Consultants and appropriate staff of both Companies to develop*
 - *Lists and descriptions of the information that are most commonly requested for (1) process evaluation and (2) impact evaluation. The lists should include the variable names under which each Company stores the information. The lists should also note what values are used to denote missing data for each variable and what special values might be found in each data field that could affect analysis. (For example, the*

approved, the EEB consider allowing third-party evaluation staff and Company database staff to communicate about data in the presence of the EEC Consultant, as part of formal or informal assessments of the evaluability of particular questions or programs. Assessing a study's evaluability—including the data available that are relevant to the study—before approving work plans would help EEB spend evaluation funds more effectively. The EEB should set aside budget for these evaluability assessments to ensure that evaluators are paid for the exploratory work on projects ultimately deemed "not evaluable."

The Company believes many of the issues surrounding data are simply a communication breakdown between the Company and the Evaluator. The Company is extremely pleased to finally see the recognition of the importance of the data request process to the ultimate evaluation results. The Company hopes these changes will be reflected in the Roadmap. The Company expects the previously allowed time of two weeks for data request fulfillment will also be expanded in light of this increased focus. The Company is in favor of removing the requirement of the Evaluation Administrator/Consultant presence for data clarification. The Company has seen firsthand the time impediment the current process has on resolving data questions. The Company believes discussions regarding evaluability would be helpful to the development of useful and appropriate evaluations.

Consistency between utility tracking systems for programs and measures.

Recommendation #3:

The EEAC and Companies may wish to explore establishing a statewide residential electric and gas customer database similar to California's, to be managed by a third-party firm. This database would contain customer electric and gas use and program participation information.

The Company would like to point out this recommendation pertains to billing systems and savings tracking, not CLM databases. The Company can explore this recommendation with the Energy Conservation Management Board (ECMB) (not EEAC), however, we believe the cost and security concerns would far outweigh any usefulness of this recommendation. As noted, the Companies continue to work to increase the functionality of tying together CLM databases with billing data including across electric and gas.

Tracking of project data for multifamily buildings with consistent unit-level reporting.

The Company wishes to reiterate that the data challenges largely pertained to challenges found in correlating CLM participation data with billing data. A common practice in multifamily housing is to have an individually metered electric service and a master metered gas service. We would

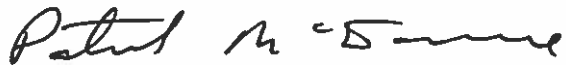
like to emphasize that parsing out the usage data for master metered accounts is nearly impossible. There was no separate recommendation to comment on.

Accurate tracking of both electric and gas account numbers.

The Company continues to work on these efforts as outlined in the memo. There was no separate recommendation to comment on.

Thank you for the opportunity to provide these comments.

Very truly yours,

A handwritten signature in black ink that reads "Patrick McDonnell". The signature is written in a cursive style with a large initial "P" and a long, sweeping underline.

Patrick McDonnell
Director of Conservation and Load Management