

August 15, 2012

Tim Cole, Ph.D.
Executive Secretary, Energy Efficiency Board
West Wind Consulting
157 Whitney Street
Hartford, CT 06105

RE: CL&P Review of the Draft Retrocommissioning, Operation & Maintenance, and Business Sustainability Challenge Programs Evaluation.

Dear Mr. Cole:

The Connecticut Light and Power Company (CL&P) is pleased to submit these written comments with regard to a draft evaluation report: *Impact Evaluation of the Retrocommissioning, Operation and Maintenance, and Business Sustainability Challenge Programs* (“draft Study”), July 23, 2012, by Michaels Energy and Evergreen Economics (“Evaluators”). The complete draft Study was released on July 31, 2012, with a request for comments to be provided by August 15, 2012. The draft Study is lengthy and detailed, and offers many specific recommendations for program improvements. CL&P is pleased to offer the following comments and recommendations on the draft Study.

In an effort to benchmark these programs and to assess opportunities for program improvement, CL&P suggests that the Evaluators compare and contrast the programs in the draft Study to other comparable programs offered in other jurisdictions. This information would help aid the reader in understanding the value in the industry for these types of non-capital programs. This comparison should include but not be limited to best practices, achieved savings, and realization rates from other leading programs.

The draft Study provides a breakdown of realization rates by type of project for Operation and Maintenance (“O&M”) and for Retro-commissioning (“RCx”). It would be beneficial to CL&P if the Evaluators could provide these realization rates by O&M and RCx end-uses, as provided in the Connecticut Program Savings Documentation (PSD). For reference, these end-uses are PRIME (not applicable), Cooling, Heating, Other and Process. This would allow the Companies to continue to accurately track savings by end-use, rather than applying a general O&M or RCx program realization rate. In addition, to provide some perspective of the magnitude of achieved savings, the Evaluators should provide percent savings against the base billing for the evaluated projects in addition to total savings for these projects.

For one specific project, EA08M003, there was a large operational adjustment to savings because of vacancies related to a recent change in ownership. These vacancies are expected to be filled in the near future and the realization rate reflects an unusual dip in the savings because the timing of the Study coincided with a temporary vacancy rate. CL&P recognizes the challenges inherent to evaluating a project or program based on a “snapshot in time”, and would welcome the Evaluators’ perspective on how the full lifetime savings and benefits of such projects should be factored into realization rates.

Various site reports within the Study mention interviews with customers, but limited detail is provided about these findings. For the benefit of the program implementers, additional feedback from customer interviews would assist CL&P in maximizing program effectiveness. CL&P recommends that the Evaluators provide all information from customers that might shed light on avoidable behavior leading to large operational adjustments. This would allow the Companies to achieve greater measure persistency and savings in the future. Likewise, all calculations and assumptions used by the Evaluators should be provided for evaluated projects, especially projects with lower realization rates. This information would be very helpful to CL&P in understanding and mitigating operational discrepancies in future projects. In particular, projects WE06M023 and WE07M064 had significant changes which merit further detail and discussion. However the draft Study only provides cursory and insufficient detail on these projects (as well as others).

In several cases (e.g. project WE06M021) the Evaluators state that the savings shown in original calculation spreadsheets does not match the savings from the tracking system; the draft study stated that the difference cannot be explained. To clarify, these discrepancies were generally the result of final reviews or inspection reports conducted after installation which reconcile the tracking savings to a best estimate of actual, installed savings. These reports were included in the project files provided to the Evaluators. CL&P would be happy to assist the Evaluators in identifying all pertinent reports.

Lastly, in some instances formatting and table numbering appears to be inconsistent, resulting in seemingly contradictory statements. For example:

- On page 26, the realization rates do not seem to match those in Table 27.
- On page 32, the draft Study states that all adjustments were quantity adjustments or operation adjustments, which conflicts with Table 34 (referred to as Table 35).

CL&P appreciates the opportunity to comment on this draft Study and looks forward to the final report.

Very Truly Yours,

Joseph Swift

Joseph Swift
Connecticut Light and Power
107 Selden Street
Berlin, CT 06037