
DATE: March 27, 2014
TO: Lori Lewis, SERA Evaluation Consultant Team
FROM: Jackie Berger
SUBJECT: Response to Comments on C12: SBEA Low-Income and Limited English Market Research Report

APPRISE submitted the review draft of the C12: SBEA Low-Income and Limited English Market Research Report for review by the CT Energy Efficiency Board's (EEB) Evaluation Committee, the EEB Consultants and the utilities. The final report includes additional clarification and discussion to enable readers to better understand the research goals and what is provided by the research effort. This memo provides responses to the comments from the Department of Energy and Environmental Protection (DEEP) and United Illuminating, Inc. (UI) provided on the review draft distributed February 7, 2014.

Comments on the report were received from UI and DEEP, and this memo provides a response to those report comments.

I. UI Comments

The comments and responses are as follows.

- *Existing outreach efforts – The report fails to recognize existing outreach efforts and provide feedback on those efforts.*

The study is not an evaluation of the efforts that the utilities or the SBEA programs are undertaking to increase participation by low-income and limited English speaking business owners. Rather, the purpose of the study is to assess whether there is potential for increased participation by this market segment and to identify means by which the utilities may increase participation. Detailed information is provided in a confidential supplement to the report to provide a basis for designing and negotiating additional efforts through a greater number of organizations throughout CT.

- *Conflict of interest and bias – The interviews could be seen as a conflict of interest and may introduce a bias in the findings of the study.*

The interviews addressed the relationships that the organizations have with low-income and limited English speaking businesses, their assessment of whether such businesses may be eligible, and their willingness to facilitate participation by these businesses. The report recommends a list of data that should be collected if any additional initiatives are undertaken in order that these could be assessed for effectiveness and cost-efficiency. The cost requirements reported by the organizations do not appear to be such as to

introduce bias in their other responses but the negotiated contracts with them and tested effectiveness is the only way to ascertain the value of working with these organizations.

- *Meaningful information – The report does not provide meaningful information that was not known about this market segment.*

There is no list available to identify businesses owned by low-income or limited English proprietors. This makes it difficult and very expensive to conduct a survey with the businesses themselves. The interviews were conducted with the organizations that worked with these businesses. As such, the report provides summary information that organizations have on these businesses and information on whether the organizations can facilitate the participation of these businesses. Because these businesses are difficult to reach and may be more trusting of a local organization that they have received assistance from in the past, we felt that a potential strategy to increase participation was to bring these organizations in as partners in the SBEA program. Based on the organizations' responses, it appears that this may be a successful method for increasing program participation by this market segment. The primary value from this research project may be in the confidential supplemental document that provides concrete information that could be directly used to negotiate with a variety of organization across CT to pilot additional outreach and facilitation towards businesses with low income or limited English owners.

- *Organizational information – There is a request for a list of organizations and information on the assistance they are willing to provide.*

A separate confidential document was always planned and referred to in the report. Further clarification and detail describing this additional document has been added to the report. The confidential supplement is also being provided to the utilities at the same time as the final report. The supplement provides detailed information on organizations willing to provide assistance, the types of information they are willing to provide, and whether compensation would be required for this work.

- *Actionable recommendations – There are not actionable recommendations except potential data collection for more in-depth analysis. There is a lack of actionable items to increase program participation by this market segment.*

The actionable recommendation is to negotiate with the organizations to recruit eligible low-income and limited English speaking businesses for program participation and to collect the data necessary to assess the effectiveness and cost-efficiency of this initiative and the organizations being used. The separate confidential document that provides detailed information on these businesses assists the utilities in doing so.

II. DEEP Comments

The comments and responses are as follows.

- *No interviews with businesses – The interviews were only conducted with organizations that support low-income and limited English businesses, but not the business owners.*

Organizations were targeted for interviews rather than businesses for the following reasons.

- Information Source – There is no information source that provides a list of small businesses that are owned by low-income or limited English speaking customers. A sample of these businesses cannot be developed without identification of specific businesses.
- Cost – Without a list to identify these businesses, it would be very costly to call and screen through thousands of businesses to identify and interview the targeted types of businesses.
- Obtaining Affordable Information – Organizations that potentially work with these types of small businesses could be identified from related organizations and through inquiry as to other such organizations, a “snowball” sampling approach. Interviewing these organizations from them to describe the characteristics of the businesses they serve that are owned by low-income or limited English speaking individuals was a cost-efficient approach.
- Trust & Development of a Marketing Approach – A primary goal for undertaking this market research was to find additional ways to increase SBEA participation by these types of businesses. Initial research suggested that the business owners would be more trusting of organizations that they had received assistance from in the past. It then made sense to assess how many of the organizations would be willing to aid participation, from what geographic area, at what cost and to gather the specifics for the program planners to negotiate with these organizations.
- *Phase I study conclusions – The conclusions of Phase I could have been surmised without undertaking the study.*

The first phase of the research affirmed that there was an opportunity to reach low-income and limited English customers in the SBEA, and provided support for the use of trusted contacts to provide program information to these customers. The number of contacts was limited because it was an exploratory outreach with the purpose of identifying the next phase of research to be pursued.

- *Phase II study conclusions – The conclusions of Phase II provided little insightful information.*

The report provides summary information that organizations have on these businesses and information on whether the organizations can facilitate the participation of these businesses. Because these businesses are difficult to reach and may be more trusting of a local organization that they have received assistance from in the past, we felt that a potential strategy to increase participation was to bring these organizations in as partners in the SBEA program. Based on the organizations’ responses, it appears that this may be a successful method for increasing program participation by this market segment. The primary value from this research project may be in the confidential supplemental document that provides concrete information that could be directly used to negotiate with a variety of organization across CT to pilot additional o

- *Preciseness of estimates – Interval estimates should have been reported.*

While the summary text does not provide the interval, the interval is provided in the table directly below the text in the body of the report. While the text states that the average

number of employees is ten or fewer, the table on the average number of employees at low-income businesses (Table III-11) shows this more detailed information.

Table III-11
Average Number of Employees at Low-Income Businesses

Number of Employees	Number of Organizations
1-2	5
3-4	4
5-10	3
Range, but less than 10	6
Don't Know	6
Total	24

Additionally, Table III-22 shows this more detailed information on limited English speaking businesses.

Table III-22
Average Number of Employees in Limited English Businesses

Number of Employees	Number of Organizations
1-3	6
4-6	2
7-10	2
Range, but less than 10	5
Don't Know	6
Total	21

Similar interval data is provided throughout the report.