



UIL HOLDINGS CORPORATION

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

January 8, 2016

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

Re: R157 Draft Multifamily Initiative Process Evaluation Report,

Dear Ms. Skumatz:

The United Illuminating Company ("UI") hereby submits the following comments on R157 Draft Multifamily Initiative Process Evaluation Report, dated December 17, 2015 with a request to provide comments by January 8, 2016.

The Company feels that the evaluation vendor NMR Group, Inc has presented a draft report that generally meets the stated goals:

- To provide reliable information from program documentation and program staff interviews in order to determine what program barriers exist, and whether the Multifamily Initiative is function as designed. This information will provide a basis for future program adjustments
- To provide reliable interview data from with participating vendors and landlords/property managers who participate in the programs in order to assess participant awareness and satisfaction.
- To provide proper analysis of the reported information in order to identify opportunities for program improvement.

The report provides a variety of conclusions and recommendations. These support actions the Companies are already taking. Some comments follow:

Recommendation 1: Explore strategies for addressing health and safety issues.

The 2016-2018 Plan discusses concerns regarding funding for health and safety barriers for HES and HES Income Eligible. The Companies will continue to research methods to ensure that the safety of employees and customers is maintained while providing as many of the program's services possible. The reference to the Massachusetts' Low Income Multifamily (LIMF) program as a program that has addressed health and safety barriers is not particularly useful. The cost effectiveness tests used in Massachusetts are very different



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that the ones required in Connecticut, and no specifics about the Massachusetts program are provided.

Recommendation 2: Continue to work with vendors to promote installations of add-on measures.

The 2016-2018 Plan details the Company's plan to promote add-on measures. The Company encourages vendors to submit comprehensive proposals and identify all areas for energy improvement, and will not permit projects to move forward without assessing all building opportunities.

Recommendation 3: Provide consistent QA/QC.

The Company requires non-program-approved weatherization contractors to hold a BPI Multifamily Building Professional certification in order to participate in the program. All contractors should be licensed through the state of Connecticut, but ultimately it is up to the property owner to select who they do business with. The Company does work with contractors, engineering consultants and housing authority consultants and other parties to ensure they are putting together a cost-effective, energy-efficient proposal that will maximize the benefit to the landlords and tenants.

Recommendation 4: Clarify Multi-family guidelines and procedures.

The Company is currently working on Multifamily Implementation Manual for 2016. The Company is also developing a combined UI and Eversource multifamily application that will improve project intake and reduce customer confusion.

The Company continues to inform contractors of all the information that is required to obtain from a multifamily site as quickly as possible.

Recommendation 5: Increase transparency in PAs roles and responsibilities

The Company introduces program staff throughout the year at quarterly meetings and sends out periodic emails regarding staffing and individual responsibilities; the Company can formalize it in an organizational chart.

Recommendation 6: Increase awareness of the multifamily initiative.

The multifamily initiative is really a custom approach to handling program multifamily buildings. As long as customers are aware of the programs and are participating, the Company sees no reason to increase marketing expense by promoting the Multifamily Initiative separately. The study found that nearly 48,000 units received services in an 18 month period, which is clearly strong program participation. The Companies will not expend program dollars to needlessly build brand recognition, since that is not a goal of the program.

Recommendation 7: Promote non-energy benefits.



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The 2016-2018 Plan detail the non-energy benefits the programs will offer. The Company will continue to promote these benefits to customers.

Recommendation 8: Develop template for vendor cobranding.

The contractors are provided with specific marketing guidelines in order to do contractor specific solicitation, the Company markets the programs as a whole and expect vendors to create their own marketing campaign. Since the multi-family initiative takes an open-market approach and allows non-program contractors to participate in the program, it is problematic to create a marketing template. These contractors are not pre-authorized to work within the multi-family initiative and may not have authorization to market the Energize Connecticut Initiative.

Specific comments to the evaluation are provided below:

Table of Contents, Figure 10 does not appear to be the "HES-IE landlords'/Property Managers' initial perceptions of Auditors Energy Savings Estimates" and it is not bookmarked properly

Table of Contents, Figures 11-22 are improperly numbered.

Page IV, it says 10 out of 29 thought that the savings estimates were accurate. How long after installing the measures did you ask the landlords? What season? The landlords that said they "didn't know if their savings were accurate"; did they explain their reasoning?

Page V, "Vendors indicate that health and safety issues are prevalent in as many as 40% of all sites", section C.1 reports that 5 out of 30 landlord/property managers reported health and safety issues. Were these health and safety issues that affected the entire sites or simply individual units? Please elaborate on the 40% from page V.

Page 2, footnote 5 extends from page 2 to page 3, it cuts off mid-sentence, try to keep it on one page.

Page 13, the data on the graph is not as clear as it could be. It would be beneficial if the Bars were more easily distinguished from one another, using different colors and more clear lines separating categories. It might be better to break the bars into percentages of each rating 1-5 which conveys more information, while taking up same space as the percentages of 4 and 5.

-Page 24, the graph is pretty simple but it would look better with an axis and axis labels and surrounding borders. Also differentiate the bars for different categories with different colors.

-Page d30-d41, many of the questions at the end regarding persistence, free ridership, and spillover could possibly be relevant to future PSD's, it would be helpful to obtain those results.



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Thank you for the opportunity to provide these comments.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Patrick McDonnell', written in a cursive style.

Patrick McDonnell
Director of Conservation and Load Management
