

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

June 27, 2014

Tracy Babbidge, Bureau Chief Department of Energy and Environmental Protection 10 Franklin Square New Britain, CT 06051

Mr. Nicholas E. Neeley Acting Executive Secretary Public Utilities Regulatory Authority 10 Franklin Square New Britain, CT 06051

RE: Docket No. 13-03-02 - PURA/BETP Consideration of 2013-2015 Conservation and Load Management Plan - C12: CT Small Business Energy Advantage Program Low-Income and Limited English Business Owner Study

Dear Ms. Babbidge & Mr. Neely:

The Energy Efficiency Board filed a third party program research study: "C12: CT Small Business Energy Advantage Low-income and Limited English Business Owner Study." by APPRISE. (the "Report"). 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 submit written comments on the final report.

Section 245m(d)(4) of the Connecticut General Statutes (the "Statute") requires that the Department of Energy and Environmental Protection ("DEEP") adopt an independent, comprehensive program evaluation, measurement and verification process to ensure, among other things, that "evaluation results are appropriately and accurately taken into account in program development and implementation." The Companies agree that program evaluation is important in the development and implementation of the programs and participate in the independent evaluation process as outlined in the Statute. The Companies have previously commented on the draft report. The Statute also allows the Companies, at their discretion, to comment on the final Report, this letter being the result. The Companies also participate in any technical sessions called regarding the final Report.

The Companies are dedicated to providing efficient, cost-effective programs and the evaluation process, including the evaluation results and recommendations, is an important component of this. As a result, the program administrators will use the recommendations from the Report, as well as comments of other stakeholders and any technical meeting results to analyze and update the program as necessary. The program administrators work with the C&I Technical consultant and the C&I Committee as necessary to update the program. The program updates are reflected in the Plan or Plan update that is presented and approved by the Energy Efficiency Board prior to the submittal of the Plan to DEEP.



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The Report provided only one actionable recommendation: 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 access the effectiveness and cost-efficiency of this initiative and the organizations being used. A list of these organizations was provided in a separate, confidential document. The Companies have existing outreach efforts in place within the program. The Companies will review this document for any additional ways to augment our existing outreach efforts.

If you have any questions please do not hesitate to contact Donna Wells at 203 499-2053 or Pat McDonnell at 203 499-2923.

Very truly yours,

Donna Wells Manager, Technical Support Services