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X1942A Cross-cutting NEI Study – Utility NEI and Arrearage Data Analysis Results

REVIEW DRAFT REPORT

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SUBMITTED TO: Connecticut Energy Efficiency Board

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Section 1 Abstract

1.1 PURPOSE

As part of the broader X1942 Non-Energy Impacts (NEIs) study, the NMR study team conducted an analysis to quantify and monetize NEIs that accrue to utilities and participants in the form of financial savings from increased bill affordability and reduced arrears for income-eligible weatherization program participants. The analysis used primary data from Eversource and UI on arrearages and shutoffs for participants in the EnergizeCT Home Energy Solutions - Income Eligible (HES-IE) program. This report, which will become a section in the broader X1942 study report, discusses the results from this analysis and presents the pertinent NEIs the study was able to monetize with the data available.

1.2 BACKGROUND

The 2018 Connecticut Non-Energy Impacts Literature Review study (R1709) identified and recommended a few keys areas for additional research and estimation. With respect to NEIs that accrue to utilities, these key areas included affordability impacts and arrearage impacts estimated through an analysis of data on customer balances, arrearages, collection actions, and pertinent utility costs.

Utilities can realize several NEIs from their low-income energy-efficiency programs in the form of financial savings. Energy-efficient technologies installed by energy-efficiency programs often result in reduced energy bills for participants, which can decrease the likelihood that customers experience difficulties paying their utility bills. In turn, utilities realize financial savings through reduced costs associated with arrearages and late payments, uncollectible bills and bad debt write-offs, service terminations and reconnections, bill-related customer calls, and the bill collections process. In addition, utilities may realize savings from their efficiency programs due to a reduction in safety-related emergency calls and reductions in energy use that is eligible for a rate discount. If utilities offer rate discounts or energy assistance to low-income customers that are subsidized by other ratepayers, energy-efficiency programs that reduce the amount of energy consumed by low-income customers can decrease the quantity of energy sold at the discounted rate and reduce the need for energy assistance.

In addition, energy efficiency program participants could also realize several NEIs such as avoided reconnect fees from increased affordability and reduced arrears.

1.3 GOAL

The goal of this part of the X1942 study was to quantify and monetize the following NEIs from increased affordability and reduced arrears that accrue either to the utility or the participants.

- Reduced arrearage carrying cost (utility NEI)
- Reduced bad debt write-off (utility NEI)



Commented [EMC1]: It would be good to include a statement somewhere in this section on whether this is electric or gas.

Commented [EMC2]:

Commented [EMC3]: Delete "and participants" – I thought the focus here was to look at utility NEIs. It would be good to look at NEIs for participants, but I did not see that fully scoped and studied here. You can add a note that some of these impacts also are NEIs for participants, but not all and there are many other NEIs for participants that are beyond the scope of this work.

Commented [EMC4]: Include this? How generalizable are any results beyond that group?

Commented [EMC5]: Maybe in a footnote or somewhere later in the paper, provide information on what measures are usual for this program or what level of savings are usual and what the range is.

Commented [EMC6]: Is this a utility NEI?

Commented [EMC7]: There are a wide range of NEIs for participants, which are well beyond the scope here. It might be good to add that (so no one thinks that the two mentioned are the bulk of it), as well as any recommendations about more fully trying to understand those in the future.

Commented [EMC8]: Again....delete "or the participants" – that has not been fully scoped and studied here. And, in the list, just focus on the utility NEIs. This study is not fully scoping and studying participant NEIs, so I'd suggest deleting the parentheticals, and putting the reconnect fees and any other late fees and interest payments on arrearages as a utility benefit.

- Fewer shutoffs and reconnects (utility NEI)
- Avoided reconnect fees (participant NEI)
- Fewer notices (utility NEI)
- Fewer collections calls (utility and participant NEI)
- Fewer safety-related emergency calls (utility and participant NEI)
- · Reduced quantity of energy sold at the discounted rate (utility NEI)

1.4 SUMMARY OF RESULTS

Table 1 presents the NEIs that the study was able to quantity and monetize with the data available. The utilities did not systematically track notices, collection calls, and safety-related emergency calls, so they could not provide the data needed to quantify the NEIs related to notices and calls. The utility and participant-NEIs related to shutoffs and reconnects were \$0 because the net change in the number of shutoffs for participants from pre- to post-treatment period was not found to be statistically significant for either of the utilities or statewide. The NEI associated with reduced quantity of energy sold at the discounted rate was not applicable because neither of the utilities offered rate discounts to their low-income customers. Table 1 also provides a comparison of the monetized NEIs in this study to the range of NEI values found in the literature from weatherization programs. Currently, none of these NEIs are included in Appendix Six (Non-Energy Impacts) in Connecticut's Program Savings Document (PSD) for use in the Total Resource Cost Test.

Table 1: Summary of Monetized NEIs – Annual NEI per Participant											
NEI	Co	nnectic	ut	NEI Values from Weatherization Programs in the Literature*							
	Eversource	UI	Statewide	Low	High	Typical					
Reduced Arrearage Carrying Cost (Utility)	\$0.38	\$0.50	\$0.41	\$1.50	\$4.00	\$2.50					
Reduced Bad Debt Write-off (Utility)	\$3.14	\$3.61	\$3.31	\$0.50	\$3.75	\$1.75					
Fewer shutoffs and reconnects (Utility)	\$0	\$0	\$0	\$0.10	\$3.65	\$0.65					
Avoided reconnect fees (Participant)	\$0	\$0	\$0	\$0.21	\$7.00	\$1.60					
Reduced quantity of energy sold at the discounted rate (Utility)	N/A	N/A	N/A	\$3.00	\$25.00	\$13.00					
TOTAL	\$3.52	\$4.11	\$3.72	\$5.31	\$43.40	\$19.50					

*Source: Skumatz Economic Research Associates, Inc. (SERA). 2014. Non-energy Benefits / Nonenergy Impacts (NEBs/NEIs) and their Role & Values in Cost-Effectiveness Tests: State of Maryland. Figure 3.4

Commented [GR9]: And couldn't the utility NEIs be included in a MUCT BCR?

Commented [EMC10]: Worth mentioning average measure life since these are annualized figures? I'm assuming the NEIs would last through the life of the measures.

Commented [GL11]: Are these NEIs applicable to commercial customers?

If not, where are the values for commercial customers?

Commented [GR12]: Here and/or below it would be helpful to put the Total values in perspective:

- How much would the addition of these NEIs increase the
- LT benefits from the HES-IE program? • How much would the addition of these NEIs change the
 - How much would the addition of these NEIs chang MUCT and TRC BCRs for the program?

This might also provide some guidance as to how much to pursue quantification of those NEIs that could not be monetized in this study.

Commented [GR13]: NEIs associated with calls and notices also could not be quantified.

Commented [EMC14]: It would be good to know what states and time periods the NEI values in the right columns are from. Just the date of the report – 2014 - shows them to be quite dated. Is there nothing more recent on this? 2017 NEEP report. Or, check with Lisa S – has she updated the work?



Section 2 Study Tasks

2.1 TASK 1 - STUDY DESIGN AND DATA REQUEST

For the analysis, the treatment group consisted of customers who had participated in the HES-IE program in 2018. The analysis compared the indicators for these customers at the end of 2017 to those at the end of 2019, the years before and after they received program services. This represented the actual change in arrearages, shutoffs, and reconnections for those customers who were served by the program. Some of these changes may have been due to the program, and some of these changes may have been due to other exogenous factors. To control for exogenous factors, the study used the 2020 HES-IE program participants as the comparison group. Later program participants – also referred to as "future" participants – are particularly effective for comparison with prior participants, because they represent other customers that have made the same decision to opt into this specific program. Relative to a non-participants regarding unobservable characteristics than the general public.¹

To the extent that the comparison group was similar to the treatment group, the change in indicators for the comparison group represented how the indicators would have changed for the treatment group if they had not received program services. The net change was the difference between the change for the treatment group and the change for the comparison group, and represented the impact of the program, controlling for other exogenous factors.

The comprehensive data request from the utilities requested arrearage- and collections-related transactions histories for the period from January 1, 2017, through December 31, 2019, for all residential customers on:

- Arrearages
- Bad debt write-offs
- Customer calls and collections
- Safety-related emergency calls
- Terminations
- Reconnections
- Late payments
- Notices

¹ Since the study examined the change in indicators from 2017 to 2019 for both the treatment and comparison groups, COVID-19 was not <u>a</u> confounding issue when 2020 participants were used as the comparison group.



Commented [EMC15]: Add a note on what qualifies someone for HES-IE?

Commented [EMC16]: The "indicators" here sound more like a data point in time ("at the end" of each of the years), whereas the costs of arrearages described below can accumulate over many months. Clarify. And, why 1 year? Provide rationale. Large arrearages may take well over a year to work down. Would results look different if these time periods pre & post were longer?

Commented [EMC17]: I question the assumption in the footnote. WHO participated in 2020 might have been very much affected by COVID and therefore the profiles might have been quite different. Can you at least provide a few comparisons that would evidence similarity?

To determine the monetary value of the pertinent NEIs, the study requested the following additional information from the utilities:

- Utility annual interest rate on short-term debt
- Percent of total arrears written off
- Utility cost per shutoff and reconnect
- Customer reconnection fee
- Utility cost per notice
- Utility cost per collections call
- Utility cost per safety-related emergency call
- Rate discount applicable to eligible low-income participants and participation rate

Finally, the study conducted in-depth interviews with utility staff on the following topics to inform the analysis:

- Relationship between arrears and HES-IE and LIHEAP program referral and participation
- Current shutoff policy and any changes in policy over the past five years

2.2 TASK 2 – DATA ASSESSMENT, CLEANING, AND PREPARATION

Upon receipt of the arrearage- and collections-related data from the utilities, the study team inspected the data for completeness and identified any data elements that were missing, incomplete, or potentially incorrect. The study team informed utility data teams of any data issues identified, and scheduled meetings as needed, to discuss and resolve these issues. After all data issues were addressed, the study team cleaned the data, merged them with HES-IE program tracking data, and prepared them for the analysis.

For both Eversource and UI, customer account numbers included in the HES-IE program tracking data were different than the customer billing account numbers included in the arrearages and shutoffs data. In order to be able to merge these two data, the study team asked for a crosswalk of the different account numbers or that the billing account numbers be added to the HES-IE data.

The utilities did not systematically track notices, collection calls, and safety-related emergency calls, so they could not provide the data needed to quantify the NEIs related to notices and calls. The NEI associated with reduced quantity of energy sold at the discounted rate was zero because neither of the utilities offered rate discounts to their low-income customers.

Only the following NEIs could be quantified with the data the utilities were able to able provide for the study.

- Reduced arrearage carrying cost (utility)
- Reduced bad debt write-off (utility)
- Fewer shutoffs and reconnects (utility)
- Avoided reconnect fees (participant)

Commented [EMC18]: Utility revenue, I presume? Any other revenues associated with arrearage and / or disconnection? Late fees (included in list above, but not here)? Interest charges?

Commented [GR19]: For all customers? Or was this just for Residential customers?

Commented [EMC20]: Why only utility staff? Perspectives from those in LIHEAP and WAP might also be useful, especially on the first of the two items.

Commented [GR21]: Good. What about WAP?

Commented [EMC22]: Only shut off policies? Or also policies on late fees, collections, etc.?

Commented [EMC23]: The study is the utility NEI; this is revenue for utility and should be put in those terms.



2.3 TASK 3 - DATA ANALYSIS

In-depth interviews the study <u>team</u> conducted with utility staff indicated a relationship between having arrearage problems and participating in HES-IE, LIHEAP, and arrearage forgiveness programs. Utilities marked customers with high arrears as having financial hardship and the customers on hardship lists would be more likely to be referred to the HES-IE program, as well as LIHEAP and arrearage forgiveness programs. That meant that using all 2018 HES-IE participants as the treatment group and all 2020 HES-IE participants as the comparison group may overstate the impact of HES-IE on arrears and shutoffs because the estimated change is likely to reflect the impact from participation in forgiveness and LIHEAP programs in addition to the impact from participation in the HES-IE program.

To control for the confounding effects from other programs, the study restricted both the treatment and the comparison group to those who carried arrears upfront (i.e., those who had non-zero arrears in December 2017) so that the two groups were more comparable in their likelihood to participate in those other programs during the study period. In this case, the change in arrears for the comparison group reflected the impact from LIHEAP and the arrearage forgiveness programs and the change in arrears for the treatment group reflected the combined impact from HES-IE as well as these other programs. So, the difference between the two reflected the incremental impact from HES-IE program.

The analysis in customer arrearage- and collections-related data quantified the following indicators for participants compared to the comparison group:

- Change in arrearages
- · Change in incidence of shutoffs and reconnects

Commented [EMC24]: Outline what arrearage forgiveness programs were in effect? Costs of those programs?

Commented [EMC25]:



Section 3 Results

3.1 ARREARAGES

Arrears are customer balances that are past due. For both the treatment and comparison group participants, the study defined arrears as of December 2017 as "Pre" and arrears as of December 2019 as "Post". The net change, or difference in differences, is the change in arrears for the treatment group minus the change for the comparison group. Table 2 presents the results for the change in arrears when all participants – with or without pre-arrears – were included in the analysis. Average pre-arrears were higher for the treatment group than the comparison group, which implies that the treatment group customers had higher levels of bill payment issues in December 2017, and were, therefore, more likely to be referred to other programs than the comparison group.

Commented [EMC26]: Any difference in definition of in arrears between the two utilities?

Commented [EMC27]: Any overall change in HDD or CDD in the year leading into each period? Arrearages can go up significantly during a very cold winter or hot summer. Would be good to mention whether any overall effects were in evidence and affecting the data.

		Pre (Mean Arrears as of	Post (Mean Arrears as of		Significant at 90%	(Diffe i	hange rence- n- ences)	Significant at 90%	
Utility	Study Group	n	Dec 2017)	Dec 2019)	Change (\$)	confidence level?	\$	%	confidence level?
E uropean services	Treatment	3,836	\$112	\$94	-\$18	Yes	*••	-32%	Yes
Eversource	Comparison	2,048	\$74	\$91	+\$18	Yes	-\$36		Yes
UI	Treatment	1,320	\$124	\$118	-\$6	No	-\$55	4.40/	Yes
UI	Comparison	454	\$73	\$122	+\$49	Yes	-900	-44%	res
Statowida	Treatment	5,156	\$115	\$100	-\$15	Yes	-\$38	-33%	Yes
Statewide	Comparison	2,502	\$74	\$97	+\$23	Yes	-900	-33%	res

To control for the confounding effects from the differences between the two groups in the likelihood to participate in other programs, which may also help reduce arrears, the analysis restricted the treatment and comparison groups to only those participants who had arrears as of December 2017. Table 3 presents the results when participants with no pre-arrears were excluded. In this case, the pre-arrears were very similar for the two groups (about \$300), which implies that the participants in the comparison group were having similar levels of bill payment issues as those in the treatment group. Therefore, the participants in the two groups were comparable in their likelihood to receive LIHEAP assistance or arrearage forgiveness during the analysis period. The net reduction in arrears for participants with pre-arrears, which was statistically significant for both utilities as well as statewide, was \$41 for Eversource, \$60 for UI, and \$46 statewide. That corresponds to a 14% reduction in arrears statewide.

Commented [EMC28]: Is there any waiting list for services for this program? What is average time from initial contact to service completion?



Table 3: Change in Arrears, Participants with Pre-Arrears											
	Pre (Mean Arrears as of	Post (Mean Arrears as of		Significant at 90%	(Diffe i	hange rence- n- ences)	Significant at 90%				
Utility	Study Group	n	Dec 2017)	Dec 2019)	Change (\$)	confidence level?	\$	%	confidence level?		
E vere evere	Treatment	1,544	\$308	\$188	-\$120	Yes	-\$41	-13%	Yes		
Eversource	Comparison	587	\$284	\$205	-\$79	Yes	-94 I		res		
UI	Treatment	488	\$334	\$242	-\$93	Yes	¢60	4.00/	Vee		
UI	Comparison	98	\$340	\$307	-\$33	No	-\$60	-18%	Yes		
Statowida	Treatment	2,032	\$315	\$202	-\$113	Yes	-\$46	-14%	Yes		
Statewide	Comparison	685	\$298	\$231	-\$67	Yes	-\$40	-14%	res		

Commented [GR29]: Are these both electric and gas arrearages? Please speak to this explicitly. The words "electric" and "gas" do not appear in this draft.

Don't we need separate analyses and NEI values for electric and gas participants?

3.2 SHUTOFFS

For both the treatment and comparison group participants, the study defined the number of shutoffs per customer in 2017 as "Pre" and the number of shutoffs per customer in 2019 as "Post". The net change, or difference in differences, is the change in the number of shutoffs per customer for the treatment group minus the change for the comparison group. Table 4 presents the results for the change in the number of shutoffs when all participants – with or without pre-arrears – were included in the analysis. Similar to the pre-arrears, the average number of shutoffs per customer in 2017 was higher for the treatment group than the comparison group when all participants were included in the analysis.

Table 4: Change in Number of Shutoffs, All Participants

Utility	Study	n	Pre (Shutoffs	Post (Shutoffs	Change	Significant at 90%	Net Cha (Differen Differen	ce-in-	Significant at 90%			0														
Ounty	Group		per customer in 2017)	per customer in 2019)		confidence level?	\$	%	confidence level?	ommented [EN ommented [EN	 		is it?													
_	Treatment	3,836	0.057	0.100	+0.044	Yes																				
Eversource	Comparison	2,048	0.035	0.070	+0.035	Yes	+0.009	+0.009	+0.009		+0.009	.009 +15%	0.009 +15%	+0.009 +15%	+0.009 +15%	0.009 +15%	+15%	+0.009 +15%	No	-15% No						
	Treatment	1,320	0.155	0.155	0	No	0.007	400/	N/																	
UI	Comparison	454	0.071	0.137	+0.067	Yes	-0.067	67 -43%	0.067 -43%	-0.067 -43%	-0.067 -43%	-0.067 -43%	-0.067 -43%	.067 -43%	-43%	-43% Yes	-0.067 -43%	-0.067 -43%	-0.067 -43%).067 -43%	67 -43%	Yes				
Ctotowide	Treatment	5,156	0.082	0.115	+0.032	Yes	0.000	110/	No																	
Statewide	Comparison	2,502	0.042	0.083	+0.041	Yes	-0.009	-0.009 -11%																		

To control for the confounding effects from the differences between the two groups in the likelihood to participate in other programs, which may also help prevent shutoffs, the analysis restricted the treatment and comparison groups only to those participants who had arrears as of December 2017. Table 5 presents the results when participants with no pre-arrears were excluded. This made the two groups more comparable in terms of the number of shutoffs they had in 2017. The results showed a statistically significant increase in the number of shutoffs for

Commented [GR32]: I initially thought of this as other EE programs, but this is mostly meant to include LIHEAP and arrearage forgiveness programs. Maybe state this explicitly.



Eversource customers in both treatment and comparison groups.² The net change in the number of shutoffs per customer was not statistically significant at the utility or statewide level.

-					,	P			
Utility	Study Group	n	Pre (Shutoffs per	Post (Shutoffs	Change	Significant at 90% confidence	(Differen	Net Change (Difference-in- Differences)	
	Group		customer in 2017)	per customer in 2019)		level?	[\$]	%	confidence level?
Eversour	Treatment	1,544	0.097	0.174	+0.077	Yes	+0.033 +3	+34%	No
Eversour	Comparison	587	0.089	0.133	+0.044	Yes	+0.033	+34%	NO
UI	Treatment	488	0.310	0.300	-0.010	No	-0.061	-20%	No
-01	Comparison	98	0.276	0.327	+0.051	No	-0.061	-20%	No
Statewide	Treatment	2,032	0.148	0.204	+0.056	Yes	+0.011	170/	No
Statewide	Comparison	685	0.115	0.161	+0.045	Yes	+0.011	+7%	NO

Table 5: Change in Number of Shutoffs, Participants with Pre-Arrears

3.3 MONETIZATION

With the data available, only the following NEIs could be quantified and monetized:

- Reduced arrearage carrying cost (utility NEI)
- Reduced bad debt write-off (utility NEI)
- Fewer shutoffs and reconnects (utility NEI)
- Avoided-<u>Reduced</u> reconnect fees (<u>utility participant-NEI</u>)

Table 6 shows the calculation of the annual monetary values of the above NEIs.

NEI per participant	Calculation
Reduced arrearage carrying cost (Utility NEI)	Reduction in arrearage per participant with pre-arrears () × % participants with pre- arrears × utility annual interest rate on short-term debt
Reduced bad debt write-off (Utility NEI)	Reduction in arrearage per participant with pre-arrears (\$) × % participants with pre- arrears × % arrears written off (5-year average)
Fewer shutoffs and reconnects (Utility NEI)	Reduction in the number of shutoffs due to non-payment per participant × (utility cost per shutoff + utility cost per reconnect net of customer reconnect fee)
Avoided reconnect fees (Participant NEI)	Reduction in the number of shutoffs due to non-payment per participant × customer reconnect fee

Table 6: NEI Monetization

Commented [EMC36]: Ditto – reduction in utility revenue from reconnection fees

Commented [EMC35]: Stick with utility focus

² The in-depth interviews the study team conducted with the utility staff revealed that while the utility shutoff policy remained the same in the past five years, Eversource increased its enforcement over these years. That may explain the increase in the shutoffs in 2019 compared to 2017.



The HES-IE program can reduce arrearages for participants and the associated carrying cost of that debt for the utilities. Table 7 shows the calculations and the resulting monetized NEI value for the reduced arrearage carrying cost. For the utility annual interest rate, instead of using the current interest rates from the utilities, which were at historic lows at the time of this analysis, the analysis chose to use the Federal Funds rate projection, which would better reflect the typical interest rates. The annual NEI is \$0.38 for Eversource, \$0.50 for UI, and \$0.41 statewide.

Table 7: Reduced Arrearage Carrying Cost										
Utility	Reduction in arrearage per participant (A)	% Participants with pre-treatment arrearage (B)	Utility annual interest rate on short-term debt* (C)	Annual NEI value per participant (A*B*C)						
Eversource	\$41	37%	2.5%	\$0.38						
UI	\$60	33%	2.5%	\$0.50						
Statewide	\$46	36%	2.5%	\$0.41						

*Median Federal funds rate projection for 2025 and beyond

The HES-IE program can reduce arrearages for participants, which in turn can reduce the bad debt write offs for the utilities. Table 8 shows the calculations and the resulting monetized NEI value for the reduced bad debt write-off. The annual NEI is \$3.14 for Eversource, \$3.61 for UI, and \$3.31 statewide.

Table 8: Reduced Bad Debt Write-off

Utility	Reduction in arrearage per participant (A)	% Participants with pre-treatment arrearage (B)	% Arrears written off (5-year average) (C)	Annual NEI value per participant (A*B*C)
Eversource	\$41	37%	21%	\$3.14
UI	\$60	33%	18%	\$3.61
Statewide	\$46	36%	20%	\$3.31

Since the reduction in the number of shutoffs due to non-payment was not statistically significant, which means that it was not statistically significantly different from zero, for either of the utilities or statewide, the monetized values of the utility and participant NEIs related to shutoffs and reconnects were \$0 as shown in Table 9. The NEI associated with reduced quantity of energy sold at the discounted rate was not applicable because neither of the utilities offered rate discounts to their low-income customers.

Table 9: Other NEIs – Annual NEI per Participant

NEI	Eversource	UI	Statewide
Fewer shutoffs and reconnects (utility)	\$0	\$0	\$0
Avoided reconnect fees (participant)	\$0	\$0	\$0
Reduced quantity of energy sold at the discounted rate (utility)	N/A	N/A	N/A



Section 4 Recommendations

Neither Eversource nor UI currently tracks data on customer notices, collection calls, and safetyrelated emergency calls in a systematic manner. Because of the absence of data on these metrics, any potential utility and participant-NEIs associated with fewer notices, collection calls, and safety-related emergency calls as a result of HES-IE program participation could not be quantified in this study. The study team recommends that the utilities start tracking these metrics so that future NEI studies could quantify the associated NEIs.

The customer account numbers included in the HES-IE program tracking data were different than those tracked in the customer shutoffs and arrearage data from the utilities. In order to be able to link the data for the same customer across the different datasets in the future, the study team recommends that the HES-IE program tracking database include the customer account numbers used by the billing department.

The study found that the reduction in the number of shutoffs due to non-payment was not statistically significantly different from zero. A potential confounding factor for that analysis was a change in the enforcement of service disconnection due to non-payment policy by Eversource. The study team recommends that utility and participant NEIs related to shutoffs and reconnects be revisited in a future NEI study.

Commented [GR37]: Though how significant would these NEIs likely be?

Commented [EMC38]: This should have been not relegated to a footnote in the body of the report. How extensive was this change and what potential effect on the results, especially since Eversource generally runs at about 75% of the Ns in the analysis.

Commented [EMC39]: Any other recommendations about looking at participant NEIs from what the team saw here? Any call for a recommendation that participant and societal NEIs be fully scoped and studied?

