June 3, 2022

Lisa A. Skumatz, Ph.D.

Skumatz Economic Research Associates (SERA)

762 Eldorado Drive

Superior, CO 80027

RE: CT C2014 C&I Lighting Saturation and Remaining Potential Study Draft Memo

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit these written comments regarding the draft memo for the *CT C2014 C&I Lighting Saturation and Remaining Potential Study* (“Draft Memo”) shared May 27, 2022, by DNV (“Evaluator”). Eversource received the Draft Memo on May 27, 2022, with a request to provide comments by either June 1 or June 2, 2022, yet this deadline was extended to June 6, 2022. Per the Energy Efficiency Board Evaluation Road Map Process, these comments are for consideration for inclusion in the Final Memo.

The objective of this study is to investigate savings opportunities around three key lighting-related themes: TLED to LED luminaire conversions, adding enhanced lighting controls capabilities to existing LEDs, and commissioning. These topics were selected during the scoping phase of this effort based on feedback from the Connecticut Evaluation Committee and Evaluation Administrator Team. This report serves as one of the key deliverables as part of the Connecticut C2014 C&I Lighting Saturation and Remaining Potential Study and presents key considerations for future program efforts.

**General Comments on Selected Presentation Findings**

Eversource appreciates the Evaluator’s efforts to investigate how Program Administrators (“PA”) can continue to generate savings within the lighting market. Eversource anticipates incorporating the new information to be provided in the Final Memo to implement program improvements.

**Comments on Methodology**

The Evaluator collected primary data from in-depth interviews (IDIs) with five lighting experts conducted in April and May 2022. The five lighting experts were selected with support from the Evaluation Administrators and represent independent consultants, product managers, and industry thought leaders with experience in EM&V, implementation, product management, policy, utility EE programs, and trade associations. While these experts were asked about Connecticut specific topics, they bring knowledge from the national market and regional markets in the Pacific Northwest, California, Midwest, and the Northeast.

Eversource finds the study methodology to be appropriate yet would like to comment on the Evaluator’s plan to conduct customer surveys to estimate net-to-gross (NTG) ratios as part of the C2014 study to help understand where lighting programs have a higher influence in continuing to transform the C&I lighting market in Connecticut. The Final Memo should note that program data was requested by the Evaluator and submitted for this purpose.

**Comments and Questions**

Eversource has the following comments and questions.

**TLED to LED Luminaire Conversions**: Consideration 1 in the Draft Memo mentions that PAs “should consider removing the incentives for TLEDs and focusing on LED luminaires, especially those with more advanced lighting controls capabilities like in luminaire-level lighting controls (LLLC) and networked lighting controls (NLC).” Eversource has the following questions pertaining to Consideration 1:

* What timeline does the Evaluators recommend this phase-out to occur? Also, how would that timeline apply to different programs (e.g., midstream, downstream, custom, direct install)?
* There are programs that offer TLEDs with controls. Does the Evaluator recommend those measures be removed as well?
* Do the Evaluator’s recommendations to stop incentivizing TLEDs apply to all types of TLEDs (e.g., Type B)?
* Can the Evaluator please elaborate on how the recommendation to remove incentives for TLEDs took into consideration impacts on environmental justice communities?

**Adding Controls to Existing LED Systems**: Consideration 3 states that “opportunities for adding controls to existing LED systems is extremely limited, so program administrators should consider focusing on integrating controls as part of all LED sales to minimize the stranded savings associated with LED only projects.” Yet how does this consideration reconcile that of Consideration 2: “Connecticut should consider conducting additional research to understand customer willingness to pay and the benefits associated with a program that would target replacing TLEDs with LLLCs or luminaires with NLC.”

* That is, the best opportunity to install an integrated control is when an LED is first installed, which would appear to be when switching from a TLED to an LED. Yet per Consideration 2, it’s unclear whether or not making such a switch is cost-effective.

**Request for Definitions**: Eversource requests that the Final Memo include definitions (ideally from industry non-profits and independent third-parties) for the following: commissioning, retro-commissioning, non-networked LLLCs, and fixtures with integrated controls.

* Consideration 5 states that “as Program Administrators explore retro-commissioning programs, they should consider focusing on non-networked LLLCs and fixtures with integrated controls.” The current retro-commissioning program focuses on energy management systems, so in addition to definitions, it would be important to understand from the Evaluator how retro-commissioning for non-networked LLLCs and fixtures with integrated controls can be put into practice.

Thank you for the opportunity to provide comments.

Sincerely,

Ignacio Obejero Paz

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