

February 16, 2015

Mr. Craig Diamond
Executive Secretary
Energy Efficiency Board
Ten Franklin Square
New Britain, Connecticut 06051

**RE: WRITTEN COMMENTS OF THE OFFICE OF CONSUMER COUNSEL
REGARDING THE IMPACT EVALUATION: HOME ENERGY
SOLUTIONS – INCOME-ELIGIBLE AND HOME ENERGY SOLUTIONS
PROGRAMS (R16)**

Dear Mr. Diamond:

The Office of Consumer Counsel (“OCC”) hereby provides its comments on the Final Report Impact Evaluation on the 2011 Home Energy Solutions – Income-Eligible (“HES-IE”) and Home Energy Solutions (“HES”) Programs (R16).

OCC is disappointed in the unexpected change in the methodology that took place during the conduct of this study, which made for a two-part study, as well as the data limitations that arose. Because the evaluation was split into two separate studies (whole-house billing analysis and measure-level impact evaluation), the overall budget increased and there were changes to both the timeline and the specificity of data that was originally expected, which most likely had an effect on the strength of the results.

Now that both the whole-house billing analysis and the measure-level impact evaluation have been completed, revealing conclusive evidence regarding the cost-effectiveness of various aspects of the programs, program and measure changes should be implemented to ensure that ratepayer and participant dollars are spent in a cost-effective manner. Low realization rates with respect to some of the measures, especially on the gas side, are of particular concern to OCC. HES and HES-IE are the flagship residential programs of the EEB, and it is imperative that they provide both actual and perceived value to ratepayers so that they can move toward becoming market based programs.

OCC continues to believe that in order to truly transform this program to be market-based, customer education and contractor licensing are two areas that must be addressed. Customers need to be well-informed about what will happen in their home during an audit, how long it will take, and that the audit is just the first step toward the ultimate goal of achieving deeper savings in the home. Deeper measures need to be encouraged in ways that make it easy for customers to make informed decisions about how to take the next steps in the program. In addition, vendors should be incented to follow up with customers after the audit to encourage follow-up on deeper measures.

OCC believes that if all parties work toward the goal of providing cost-effective programs that are transitioning to a market-based programs, HES and HES-IE can improve to be more valuable and cost-effective services to Connecticut consumers.

OCC looks forward to reviewing other comments, taking part in the technical meeting and working with all parties on the transformation of the HES and HES-IE programs.

Respectfully submitted,

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