



May 24, 2018

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

RE: R1702/R1710 Codes and Standards Assessment Draft Report

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit these written comments regarding the draft evaluation report: *R1702/R1710 Codes and Standards Assessment, Review Draft* (“Draft Report”), submitted May 10, 2018 by NMR, Inc. (“Evaluator”). Eversource received the Draft Report on May 10, 2018 with a request to provide comments by May 24, 2018. Per the Energy Efficiency Board Evaluation Road Map Process, these comments are for consideration for inclusion in the Final Report.

This study estimated code compliance rates and potential savings from compliance enhancement for new single-family homes in Connecticut that were built at the end of the 2009 International Energy Conservation Code (IECC) cycle. The study also compares homes to the amended version of the 2012 IECC adopted in Connecticut (2012 IECC-CT). The study projects the savings potential of creating a compliance enhancement program in Connecticut, by (1) assessing code compliance rates for new homes in Connecticut using the “MA-REC” methodology, and (2) estimating the gross technical potential savings available from code compliance enhancement in Connecticut. The analysis was based on site visits to 70 new, non-program homes and REM/Rate analysis of 180 program homes.

Comments on Findings and Recommendations

Eversource appreciates the Evaluator’s well-supported analysis and useful findings on code compliance in the Connecticut residential construction market. Eversource supports the goal of increasing levels of code compliance for new homes in Connecticut, and realizing the energy savings that comes with increased compliance. In support of this goal, Eversource’s Residential New Construction (RNC) program has offered increased trainings on 2012 IECC requirements to code officials, builders, and others. As part of this code-related training curriculum, the program has emphasized air leakage—an area of code that the Draft Report identifies as having relatively lower levels of compliance—and will continue to do so in future trainings. Eversource looks forward to the results of the ongoing RNC Net-to-Gross (NTG) evaluation, to help quantify how existing trainings impact building practices across the state, including to what extent these efforts increase compliance levels of non-program homes.

In addition, Eversource will continue to monitor the results of compliance enhancement programs in neighboring states, as suggested in the Draft Report. There is a certain level of complexity associated with measuring and attributing savings from code compliance programs, such as disentangling spillover savings already captured in NTG studies, and quantifying impacts from performance-based vs. prescriptive compliance paths. Eversource will consider whether additional compliance enhancement efforts such as those in neighboring states could achieve savings that can be clearly documented, measured and attributed to program. Finally, Eversource looks forward to the results of the residential code compliance study currently being conducted by Tunxis Community College, which should provide further insight into potential savings opportunities from compliance enhancement efforts in Connecticut.

Sincerely,

Miles Ingram

Miles Ingram
Sr. Analyst, Energy Efficiency, Eversource
Miles.Ingram@Eversource.com
860-665-2441