



September 4, 2018

Lisa A. Skumatz, Ph.D.

Skumatz Economic Research Associates (SERA)

762 Eldorado Drive

Superior, CO 80027

R1707 Net-to-Gross Study of Connecticut Residential New Construction, Draft Report

Dear Dr. Skumatz

The United Illuminating (“UI”) on the behalf of the United Illuminating, Connecticut Natural Gas and Southern Connecticut Natural Gas Companies is pleased to submit these written comments regarding the draft evaluation report: R1707 Net-to-Gross Study of Connecticut Residential New Construction (RNC) Program submitted August 9 2018 by NMR Group, Inc. (“Evaluator”) to the Energy Efficiency Board Evaluation Road Map Process, these comments are for consideration for in the Final Report.

This study evaluated projects with the most energy savings in the CT Connecticut Residential New Construction (RNC) Program for the year 2015.

UI appreciates the opportunity to comment on this draft report. Along with these briefs comments, UI has attached the draft report with our comments included.

Overall, UI finds that this report confirms the high level of impact of for the RNC Program in Connecticut.

There are several areas of the report for which UI would like further clarification:

- The report shows savings reports savings values for all homes, gas, and propane heated homes. With that information UI would like to see the results for electrically heated new homes parsed out. This will be useful as Connecticut looks to advance heat pumps for future.
- The report should better define their definition it used to define multi-family new homes, such as number of units, number of stories, etc.

- UI would like a better explanation to the Free Ridership calculation that is based on “Program Counterfactual Consumption” minus “Program as Built Consumption”.
- The report recommends the use of single overall Net to Gross Value for both single and multi-family homes, yet the results for single family and multi-family are very different. U would like to see further discussion on the possible results
- UI is concerned that Multifamily projections given the following description in the report. “While single-family results are speculative in that panelists provided estimates of a hypothetical scenario, readers should be advised that the results from the multifamily analyses could be considered more so, as the panelists did not make measure level multifamily estimates, and non-program data was based on artificial data sets
- The report should make an estimate of the impact, on the RNC, of the adoption of the 2015 IESS building code in late 2018.

UI appreciates the opportunity to provide these comments on the draft report and we look forward to their incorporation into the study’s final report.

Richard Oswald

Principal Engineer.
UIL Holding Company
Richard.Oswald@uinet.com