March 23, 2012

Tim Cole, Ph.D. Executive Secretary, Energy Efficiency Board West Wind Consulting 157 Whitney Street Hartford, CT 06105

RE: CL&P Review of the Draft Interim Report on the Connecticut Light and Power Home Energy Reports Program.

Dear Mr. Cole:

The Connecticut Light and Power Company ("CL&P" or the "Company"), is pleased to submit these written comments with regard to a draft evaluation report: *Connecticut Light and Power Home Energy Reports Program: Spring and Summer Billing Analysis, Draft Interim Report*, NMR Group, Inc. ("interim report"). The interim report was submitted to the Energy Efficiency Board ("EEB") on March 9, 2012 and provides preliminary results from the CL&P Home Energy Reports program.

CL&P is encouraged by the preliminary findings in the interim report which estimate total program induced electricity savings of approximately 1.9% based on the first seven months of program activity (February 2012 through August 2012). The interim report also stated that participants that received monthly reports showed higher savings (2.2%) compared to customers who received quarterly reports (1.4%) during the study period.

However, CL&P is aware that there are significant unexplained discrepancies between the NMR, Inc. interim report findings and estimates of savings produced by the vendor (Opower) who is implementing the Home Energy Reports program. If not resolved, these discrepancies could cause the EEB to draw inaccurate conclusions about the program's impact that could negatively influence the design of future such programs in the state. Furthermore, CL&P understands that Opower will be submitting comments reflecting these differences and that Opower will recommend that these differences should be examined through a collaborative process. In order to ensure confidence in the program savings, CL&P supports efforts to further examine the findings provided by Opower and NMR, Inc. in order to understand the differences in the two savings estimates.

NMR, Inc. is expected to complete the analysis of the Home Energy Reports program in the next few months and submit a final report on the Home Energy Reports program later this year. While the interim report findings are promising, CL&P believes the final report will provide additional and meaningful information on the program and will provide a more comprehensive analysis of the program including a full year billing analysis with estimates of winter and summer savings; focus group results; an analysis of persistence of savings; and follow up surveys to gauge program satisfaction and to identify participant changes in behavior. CL&P requests that the final report include a rigorous and transparent analysis to provide additional assurance that the results are meaningful, accurate, and indisputable.

CL&P awaits the release of the draft final report and reserves the right to comment on the final report upon its completion.

Very Truly Yours,

Ronald Araujo

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