



UIL HOLDINGS CORPORATION

157 Church Street, New Haven CT 06510-2100
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October 2, 2014

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

Craig Diamond
Executive Secretary, CT Energy Efficiency Board
10 Franklin Square
New Britain, CT 06051

Re: Residential Lighting Interactive Effects (R67)

Dear Ms. Skumatz:

The United Illuminating Company (“UI”) hereby submits the following comments on the draft evaluation report: *Residential Lighting Interactive Effects (R67)*, (“study”), September 5, 2014, NMR Group, Inc. (“Evaluator”). UI received a memo on September 18, 2014 that included details of the findings from the study with a request to provide comments by October 2, 2014.

NMR has also recently completed the Regional Hours of Use Study (R3) and has drafted the Home Energy Solutions/Home Energy Solutions Income Eligible Evaluation (R-16). These also evaluated lighting extensively but used different methodologies.

UI requests further work to be done to evaluate these three studies in tandem.

- A comparison should be made of the lighting assumptions used in this study (energy modeling with RemRate) with those findings from the Regional Hours of Use Study (R-3). Specifically, explain the difference in these studies relative to hours of use, hours of use as a function of penetration percent, number of sockets per home, load shapes, savings by room type, existence of snapback, etc.
- Review and document that the realization rates in R-16 are properly allocated to the correct measure. Based on this study, the evaluated savings in R-16 and the heating realization rates in R-16 should be adjusted to properly reflect for “lost gas” savings attributed to lighting interactive effects.



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In addition, please provide information regarding the following:

- What was the reasoning behind using the Saturation study to model the efficient bulbs rather than using more recent data, in light of the rapidly changing market.
- How are the 2007 EISA standards reflected in the study? Footnote six states baseline is incandescent, and the examples do not follow the PSD methodology that accounts for EISA effects.
- Please provide detailed information on precision as it relates to the lighting representation, interactive effects and gas takeback factor. The only precision provided was the homes are a reasonably accurate description of single-family homes in Connecticut for the Weatherization Baseline Assessment.
- The study was done on single-family homes. How should multi-family be treated?
- Why was only a gas takeback factor included when our programs serve all customers regardless of fuel?

Thank you for the opportunity to provide these comments. We look forward to the next draft that addresses our concerns and will plan to provide additional feedback.

Very truly yours,

A handwritten signature in blue ink that reads "Donna Wells".

Donna Wells
Manager Technical Support Services
UIL Holdings Corporation