



UIL HOLDINGS CORPORATION

157 Church Street, New Haven CT 06510-2100
203-499-2000

May 27, 2015

Lisa Skumatz, Ph. D.
Skumatz Economic Research Associates (SERA)
762 Eldorado Drive
Superior, CO80027

Re: R-86: Connecticut LED Market Assessment and Lighting Net-to-Gross Overall Report (Study), May 2015, NMR Group, Inc., Cadmus Group, and DNV GL

Dear Ms. Skumatz:

The United Illuminating Company (“UI” or the “Company”), hereby submits the following comments on R-86: Connecticut LED Market Assessment and Lighting Net-to-Gross Overall Report (Study). The draft was submitted to UI on May 13, 2015 with a request for comments to be provided by May 27, 2015.

The Company feels that the evaluation vendor has presented a draft report that is organized and general meets the stated goals of:

- Consumer reactions to varying efficient bulb types and the Energy Independence and Security Act (EISA);
- To assess the residential LED market by describing current conditions and exploring future conditions;
- Net-to-gross (NTG) ratios for CFLs and LEDs for the upstream lighting (Retail Products) program.

The report provides a variety of conclusions and recommendations. These support actions the Companies are already taking. Some comments follow:

NTG Estimates for 2013 and 2014; looking ahead to 2016 to 2018:

The Company agrees that the current NTG values will continue to be used for 2016-2018. The Company practice is to use the existing results until superseded by a newer study.

Continue practice of increasing support for LEDs while gradually reducing support for CFLs:

The Company will continue this practice.

Consider shifting some incentive support from Home Improvement to other channels:

The Company already provides differing levels of incentives to different types of stores and will continue this practice.

Cease specialty CFL incentives:

The Company has already ceased specialty CFL incentives.



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Continue regular estimation of NTG using a multi-pronged NTG approach:

The Company agrees with the importance of regular and timely NTG or realization rates studies for all of our programs. These results are used in the Connecticut Program Savings Documentation and impact energy savings calculations.

Increase customer education toward LEDs:

The Company will continue to educate our customers on lighting through a variety of channels.

Specific comments to the evaluation are provided below:

On page 1, the Study refers to “state legislation mandating the shift” (to LEDs). Please provide clarification and a source for this statement.

The Company has questions regarding the socket saturation forecast for 2014. It appears the 2014 socket saturation number is a straight line extrapolation from the 2013 data. Should this be considered a forecast? It also appears that there are several numbers for the 2014 saturation forecast; Figure 4 provides 38% while Figure 5 and Figure 6 provides 34%. Please clarify.

The Company has concerns the supplier comments regarding *comparisons* of different programs are being written as negative findings for the Connecticut program. If the supplier survey had not been performed in conjunction with another State would these comparisons have been offered?

The limitations of the POS data should be spelled more clearly early on. It should be in the text, not just a footnote at first mention. The actual percentage impact is known and should be mentioned earlier than page 15. Was the lack of data known prior to the purchase? Is there a recommendation whether this data should be used in the future due to this limitation?

Please provide additional details on why NTG numbers were calculated for each utility. Is there any statistical difference between companies?

On page 9, change the footnote from an email to referencing page 289 of the 2015 Connecticut Program Savings Document (PSD).

Thank you for the opportunity to provide these comments.

Very truly yours,

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

Donna Wells
Manager Technical Support Services
UIL Holdings Corporation