



May 18, 2022

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

RE: X1942a Cross-Cutting NEI Study – Utility NEI and Arrearage Data Analysis Results

Dear Dr. Skumatz,

Eversource Energy (“Eversource”) is pleased to submit these written comments regarding the Review Draft Evaluation Memo: *X1942a Cross-Cutting NEI Study – Utility NEI and Arrearage Data Analysis Results* (“Draft Memo”), submitted May 10, 2022 by NMR Group (“Evaluator”). Eversource received the Draft Memo on May 10, 2022 with a request to provide comments by May 18, 2022. Per the Energy Efficiency Board Evaluation Road Map Process, these comments are in response to the Draft Memo for consideration for inclusion in the Final Report.

The goal of this part of the X1942 study was to quantify and monetize non-energy impacts (NEI)s from increased affordability and reduced arrears.

General Comments on Draft Memo Findings

Eversource appreciates the Evaluator’s efforts to conduct a study to quantify NEIs that accrue to utilities and participants in the form of financial savings from increased bill affordability and reduced arrears. We value the Evaluator’s determination of NEIs and anticipate incorporating the new NEI values into the PSD.

Comments on Methodology

The Evaluator conducted in-depth interviews with utility staff and analyzed the Companies' arrearage and collections data. To control for confounding effects from other programs, the Evaluator restricted both the treatment and comparison group to those who had arrears in December 2017 so the two groups would be comparable in their likelihood to participate in other programs during the study program. The analysis in customer arrearage- and collections-related data quantified the following indicators for participants compared to the comparison group: change in arrearages and change in incidence of shutoffs and reconnects. Eversource finds the study methodology to be appropriate.

Comments and Questions

Eversource has the following comments and questions.

Did the analysis look at all customers who participated in the Home Energy Solutions – Income Eligible (HES-IE) program (including participants who only received a home energy assessment) or just those that completed weatherization measures?

Please clarify the analysis that was done to ensure comparability between the treatment and comparison groups.

Clarification around account numbers in program tracking data and billing data: One of the recommendations stated that customer account numbers included in the HES-IE program tracking data were different than those tracked in the customer shutoffs and arrearage data from the utilities. This is not accurate. The account numbers are the same across the program tracking data and the customer billing data. The account numbers are just listed in different formats in the two tracking systems. Eversource explained to the Evaluator how to convert the account numbers from the program tracking data into the format that they appear in the billing data. Eversource's current program tracking data system stores the account numbers both in their full form and the abbreviated form that appears in the billing data, so converting between the two formats to compile data will not be needed in the future.

Thank you for the opportunity to provide comments and questions.

Sincerely,

Megan Errichetti

Megan Errichetti

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