



OCC Submits Comments for DEEP's Consideration in 2016-2018 Conservation & Load Management Plan

The Office of Consumer Counsel ("OCC") provided written comments on the proposed 2016-2018 Conservation and Load Management Plan, which was submitted to DEEP for its consideration by Eversource Energy, The United Illuminating Company, Connecticut Natural Gas and Southern Connecticut Gas Company (collectively, "the Companies").

DEEP is currently considering the proposed Plan and will issue a Draft Decision in the coming weeks. OCC's comments highlighted four main areas:

Audits – OCC worked with the Energy Efficiency Board members as well as the state's utility companies during the planning of the 2016-2018 C&LM Plan to incorporate independent financial and operational audits of conservation funds to be done periodically, beginning in 2016. OCC is pleased with the addition of this important review, but is interested in learning how the companies determined the dollar amount in the proposed plan, and whether there is a contingency plan in place should the funds be too low or too high.

Evaluation – OCC continues to work closely with the evaluation process, which focuses on improving existing programs and creating successful new programs. OCC values the collaborative nature of the evaluation committee and feels confident that the budgets for the studies over the next three years has been appropriately negotiated and set.

Home Energy Solutions – OCC is supportive of the Home Energy Solutions ("HES") program transitioning into a market-based program but hopes that DEEP requires stringent QA/QC in place. OCC does not support the Companies' proposal to have the authority to change the HES co-pay regionally, but instead believes the co-pay should remain constant throughout the state.

Performance Management Incentives – OCC does not support the Companies' proposed level of performance management incentive ("PMI") of 4.5%, and encourages DEEP to either keep the current level of 4.0% or to not go beyond 4.25%. With the significant changes pending in the flagship HES program, OCC believes the PMI should remain constant for the next three transitional years.