



# Ameren Illinois CPAS Perspective



- Ameren Illinois shifting away from focus on first year savings to identify and value long term savings for measures and programs
- This refined focus may be identified through changes including but not limited to:
  - Adding or removing programs or measures based on assumed measure life
  - Adjusting program design based on measure life
  - Reevaluating eligible facility for program marketing or offerings based on potential measures and measure life
  - Balancing overall portfolio makeup year-to-year based on measure life and future expiring savings
  - Increased focus of evaluation efforts on program and measure life considerations
- One example would be limiting incentives for measures with 1 to 2 year measure life; or expanding incentives for measures, programs, or initiatives with longer measure life
- CPAS focus presents a need to balance limited budgets while useful measures with long measure life may present higher cost per savings

# Ameren Illinois CPAS Challenges



- Main challenges are in standard/specialty LED bulbs and behavior modification
  - Traditionally, able to provide lowest \$/kWh
  - Generally these measures are presenting shorter measure life through Illinois TRM
  - Are there alternative program designs or priority approaches from policy perspective that will override impact of short measure life on portfolios?
- Is the TRM making CPAS more complicated than it needs to be?
  - For example, T12 replacements at Assisted Living Facilities has a 1 year life prior to a baseline shift.
  - Also, baseline shifts on some building envelope residential measures are extremely complicated based on the type of equipment that the customer has

## **Two choices seem to exist:**

- 1. Expired measure life means expired measure life only; or**
- 2. TRM is cleaned up to make demonstration of expired savings very clear**

# Ameren Illinois CPAS challenges



- CPAS should take into account what would occur if the EE programs are not in place
  - For instance, energy use would likely go up over immediate future without Compressed Air Leaks being repaired through the programs in Illinois
- Should studies incorporate the market outside of Ameren Illinois and ComEd areas, in areas that do not have EE programs?
  - If market studies are used to influence CPAS, the baseline should be areas where there are no EE programs in place
  - Also, in looking at the future for potential studies, the market in Illinois has had EE influence for over a decade so potential may be less

# Ameren Illinois CPAS challenges



- Difficulty of achieving persisting savings
  - Lighting standards hitting in 2021/2022
    - PY2018 AIC Standard/Specialty LED bulbs
      - \$0.07/first year kWh (incentives only) and 110,000 MWh (28% of goal)
      - Other measures: \$0.17/first year kWh (incentives only) and 270,000 MWh
  - With lower hanging fruit gone, more expensive measures must be installed to get longer-term savings
  - Measures are impacting CPAS prior to the end of the measure life due to baseline shifts and other policy considerations
- Need to focus on measures that provide long-term savings through 2030 and beyond, not just the 4 year planning cycles as the goal period
- A potential solution would be adjustable goals
- A potential solution would be to clean up the TRM

# Ameren Illinois CPAS questions looking ahead



- Market adjustments for savings over lifetime of the measure are being put in the TRM versus Net-to-Gross (NTG) adjustments
  - If a market adjustment is assumed for a measure, should NTG go to 1 once that market adjustment is put in place?
- Should incentives for customers be higher for measures that expire 2030 or later?
- Savings for many behavior measures have a low default measure life. If the utility is thinking about doing pilot studies, there is concern of how a short measure life by default may impact immediate goals.
  - Is there a possibility to get intermediary measure life that is longer for some of the pilot measures or expiration that does not affect AAIG achievement within a current plan?

