

CPAS Questions Requiring Further Discussion¹

SAG Facilitator – December 9, 2019 (Draft)

1. SAG needs to think about CPAS challenges from a policy standpoint:
 - a. How do we address competing policy objectives?
 - b. How do we address the impact of CPAS on income qualified/income eligible programs?
 - c. Impact on IL gas utility portfolios due to significant electric changes.
2. IL-TRM Questions:
 - a. Are there process changes needed to the annual TRM update to account for CPAS considerations, such as the potential for future baseline shifts and market adjustments?
 - b. Is there a need for revisiting the current practice, that the TRM assumptions at the time of installation hold for the full measure life, rather than making adjustments to savings in later years for changes made in future TRMs (retroactive application of TRM changes)? If so, how would that work?
 - c. How does the TRM identify the end of measure life?
 - d. What is the appropriate venue to discuss measure baselines going forward?
 - e. If a market adjustment is assumed as part of baseline assumptions for a measure, should NTG be deemed at 1.0 once that market adjustment is put in place?
 - f. There were a number of references to “cleaning up the TRM” in the Nov. 20th meeting – what would that include?
 - g. How could the TRM be changed to make “demonstration of expired savings” very clear?
 - h. How can the TRM process consider different assumptions for income qualified measures?
3. What does it mean to reach the end of the measure life?
4. How to define “expired savings”?
5. Are there joint utility program considerations that could help address CPAS challenges (such as behavior modification programs)?
6. Market Effects
 - a. Should studies incorporate the market outside of Ameren IL and ComEd service territories, in areas that do not have EE programs (e.g., can savings from market effects be claimed)?
 - b. How is “market effect” defined?
7. How can CPAS take into account what would occur if the EE programs are not in place?
 - a. For example, addressing the measure life on a measure like compressed air leaks. Without the program, there would be additional leaks.
 - b. What are the evaluation challenges and how can they be addressed?
8. Potential proposed solution: A policy to allow adjustable savings goals for electric utilities.
9. Should incentives for customers be higher for measures that expire 2030 or later? Is there a policy rationale in IL to prioritize savings that last beyond 2030?

¹ Questions identified during Nov. 20, 2019 SAG meeting: <https://www.ilsag.info/event/wednesday-november-20-sag-meeting-persisting-savings/>