**ComEd Proposed Edits to IL-TRM Attachment C**

**Draft for Working Group Review (6/22/2022)**

**Proposal and Draft Language:**

* Add new Sections 1.7 and 1.8, following the existing Section 1.6 of Attachment C: [Attachment C to IL-TRM Version 8.0: Framework for Counting Market Transformation Savings in Illinois (August 23, 2019)](https://ilsag.s3.amazonaws.com/MT_Savings_Paper_Final_08-23-2019.pdf)

**1.7 Pre-Program Planning**

Market Transformation programs and Program Administrators/Implementers should develop a thorough savings framework and logic model *before* implementation decisions. Evaluators should review the MT Savings Protocols that includes the logic model, market progress indicators (MPIs), Natural Market Baseline (NMB) and savings framework before a project is initiated, informing development of an Evaluation Plan. The objective is to agree (before resources are allocated to an MT Program) that as long as the program is executed consistent with the Program Design, energy savings will not be challenged and retroactively revised.

The Evaluator Review should address the questions below:

* Can the market for the MT program be measured?
* Is the Logic Model/Program Design sound and does it meet a threshold level of confidence?
* If an element of the program design needs to be strengthened, can the Evaluator recommend research to bolster the Logic Model?
* Does the program design include collection of information sufficient to apply a preponderance of evidence approach to evaluation of all MPIs, and the frequency at which MPIs should be evaluated?
* Is there an understanding and agreement on the Natural Market Baseline, which is an estimate of the market as if there were no utility funded energy efficiency activity over time?
* Are there any needed improvements to the Savings Framework?

MT Program Planners should consider that the development of the MT Savings Protocols that includes the Logic Model/Program Design, Natural Market Baseline, a Savings Framework and an Evaluation Plan will require more time and resources than the corresponding Plan for an RA program, and propose any additional research that may be needed to answer the questions above. Utilizing the TRM Attachment C MT Protocol Process Recommendation provides a MT framework and work breakdown structure to help streamline activities in reaching consensus on these MT Savings Protocols.

**1.8 Revisions to the Savings Framework**

As Market Transformation Programs progress and markets evolve over time, Program Implementers and Evaluators will get new information on the underlying assumptions for the Energy Savings Framework. As this happens, original market projections of program impact (and therefore assumptions about the Natural Market Baseline) may deviate from actual market developments as measured. Therefore, the criteria for reopening and redesigning the energy savings framework should be established prior to program initiation. The criteria should be based on the magnitude of the deviation. Typical market metrics such as market share or number of efficient appliances sold should be used. A nominal value of 15% deviation can be used, but this value should be established in the Pre-Program Planning phase.

Revisions to the Energy Savings Framework for Market Transformation Programs should only be adopted prospectively, applying only to future programs. The savings framework will be prospective only.