

**Annual SAG Net-to-Gross Update Process**  
**Guidehouse Responses to Questions Raised by the Office of the Illinois Attorney General**  
**September 18, 2026**

**ComEd NTG Value: All but Street Lights and Data Centers New Construction**

1. How many interviews/surveys were conducted?
  - a. **Response:** The results are based on 14 in-depth interviews and 3 web surveys that represent 23 projects and 65% of the total ex ante savings. This information is provided in Table 3 of the memo. The 2027 recommended NTG value is based on a three-year rolling average of research conducted in CY2023, CY2024, and CY2025, combined to develop the recommendation.
2. What questions were asked? (Note: Guidehouse stated it can add the survey to the end of the memo as an appendix.)
  - a. **Response:** The same survey instrument was used for all projects in the Custom program. The survey instrument was added to the research memo as an appendix.

**ComEd NTG Value: Data Center New Construction**

1. The basis for the recommended change is based on "In-depth telephone interviews and web surveys for sampled projects"
  - a. How many interviews/surveys were conducted?
    - **Response:** For CY2025, four in-depth interviews were conducted, representing 60% of the total ex ante savings for New Construction Data Center projects. Additional information is provided in Table 4 of the memo. The 2027 recommended NTG value is based on a three-year rolling average of research conducted in CY2023, CY2024, and CY2025, combined to develop the recommendation.
  - b. What were the sizes of the sampled data center projects? Were they hyper-scalers, whole building data centers, subcomponent of a building, etc.?
    - **Response:** All four New Construction Data Center projects in our sample are whole building facilities classified as large-scale data centers (10–50 MW).
  - c. What questions were asked to ascertain free ridership? How was it determined that the incentive influenced the project scope?
    - **Response:** We have included the survey instrument as in the appendix in the memo that provides the questions and the algorithm that were used to estimate FR. The questions and the algorithm are consistent with the TRM recommended approach.
  - d. What are the expected data center sizes for the future applications? Should there be different approaches for different scales?
    - **Response:** Based on our current pipeline visibility, future applications appear consistent with historical trends, primarily consisting of large-scale data center facilities. We believe our current single NTG approach for this category is the best possible approach given the small sample size and

the current sizes of the existing data center projects. If we begin to see an increase in the sample size as well as data centers of varying scales in the application pipeline, we can adjust our approach as needed in the next cycle to account for differences in project size.

e. Please provide the calculation that supports the 0.82 FR value.

- **Response:** The NTG value of 0.18 was developed based on research conducted for CY2023, CY2024, and CY2025 Data Center projects. To support this result, we are providing aggregate information including the population and sample sizes, the kWh savings represented by the sample, and the stratum-level NTG results shown below. There is no spillover associated with the researched projects. As shown in the table, the research is based on four completed interviews representing eight projects and 69% of the three-year population savings. The savings-weighted average NTG across Data Center New Construction projects is 0.18, which corresponds to an FR value of 0.82.

**Table 1: DC NC Sample Distribution and NTG Results by Stratum (CY2023-25)**

| Strata           | Population | Sample Size | Sample as % of Population Savings | Strata kWh | Strata FR | Strata NTG |
|------------------|------------|-------------|-----------------------------------|------------|-----------|------------|
| DC NC – Strata 1 | 5          | 3           | 46%                               | 40,962,553 | 0.85      | 0.15       |
| DC NC – Strata 2 | 7          | 5           | 97%                               | 22,669,427 | 0.77      | 0.23       |
| <b>Total</b>     | <b>12</b>  | <b>8</b>    | <b>69%</b>                        |            |           |            |

- When conducting these surveys, we made a commitment to our respondents that their individual responses would stay confidential and only be shared in aggregate form. We are concerned about sharing individual project results since that could potentially compromise that confidentiality commitment. Language used in the Survey Instrument Guide notes, *“Your responses are completely confidential and will only be shared in combination with other Program participants’ responses.”* However, the stratum level results and the sample representations provided in Table 1 should provide the visibility needed on how the program level NTG was derived.

f. Please provide this year’s and last year’s survey results for FR.

- **Response:** The table below provides the weighted NTG for each program year.

**Table 2: DC NC Weighted NTG by Program Year**

| Program Year | Sample Size | Weighted NTG |
|--------------|-------------|--------------|
| CY2023       | 1           | N/A*         |
| CY2024       | 3           | 0.05         |
| CY2025       | 4           | 0.25         |

\*Since the sample size for CY2023 is 1, weighted NTG was not provided for that year.

- We are providing the weighted NTG for each program year instead of the individual survey results. Consistent with the confidentiality commitments made to survey respondents mentioned above, we cannot

provide respondent-level calculations or survey results. Given the very small sample size, disclosure of project-level or respondent-level information could compromise participant anonymity.

- g. See Guidehouse's Custom Program CY2025 Net-to-Gross Research Results Memo at 3: "Given the pace of change in the data center market, incorporating projects closer to the time of the actual investment decision is expected to improve the relevance and quality of NTG research findings while reducing reliance on decisions made several years earlier." (Section 2.2) Why are results from previous years less relevant, particularly given the small number of projects available as the basis for the NTG determination? Why are previous survey results viewed as lower quality than more recent surveys?
- **Response:** We are not suggesting that previous research results are lower quality. Rather, we accelerated the inclusion of newly completed NTG interview of the pre-approved project to ensure the dataset reflects current market conditions; all projects are weighted equally based on their savings representation regardless of research cycle. This approach allows us to maintain a balanced three-year rolling average (CY2023, CY2024, and CY2025) that captures both current market dynamics and stability from multiple years of research data. We can revise the language in the memo to clarify our approach.