**Illinois EE Stakeholder Advisory Group**

**Fuel Conversion Working Group**

**Policy Questions – Request for Responses (3/23/2021)**

**Instructions for Responding to Policy Questions:**

* Interested parties are requested to respond to policy questions no later than **Monday, April 19 –** send responses to [Celia@CeliaJohnsonConsulting.com](mailto:Celia@CeliaJohnsonConsulting.com).
* Please provide responses *within this Word document*.
* The SAG Facilitator will organize responses to questions and circulate in advance of Meeting #2, scheduled on Monday, April 26.

**Policy Questions – March 2021**

1. There is a 2-phase question around Section 8-103B(b-25) in the Future Energy Jobs Act (FEJA) – does the statute require the same methodology? If not, is another methodology / conversion factor more appropriate?
   1. Does Section 8-103B(b-25) relate to measures / programs that save both gas and electric for joint programs (or non-joint programs)?
   2. Since FEJA states that claiming savings from “other fuels” is permissible for measures or programs that save both electricity and other fuels, what does that mean (specifically “*measures or programs that save both electricity and other fuels*?”)
2. Should site or source savings be used for screening criteria (whether a project qualifies as an energy efficiency measure)?
3. If using source energy is the SAG decision, how is “source energy” or “carbon equivalency” defined for each fuel?
   1. What losses, if any, should be included in source energy?
   2. Should historic, current or forecast be used, or a blend?
4. Should site or source savings (or carbon equivalency) be used for counting savings?
   1. Does the decision depend on whether it’s an energy conservation measure vs. a fuel switching measure?
   2. Define “energy conservation measure”
   3. Define “fuel switching”
   4. Is there a difference between switching between a regulated fuel and a non-regulated fuel?
   5. For CHP, does the carbon equivalency need to change (given there is no methodology in the gas statute)?
   6. Should the answer to the site vs. source question be different in different use cases?
   7. How does the site vs. source decision impact custom measures?
5. There may be statutory language that is applicable for defining an energy efficiency measure; once an energy efficiency measure is identified, how should the savings be calculated?
6. Is there a difference between reducing consumption at the site, and eliminating a natural gas customer? Does that change how we treat the savings?
7. Are fuel switching measures limited by the 10% cap in FEJA?
8. Are there any differences in these conclusions depending on which fuel is being substituted?
   1. Is there a difference between switching between a regulated fuel and a non-regulated fuel?
9. When is a utility allowed to claim savings from a gas to electricity fuel switch?
   1. Criteria for electric-only utilities
   2. Criteria for gas-only utilities
   3. Criteria for dual-fuel utilities
10. Is a source savings calculation required for each installation to determine whether it is an eligible efficiency measure?
    1. If yes, what if measures are delivered midstream and the existing fuel type is not collected?
    2. Can source savings screening occur for most likely baseline and efficiency assumptions at the start of a program year, and if eligible, no further source screening would be required for the rest of the program year?