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6 Cross-Cutting Measures

6.1 Behavior

6.1.1 Adjustments to Behavior Savings to Account for Persistence

DESCRIPTION

Energy efficiency program administrators are increasingly including behavior programs as part of their portfolios. These programs are characterized by various kinds of outreach, education, and customer engagement designed to motivate increases in conservation and energy management behaviors, and most commonly include participant specific energy usage information. Savings impacts are evaluated by ex-post billing analysis comparing consumption before and after (or with and without) program intervention, and require M&V methods that include customer specific energy usage regression analysis and randomized controlled trial (RCT) experimental designs, among others (see Behavioral protocol set forth in the IL-TRM Attachment A: Illinois Statewide Net-to-Gross Methodologies for more information). As such, initial calculation of savings is treated as a custom protocol.[1]

An important issue for many stakeholders is whether energy savings from behavior programs continue over time (i.e., whether they persist beyond the initial program year). Behavior programs have now been delivered for a number of years in many jurisdictions. The weight of evaluation evidence indicates that the energy-saving behaviors influenced through at least some types of these programs can persist beyond the initial period of program intervention, even without continued program participation.[2] This post-treatment savings persistence has implications for calculations of first-year savings, measure life, and cost-effectiveness testing. Accounting for persistence will yield savings and cost-effectiveness estimates that more accurately reflect the true benefits of these programs. Because annual goals are based on first-year savings, programs should count, and only count, savings attributable to first-year spending. The effect of persistence of savings from such spending beyond the first year should be included in any lifetime savings calculations (including cumulative persistent annual savings) and cost effectiveness testing.

The protocol below was developed to outline the adjustments that should be made to account for the persistence of savings beyond the year of program delivery. This general protocol is applicable to behavior programs of any type, delivered to residential or C&I customers, that have evaluated evidence of program persistence. However, the deemed persistence values and measure life in this version of the protocol are specific to residential home energy reports (HERs)-type programs only.[3] Evaluations in Illinois and elsewhere have shown that at least some of the savings from residential HERs-type behavior programs can persist into the first several years following discontinuation of program delivery, though on-going savings levels decay over time.[4] For residential RCT programs evaluated to date, savings have been shown to persist for at least two years and as much as eight years following program delivery,[5] and industry expectations are that savings may persist beyond that. For any other program type,

[1] The protocol outlined here assumes that adjustments to remove the effects of savings from program lift (participation in other utility programs), including legacy uplift, to account for move-outs and opt-outs, to normalize for effects of weather, and any other appropriate adjustments, have been made as part of the custom calculation of savings – this final savings value is referred to as "Measured Savings" in the calculations below.

[2] Long-Run Savings and Cost-Effectiveness of Home Energy Reports Programs, Cadmus, October 2014. Also see additional sources in the REFERENCE TABLES section below.

[3] Residential HERs-type programs: programs that regularly deliver home energy reports to residential customers through direct mail or email channels using a random control trial (RCT) experimental design. At a minimum, the reports include customer specific usage information used for a comparison to similar households and individualized energy savings tips.

[4] See REFERENCE TABLES below for sources.

[5] Long-Run Savings and Cost-Effectiveness of Home Energy Reports Programs, Cadmus, October 2014. Also see additional sources in the REFERENCE TABLE below. Given the variable characteristics of persistence studies available, we acknowledge that using an average of these studies by fuel type may be the best approximation of persistence rates. However, moving forward, the TAC will incorporate additional study values and develop the most appropriate persistence factors, taking into account when possible participant characteristics, such as the duration of exposure, the frequency of reports, baseline usage, as well as the amount of time that has persisted since receiving their final report, and the shape of the persistence curve.

persistence factors and years of persistence will only be deemed for application once supportable assumptions for persistence exist as measured by multi-year, rigorous evaluation studies.

Evaluations of residential HERs-type programs calculate a custom value on an annual basis to estimate yearly savings which is the initial input value for application of this persistence protocol. Evaluators typically use a regression analysis to estimate program effects. These regression analyses provide what is called an average treatment effect (ATE) estimate of program savings. The ATE approach takes advantage of the presence of a randomly assigned control group for each cohort that received reports in the service territory. These regressions use various methods to account for household-specific usage patterns.[6] Because of the experimental design, we can assume that the treatment and control groups experienced similar historical, political, economic, and other events that had comparable effects on their energy use. Moreover, because these groups experienced generally similar weather conditions, it is not necessary to measure or include weather in the RCT model specification to calculate initial annual savings related to the program.

However, in the case of comparing and summing savings year over year, exogenous factors, such as weather, are likely to make annual estimates non-equivalent. In particular, weather is likely to play an important role in driving behavioral effects, affecting savings magnitude (e.g., a constant percentage change in consumption will result in more cooling savings during a hotter-than-average summer), as well as savings rate (e.g., the percentage change in consumption is likely to be higher during hotter-than-average summers. As such, for this framework, evaluators will adjust for effects related to weather as part of the custom inputs to this protocol. Each evaluator will choose the most appropriate method for weather normalization. For example, one method would be to provide savings using a model specification that incorporates standard weather year inputs (e.g., HDD and CDD), to be used as the initial input into the calculation of annual savings, as well as inputs for cost effectiveness, as outlined below. This input will approximate average savings for a standard weather year based upon historical data.[7] Adjusting savings to a standard weather year is consistent with how other weather-sensitive TRM measures are specified, and will remove weather risk from performance goals and cost-effectiveness testing.[8]

For any new programs (referred to as “waves” in the calculations below), their first year will be assumed to be Year 1 for that wave – that is, each wave is tracked separately, and savings are calculated separately using the approach outlined here. The assumptions and protocols outlined below will not be applied retrospectively to any utility programs.

Updates to persistence factors and prospective retention rates from future evaluations, once incorporated into the IL-TRM, will be used when available for calculation of annual savings values for applicable program years but will not be applied retrospectively to previous years’ savings calculations. This includes that when persistence factors and retention rates are changed, the evaluation will utilize the persistence factors and retention rates that were used to calculate claimed savings in previous years to subtract persistence savings from those years. For example, persistence factors changed between CY2021 and CY2022; in CY2021 the earlier persistence factors (based on a 5-year measure life) were used to claim savings from CY2021- CY2025, therefore in CY2022-CY2025 persisting savings from CY2021 should be subtracted based on those same persistence factors. Savings for CY2022 and forward would use the new persistence factors. The same logic applies for prospective retention rates. This avoids a situation where savings that have never been claimed are being subtracted as persisting (for example, avoiding the situation where in CY2018 the utility only got to claim 15% of savings for CY2022, but now in CY2022 we are going to subtract 37% of savings as persistence from CY2018).

[6] For example, a linear fixed-effects regression (LFER) model includes a household-specific intercept to account for time invariant, household-level factors affecting energy use, and a post program regression (PPR) model uses energy use lags to account for household-specific usage in the year prior to the program.

[7] In the future, this approach could be empirically tested by comparing actual savings calculated in future program years against standard weather year results, producing a ‘realization rate’ between planned and actual savings results. Standard weather years could potentially be enhanced to better reflect these differences.

[8] We acknowledge that this approach is a proxy for estimating actual savings to allow for prospective calculation of lifetime savings. However, a substantial limitation to this approach is the issue of unobserved behavioral ramp-up that is likely to occur for future waves of participants.

As noted above, all other types of behavior programs other than residential HERs-type programs may use this adjustment protocol with appropriate persistence factors as follows. In the absence of supportable evidence for behavioral persistence for such other program types, persistence factors and measure life will not be deemed. Instead, program administrators may choose to propose and defend persistence factors and years of persistence to be used for such behavioral programs on a custom basis in concert with the independent evaluator and stakeholders,[9] on the understanding that the evaluator should then plan to retrospectively assess persistence for these programs when feasible. However, these persistence factors will be subject to evaluation risk similar to any other custom evaluation parameter.

DETERMINATION OF EFFICIENT BEHAVIOR

Behavior programs focus primarily on reducing electricity and natural gas consumption through behavioral changes; this reduction is generally measured through ex-post billing analysis after program intervention. Specific energy conservation and management behaviors are not usually directly observable. The specific definition of the efficient case is part of the design of behavioral programs and is included as part of the custom saving protocol, which will include any adjustment necessary to remove effects of program-related investments in efficient equipment.

DETERMINATION OF BASELINE BEHAVIOR

The ideal baseline for behavior programs is the energy usage without the program intervention. Various types of experimental, quasi-experimental, and/or regression-based EM&V approaches are used to present statistically valid approximations to this without-program baseline.[10] The specific definition of the baseline case is part of the design of behavioral programs and is included as part of the custom saving protocol.

DEEMED LIFETIME/PERSISTENCE OF SAVINGS

We assume here that positive savings for residential HERs-type behavior programs persist at some level for nine years beyond the initial treatment year for electric programs, giving a 10-year measure life, and for six years beyond the initial treatment year for gas programs, giving a seven-year measure life.[11] In the case of negative first-year savings, savings do not persist into the future. On-going persistent savings over those years are not equal, however; it is preferable that actual levels of ongoing savings should be calculated by future year as outlined below (see Application of Persistence for Prospective Calculations section below) to be used in cost effectiveness and lifetime savings calculations.[12] For other behavior program types without deemed measure lives and persistence factors, program administrators may choose to propose and defend years of persistence to be used on a custom basis in concert with the independent evaluator and stakeholders, on the understanding that the evaluator should then plan to retrospectively assess persistence for these programs when feasible. Alternatively, a deemed one-year measure life may be used if nothing defensible on measure life/persistence exists.

DEEMED MEASURE COST

It is assumed that most behavior changes in residential settings can be accomplished with homeowner labor only and without investment in new equipment; therefore, without evidence to the contrary, measure costs incurred by customers in such residential programs focused on motivating changes in customer behavior may be defined as $0.[13]

[9] Program Administrators may also choose to use a deemed one-year measure life in the absence of other evidence.

[10] See the Illinois Behavioral protocol set forth in the IL-TRM Attachment A: IL-NTG Methods for more information concerning randomized control trials and quasi-experimental evaluation methods for non-randomized designs for behavior programs.

[11] Determined as a reasonable assumption by Illinois TAC members. This assumption should continue to be updated as additional research is conducted on these types of programs, and additional evaluation should be undertaken to assess the reasonableness of this assumption for Illinois-specific programs.

[12] This method of applying calculated values for future year benefits is preferred. Alternatively, an effective measure life can be calculated as Effective Measure Life = Total Discounted Lifetime Savings / First Year Savings.

[13] Future evaluation of costs of behavior change is encouraged to help clarify this assumption. In addition, as noted earlier in this measure characterization, in order to ensure double counting of savings does not occur, the protocol outlined here assumes that adjustments to remove the effects of program lift have been made as part of the custom calculation of savings. In

Costs for C&I programs may include additional staffing, software purchases, etc. Cost for such programs is therefore program specific and is determined on a custom basis.

Costs incurred by Program Implementation Contractors to provide customer-specific information leading to behavior changes are considered study-based services as defined in the Illinois Energy Efficiency Policy Manual. Therefore, the full cost of these study-based services charged by the Program Implementation Contractor is the measure cost, because this is assumed to be the cost of the study-based service that would have been incurred by the Customer if the Customer were to have the study-based service performed in the absence of the efficiency Program.

LOADSHAPE AND COINCIDENCE FACTOR

While there is evidence from analysis of AMI data that the savings loadshape for residential HERs-type programs mirrors the whole-house electric energy load pattern, there are not yet enough data to develop a behavior-specific loadshape. Indications from several unpublished analyses[14] show that these behavior savings occur in a general pattern most closely approximated by the Residential Electric Heating and Cooling Loadshape (R10) than any other current residential measure loadshape; this is therefore recommended as the most reasonable approximation for use until more-specific data are available. Loadshapes and coincidence factors will need to be determined for other types of behavior programs once sufficient data are in hand.

Algorithm

CALCULATION OF SAVINGS

Throughout these protocols, Year T refers to the current reporting year for which annual savings are being determined (treatment year).[15]

ELECTRIC ENERGY SAVINGS

The algorithm shown below for this measure was developed to calculate the annual persistence-adjusted electric savings in to be reported in year T after adjustment to account for the proportion of the measured savings for that program year that actually reflects any persistent savings from prior years' program activities (Years T-1, T-2, T-3, etc.).[16]

$$\Delta kWh_{T\ Adjusted} = \Delta kWh_{T\ Measured} - \sum_{i=1}^{n} (\Delta kWh_{T-i\ Adjusted} * RR^{i} * PFE_{i})$$

Where:

$\Delta kWh_{x\ Adjusted}$ = total program annual savings for year X after adjustments to account for persistence (calculated value)

$\Delta kWh_{x\ Measured}$ = measured kWh savings: total program savings as determined from custom

a similar manner, given the savings accounted for by other utility programs are removed from the savings claims and cost effectiveness for the behavior program, the incremental costs associated with such utility program incentivized measures should also be excluded from the behavior program cost-effectiveness analysis, so as to help ensure double counting of costs does not occur in the utility portfolio cost-effectiveness analysis.

[14] Based on communication from Mathias Bell based on (currently unpublished) studies done by Opower, Cadmus, and LBNL. Also see DTE Energy: Behavior Program Measures for Submission to 2015 MEMD - Year Three Energy Savings - Demand Savings. Energy Optimization, April 15, 2014. http://www.michigan.gov/documents/mpsc/memd_2015_453673_7.pdf

[15] Calculation algorithms account for attrition of customers out of the service territory, as well as persistence decay. It has been noted that there may also be a need to adjust for cross-year effects of large differences in weather conditions or economic impacts. Custom savings inputs therefore are adjusted for standard year weather.

[16] This calculation should be carried out separately for each "wave" of behavior programs, where a wave is defined as a newly launched program. For simplicity, any new wave is assumed to start at the beginning of a program year (Year 1) and may include multiple different treatment types such as usage groups, report frequency, etc. For example, any wave added after 2022 will be considered Year 1 in the year they are launched.

calculation/billing analysis of participants in program during year X (input value)[17]

RR = a wave-specific expected retention rate for the program[18,19]

PFE_Z = Persistence factor, electric programs (deemed value)

= % savings that persist Z years after savings were initially measured

= use table below to select the appropriate value

n = number of additional years beyond first year of program delivery for which savings persist

= Illinois electric programs assumption = 9

Electric Persistence Factors[20]

Program Type = Electric Residential HERs-type (RCT)		
Application Year	Persistence Factor	
	If ΔkWh_T Adjusted >= 0	Else
Program Year T (treatment year) - record 100% of adjusted savings ($\Delta kWh_{TAdjusted}$ above)	100%	100%
Percent adjusted savings from Year T activities that persist **1 year after year T** = PFE_1	78%	0%
Percent adjusted savings from Year T activities that persist **2 years after year T** = PFE_2	61%	0%

[17] All appropriate adjustments to remove effects of participation in other utility programs, move-outs, opt-outs, to normalize for effects related to weather, and other adjustments as determined by the program experimental design, are assumed to have been made to result in this value for "measured savings". This value has been adjusted for standard year weather terms.

[18] This retention rate should be an historical average, based on multiple years of data, that applies for a given utility wave. The retention rate should be updated on a regular basis (for example, with the program planning cycles) to make sure it remains reflective of current program and economic conditions. Evaluators will decide for each wave what population the retention rate should be based on (for example: all residential customers; the entire population eligible for the program; the current program population). In making this decision, evaluators should consider data availability, how long a wave has been in the program, the customer makeup of the wave, and other factors as needed.

[19] It is possible that some savings related to behavioral programs persist even after participants move and are therefore dropped from the program. Such persistent savings could potentially occur in two ways. First, some proportion of these potential savings likely comes from efficient measures installed on the premises and not otherwise identified through other direct program participation; this component of saving could persist even under new building ownership. Second, participants who move might continue behavior changes that save energy even in a new setting; this could continue to provide savings to the program administrator if the move was within the same utility territory. As of this time, no definitive information exists as to the level of program savings related to installed measures vs. behavioral changes, making determination of these effects highly uncertain, and sufficient data may not exist to track individual customer moves. As such, this protocol assumes no persistent savings related to customers who move. Program administrators may choose to propose and defend a methodology to calculate persisting savings net of the existing RCT for the residual effects of move-outs on a custom basis in concert with the independent evaluator and stakeholders. Such a custom treatment should be based on defensible evaluation of the proportion of persisting savings from move-outs related to installed efficient measures vs. ongoing changes in behavior, utility-specific data on total customer moves within the utility territory, and appropriate management of customers who move with regard to future behavior program participation. Management of customers who move out, and the associated persisting savings of the households and premises, should not impede the ability of the program administrator to operate the program as an RCT and maintain or expand the program size (households in treatment, etc.). Such an adjustment will be subject to evaluation risk similar to any other custom evaluation parameter.

[20] See REFERENCE TABLES below for sources.

Program Type = Electric Residential HERs-type (RCT)		
Application Year	Persistence Factor	
	If ΔkWh_T Adjusted >= 0	Else
Percent adjusted savings from Year T activities that persist **3 years after year T** = PFE_3	47%	0%
Percent adjusted savings from Year T activities that persist **4 years after year T** = PFE_4	37%	0%
Percent adjusted savings from Year T activities that persist **5 years after year T** = PFE_5	29%	0%
Percent adjusted savings from Year T activities that persist **6 years after year T** = PFE_6	23%	0%
Percent adjusted savings from Year T activities that persist **7 years after year T** = PFE_7	18%	0%
Percent adjusted savings from Year T activities that persist **8 years after year T** = PFE_8	14%	0%
Percent adjusted savings from Year T activities that persist **9 years after year T** = PFE_9	11%	0%

Example of Adjusted Annual Savings Calculations:

Assume the following information on participation and measured savings for an electric HERs-type program for the following program years (all adjustments have been made to remove effects of program lift, weather, etc. within the custom savings calculations). Assume 2021 is the first year of the program/wave.

	Reporting Year						
	2021	2022	2023	2024	2025	2026	2027
Input data from program information and custom savings analysis							
# Participants (households)	120,000	109,000	103,000	99,000	94,000	90,000	88,000
kWh per participant (household)	200	250	245	250	250	265	265
kWh Measured savings (custom)	24,000,000	27,250,000	25,235,000	24,750,000	23,500,000	23,850,000	23,320,000

Expected Retention Rate of 95%

Calculation of Adjusted Annual Savings:

$\Delta kWh_{2021\ Adjusted}$ = 24,000,000 kWh

$\Delta kWh_{2022\ Adjusted}$ = 27,250,000 – (24,000,000 * 0.95 * 0.78)
= 9,466,000 kWh

$\Delta kWh_{2023\ Adjusted}$ = 25,235,000 – (9,466,000 * 0.95 * 0.78) – (24,000,000 * 0.95^2 * 0.61)
= 5,008,094 kWh

$\Delta kWh_{2024\ Adjusted}$ = 24,750,000 – (5,008,094 * 0.95 * 0.78) – (9,466,000 * 0.95^2 * 0.61) – (24,000,000 * 0.95^3 * 0.47)
= 6,156,543 kWh

$\Delta kWh_{2025\ Adjusted}$ = 23,500,000 – (6,156,543 * 0.95 * 0.78) – (5,008,094 * 0.95^2 * 0.61) – (9,466,000 * 0.95^3 * 0.47)
– (24,000,000 * 0.95^4 * 0.37)
= 5,133,637 kWh

$\Delta kWh_{2026\ Adjusted}$ = 23,850,000 – (5,133,637 * 0.95 * 0.78) – (6,156,543 * 0.95^2* 0.61) – (5,008,094 * 0.95^3 * 0.47)
– (9,466,000 * 0.95^4 * 0.37) – (24,000,000 * 0.95^5 * 0.29)
= 6,400,301 kWh

$\Delta kWh_{2027\ Adjusted}$ = 23,320,000 – (6,400,301 * 0.95 * 0.78) – (5,133,637 * 0.95^2 * 0.61) – (6,156,543 * 0.95^3 * 0.47)
– (5,008,094 * 0.95^4 * 0.37) – (9,466,000 * 0.95^5 * 0.29)
– (24,000,000 * 0.95^6 * 0.23)
= 5,579,188 kWh

Continue for future years as appropriate.

Apply the same approach to calculate adjusted annual kW and Therms, using appropriate factors and lifetimes.

SUMMER COINCIDENT PEAK DEMAND SAVINGS

Coincident peak demand savings in year T should also be adjusted to account for persistence from previous years using a similar algorithm.[21]

If peak demand is measured directly by the custom savings analysis:

$$\Delta kW_{T\ Adjusted} = \Delta kW_{T\ Measured} - \sum_{i=1}^{n} (\Delta kW_{T\text{-}i\ Adjusted} * RR^{i} * PFE_{i})$$

Where:

[21] While there are no current studies that evaluate the persistence of peak savings, without more-specific information on the actual behaviors undertaken by program participants and their corresponding peak savings, it seems reasonable to assume that peak savings will also persist in a similar pattern; both of the approaches given assume persistence in peak savings. Further evaluation should be undertaken to clarify this point and determine appropriate peak-specific persistence values.

$\Delta kW_{X\ Adjusted}$ = total program demand savings for year X after adjustments to account for persistence (calculated value)

$\Delta kW_{X\ Measured}$ = total program demand savings as determined from custom calculation /billing analysis of participants in program during year X (input value)[22]

Other variables as defined above

If peak demand is not measured directly by the custom savings analysis, peak demand should be calculated as follows:

$\Delta kW_{T\ Adjusted}$ = ($\Delta kWh_{T\ Adjusted\ Summer}$ / #summer hours) * peak adjustment factor

Where:

$\Delta kWh_{T\ Adjusted\ Summer}$ = average adjusted electric energy savings (calculated above) for peak summer months

= $\Delta kWh_{T\ Adjusted}$ * 0.42 * (3/5)

= $\Delta kWh_{T\ Adjusted}$ * 0.25

Where:

0.42 = Summer Loadshape % for May – Sept[23]

3/5 = proportion of May-Sept hours that fall in June, July, and Aug

summer hours = # hours in June, July, and Aug

= 8760 / 4

Where: 8760 = Hours per year

peak adjustment factor = adjustment for peak k/w over average kW for these hours

= 1.5 [24]

FOSSIL FUEL ENERGY SAVINGS

The algorithm shown below for this measure was developed to calculate the annual persistence-adjusted Therm savings in to be reported in year T after adjustment to account for the proportion of the measured savings for that program year that actually reflects any persistent savings from prior years' program activities (Years T-1, T-2, T-3, etc.).[25]

$\Delta Therms_{T\ Adjusted} = \Delta Therms_{T\ Measured} - \sum_{i=1}^{n} (\Delta Therms_{T-i\ Adjusted} * RR^{i} * PFG_{i})$

Where:

$\Delta Therms_{x\ Adjusted}$ = total program annual savings for year X after adjustments to account for persistence (calculated value)

[22] All appropriate adjustments to remove effects of participation in other utility programs, move-outs, opt-outs, to normalize for effects related to weather, and other adjustments as determined by the program experimental design, are assumed to have been made to result in this value for "measured savings". This value has been adjusted for standard year weather terms.

[23] The value 0.42 represents the total summer hour percentage from the Residential Electric Heating and Cooling (R10) loadshape (i.e. summer peak (31%) plus summer off-peak (11%)).

[24] Based on an approach used in Michigan that gives resulting values supported by evaluation claims. Also see DTE Energy: Behavior Program Measures for Submission to 2015 MEMD - Year Three Energy Savings - Demand Savings. Energy Optimization, April 15, 2014. http://www.michigan.gov/documents/mpsc/memd_2015_453673_7.pdf

[25] This calculation should be carried out separately for each "wave" of behavior programs, where a wave is defined as a newly launched program. For simplicity, any new wave is assumed to start at the beginning of a program year (Year 1) and may include multiple different treatment types such as usage groups, report frequency, etc.

$\Delta Therms_{x\ Measured}$ = total program savings as determined from custom calculation/billing analysis of participants in program during year X (input value)[26]

PFG_Z = Persistence factor, gas programs (deemed value)

= % savings that persist Z years after savings were initially measured

= use table below to select the appropriate value

n = number of additional years beyond first year of program delivery for which savings persist

= Illinois gas programs assumption = 6

Other variables as defined above

Gas Persistence Factors[27]

Program Type = Gas Residential HERs-type (RCT)		
Application Year	**Persistence Factor**	
	If $\Delta Therms_{TAdjusted}$ >=0	**Else**
Program Year T (treatment year) - record 100% of adjusted savings ($\Delta Therms_{TAdjusted}$ above)	100%	100%
Percent adjusted savings from Year T activities that persist **1 year after year T** = PGE_1	70%	0%
Percent adjusted savings from Year T activities that persist **2 years after year T** = PGE_2	49%	0%
Percent adjusted savings from Year T activities that persist **3 years after year T** = PGE_3	34%	0%
Percent adjusted savings from Year T activities that persist **4 years after year T** = PGE_4	24%	0%
Percent adjusted savings from Year T activities that persist **5 years after year T** = PGE_5	17%	0%
Percent adjusted savings from Year T activities that persist **6 years after year T** = PGE_6	12%	0%

APPLICATION OF PERSISTENCE FOR PROSPECTIVE CALCULATIONS

For determination of prospective savings related to programs delivered in year T (including cost-effectiveness, lifetime savings, and cumulative prospective annual savings (CPAS)), future years' savings related to the current year activities should be recorded for this measure as savings for each specific year calculated using the table below – the current year plus 9 years of future persisting savings for electric programs, and the current year plus 6

[26] All appropriate adjustments to remove effects of participation in other utility programs, move-outs, opt-outs, to normalize for effects related to weather, and other adjustments as determined by the program experimental design, are assumed to have been made to result in this value for "measured savings". This value has been adjusted for standard year weather terms.
[27] See REFERENCE TABLES below for sources.

years of future persisting savings for gas programs, in the case of positive first-year savings. Because of the potentially confounding effects of differences in weather in future years, the savings inputs used ($\Delta kWh_{TAdjusted}$, $\Delta kW_{TAdjusted}$, $\Delta Therms_{TAdjusted}$) for these future-year savings calculations have been determined using weather normalized inputs. This input (to be provided by program evaluators) will approximate average savings for a standard weather year based upon historical data.[28] In the case of negative first-year savings, no savings will persist into future years.

Calculation of Future Years' Savings Related to Current Year Activities			
	Electric Programs		Gas Programs
	Electric Energy Savings	Peak Savings	Therm Savings
Program Year T: record 100% of adjusted annual savings as calculated above	$\Delta kWh_{TAdjusted}$	$\Delta kW_{TAdjusted}$	$\Delta Therms_{TAdjusted}$
Percent savings from Year T activities that persist 1 year after year T	$\Delta kWh_{TAdjusted} * PFE_1 * RR$	$\Delta kW_{TAdjusted} * PFE_1 * RR$	$\Delta Therms_{TAdjusted} * PFG_1 * RR$
Percent savings from Year T activities that persist 2 years after year T	$\Delta kWh_{TAdjusted} * PFE_2 * RR^2$	$\Delta kW_{TAdjusted} * PFE_2 * RR^2$	$\Delta Therms_{TAdjusted} * PFG_2 * RR^2$
Percent savings from Year T activities that persist 3 years after year T	$\Delta kWh_{TAdjusted} * PFE_3 * RR^3$	$\Delta kW_{TAdjusted} * PFE_3 * RR^3$	$\Delta Therms_{TAdjusted} * PFG_3 * RR^3$
Percent savings from Year T activities that persist 4 years after year T	$\Delta kWh_{TAdjusted} * PFE_4 * RR^4$	$\Delta kW_{TAdjusted} * PFE_4 * RR^4$	$\Delta Therms_{TAdjusted} * PFG_4 * RR^4$
Percent savings from Year T activities that persist 5 years after year T	$\Delta kWh_{TAdjusted} * PFE_5 * RR^5$	$\Delta kW_{TAdjusted} * PFE_5 * RR^5$	$\Delta Therms_{TAdjusted} * PFG_5 * RR^5$
Percent savings from Year T activities that persist 6 years after year T	$\Delta kWh_{TAdjusted} * PFE_6 * RR^6$	$\Delta kW_{TAdjusted} * PFE_6 * RR^6$	$\Delta Therms_{TAdjusted} * PFG_6 * RR^6$
Percent savings from Year T activities that persist 7 years after year T	$\Delta kWh_{TAdjusted} * PFE_7 * RR^7$	$\Delta kW_{TAdjusted} * PFE_7 * RR^7$	n/a
Percent savings from Year T activities that persist 8 years after year T	$\Delta kWh_{TAdjusted} * PFE_8 * RR^8$	$\Delta kW_{TAdjusted} * PFE_8 * RR^8$	n/a
Percent savings from Year T activities that persist 9 years after year T	$\Delta kWh_{TAdjusted} * PFE_9 * RR^9$	$\Delta kW_{TAdjusted} * PFE_9 * RR^9$	n/a

Where all variables are as defined above.

[28] In the future, this approach could be empirically tested by comparing actual savings calculated in future program years against standard weather year results, producing a 'realization rate' between planned and actual savings results. Standard weather years could potentially be enhanced to better reflect these differences.

Example of Calculation of Cost-effectiveness Inputs:

Assume the same information for an electric program as was used in the Example of Adjusted Annual Savings Calculations.

	Reporting Year T						
	2021	2022	2023	2024	2025	2026	2027
Annual Energy Savings = Adj. kWh savings (previously calculated) = $\Delta kWh_{TAdjusted}$	24,000,000	9,466,000	5,008,094	6,156,543	5,133,627	6,400,301	5,579,188
RR = 0.95							

Inputs for calculating cost effectiveness in 2021:

Cost-effectiveness benefit of 2021 savings in 2022 = $\Delta kWh_{2021\ Adjusted} * PFE_1 * RR$ = 24,000,000 * 0.78 * 0.95 = 17,784,000 kWh

Cost-effectiveness benefit of 2021 savings in 2023 = $\Delta kWh_{2021\ Adjusted} * PFE_2 * RR^2$ = 24,000,000 * 0.61 * 0.95^2 = 13,212,600 kWh

Cost-effectiveness benefit of 2021 savings in 2024 = $\Delta kWh_{2021\ Adjusted} * PFE_3 * RR^3$ = 24,000,000 * 0.47 * 0.95^3 = 9,671,190 kWh

Cost-effectiveness benefit of 2021 savings in 2025 = $\Delta kWh_{2021\ Adjusted} * PFE_4 * RR^4$ = 24,000,000 * 0.37 * 0.95^4 = 7,232,816 kWh

Cost-effectiveness benefit of 2021 savings in 2026 = $\Delta kWh_{2021\ Adjusted} * PFE_5 * RR^5$ = 24,000,000 * 0.29 * 0.95^5 = 5,385,515 kWh

Cost-effectiveness benefit of 2021 savings in 2027 = $\Delta kWh_{2021\ Adjusted} * PFE_6 * RR^6$ = 24,000,000 * 0.23 * 0.95^6 = 4,057,707 kWh

Inputs for calculating cost effectiveness in 2022:

Cost-effectiveness benefit of 2022 savings in 2023 = $\Delta kWh_{2022\ Adjusted} * PFE_1 * RR$ = 9,466,000 * 0.78 * 0.95 = 7,014,306 kWh

Cost-effectiveness benefit of 2022 savings in 2024 = $\Delta kWh_{2022\ Adjusted} * PFE_2 * RR^2$ = 9,466,000 * 0.61 * 0.95^2 = 5,211,270 kWh

Cost-effectiveness benefit of 2022 savings in 2025 = $\Delta kWh_{2022\ Adjusted} * PFE_3 * RR^3$ = 9,466,000 * 0.47 * 0.95^3 = 3,814,479 kWh

Cost-effectiveness benefit of 2022 savings in 2026 = $\Delta kWh_{2022\ Adjusted} * PFE_4 * RR^4$ = 9,466,000 * 0.37 * 0.95^4 = 2,852,743 kWh

Cost-effectiveness benefit of 2022 savings in 2027 = $\Delta kWh_{2022\ Adjusted} * PFE_4 * RR^5$ = 9,466,000 * 0.29 * 0.95^5 = 2,124,137 kWh

Cost-effectiveness benefit of 2022 savings in 2028 = $\Delta kWh_{2022\ Adjusted} * PFE_4 * RR^6$ = 9,466,000 * 0.23 * 0.95^6 = 1,600,427 kWh

Continue this approach for future years as appropriate.

Apply the same approach to calculate cost-effectiveness inputs for kW and for Therms, using appropriate factors and lifetimes.

WATER IMPACT DESCRIPTIONS AND CALCULATION

N/A

DEEMED O&M COST ADJUSTMENT CALCULATION

N/A

REFERENCE TABLES

Persistence studies done to date for HERs-type programs capture effects through a specific time frame and only for the specific program characteristics of the programs studied. While any individual study may not accurately represent conditions in Illinois or those for all Illinois programs, the Illinois TAC has determined that an average of the implied annual decay rates across the electric- or gas-specific studies done to date (Tables 1 and 2 below) is the best currently available data to approximate persistence for the general class of residential HERs-type programs. This protocol assumes a standard decay function with a constant annual savings decay rate, where Persistence in year t = (1 – Annual Decay Rate)^t.

It is recommended that the persistence values and the length of persistence application as used in this protocol continue to be reviewed for update once every plan cycle as further longer term and Illinois-specific evaluations are undertaken.

Source	Utility/Location	Number of Months in Program Before Terminated	Number of Post-Treatment Savings Analysis Months	Persistence:								
				1 Year after Treatment	2 Years after Treatment	3 Years after Treatment	4 Years after Treatment	5 Years after Treatment	6 Years after Treatment	7 Years after Treatment	8 Years after Treatment	Implied Annual Decay Rate
1 & 2	Upper Midwest	24-45	26		62%							**21%**
1 & 2	West Coast	24	29		67%							**18%**
1 & 2	West Coast	25-28	34		72%							**15%**
1 & 3	SMUD	27	12	68%								**32%**
4	MASS	26	15	67%								**33%**
5	Duke Energy Progress	22	12	54%								**46%**
6 & 7	Southern California Edison	12	24	97%	75%							**13%**
7 & 8	Pennsylvania (PPL & Duquesne)	10-38	16-21		69%							**17%**
7 & 9	Connecticut	8-14	48	71%	61%	26%	27%					**28%**
10	Pacific Gas and Electric	30	36	100%	92%	72%						**10%**
11	Indiana Michigan Power Company	21	27		66%							**19%**
12	Pennsylvania (Met-Ed &	20-48	24		41%							**36%**

Source	Utility/Location	Number of Months in Program Before Terminated	Number of Post-Treatment Savings Analysis Months	Persistence:								
				1 Year after Treatment	2 Years after Treatment	3 Years after Treatment	4 Years after Treatment	5 Years after Treatment	6 Years after Treatment	7 Years after Treatment	8 Years after Treatment	Implied Annual Decay Rate
	Penelec)											
13-20	Puget Sound Energy	24	96	59%	61%	51%	38%	34%	23%	29%	18%	**19%**
21	ComEd	16-52	60	90%	69%	65%	70%	63%				**9%**
22	Ameren Illinois	4-90	24	93%	73%							**14%**
								Average Annual Electric Savings Decay Rate:				**22%**

Source	Utility/Location	Number of Months in Program Before Terminated	Number of Post-Treatment Savings Analysis Months	Persistence:								
				1 Year after Treatment	2 Years after Treatment	3 Years after Treatment	4 Years after Treatment	5 Years after Treatment	6 Years after Treatment	7 Years after Treatment	8 Years after Treatment	Implied Annual Decay Rate
4	MASS	15	15	36%								**64%**
10	Pacific Gas and Electric	30	36	60%	44%	37%						**28%**
13-20	Puget Sound Energy	24	96	94%	69%	80%	83%	72%	63%	63%	62%	**6%**
22	Ameren Illinois	4-90	24	97%	86%							**7%**
23	Nicor	12	12	54%								**46%**
								Average Annual Gas Savings Decay Rate:				**30%**

Sources:

1. http://www.cadmusgroup.com/wp-content/uploads/2014/11/Cadmus_Home_Energy_Reports_Winter2014.pdf
2. https://www.povertyactionlab.org/sites/default/files/publications/899%20Allcott%20and%20Rogers%20AER2014%20The%20Short-Run%20and%20Long-Run%20Effects%20of%20Behavioral%20Interventions.pdf
3. https://library.cee1.org/content/impact-persistence-evaluation-report-sacramento-municipal-utility-district-home-energy-repor
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12: http://www.puc.state.pa.us/Electric/pdf/Act129/SWE_Res_Behavioral_Program-Persistence_Study_Addendum2018.pdf
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20: https://conduitnw.org/pages/file.aspx?rid=4976
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23:http://ilsagfiles.org/SAG_files/Technical_Reference_Manual/Version_6/Evaluation_Documents/Nicor_Gas_HER_Persistence_Study_Part_2_Final_2016-09-21.pdf

MEASURE CODE: CC-BEH-BEHP-V07-270101

REVIEW DEADLINE: 1/1/2028

6.2 System Wide

6.2.1 Voltage Optimization

DESCRIPTION

Voltage optimization (VO)[29] is a smart grid technology that flattens voltage profiles and lowers average voltage levels on an electric power distribution grid. Lowering voltage reduces the instantaneous power consumed by customers on VO-enabled feeders,[30] which in turn results in energy and demand savings. Voltage optimization is achieved through the operation of distributed sensors, two-way communications infrastructure, remote controls on substation transformer load-tap changers, voltage regulators and line capacitor banks, and integrating/optimizing software.

Unlike energy efficiency programs that achieve savings by providing financial incentives to encourage customers to adopt energy-efficient equipment or behavioral suggestions to encourage them to adopt no-cost energy-saving behaviors, VO involves no direct customer engagement. Instead, savings are achieved by operating the voltage and reactive power controls on VO-enabled feeders in a manner designed to maintain the voltages delivered to affected customers in the lower part of the allowable voltage range.[31]

In general, reducing the voltage on a feeder reduces power consumed by the connected loads, assuming all other factors of the feeder remain constant. This is a realistic assumption for many types of consumer devices. However, there are several scenarios in which decreasing voltage does not directly result in energy and demand savings. For example, some devices (e.g., electronics) have self-contained control systems that maintain constant power consumption despite the delivered voltage. Other devices increase their power draw when presented with reduced voltage due to nonlinear inefficiencies. Still other devices (e.g., resistive heating) might decrease instantaneous power draw but operate for longer periods; thus their total energy consumption remains approximately constant (similar to the time-shifting effects of demand response programs). This means VO is more effective in reducing load for some device types than others. This may lead it to be more or less effective for specific feeders depending on the exact mix of device types the feeder has.

This measure was developed to be applicable to the following program types: Voltage Optimization. This measure is unique and does not apply to other program types.

DEFINITION OF EFFICIENT EQUIPMENT

To qualify for this measure, feeders must be enabled with VO technology and have VO fully commissioned and operational.[32]

DEFINITION OF BASELINE EQUIPMENT

The baseline assumption is a feeder without any VO technology.

DEEMED LIFETIME OF EFFICIENT EQUIPMENT

Due to legislative changes over time, VO measure life differs depending on the year the feeder was initially evaluated.

[29] Voltage optimization is also referred to a volt-var optimization (VVO) or conservation voltage reduction (CVR).

[30] For the purposes of this measure, the term feeder is synonymous with circuit.

[31] The bulk of the energy savings that occurs is thus expected to occur on the customer side of the meter, although additional savings is expected from reduced current flows along the full length of the affected feeders.

[32] Note that any VO On/Off testing for the purposes of evaluation or updating the TRM will not be counted against the utility in claiming savings. VO On/Off testing is an experimental design that involves enabling and disabling the VO system under a predefined schedule for the purposes of testing its functionality. By following a predefined schedule, the VO On/Off design enables modeling of the impact of VO while controlling for factors that may vary over time, such as weather or weekday vs. weekend loads.

- For VO feeders evaluated in 2027, VO measure life is defined as 30 years[33].
- For VO feeders first evaluated prior to 2027, v14 of the TRM should be used to evaluate lifetime savings. Version 14 of the TRM defines the measure life as below:

"VO Energy Savings can be renewed every 15 years and have a maximum measure life of 50 years[34] [35]. The renewal would claim the same savings as the original measure for an additional 15 years (up to a maximum of 50 years) after verifying that VO is still operational on the feeder in a manner consistent with the operation that led to the original TRM savings estimate. This does not preclude future consideration of (and TRM development for) a potential new measure that provides greater savings than the VO measure characterized here.

Within the EE Plan submittal ComEd and Ameren shall prepare a planned activation summary of all feeders whose energy savings are set to expire within the timeframe the EE Plan is active. This planned activation summary will indicate the planned activation status of VO feeders in an 'enabled' or 'disabled' format along with the total energy savings in MWh of each activation status. This check-in will be performed at the same cadence the EE plan is submitted. Once confirmed, the energy savings shall be credited for 15 years until the next renewal period and for a maximum of 50 years. However, if the utility ever ceases to operate VO in such a manner on any circuits, it will report such changes to evaluators and stop claiming persisting savings on such circuits in the year following the year in which operations ceased (even if less than the TRM measure life)."

DEEMED MEASURE COST

The costs vary by feeder. Actual costs should be used.

LOADSHAPE

Loadshape C67 – Voltage Optimization – Ameren

Loadshape C68 – Voltage Optimization – ComEd

COINCIDENCE FACTOR

N/A

Algorithm

CALCULATION OF ENERGY SAVINGS

ELECTRIC ENERGY SAVINGS

Annualized savings should be calculated separately for each VO-enabled feeder. The savings reductions during VO On/Off testing shall not be a basis to reduce the estimated savings.[36] The off periods from testing shall be treated as

[33] A TAC VO Working Group reviewed the lifetime of key equipment required to initiate VO, and agreed that thirty years is a reasonable estimate of VO savings lifetime. The VO Working Group commits to continue to discuss this lifetime assumption in the v16 update process for 2028 onwards.

[34] For ComEd, the first renewal can start in CY2033 with the renewal of CY2018 feeders. For Ameren, the first renewal can start in CY2034 with the renewal of CY2019 feeders

[35] Climate and Equitable Jobs Act (CEJA), Public Act 102-0662, "(b-20) Each electric utility subject to this Section may include cost-effective voltage optimization measures in its plans submitted under subsections (f) and (g) of this Section, and the costs incurred by a utility to implement the measures under a Commission-approved plan shall be recovered under the provisions of Article IX or Section 16-108.5 of this Act. For purposes of this Section, the measure life of voltage optimization measures shall be 15 years. The measure life period is independent of the depreciation rate of the voltage optimization assets deployed. Utilities may claim savings from voltage optimization on circuits for more than 15 years if they can demonstrate that they have made additional investments necessary to enable voltage optimization savings to continue beyond 15 years. Such demonstrations must be subject to the review of independent evaluation."

[36] VO On/Off testing is an experimental design that involves enabling and disabling the VO system under a predefined schedule

if they were on during the evaluation period.

$\Delta kWh = kWh_{BASE} * \Delta V * CVR_f$

Where:

kWh_{BASE} = Baseline kWh consumption on the feeder per year[37]

For Ameren territory, use the average annual customer energy use for each feeder over the 2019-2021 timeframe, less energy use by exempt customers.

For ComEd territory, use annual energy consumption using the actual energy measurement during the time when VO was off (as appropriate; this may include the actual measurements prior to VO activation during the given program year and from prior program years and VO OFF periods from subsequent program years) and a calculated VO OFF value for the time when VO was on. The VO OFF baseline energy for the periods when VO is on shall be calculated using:

$$E_{VO_OFF} = \frac{E_{VO_ON}}{1 - (CVR_f * \Delta V)}$$

Where:

E_{VO_OFF} = the calculated VO OFF energy consumption when VO is on (activated)

E_{VO_ON} = the actual measured energy consumption during the period when VO is on

ΔV = the voltage reduction

CVR_f = the CVR factor

i. Where power (MW) data has not been established yet, best available data from the feeder line measurement devices should be considered.

ii. Data are clustered into bins according to temperature range,[38] season,[39] day type (weekday/weekend),[40] and hour of the day based on the VO OFF and ON statuses to create a lookup table. If multiple data points are found (i.e., same temperature range, same season, same day type, same hour of the day, and same VO status), the average of multiple references are placed into the lookup table. Various combinations of these variables may be used in an order of decreasing priority when no data points are found that match all of them.

iii. The independent evaluator shall use best practices, including an appropriate technique that is transparent, replicable, and most accurate, to address any data quality issues, with input from interested stakeholders, including ComEd.

iv. The following approach will be used for claiming kWh savings

for the purposes of testing its functionality. By following a predefined schedule, the VO On/Off design enables modeling of the impact of VO while controlling for factors that may vary over time, such as weather or weekday vs. weekend loads.

[37] If the energy consumption baseline is measured at the feeder head, an adjustment will be made to recognize line losses and loss savings.

[38] Temperature bins are to the ceiling of the nearest 5°F interval.

[39] Seasons are defined as follows; Spring: March through May; Summer: June through August; Fall: September through November; and Winter: December through February.

[40] Weekdays are Monday to Friday and weekends are Saturday and Sunday.

from no-load and future feeders. ComEd installs new feeders every year to accommodate area load growth. Some of them are sourced from previously claimed VO-activated substations or exist with no-load on transformers where VO is being activated in a given year. Examples of when a new feeder will be installed include, as part of a new business project to accommodate a new or existing customer's load addition, or to relieve area loading congestion and contingency planning for the purpose of increasing capacity. ComEd projects load on some of these feeders over a future period, however, there are uncertainties regarding when the projected target loads will materialize.

ComEd cannot claim VO savings for a newly commissioned feeder while there is no load but can claim when a pre-defined threshold of the feeder's projected load is reached. A threshold of 70% of projected load for 6 months is adopted for ComEd.[41] To be eligible for savings, the feeder must add load to the substation transformer rather than simply splitting existing load among the feeders sourced from same transformer.

ComEd will maintain a list of existing feeders with no-load along with their projected load, to be updated as needed, and will share it with their evaluator so they can make comparisons to the threshold when the feeder is claimed. Changes can be made to the projected load, as needed, with justification. When such feeders reach the threshold of 70% of their projected load for 6 months, ComEd will notify their evaluator and provide relevant feeder and associated substation transformer data to evaluators for the purpose of verifying savings to claim in the annual impact evaluation report.

ΔV = Percentage voltage reduction on the feeder caused by VO

For Ameren territory, voltage reduction shall be calculated using a pre-post regression model (i.e., comparing pre-VO and post-VO installation). The model specification will be selected based on model fit and may vary year to year. The model will be run in accordance with the terms provided in subsections (i) through (iv) below:

i. The model utilizes pre-period (VO OFF) data from the feeders in question from the prior calendar year.

ii. Voltage (V) data is sourced from customer AMI meters. The feeder average voltage is calculated as the average of at least 70% of the AMI meters on the feeder, whenever possible.[42]

[41] This threshold was determined based on the discussion between ComEd's Capacity planning and Voltage Optimization group. To determine the value, ComEd considered several factors including the timeline of commissioning any future feeder, load ramping up for large customers, and the comments received from ICC and Guidehouse to claim the feeders as soon as ComEd expects to have full load. ComEd considers a feeder to have reached its full load when 70% of the projected load (at the minimum) has been materialized.

[42] In cases when less than 70% of the AMI meters are programmed to record voltage data, all available meters will be used, with the goal of utilizing as close to 70% of the meters as possible.

AMI voltage readings are normalized by their nominal voltage before averaging voltage across the AMI meters on a given feeder.

iii. Ameren and stakeholders have agreed on a list of excludable events, during which Ameren may claim VO savings if the system is down for reasons deemed appropriate. Please see Table 1 below for further explanation and list of excludable and non-excludable events.

iv. The independent evaluator shall use best practices, including an appropriate technique that is transparent, replicable, and most accurate, to address any data quality issues, with the input from interested stakeholders, including Ameren.

For ComEd territory, voltage reduction shall be calculated from voltage measurements taken from the feeder's head end primary voltage source using the following equation and in accordance with the terms provided in subsections (i) through (iv) below:

$$\Delta V = \left(\frac{V_{OFF} - V_{ON}}{V_{OFF}}\right)$$

v. When VO is off, the voltage if VO was on needs to be estimated and vice versa. Actual measurements shall be used for the off voltage when VO is off and the on voltage when VO is on.

vi. Data are clustered into bins in accordance to temperature range,[43] season,[44] day type (weekday/weekend),[45] and hour of the day based on the VO OFF and ON statuses to create a lookup table. If multiple data points are found (i.e., same temperature range, same season, same day type, same hour of the day, and same VO status), the average of multiple references are placed into the lookup table. Various combinations of these variables may be used in an order of decreasing priority when no data points are found that match all of them.

vii. The independent evaluator shall use best practices, including an appropriate technique that is transparent, replicable, and most accurate, to address any data quality issues, with the input from interested stakeholders, including ComEd.

viii. The counterfactual VO ON and VO OFF profiles shall be created for each feeder for the entire program year using the lookup table for temperature range,[46] season,[47] day type (weekday/weekend),[48] and hour of the day.

ix. If VO is ON in a continuous basis throughout the year, previous

[43] Temperature bins are to the ceiling of the nearest 5°F interval.

[44] Seasons are defined as follows; Spring: March through May; Summer: June through August; Fall: September through November; and Winter: December through February.

[45] Weekdays are Monday to Friday and weekends are Saturday and Sunday.

[46] Temperature bins are to the ceiling of the nearest 5°F interval.

[47] Seasons are defined as follows; Spring: March through May; Summer: June through August; Fall: September through November; and Winter: December through February.

[48] Weekdays are Monday to Friday and weekends are Saturday and Sunday.

year's voltage data along with temperature, day type, and time of the day can be correlated in accordance to present year's temperature data, day type, and time of the day to create the VO OFF profile. This correlation shall use the data created from the most representative feeder or feeders that have undergone testing.

x. For the no-load and future feeders, ComEd's evaluator will use the evaluated historical transformer voltage reduction for each feeder going back to the year when the station or transformer was originally VO-enabled.[49]

CVR_f = conservation voltage reduction factor relating the change in voltage to a change in energy

= 0.80 (for both Ameren and ComEd territories)[50]

SUMMER COINCIDENT PEAK DEMAND SAVINGS

Peak demand savings should be calculated separately for each VO-enabled feeder. The savings reductions during VO On/Off testing shall not be a basis to reduce the estimated savings. The off periods from testing shall be treated as if they were on during the evaluation period.

$$\Delta kW = kW_{BASE} * \Delta V_{PEAK} * CVR_{f,PEAK}$$

Where:

kW_{BASE} = Baseline kW usage on the feeder during the peak period, defined as 1:00-5:00 pm CDT on non-holiday weekdays from June 1 to August 31.

For Ameren territory, this will be calculated as the average demand in the peak hour for each feeder over the 2019-2021 timeframe, adjusted by a calibration factor that describes the relationship between demand in the peak hour and average demand over the peak period (defined as 1:00-5:00 pm CDT on non-holiday weekdays from June 1 to August 31). This calibration factor will be calculated based on a sample of feeders for which 2019-2021 data is available.

For ComEd territory, this will be calculated in the same manner as kWh_{BASE} for energy savings but with the intent of estimating the baseline just for the peak period as opposed to for the entire year.

ΔV_{Peak} = Percentage voltage reduction on the feeder caused by VO during the peak period, defined as 1:00 – 5:00 pm CDT on non-holiday weekdays from June 1 to August 31.

For Ameren territory, this will be calculated in the same manner as ΔV for energy savings but with the intent of estimating ΔV just for the peak period as opposed to for the entire year.

For ComEd territory, this will be calculated in the same manner as ΔV for energy savings but with the intent of estimating ΔV just for the peak period as opposed to for the entire year.

$CVR_{f,PEAK}$ = conservation voltage reduction factor relating the change in voltage to a change in energy specifically for the peak period, defined as 1:00 – 5:00 pm CDT on non-holiday weekdays from June 1 to August 31

[49] This is recommended by ComEd to ensure consistency that all the feeders under the same transformer receive same average voltage reduction using both timeseries VO ON and OFF data from the testing period.

[50] Guidehouse. 2020. *Supporting Documentation for Voltage Optimization TRM Measure*. <Add hyperlink when available>

For Ameren territory, 0.68.[51]

For ComEd territory, 1.02.[52]

EXCLUDABLE AND NOT-EXCLUDABLE EVENTS IN CALCULATING ELECTRIC SAVINGS

Both Ameren and ComEd have established a set of excludable (where VO is off, but savings can be claimed as if VO is on) and not-excludable (where VO is off, and savings cannot be claimed) events. These events can be accounted for either by: 1) determining the percentage of time non-excludable events occur and de-rating the savings by this percentage (ComEd's approach), or 2) removing the excludable events from the dataset used to calculate savings (Ameren's approach).

Below are tables of events each utility has established as excludable and non-excludable. Changes or additions can be made to these tables with the consensus of the utilities, the independent evaluator, and ICC staff (none of whose consensus shall not be unreasonably withheld).

Table 1. Ameren Excludable and Non-Excludable VO Events

Event	Description	Reason/Explanation	Category
Feeder Outage	Anytime the majority of a feeder is out due to any reason.	Feeder outages are typically not predictable or planned and are outside of Ameren's control. They are an anomaly and are not certain to occur on the same feeder in subsequent years.	Excludable
Repair / Maintenance	Repair or maintenance work is performed on a VO feeder causing VO to be disabled.	Repair and maintenance of Ameren's system is an operational necessity to provide customers with safe and reliable electric service. These events are not certain to occur on the same feeder in subsequent years.	Excludable
Switching	Dispatch disables VO on the feeder for any necessary switching event.	Ameren will perform switching for storms, outages, repair, maintenance, safety, and work to support new customer growth. These events are not certain to occur on the same feeder in subsequent years.	Excludable
Technology	A failure of the Information and/or Communication Technology which results in "all" VO feeders being disabled simultaneously due to events outside of Ameren's control.	VO is dependent upon third party infrastructure that Ameren has no control over. Examples include the loss of the cellular communications network (AT&T and Verizon), the failure of the VO Software provided by the outside vendor, or a Cyber event. Events of this nature are an anomaly and are not certain to occur year after year. This event is not predictable or planned and is outside of Ameren's control.	Excludable

[51] Ibid.

[52] Ibid.

Event	Description	Reason/Explanation	Category
Worldwide Pandemic / Orders by Civil Authorities	Repairs and maintenance may take longer due to limited crew availability or other restrictions/priorities. Example: COVID-19	Due to restrictions, repairs and maintenance may take longer. This reasonable delay is outside the control of Ameren.	Excludable
Disaster Recovery (DR) Testing	Ameren periodically performs Disaster Recovery testing on systems (AMI, ADMS, VO, etc.) which could result in VO disabling. Typically all VO feeders would be affected during DR testing.	Disaster Recovery is necessary and critical to ensure that Ameren can operate safely and effectively during an unforeseen event.	Not-Excludable
Server patching/issues	Anytime servers go down or patching takes place and the VO system does not come back online due to servers not rebooting correctly.	Events of this nature are unavoidable, but should be addressed by Ameren in a timely fashion. This should result in negligible impacts to energy savings.	Not-Excludable
Configuration Changes	Anytime VO is disabled for making updates to the Orion, go-live testing, or to make changes on the system resulting in shutting down services.	Events of this nature are unavoidable, but should be addressed by Ameren in a timely fashion. This should result in negligible impacts to energy savings.	Not-Excludable
VO field hardware failures	The loss or failure of a voltage regulator control, LTC control, or switched capacitor control on a feeder.	Events of this nature are unavoidable, but should be addressed by Ameren in a timely fashion. This should result in negligible impacts to energy savings.	Not-Excludable
Loss of communications	Anytime a device has a communications failure that would result in VO disabling. This event does not include 3rd party cellular communications network (AT&T and Verizon) failures.	Events of this nature are unavoidable, but should be addressed by Ameren in a timely fashion. This should result in negligible impacts to energy savings.	Not-Excludable

Table 2. ComEd Excludable and Non-Excludable VO Events

Event	Description	Reason/Explanation	Category
System Operational Requirements	OCC takes control and disables VO due to station/feeder out of configuration, major alarm, repair/maintenance or switching events.	Feeder outages are typically not predictable or planned and are outside of ComEd control. ComEd will take necessary steps to ensure the reliability and safety of the system during storms and outages, maintenance, and work to support new customer growth. These events are not certain to occur on the same feeder in subsequent years.	Excludable
Loss of communication	Any unplanned interruption to the communication network.	Natural causes or unplanned repair due to equipment failure occasionally disrupting communication network.	Excludable
VO Control System	System component failure requires vendor upgrade or revision.	The failure of the VO Software provided by the outside vendor (OSI), or a Cyber event. Events of this nature are an anomaly and are not certain to occur year after year. This event is not predictable or planned and is outside of ComEd's control.	Excludable

Event	Description	Reason/Explanation	Category
VO On/Off Cycling Schedule	Supervision over the transitional states from on to off, and vice versa.	When adding or commissioning substations or feeders to the VO Control system.	Excludable
Customer Maintenance	VO is disabled to investigate power quality issues.	Possible VO deactivation may be required to facilitate certain investigation requirements.	Not-Excludable
Worldwide Pandemic / Orders by Civil Authorities	Repairs and maintenance may take longer due to limited crew availability or other restrictions and priorities. Example: COVID-19	Due to restrictions, repairs and maintenance may take longer. This reasonable delay is outside the control of ComEd.	Excludable
VO Control System	Anytime VO system fails to operate due to model error in VO software, or inappropriate manual settings (human error).	Events of this nature should be addressed by ComEd in a timely manner, resulting in negligible impacts to energy savings.	Not-Excludable
Loss of communication	Any planned system upgrade that interrupts communication.	Planned system patching or upgrades interfere with the communication network and disable VO. This should be addressed by ComEd in a timely manner, resulting in negligible impacts to energy savings.	Not-Excludable
Equipment	Equipment failure that results in VO feeders being disabled (MJ5/DCIAB).	The equipment failure should be addressed by ComEd in a timely manner. This should result in negligible impacts to energy savings.	Not-Excludable
Server patching/ issues	Anytime servers would go down or if patching took place and VO system did not come back online due to servers not rebooting correctly.	Events of this nature are unavoidable but should be addressed by ComEd in a timely manner. This should result in negligible impacts to energy savings.	Not-Excludable

FOSSIL FUEL SAVINGS

N/A

WATER AND OTHER NON-ENERGY IMPACT DESCRIPTIONS AND CALCULATION

VO may provide non-monetized energy benefits in the form of improved ability to manage the grid “downstream” of the substation. This could result in improved reliability, lower spending on other grid improvements, or both. Further research is needed to understand the scope and impact of these potential benefits. There are no water savings or non-energy impacts from VO.

DEEMED O&M COST ADJUSTMENT CALCULATION

There are annual O&M costs incurred by the utility as a result of implementation of VO.

- For VO feeders first evaluated in 2027 or later, cost-effectiveness analysis should include estimates of annual O&M costs over the 30 year period.
- For VO feeders first evaluated prior to 2027, v14 of the TRM should be used to evaluate O&M costs. Version 14 of the TRM defined the O&M costs as below:
  "Cost-effectiveness analysis should include estimates of annual O&M costs over the initial 15-year period and then for each incremental renewal period up to 50 years of the VO investment."

In all cases, O&M cost estimates should be discounted to present value for the year in which the VO investment is being analyzed and should include (a) labor and equipment costs to maintain the system and (b) third-party software costs.

MEASURE CODE: CC-SYS-VOPT-V05-270101

REVIEW DEADLINE: 1/1/2028

Consistent with the definition of Review Deadline in TRM Volume 1 (Overview), the Voltage Optimization working group collectively acknowledges that this date does not represent a commitment or obligation to revise TRM content by this date.

6.3 Purchasing Tools

6.3.1 Efficient Choice Tool

DESCRIPTION

Efficient Choice (EC) is an online platform that facilitates energy efficient retail purchases. Users[53] can compare products in a wide range of electric and gas residential product categories, including but not limited to home appliances, consumer electronics and heating and cooling equipment. Users may choose from among current retail offers and are redirected to retailer websites to purchase. EC is designed to eliminate market, cognitive, and psychological barriers to the adoption of energy efficient products through comparisons that include product specifications, pricing, information on energy consumption, and a number of other pieces of information.

Because EC does not track "participants," estimation of savings is reliant on a combination of observed website traffic and surveys of utility customers who may have engaged with the website.[54] Program tracking data and survey responses are used to identify utility customers who engaged with EC, estimate those customers' purchase rates for product categories found on the site, and the proportions of those purchases that were energy-efficient and did not receive an incentive through another energy efficiency program. Whenever available, program tracking data should be used before self-reported survey results. Surveys include a verification component to validate energy-efficient purchases reported by survey respondents.

Observed website traffic is then used to estimate the number of unique customers who have engaged with the website, referred to as "unique active shoppers" (for further detail, please see the Unique Active Shoppers section of this measure). Unique active shopper counts are then used to scale estimated energy-efficient purchase quantities to the population of unique active shoppers to estimate the total number of energy-efficient products purchased by unique active shoppers. Per-unit savings are then estimated using the most appropriate measure-specific IL-TRM specifications.

DEFINITION OF EFFICIENT EQUIPMENT

The specific definitions of the efficient case vary by type of equipment purchased. For many common product categories (for example, clothes washers), definitions of the efficient case are provided in Volume 3 of the IL-TRM, and should be used. For categories of equipment not yet characterized in the IL-TRM, provisional efficient case definitions can be used at evaluation discretion.

DEFINITION OF BASELINE EQUIPMENT

The specific definitions of the baseline case vary by type of equipment purchased. For many common product categories (for example, clothes washers), definitions of the baseline case are provided in Volume 3 of the IL-TRM, and should be used. For categories of equipment not yet characterized in the IL-TRM, provisional baseline case definitions can be used at evaluation discretion.

DEEMED LIFETIME OF EFFICIENT EQUIPMENT

Measure lives should be sourced from the product category's corresponding measure in Volume 3 of the IL-TRM. For categories of equipment not yet characterized in the IL-TRM, provisional measure lives can be used at evaluation discretion.

DEEMED MEASURE COST

Incremental costs should be sourced from the product category's corresponding measure in Volume 3 of the IL-TRM by default. At evaluation discretion, deviations from IL-TRM specified incremental costs can be made with sufficient

[53] As currently implemented, EC is typically a publicly-facing website and can be used by anyone.

[54] Discussion of the identification of the population of utility customers who may have engaged with EC and therefore should be included in evaluation research is outside of the scope of the IL-TRM.

justification.

LOADSHAPE

N/A

COINCIDENCE FACTOR

Per-unit demand savings for each product category should apply coincidence factors from corresponding measure in Volume 3 of the IL-TRM.

PURCHASE RATES

Survey research should inform purchase rates for each product category and each utility's EC. These rates, broadly, reflect the portion of customers who engaged with each product category and went on to purchase non-rebated energy-efficient products. Purchase rates should not count rebated or non-energy efficient products as EC purchased measures. Purchase rates should be calculated as the product of the four survey-based response ratios from EC participants that actively engaged with the EC site. These include:

1) The portion of EC users who reported purchasing a product of any efficiency level after engaging with the respective product category on the EC website
2) The portion of customers who purchased a product of any efficiency level who reported purchasing a product that did not receive any form of utility rebate;
3) The portion of customers who purchased a non-rebated product who reported purchasing an efficient product; and
4) The portion of customers who reported an efficient purchase who were able to verify the efficiency of this product by providing the manufacturer model number or SKU.

The equation below describes the calculation of product level a purchase rate formulaically.

$$Purchase\ Rate = \frac{Number\ of\ self\ reported\ purchases}{\substack{Total\ number\ of\ self\ reported\ EC\ users\ who\\ engaged\ with\ the\ respective\ product\ category}} X \frac{Number\ of\ purchases\ without\ a\ utility\ rebate}{Number\ of\ self\ reported\ purchases} X \frac{Number\ of\ self\ reported\ efficient\ purchases}{Number\ of\ purchases\ without\ a\ utility\ rebate} X \frac{Number\ of\ verified\ efficient\ purchases}{\substack{Number\ of\ self\ reported\ efficient\ purchases\ with\\ verifiable\ efficiency\ ratings}}$$

Purchase rates should be determined through evaluation. The targeted confidence and precision for purchase rates should also be determined by the evaluator.

In some cases, like measures may be grouped together if there is not enough EC activity for individual evaluation. For example, televisions and monitors can be grouped under an overall electronics purchase rate. The grouping of measures under a single purchase rate should be determined by the evaluator.

Purchase rates may be deemed for future use after research of specific product categories. Deemed purchase rates should be reevaluated as determined by evaluators and/or the TAC.

PURCHASE QUANTITY

For some measures presented on EC, customers can purchase multiple units. Purchase quantities should be determined through evaluation.

For measures purchased with utility rebates, their associated energy, demand, water and natural gas savings should be claimed by the program incentivizing the measure. Savings from measures receiving rebates should not be claimed by EC as detailed in the purchase rate section above.

UNIQUE ACTIVE SHOPPER COUNT

The count of unique active shoppers is based on observed web traffic associated with each product category and should reflect the total number of EC visitors that actively engaged with the product. Active engagement is defined as an EC visitor who conducted at least one of ten specific actions on the site.[55] These values should be provided by implementer staff for the duration of the participation period and verified through evaluation.

Algorithm

CALCULATION OF ENERGY SAVINGS

ELECTRIC ENERGY SAVINGS

$$\Delta kWh = PR \times Qty \times UAS \times kWh_{per}$$

PR = Purchase rate (defined above).

Qty = Average purchase quantity

UAS = Count of Unique Active Shoppers for each product category

kWh_{per} = Develop unitary electric energy savings based on the measure's corresponding TRM section

kWh_{per} should include secondary kWh savings where appropriate.

Summer Coincident Peak Demand Savings

$$\Delta kW = PR \times Qty \times UAS \times kW_{per}$$

kW_{per} = Develop unitary demand savings based on the measure's corresponding TRM section.

FOSSIL FUEL SAVINGS

$$\Delta Therms = PR \times Qty \times UAS \times Therms_{per}$$

$Therms_{per}$ = Develop unitary therm savings based on the measure's corresponding TRM section.

WATER AND OTHER NON-ENERGY IMPACT DESCRIPTIONS AND CALCULATION

$$\Delta Water\ (gallons) = PR \times Qty \times UAS \times \Delta Water_{per}$$

Where

ΔWater (gallons) = Water saved, in gallons

$\Delta Water_{per}$ = Develop unitary water savings based on the measure's corresponding TRM section.

DEEMED O&M COST ADJUSTMENT CALCULATION

N/A

MEASURE CODE: CC-PTS-ECT-V01-230101

REVIEW DEADLINE: 1/1/2025

[55] Actions include: (1) recommendations engaged, (2) product selected, (3) product list sorted, (4) product list filtered, (5) histogram engaged, (6) product favorites engaged, (7) search saved, (8) offer clicked, (9) compare button engaged, (10) compare started.

2026 Illinois Statewide Technical Reference Manual for Energy Efficiency Version 14.0

Attachment A

Illinois Statewide Net-to-Gross Methodologies

Effective for Evaluation

All NTG data collection and analysis activities for the program types covered by this document shall conform to the NTG methods set forth herein.

Attachment A: Illinois Statewide Net-to-Gross Methodologies

1 Policy Context for this Information

Starting in 2014, the Illinois Evaluation Teams (Cadmus Group, Itron, Navigant Consulting, Opinion Dynamics, Ridge & Associates) worked with the Illinois Stakeholder Advisory Group (SAG) to create an Illinois Statewide Net-to-Gross (NTG) Methodologies document (IL-NTG Methods). This document has been updated annually, including with input from the current Illinois Evaluation Teams (Guidehouse, Opinion Dynamics, Ridge & Associates, and Verdant). The IL-NTG Methods document is included as an attachment to the Illinois Statewide Technical Reference Manual for Energy Efficiency (IL-TRM). Through five different dockets, the Illinois Commerce Commission (ICC) has directed the Evaluation Teams to compile and formalize standard NTG methods for use in Illinois energy efficiency (EE) evaluation, measurement, and verification (EM&V) work. The ICC EE dockets are shown in the following table.

Table 1-1. ICC Energy Efficiency Dockets

ICC Order Docket No. and Date	Program Administrator	NTG Discussion – Order Pages	ICC Link
13-0495 (1/28/14)	Commonwealth Edison Company (ComEd)	129-130	http://www.icc.illinois.gov/downloads/public/edocket/367591.pdf
13-0498 (1/28/14)	Ameren Illinois Company (Ameren)	167, 171	http://www.icc.illinois.gov/downloads/public/edocket/367603.pdf
13-0499 (1/28/14)	Illinois Department of Commerce & Economic Opportunity (Department of Commerce)	20, 23, 49	http://www.icc.illinois.gov/downloads/public/edocket/367581.pdf
13-0549 (5/20/14)	Nicor Gas Company (Nicor)	41-42, 78	http://www.icc.illinois.gov/downloads/public/edocket/378494.pdf
13-0550 (5/20/14)	North Shore Gas Company (North Shore Gas) and The Peoples Gas Light and Coke Company (Peoples Gas) (collectively, PG&NSG)	54-55, 66	http://www.icc.illinois.gov/downloads/public/edocket/378495.pdf

To provide clarity to the ICC directives, the relevant section on IL-NTG Methods is shown in its entirety from the Nicor Gas Order (Docket No. 13-0549). The Nicor Gas Order provides the most detail on the ICC NTG directive in comparison to the other EE orders. The Nicor language is as follows:

> The Commission believes that Staff's recommendations concerning Commission adoption of consistent statewide net-to-gross methodologies ("IL-NTG Methods") for use by the evaluators are reasonable and will aid in future evaluation of the energy efficiency programs. To help ensure the independence of the evaluators, to improve efficiency in the evaluation process, and to ensure programs across the state as delivered by the various Program Administrators can be meaningfully and consistently evaluated, the Commission hereby adopts Staff's recommendation that consistent IL-NTG Methods be established for use in the evaluations of comparable energy efficiency programs offered by different Illinois Program Administrators. The Commission notes that Section 8-104(k) of the Act encourages statewide coordination and consistency between the gas and electric energy efficiency programs and Staff's proposal would help ensure consistency in the evaluation of program performance. The Commission notes that this directive is not to create entirely "new" NTG methodologies for every energy efficiency program, but rather to assess NTG methodologies and survey instruments that have been used to evaluate energy efficiency programs offered in Illinois, and to compile the most justifiable and well-vetted methodologies (or potentially combine certain components from the existing approaches to better represent the most justifiable and well-vetted method consistent with best practices) in an attachment to the Updated IL-TRM that would

get submitted to the Commission for approval. The Commission notes that the IL-NTG Methods will be flexible and adaptable to multiple program designs and budgets and tailored to appropriately assess the specifics of each of the Program Administrators' energy efficiency programs, consistent with standard NTG methodologies adopted in other states that were filed in this proceeding. The Commission agrees with Staff that in the interest of efficiency, the current program evaluators should take the lead in compiling and formalizing standard methodologies for NTG in Illinois taking into consideration SAG input. Because the existing Plan 1 evaluators are under contract with the Company for the evaluation of program year three energy efficiency programs, it is appropriate for these existing evaluators to work on and complete the compilation of the IL-NTG Methods over the next year. The Commission recognizes that each year considerable time may be spent vetting NTG methodologies for each program evaluation separately for each utility under the existing evaluation plan review practices; adoption of IL-NTG Methods would save on these limited evaluation resources by having a common reference document for the evaluators to use in estimating net savings for Illinois.

The Commission hereby directs the Company to require its evaluators to collaborate with the other Illinois evaluators and the SAG to use best efforts to reach consensus on the approaches used in assessing NTG in particular markets for both residential and non-residential energy efficiency programs in a manner consistent with the direction described herein. (Pages 41-42)

(16) Northern Illinois Gas Company shall require its evaluators to collaborate with the other Illinois evaluators and the SAG to reach consensus on the most defensible and well-vetted methodologies for assessing net-to-gross ratios in particular markets for both residential and non-residential energy efficiency programs in a manner consistent with the direction provided herein.

(17) ICC Staff shall file the agreed-upon consensus statewide NTG methodologies with the Commission as an attachment to the Updated IL-TRM, and if consensus is not reached on a certain component of the statewide NTG methodologies, that particular non-consensus component should be submitted in a manner consistent with the approach used for non-consensus IL-TRM Updates. (Page 78)

1.1 Programs Currently Covered in this Document

This document is intended to cover the majority of residential and non-residential programs offered in Illinois.[56] Programs covered as of the writing of this document are listed in tables at the beginning of Section 3: 3 Commercial, Industrial, and Public Sector Protocols and Section 0: 4 Residential and Low Income Sector Protocols. If the design of a given program changes significantly, then it may mean that the NTG protocol listed for that program in this document is no longer appropriate. If that happens, the evaluator should follow the procedures outlined below under Section 1.4: Diverging from the IL-NTG Methods.

This document will be updated over time to incorporate new programs and to reflect recommended changes to existing methodologies. All NTG data collection and analysis activities for the program types covered by this document shall conform to the NTG methods set forth herein.

1.2 Updating the IL-NTG Methods

This attachment is part of the IL-TRM and follows the timeline for updating of the IL-TRM, as specified in the Illinois Energy Efficiency Policy Manual. In general, the following will take place:

- Updates will generally occur annually.
- Any changes to the IL-NTG Methods document will be circulated to the full SAG, and SAG participants will have a ten-business day review process.
- Updates may be discussed within the SAG throughout the year but will be completed annually.
- Annually, the ICC Staff will submit a Staff Report (with the consensus Updated IL-TRM attached) to the Commission with a request for expedited review and approval.

[56] Evaluation reports on those programs can be found at http://www.ilsag.info/evaluation-documents.html.

- Updated NTG methods go into effect upon SAG approval, which may be before the annual TRM update or before the effective date of the updated TRM.

1.3 Diverging from the IL-NTG Methods

The NTG methods for the programs outlined in this document are partially binding. The criteria for deviating from the IL-NTG Methods document are set forth below. In all cases, the evaluators (or any interested stakeholder) submit the proposed deviation to the full SAG for a ten-business day SAG review and comment period. In the event of an objection by a SAG participant, efforts may be made to see if consensus can be reached on the proposed deviation in a subsequent monthly SAG meeting. In this case, a final opportunity for SAG review and comment to the proposed deviation will be provided following the SAG meeting.

Evaluators may modify the approaches described in this document if the following three conditions have been satisfied:

1. Evaluators must explicate within the annual evaluation research plan (or another document) how specific items in the proposed modified NTG method will diverge from what is written in this document. Evaluators must justify why the divergence is appropriate.
2. Prior to the use of the modified NTG method for a particular program, evaluation teams must be in agreement on the use and execution of the modified NTG method.
3. Any objection from SAG participants regarding the proposed modified NTG method is resolved.

Evaluators may test alternative methods of estimating NTG for a particular program in addition to the NTG methods outlined in this document, if the following three conditions have been satisfied:

1. Evaluators must explicate within the annual evaluation research plan (or other document) the proposed alternative NTG method. Evaluators must explain why the proposed alternative NTG method might be superior to the NTG methods outlined in this document for the particular program. Evaluators must discuss the foundation for expecting that the proposed alternative NTG method is likely to produce meaningful results.
2. Prior to the use of the alternative NTG method for a particular program, evaluation teams must be in agreement on the key details of the approach for implementing the alternative NTG method.
3. Any objection from SAG participants regarding the proposed alternative NTG method gets resolved.

When performing alternative NTG methods for a particular program, the choice of methods may vary across the state. For example, if ComEd's evaluator chooses to test Methods 1 and 2 for a particular program, Ameren's evaluators do not also have to perform Methods 1 and 2 for a similar program.

Several sections of this attachment provide example questions that can be used to collect the data required in the NTG algorithms. Adjustments to refine specific question wording, e.g., to better reflect the design of the evaluated program, do not constitute divergence from the IL-NTG Methods. Evaluators are not required to use the exact wording provided in the example questions.

1.4 Procedure for Non-Consensus Items

Non-consensus items that arise during the development and updating of the IL-NTG Methods document will be handled in substantially the same way as non-consensus IL-TRM Updates are addressed. The approach to be used is as follows.

- Once the Illinois NTG Working Group[57] has progressed as far as they can on the methodology, and it has been found that there is non-consensus on a specific Net-to-Gross Methods topic or procedure, the

[57] The Illinois NTG Working Group consists primarily of the subset of Evaluators deliberating on NTG methodologies; however, any interested party may participate in the Illinois NTG Working Group.

Illinois NTG Working Group shall submit to the ICC Staff and the SAG's Technical Advisory Committee (TAC) a "Comparison Exhibit of Non-Consensus Net-to-Gross Methods topics/procedures" within two weeks after the Illinois NTG Working Group has failed to reach consensus. The TAC will then deliberate on the issue with a goal of reaching consensus.

- If consensus does not emerge in the TAC regarding a particular Net-to-Gross Methods topic or procedure, the "Comparison Exhibit of Non-Consensus NTG Methods topics/procedures" is then sent to the full SAG for their deliberations and input. The SAG provides a forum where experts on all sides of the contested issue can present their expert opinions in an effort to inform parties of the contested issue and to also facilitate consensus.
- To the extent a consensus among Program Administrators and non-financially interested stakeholders cannot be reached regarding issues related to specific Net-to-Gross Methods topic or procedure updates, the IL-TRM Administrator shall have the authority to use its best judgment to propose a resolution of the issue and include such in the updated IL-TRM that gets submitted to the ICC for approval. For transparency and informational purposes, the ICC Staff will document such dispute and include a link to a "Comparison Exhibit of Non-Consensus Net-to-Gross Methods topics/procedures" developed by the Illinois NTG Working Group and the IL-TRM Administrator in the Staff Report submitted to the Commission. The "Comparison Exhibit of Non-Consensus Net-to-Gross Methods topics/procedures" will document, with input from the parties, the various parties' positions concerning a non-consensus Net-to-Gross Methods topic or procedure update as well as the IL-TRM Administrator's rationale for its decision to resolve the issue.
- Nothing in this language shall preclude Program Administrators and stakeholders from challenging the IL-TRM Administrator's proposed resolution by petitioning the Commission. Until the Commission resolves the petition, the Commission-approved Net-to-Gross Methods topic or procedure shall be the default pending the issuance of a Commission Order. The applicable date for the Commission-resolved Net-to-Gross Methods topic or procedure will be the latter of January 1 of the year the IL-TRM was designed to go into effect, or the first day of the next month following the Commission order. In the petition, the filing party should note all Program Administrators affected by the IL-TRM dispute, and request that the Commission join each affected Program Administrator to the docket.

2 Attribution in Energy Efficiency Programs in General

One of the most difficult aspects of evaluation, and not just within evaluation of energy efficiency programs, is attributing results to a program. Attribution provides credible evidence that there is a causal link between the program activities and the outcomes achieved by the program. Attribution research estimates the difference between the outcomes and those that would have occurred absent the program (i.e., the counterfactual). Put in research terms, evaluators must reject the null hypothesis of no causality through probabilistic statements (e.g., "strong evidence"; "high probability"). As such, it is important to realize that the concept of the counterfactual cannot be proven with certainty. So even though the NTG ratio is a single value, conceptually it is a probabilistic statement.[58] One of the main academics within evaluation stated that there is a "…total and inevitable absence of certain knowledge [arising] from the methods social scientists use" when assessing the counterfactual. (Shadish, et al., 2002) This statement is not about poor methods, but about the counterfactual itself. Because programs work with people and are usually not a laboratory experiment that can be replicated over and over[59] to find out what actions people would have taken absent an intervention, one would need a time machine to take people back in time and not provide the program. Since time machines do not exist, evaluators have developed methods that approximate the counterfactual to the best of their ability.

2.1 Definitions

For energy efficiency programs, evaluators differentiate between savings at a "gross" and "net" level as described below in the short set of relevant definitions. These definitions are not all encompassing or meant to restrict evaluation in any way, but to provide context before additional detail is provided in later sections. Research to determine attribution occurs to allow for a better understanding of the net level of savings.

Table 2-1. Definitions

Concept	Term	Definition
Consumers	Nonparticipant	Any consumer who was eligible but did not participate in the subject efficiency program, in a given program year.
	Participant	A consumer who received a service offered through the subject efficiency program, in a given program year; also called program participant. The term "service" is used in this definition to suggest that the service can be a wide variety of inducements, including financial rebates, technical assistance, product installations, training, energy efficiency information, or other services, items, or conditions. Each evaluation plan should define "participant" as it applies to the specific evaluation.
Gross Impacts	Gross Impacts	The change in energy consumption and/or demand that results directly from program-related actions taken by participants in an energy efficiency program, regardless of why they participated.
Attribution of Impacts	Net Impacts	The change in energy consumption and/or demand that is attributable to a particular energy efficiency program. This change in energy use and/or demand may include, implicitly or explicitly, consideration of factors such as free ridership, participant and nonparticipant spillover, and induced market effects. These factors may be considered in how a baseline is defined (e.g., common practice) and/or in adjustments to gross savings values.
	Net-to-Gross Ratio	A factor representing net program savings divided by gross program savings that is applied to gross program impacts to convert them into net program impacts. The factor itself may be made up of a variety of

[58] A probabilistic statement is not the same as the confidence and precision information calculated based on sampling theory.
[59] However, a small number of program designs do lend themselves to experimental or quasi-experimental designs that allow for regression analysis of net impacts.

Concept	Term	Definition
		factors that create differences between gross and net savings, commonly including free riders and spillover. The factor can be estimated and applied separately to either energy or demand savings. Note that the net-to-gross ratio (NTGR) = ((1-Free Ridership) + Participant Spillover + Nonparticipant Spillover).
	Core NTGR	1-Free Ridership
	Free Rider	A program participant who would have implemented the program's measures or practices in the absence of the program. Free riders can be: (1) total, in which the participant's activity would have completely replicated the program measure; (2) partial, in which the participant's activity would have partially replicated the program measure; or (3) deferred, in which the participant's activity would have partially or completely replicated the program measure, but at a future time.
	Spillover	Reductions in energy consumption and/or demand caused by the presence of an energy efficiency program. There can be participant and/or nonparticipant spillover. *Participant spillover* (PSO) is the additional energy savings that occur as a result of the program's influence when a program participant independently installs incremental energy efficiency measures or applies energy-saving practices after having participated in the energy efficiency program. Evaluated savings associated with Program Administrator Training programs will also be considered Participant spillover.* There are several general categories of participant spillover: • *Inside spillover* (ISO): Occurs when program participants implement additional program-induced energy efficiency measures at the program project site. • *Outside spillover* (OSO): Occurs when program participants implement program-induced efficiency measures at other sites within the Program Administrator's service territory at which program project measures were not implemented. • *Like spillover:* Occurs when program participants implement program-induced efficiency measures of the same type as those implemented through the program. Like spillover can occur at the program project sites (ISO) or at other sites within the Program Administrator's service territory (OSO). • *Unlike spillover:* Occurs when program participants implement program-induced efficiency measures of a different type from those implemented through the program. Unlike spillover can occur at the program project sites (ISO) or at other sites within the Program Administrator's service territory (OSO). *Nonparticipant spillover* (NPSO) refers to energy savings that occur when a program nonparticipant installs energy efficiency measures or applies energy savings practices as a result of a program's influence.
Markets	Market	The commercial activity (e.g., manufacturing, distributing, buying, and selling) associated with products and services that affect energy use.
	Market Effects	A change in the structure of a market or the behavior of participants in a market that is reflective of an increase (or decrease) in the

Concept	Term	Definition
		adoption of energy efficient products, services, or practices and is causally related to market interventions (e.g., programs). Examples of market effects include increased levels of awareness of energy-efficient technologies among customers and suppliers, increased availability of energy-efficient technologies through retail channels, reduced prices for energy-efficient models, build-out of energy-efficient model lines, and—the end goal— increased market shares for energy-efficient goods, services, and design practices.
	Market Assessment	An analysis that provides an assessment of how and how well a specific market or market segment is functioning with respect to the definition of well-functioning markets or with respect to other specific policy objectives. A market assessment generally includes a characterization or description of the specific market or market segments, including a description of the types and number of buyers and sellers in the market, the key factors that influence the market, the type and number of transactions that occur on an annual basis, and the extent to which market participants consider energy efficiency an important part of these transactions. This analysis may also include an assessment of whether a market has been sufficiently transformed to justify a reduction or elimination of specific program interventions (or whether continued or even increased intervention is necessary). Market assessment can be blended with strategic planning analysis to produce recommended program designs or budgets. One particular kind of market assessment effort is a baseline study, or the characterization of a market before the commencement of a specific intervention in the market for the purpose of guiding the intervention and/or assessing its effectiveness later.

* This definition does not apply to Building Operator Certification (BOC) when using IL-TRM defined prescriptive savings. IL-TRM defined prescriptive savings for BOC are considered net and are not subject to any further NTG adjustment.
Sources: State and Local Energy Efficiency Action Network. 2012. Energy Efficiency Program Impact Evaluation Guide. Prepared by Steven R. Schiller, Schiller Consulting, Inc., www.seeaction.energy.gov; Violette and Rathbun 2014. The Uniform Methods Project: Methods for Determining Energy Efficiency Savings for Specific Measures, Chapter 23: Estimating Net Savings: Common Practices, http://www.nrel.gov/docs/fy17osti/68578.pdf..

2.2 Free Ridership-Specific Issues

2.2.1 Survey Design

Free ridership questions, especially questions about the counterfactual, can be challenging to answer and may confuse respondents. To address these challenges, evaluators may use the following survey design strategies:

- Warm up questions
- Clarification of key terms

Warm up Questions

Warm up questions preface the counterfactual questions to remind the respondent of their state of mind when they decided on the efficient option. Examples of warm up questions are as follows:

1. How did you first learn about the energy efficient option of this [MEASURE]?
2. How did you first learn about the following features of this energy efficient [MEASURE]:
   A. The potential to save energy and lower your utility bill?
   B. The environmental benefits?
   C. The potential to reduce maintenance costs?

D. The home comfort benefits?
E. The price difference between this energy efficient [MEASURE] and one of standard efficiency?

Responses to warm up questions are not to be used to calculate free ridership. They are intended to improve the quality of responses to free ridership questions by reminding the respondent of their process to choose the energy efficient option.

Clarification of Efficiency Terms

To highlight that free ridership questions focus on the process of choosing an efficient option over one of standard efficiency, evaluators may clarify the terms used to describe the options before asking the questions. For example:

> "Next, we will ask you about your decision to purchase the energy efficient [measure] instead of one of standard efficiency. By "energy efficient" we mean the equipment performs just as well or better than equipment of standard efficiency, but the energy efficient equipment uses less energy to do so. Energy efficient equipment typically costs more than standard models, but they cost less to operate and often cost less to maintain than standard models do."

Prefacing counterfactual questions with clarifications of efficiency terms may highlight for the respondent that the questions center on choosing the efficient option – not on the need to replace the existing equipment (with a model of any efficiency).

2.2.2 Supplementing Self-Report with Historical Tracing

For programs with projects that are large, complex, involve multiple decision-makers, and are the result of many decisions made over the course of the project (for example, custom and new construction programs), evaluators may review project documentation to supplement their analysis of self-report survey results. Historical tracing, which involves reconstructing the events that led to the outcome of interest, can support logic to enhance the validity of the free ridership estimation from self-report survey results[60]. By considering additional qualitative and quantitative information, such as project files, documented communication, as well as open-ended survey responses, evaluators may better understand the multiple sources of program attribution and the weight of various decision makers for complex projects. In these instances, evaluators may include a historical tracing approach to add consideration of the multiple decision maker perspectives. Because the process of gathering the appropriate documentation from program teams, implementers, and customers can be burdensome on all parties involved, evaluators should prioritize projects within a given program that would most affect the confidence of the savings-weighted NTG estimate.

2.3 Spillover-Specific Issues

Some issues related to spillover are applicable for both residential and non-residential programs and are discussed in this section.

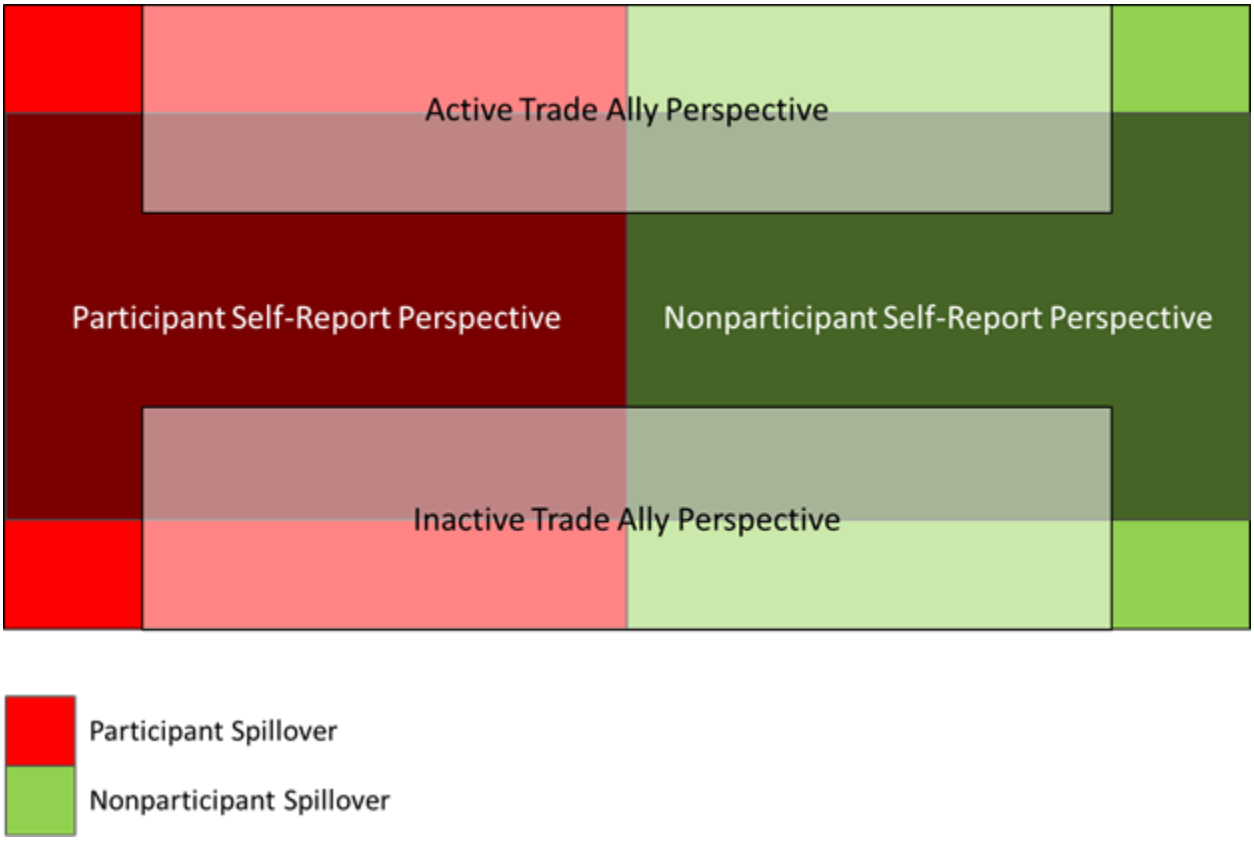
Spillover is generally categorized into two broad categories – participant spillover and nonparticipant spillover (see Table 2-1). These protocols include two general methods of assessing spillover, one through end-user (or participant/nonparticipant) research and the other through trade ally research. Estimates of participant and nonparticipant research are mutually exclusive, as long as only one of these two general methods is used for a given evaluation period. For example, there is no danger of double-counting spillover if an evaluation includes end-user research with both participants and nonparticipants. Similarly, there is no danger of double-counting spillover if an evaluation includes research with both active and inactive trade allies (see definitions in Section 0). However, once end-user research is combined with trade ally research, there is a potential for overlap in the resulting spillover estimates, and care must be taken to avoid double-counting.

Figure 2-1 provides a visual depiction of how the four methods (or "perspectives") for estimating spillover included in these protocols (participant and nonparticipant self-report, Sections 0 and 0; and active and inactive trade ally spillover, Section 0) can be used to assess both participant (red) and nonparticipant spillover (green). This figure illustrates that (a) different spillover methods can overlap in the spillover they cover, leading to potential double-

[60] Violette and Rathbun, *Estimating Net Savings*, 46-48.

counting, and (b) some spillover may not be measured by these methods (as represented by the four corners in the diagram).

Figure 2-1. Example - Types of Spillover and Methods for Assessment



2.3.1 Measure Costs

In order to facilitate analysis of program Total Resource Cost (TRC), estimates of the total incremental measure cost (IMC) at the program level must be developed. IMC values are available for most IL-TRM measures and can be summed to the program level. However, the IMC values for spillover measures could also be estimated and added to this total. The problem is that IMC values for spillover measures can be difficult to estimate. When the magnitude of the savings justifies the effort to estimate the total IMC for spillover measures, the following approaches should be used.

- In cases where the evaluator believes the spillover measure incremental costs are not materially different from the rebated measure incremental costs, the evaluator may multiply the IMC for the rebated measure by the spillover rate to derive the IMC for the spillover measure.
- In cases where the evaluator believes the spillover measure incremental costs are materially different from the installed measure incremental costs (e.g., installation of measures that have no efficiency levels), the evaluator should use the estimated incremental project costs as the IMC for the spillover measure.

Normally, the sample-based estimates of IMCs for spillover measures should be extrapolated to the program level using sample weights. Then the total IMCs for rebated measures and the total IMCs for spillover measures should be summed and used in the TRC calculation.

For measures characterized by the IL-TRM, measure effective useful life (EUL) estimates should be based on the IL-TRM. For measures not characterized by the IL-TRM, evaluators can use either the EUL for similar measures or best professional judgment. In either case, the evaluator must provide the rationale for their choices.

3 Commercial, Industrial, and Public Sector Protocols

The table below lists Illinois non-residential programs and the free ridership protocol and Timing Adjustment time period applicable to each program.[61] The Timing Adjustment time period varies from 2 to 3 years, where programs that include more expensive of larger measures generally rely on a longer time period. If the design of a given program changes significantly, then it may mean that the NTG protocol listed for that program in this document is no longer appropriate. Further, the recommended time period to be applied in the Timing Adjustment may be inappropriate if, for example, the measure mix of the program changes or the research approach followed facilitates a measure-level application of the timing adjustment. In either case, the evaluator should follow the procedures outlined in Section 1.4: Diverging from the IL-NTG Methods. Note that the Core Non-Residential Spillover protocol described in Section 0 is generally applicable to most of these programs.

Table 3-1. Commercial, Industrial, and Public Sector Programs

Program Administrator	Program Name	Timing Adjustment Formula	Free Ridership Protocol
Ameren Illinois	Custom Initiative	3 Year	3.1 Core Non-Residential Protocol
Ameren Illinois	Midstream Initiative	2-3 Year	5.4 Midstream Protocol
Ameren Illinois	Retro-Commissioning Initiative	2 Year	3.4 Study-Based Protocol
Ameren Illinois	Small Business Initiative	2 Year	3.1 Core Non-Residential Protocol
Ameren Illinois	Standard Initiative	3 Year	3.1 Core Non-Residential Protocol
ComEd	Assessments	3 Year	3.4 Study-Based Protocol
ComEd	Behavior – Bus/Pub	3 Year	3.4 Study-Based Protocol
ComEd	Incentives	3 Year	3.1 Core Non-Residential Protocol
ComEd	Midstream/Upstream	2-3 Year	5.4 Midstream Protocol
ComEd	Multifamily (Market rate, common area perspective)	3 Year	3.1 Core Non-Residential Protocol
ComEd	New Construction – Bus/Pub	3 Year	3.3 C&I New Construction Protocol
ComEd	Small Business	2 Year	3.1 Core Non-Residential Protocol
ComEd	Small Business (Small Business Kits component)	2 Year	4.7 Energy Saving Kits and Elementary Education Protocol
ComEd	Streetlighting Initiative	3 Year	3.1 Core Non-Residential Protocol
ComEd	Targeted Systems (RCx, VCx, Industrial Systems)	3 Year	3.4 Study-Based Protocol
Nicor Gas	Business Energy Efficiency Rebates	2 Year	3.1 Core Non-Residential Protocol
Nicor Gas	Business Optimization	2 Year	3.1 Core Non-Residential Protocol
Nicor Gas	Combined Heat and Power	3 Year	3.1 Core Non-Residential Protocol
Nicor Gas	Commercial Food Service Midstream	3 Year	5.4 Midstream Protocol
Nicor Gas	Custom Incentives	3 Year	3.1 Core Non-Residential Protocol
Nicor Gas	Multifamily (Market rate, common area perspective)	3 Year	3.1 Core Non-Residential Protocol
Nicor Gas	Non-Residential New Construction	3 Year	3.3 C&I New Construction Protocol
Nicor Gas	Retro Commissioning	2 Year	3.4 Study-Based Protocol
Nicor Gas	Small Business Program – Incentives/Direct Install/Kits	2 Year	3.1 Core Non-Residential Protocol

[61] The "Free Ridership Protocol Name" in the second column of the table refers to the numbered sections in this document, e.g., "0 Core Non-Residential Protocol."

Program Administrator	Program Name	Timing Adjustment Formula	Free Ridership Protocol
Nicor Gas	Strategic Energy Management	3 Year	3.4 Study-Based Protocol
Peoples Gas/ North Shore Gas	C&I and PS Custom and Prescriptive Rebates, Direct Install, Partner Trade Ally, Kits, Small and Midsize Business Custom, Direct Install & Assessment, Kits, Partner Trade Ally, Prescriptive, Multifamily (Market rate, common area perspective)	3 Year, Direct Install and Small Business 2 Year	3.1 Core Non-Residential Protocol
Peoples Gas/ North Shore Gas	C&I and PS Gas Optimization	3 Year	3.4 Study-Based Protocol
Peoples Gas/ North Shore Gas	C&I and PS Retro-Commissioning	2 Year	3.4 Study-Based Protocol
Peoples Gas/ North Shore Gas	C&I and PS Strategic Energy Management	3 Year	3.4 Study-Based Protocol
Peoples Gas/ North Shore Gas	Commercial Food Service Midstream	3 Year	5.4 Midstream Protocol
Peoples Gas/ North Shore Gas	MF Gas Optimization	3 Year	3.4 Study-Based Protocol
Peoples Gas/ North Shore Gas	Non-Residential New Construction	3 Year	3.3 C&I New Construction Protocol

3.1 Core Non-Residential Protocol

3.1.1 Core Non-Residential Free Ridership Protocol

Key considerations and guidelines for estimation of free ridership under this Core Non-Residential Free Ridership (FR) protocol are listed below:

- **Multiple Questions:** Evaluators will use program participant responses to multiple survey questions as inputs to the free ridership calculation algorithm. Evaluators will not use the response to a single question to establish a survey respondent as either a complete free rider or a complete non-free rider.
- **Consistency Checks:** Evaluators should administer survey questions as checks on the consistency of responses associated with a core free ridership assessment methodology. Evaluators may also reference available quantitative and qualitative data, including consistency check data, to perform documented modifications to individual free ridership estimates resulting from the application of a core free ridership assessment methodology.
- **Vendor Recommendations:** Vendor recommendations may be important in the influence of a program on customer decision-making. Vendors include trade allies, contractors, distributors, suppliers, and other market actors involved in the selection and installation of program-incented equipment on behalf of the participant. If program logic supports it, evaluators will include vendor recommendations as a program factor when reminding respondents of program components. In addition, evaluators will consider surveying vendors instead of or in addition to participating customers as part of their overall evaluation approach. Should both vendors and customers be surveyed, Section 5.1 describes an approved method to merge the two perspectives for the purposes of developing a program-level free ridership estimate.

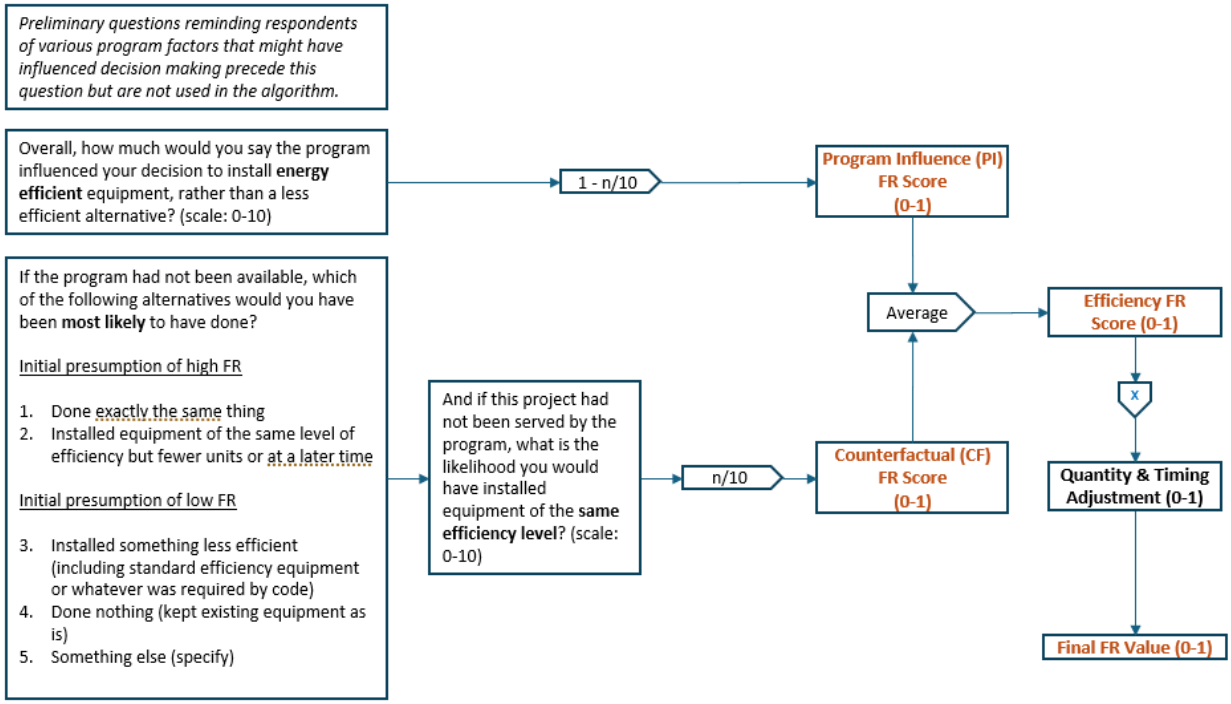
- **Quality Control Review:** For programs involving large, complex projects and decision-making, after all the survey data collection has been completed and preliminary NTGRs have been computed using the standard calculation procedures, a quality control review should be completed. At a minimum, this review should be completed for projects that are large, complex, or that have a substantial weight in the development of the free ridership score. All quantitative and qualitative data should be systematically and independently analyzed by a researcher who is familiar with the program, the individual site and the social science theory that underlies the decision maker survey instrument. This researcher should make an independent determination of whether the additional information justifies modifying the previously calculated NTGR score, and if a modification is determined to be necessary, present any recommended modifications and their rationale in a well-organized manner, along with specific references to the supporting data. Circumstances that may justify a revision of the previously calculated NTGR score include: (1) significant inconsistencies exist between separate FR scores that may lead to elimination of FR scores determined to be outliers; (2) the emerging "story" from the qualitative data is in conflict with the quantitative data, thereby requiring a callback to the customer to resolve the inconsistency and a revision to the original scoring based on the new information; or (3) the entire set of results for an interview are inconsistent, the data are too disparate and would not be helped with a callback. In such cases, a recommendation is made to remove that sample point and replace it with a back-up point (if available).

3.1.1.1 Core Free Ridership Scoring Algorithm

The Core Non-Residential FR protocol consists of two scores that measure the program's impact on efficiency (the Program Influence, or "PI", FR Score and the Counterfactual, or "CF", FR Score), as well as a Quantity and Timing (Q&T) Adjustment that provides credit to the program for increasing the scope of a project or accelerating the timing. The three components are combined as shown in Figure 3-1 to calculate the final free ridership value.

Evaluators will submit participant survey and net savings analysis data to the Illinois NTG Working Group. The group will analyze these data for the purpose of further refining the protocol.

Figure 3-1. Core Free Ridership Algorithm



Program Factors

To ensure that the respondent thinks about the program holistically, the survey will first remind the respondent of program factors that might have influenced decision-making. This could be through one or more questions about

program factors or through a read-in of program factors.

The factors referenced in the survey will include those that the evaluator determines could potentially impact the participant decision-making process. Evaluators determine these factors based on available information, including but not limited to discussions with the program management and implementation contractor team, program materials, and program theory or logic model documentation. Program factors may, for instance, include the availability of the program incentive, technical assistance from program partner staff (e.g. trade allies), program staff recommendations, Program Administrator marketing materials, and an endorsement or recommendation by a Program Administrator, account manager or program partner staff.

Evaluators will determine if vendor recommendations should be considered a program factor. This section outlines the rules for the treatment of vendor recommendations.

The evaluator first determines if the program has a qualifying trade ally network. A trade ally network is qualifying if the evaluator determines that the trade ally network meets all of the following criteria:

1. The trade ally network consists of pre-approved, registered trade allies that complete signed agreements or are verified through direct contact with the Program Administrator
2. Registered trade allies are an integral component of program delivery, as supported by program design
3. Registered trade allies receive program-sponsored training

Vendor recommendations are considered a program factor under the following scenario:

- The program has a qualifying trade ally network and the vendor who implemented the project under investigation is currently a registered trade ally, or has been so in the last three years

Vendor recommendations are not considered a program factor under the following scenarios:

- The program does not have a qualifying trade ally network
- The program has a qualifying trade ally network but the vendor who implemented the project under investigation is not a registered trade ally

In cases where vendor recommendations are considered a program factor, the survey shall specifically identify the vendor to the respondent.

Program Influence FR Score

The PI Score measures the overall influence of the program on the participant's decision to select energy efficient equipment instead of a less efficient alternative. It is developed based on a single question that asks the respondent to rate the overall influence of the program on the decision to install energy efficient equipment using a scale from 0 to 10, with 0 being not at all influential and 10 being extremely influential.

Evaluators will calculate the PI Score for each survey respondent using the following equation:

$$Program\ Influence\ FR\ Score\ = 1 - \left(\frac{[Influence\ Rating]}{10}\right).$$

This score can range from 0 (no free ridership) to 1 (full free rider).

In cases where vendor recommendations are considered a program factor, the survey shall ask a second Program Influence question that asks the respondent to rate the influence of interactions with the relevant vendor on the decision to install energy efficient equipment using a scale from 0 to 10, with 0 being not at all influential and 10 being extremely influential. In these cases, the PI Score will be calculated using the maximum influence score across the two questions.

Counterfactual FR Score

The CF Score is based on the likelihood the respondent would have installed equipment of the same efficiency in the absence of the program.

Evaluators will first administer a counterfactual scenario survey question, which asks the respondent to identify which alternative among a list they would have been most likely to follow if the program had not been available. The scenarios will be specific to the program, but generally include options such as purchasing less efficient equipment, doing the same thing they did through the program, or doing nothing at all. The evaluator should explicitly consider if, before the counterfactual survey question is administered, the respondent needs to be reminded of the program factors. If the position of the counterfactual question relative to the initial introduction of program factors as described in Section 3.1.1.1.1 is such that the respondent might plausibly not recall the definition of the program, the evaluator shall remind the respondent of the program factors (including the vendor recommendations if applicable). The respondents will then be asked a scale-based likelihood question as illustrated in Figure 3-1. Evaluators will calculate the CF Score for each survey respondent based on the following equation:

$$Likelihood\ would\ have\ done\ same\ efficiency\ =\ \left(\frac{[Rating]}{10}\right).$$

Quantity and Timing Adjustment

The Q&T Adjustment can reduce the Efficiency FR Score in cases where the program influenced a respondent to expedite all or parts of their project (compared to when they would have completed it without the program). The Q&T Adjustment can range from 0 to 1, where a lower value means a greater FR reduction (i.e., more credit to the program). As shown in Figure 3-1, the Q&T Adjustment is multiplied by the Efficiency FR Score to derive the final FR values.

Quantity adjustments are applicable to equipment measures where 2 or more units are installed, and to all upgrades that have a length or area component (such as air sealing or insulation). When quantity adjustments are applicable, evaluators will first ask respondents how much (in percentage terms) of the installed energy-efficient equipment would have been installed at the same time without the program. Only the quantity that would not have been installed at the same time is eligible to receive the Q&T credit. Evaluators then ask if the respondent would have installed the remaining quantity later and, if so, how much later. When quantity is not applicable, respondents are only asked if they would have installed the equipment later, and if so, how much later.

The timing question will present a series of date ranges (e.g., within one year, between 12 months and 2 years, etc.) and ask the respondent to pick one representing their best estimate of when the measure(s) would have been implemented in the absence of the program. However, program specific timing adjustments have been established, as shown in Figure 3-1, and use the following formulas:

2-year Time Horizon Timing Adjustment = 1 - (Number of Months Expedited - 6)/18

3-year Time Horizon Timing Adjustment = 1 - (Number of Months Expedited - 6)/30

The Timing Adjustment can range from 0 to 1. A smaller value means a greater reduction in FR, because the program resulted in a greater acceleration of the project. The Q&T Adjustment is then calculated as follows:

*Q&T Adjustment = (% Not Installed at Same Time * Timing Adjustment) + % Installed at Same Time*

Consistency Checks

Per the key considerations listed at the beginning of Section 3.1, respondents should be asked one or more questions to facilitate evaluator understanding of responses to the free ridership questions and potentially reconcile apparently inconsistent responses. Some questions may be asked of all respondents; others may be asked when previous answers appear inconsistent. Evaluators should report on the amount of inconsistency encountered, and on the resolution, to inform future protocol revisions. Four recommended consistency checks are outlined below (three related to the level of efficiency of the equipment and one related to the quantity and timing of the project), but evaluators may also incorporate additional consistency checks as they see fit.

If one or more **efficiency-related inconsistencies** are observed, evaluators will ask a single follow-up question about how the program (including any interactions with the vendor, if applicable) influenced the level of efficiency of the installed equipment. The following inconsistencies trigger the efficiency consistency check:

- **Program Influence FR Score/Counterfactual FR Score Inconsistency**

    1) The difference between the Program Influence FR Score and the Counterfactual FR Score is ≥ 0.4.

- **Vendor Influence FR Score/Counterfactual FR Score Inconsistency**

    1) Vendor recommendations are determined to be a program factor as discussed in Section 0

    2) The difference between the Program Influence FR Score and the Counterfactual FR Score is ≥ 0.4 AND the Program Influence FR Score was calculated based on the vendor-specific Program Influence question.

- **Counterfactual Scenario/Counterfactual Likelihood Inconsistency**

    1) The respondent states that without the program, they most likely would have done exactly the same thing or would have installed equipment of the same efficiency, but fewer units or at a later time, AND the likelihood of installing equipment with the same efficiency is < 5.

    OR

    2) The respondent states that without the program, they would have installed lower efficiency equipment, would have done nothing (i.e., kept existing equipment), or would have done something else, AND the likelihood of installing equipment with the same efficiency is > 5.

If a **quantity and timing-related inconsistency** is observed, evaluators will ask respondents to describe how the program (including any interactions with the vendor, if applicable) influenced the timing of their installation or the number of units of equipment they installed (if quantity is applicable). The following inconsistency triggers the quantity and timing consistency check:

- **Counterfactual Scenario/Quantity and Timing Inconsistency**

    1) [*In cases where quantity is applicable*] The respondent states that without the program, they would have installed equipment of the same efficiency but fewer units or at a later time, AND the respondent later states that without the program, they would have installed the same quantity of units at the same time they did (or indicate they are unsure).

    OR

    2) [*In cases where quantity is not applicable*] The respondent states that without the program, they would have installed equipment of the same efficiency but fewer units or at a later time, AND the respondent later states that without the program, they would have completed the project at the same time they did (or indicate they are unsure).

3.1.1.2 Construction of Core Free Ridership Value

Evaluators will calculate final FR values in the following manner:

Core FR Algorithm = AVERAGE([Program Influence FR Score], [Counterfactual FR Score])*[Quantity & Timing Adjustment]

The Core FR Algorithm is graphically presented in Figure 3-1.

3.2 Core Non-Residential Spillover Protocol

Spillover refers to energy savings associated with energy-efficient equipment installed by consumers who were influenced by an energy efficiency program, but without direct intervention (e.g., financial or technical assistance) from the program.

To place the spillover protocols in context, we begin by defining the NTGR as:

NTGR = (1 – Free Ridership Value + PSO Rate + NPSO Rate)

Where:

PSO Rate = Participant spillover rate

NPSO Rate = Nonparticipant spillover rate

The term (1-Free Ridership) is referred to as the Core NTGR for an efficiency program.

3.2.1 Core Participant Spillover Protocol

The Core Participant Spillover protocol is generally applicable to most commercial, industrial, and public sector programs.

3.2.1.1 Research Methods

Data collection approach. An initial determination of participant spillover may be made based on self-reported findings from surveys of program participants. At a minimum, surveys collecting data pertaining to participant spillover will obtain general information on the specific measures installed and information substantiating their attribution to an energy efficiency program. Research on the specific characteristics of the energy efficient equipment installed and the baseline and operating conditions needed to estimate savings may be done in one of two ways: 1) a detailed battery of measure specific questions may be administered as part of the initial survey; or 2) a separate in-depth follow-up interview may be conducted by the engineer or analyst responsible for the energy savings calculation. In either case, an engineer or analyst will use the collected data to develop an estimate of spillover savings for each project.

Sample Frame. One target for participant spillover research may be the most recent year's program participants who have been sampled for free ridership or process surveys. In the case where a stand-alone spillover study is being conducted, the sample frame may be broader and include those whose participation occurred during the time period of two prior program years.

Because evaluated spillover energy impacts associated with the sample are being extrapolated to the program population, it is important that the sample frame be limited to participating customers for which spillover may potentially be claimed.

Sample frames should be constructed in accordance with the following guidelines:

- Self-directing customers as defined by 220 ILCS 5/8-104(m) should be excluded from the sample frame for natural gas spillover.
- Customers of municipal electric utilities should be excluded from the sample frame for electric spillover.

Timing of Data Collection. Evaluators may either administer the participant spillover module as part of a comprehensive net-to-gross survey, or they may elect to implement it separately. A follow-up in-depth interview may also be conducted by an engineer or analyst to obtain additional details needed to quantify savings. Optimally, the spillover inquiry should be timed in order to allow sufficient time for spillover to occur; at a minimum, three months after the program-incented measure is installed. Projects installed up to two years after program participation occurred may be counted as spillover, provided it can be substantiated.

3.2.1.2 Approach for Identifying and Quantifying Spillover

Attribution Criteria. Program attribution is determined by the responses to the following two survey questions:

1. How important was your experience in the <PROGRAM> in your decision to implement this measure, using a scale of 0 to 10, where 0 is not at all important and 10 is extremely important?
2. If you had not participated in the <PROGRAM>, how likely is it that your organization would still have implemented this measure, using a 0 to 10 scale, where 0 means you definitely WOULD NOT have implemented this measure and 10 means you definitely WOULD have implemented this measure?

The response to the first question cited above is "Measure Attribution Score 1," and the response to the second question cited above is "Measure Attribution Score 2."

There are two methods by which the attribution may be calculated:

1. Program attribution is established if the average of Measure Attribution Score 1 and (10 – Measure Attribution Score 2) exceeds 5.0[62]; either the Measure Attribution Score 1 or (10 – Measure Attribution Score 2) could be below 5.0—as long as the average is greater than 5.0, the threshold is met. If the average is greater than 5.0, 100% of the measure energy savings referenced in the question are considered to be attributable to the program. If the average is not greater than 5.0, none of the measure energy savings are considered to be attributable to the program.
2. An attribution rate may be calculated as equal to the sum of Measure Attribution Score 1 and (10 – Measure Attribution Score 2), divided by 20. For instance, if the attribution rate is 0.3, then 30% of the measure energy savings referenced in the question are considered to be attributable to the program.

Program attribution option 2 must be used in cases in which evaluators have performed the data collection and analysis required to attribute energy savings using option 2 identified above.

Calculation of Spillover Measure Energy Savings. Energy savings of spillover measures shall be calculated in one of two ways.

1. Those addressed in the IL-TRM shall be calculated in accordance with the methods and algorithms specified in the IL-TRM, and shall reference the IL-TRM-defined time-of-sale or new construction baseline.
2. For measures not addressed in the IL-TRM, evaluators shall quantify savings using accepted industry-wide savings methods that conform to IPMVP or other industry protocols and documents.

Evaluators will make every effort to ensure that there is no double-counting of participant spillover energy savings across multiple sources of participant and nonparticipant spillover (such as participating customer and trade ally surveys) and will document that effort.

Measure implementation must have occurred within one year of the participant spillover study data collection effort in order to be countable as participant spillover.

For the purposes of accounting for spillover savings attributable to a program, spillover will only be quantified for measures implemented within the Program Administrator's service territory.

3.2.1.3 Key Participant Spillover Survey Questions

The Participant Spillover question module is designed to be a general inquiry that seeks to: (1) assess whether additional energy efficiency improvements were implemented since the rebated project was completed; (2) confirm that these measures either had not received program incentives, or that there were no plans to submit them for program incentives in the future; (3) gather basic information about the additional energy efficiency measures (e.g., their type, size, quantities, and energy efficiency rating); and (4) establish program attribution.

The basic question structure is shown below. The measure-specific questions can be repeated in order to capture multiple measures. Note that there is considerable flexibility to tailor the questions to specific types of applications and programs.

1. Since your participation in the <PROGRAM>, did you implement any ADDITIONAL energy efficiency improvements at this facility or at your other facilities within <PROGRAM ADMINISTRATOR>'s service territory that did NOT receive incentives through <PROGRAM>?
2. What measures did you implement without an incentive?

[62] Note that the threshold value for counting spillover has been lowered from 7.0 to 5.0. The rationale for this lower threshold is: (1) the value of >5 is a strong indicator of program influence on the decision to install non-rebated equipment and is currently being used in other states (e.g., California); (2) the previous value of >7 set an unreasonably high standard for demonstrating program influence on the decision to install non-rebated equipment; and (3) past IL evaluation data show that a threshold of >5 will improve spillover estimates as it provides a better approximation of partial spillover (i.e., where a portion of the savings for each measure installed outside the program gets credited as spillover based upon the program influence rating).

MEASURE-SPECIFIC QUESTIONS [repeated for each spillover measure][63]

1. How important was your experience in the <PROGRAM> in your decision to implement this <MEASUREX>? Please use a scale of 0 to 10, where 0 is not at all important and 10 is extremely important.
2. Can you explain how your experience with the <PROGRAM> influenced your decision to install this additional high-efficiency measure?
3. If you had not participated in the <PROGRAM>, how likely is it that your organization would still have implemented <MEASURE>? Please use a 0 to 10, scale where 0 means you definitely WOULD NOT have implemented this measure and 10 means you definitely WOULD have implemented this measure.
4. How many of <MEASURE> did you install?3
5. Questions to further define the measure (as applicable):
    a. Type
    b. Efficiency
    c. Size
    d. Other attributes
6. Can you briefly explain why you decided to install this energy efficiency measure without going through the <PROGRAM>?

Since spillover is best conceptualized as a program-level concept, the preferred approach is to ask the influence questions (Q.1-3 above) relative to the participant's experience with the *program*, rather than relative to the participant's experience with a specific *project* or *incented measure* (in cases where a unique participant implemented more than one project/measure through the program during the evaluation period).

3.2.1.4 Reporting of Results

Evaluators will report the following information relating to participant spillover data collection and analysis in annual EM&V reporting: 1) the number of participants surveyed; 2) the number of survey respondents reporting additional energy efficiency improvements; 3) the number of survey respondents who meet the spillover attribution threshold; 4) the number of respondents for which spillover savings were actually quantified; 5) the spillover savings for each respondent and overall; and 6) the spillover rate. The term (1-Free Ridership) is referred to as the Core NTGR.

The report summarizing spillover should also describe the means by which the participant spillover rate is calculated.

The preferred approach is to estimate program spillover effects by summing spillover estimates for the sample and dividing this sum by the total ex ante or ex post (if available) gross savings for all projects completed by the respondents in the sample to produce the participant spillover rate. This participant spillover rate can be added to the Core NTGR for the sample to yield the NTGR. If the sample is stratified, sampling weights must be applied before applying the NTGR to the ex post gross savings of the participant population.

Using this approach, the participant spillover rate is calculated using the following formula:

$$Participant\ Spillover\ Rate = \frac{ISO + OSO\ in\ sample}{Ex\ Post\ Gross\ Impacts\ for\ all\ projects\ by\ respondents\ in\ sample}$$

Where:

ISO = Inside participant spillover

OSO = Outside participant spillover

An alternative method is to add the participant spillover rate to each project's Core NTGR. The project-level NTGRs are then weighted by each project's ex ante or ex post (if available) gross savings as a share of the total. This savings-weighted NTGR can then be applied to the ex post gross savings of the participant population. If the sample is stratified, sampling weights must be applied before applying the NTGR to the ex post gross savings of the participant

[63] Example questions to gather engineering information to support the calculation of spillover savings may be accessed here: http://www.ilsag.info/il_ntg_methods.html

population. If this method is chosen, the influence questions (Q.1-3 above) must be asked relative to the participant's experience with a specific *project* and the following formula is used:

$$Participant\ Spillover\ Rate = \frac{ISO + OSO\ in\ sample}{Ex\ Post\ Gross\ Impacts\ for\ all\ sampled\ projects}$$

Irrespective of the approach used to calculate the participant spillover rate, it is essential that the wording of the influence questions (i.e., whether relative to the participant's experience with the *program* or relative to the participant's experience with a specific *project or incented measure*) match the impacts included in the denominator of the participant spillover rate.

3.2.2 Core Nonparticipant Spillover Protocol

The evaluation may perform research to measure nonparticipant spillover (NPSO). Evaluators will make efforts to ensure that there is no double-counting of energy savings across multiple sources and will document those efforts.

3.2.2.1 Core Nonparticipant Spillover Protocol – Measured from End Users

NPSO for end users is defined as the energy savings that are achieved when a nonparticipant end user—as a result of the influence of a Program Administrator's programs—implements energy efficiency measures *outside* of the Program Administrator's programs.

One option for the evaluator would be to survey nonparticipating customers and estimate spillover savings for any efficient measures installed that respondents are able to attribute to specific Program Administrator programs. However, in many cases, nonparticipants might find it difficult, if not impossible, to reliably attribute any of their installations to the influence of a specific Program Administrator program. If an evaluator suspects that nonresidential nonparticipants will not be able to reliably attribute spillover savings to any particular Program Administrator program, a second option would be to survey nonparticipants and estimate spillover savings from the installation of efficient measures that respondents are able to attribute to their general knowledge of the Program Administrator incentives and information, regardless of the particular program source. These protocols are written assuming that the NPSO for end users will be estimated using this second option.

Note that this protocol does not address estimating spillover for upstream and midstream programs where the end user is assumed to be completely ignorant of any Program Administrator influence. Of course, when considered feasible, evaluators are free to estimate spillover and spillover rates at the program-specific level with the suggested questions presented in Section 3.2.2.1.2 modified appropriately.

Research Methods

Data Collection Approach. An initial determination of spillover may be made based on self-reported findings from surveys of nonparticipants. At a minimum, surveys collecting data pertaining to nonparticipant spillover will obtain general information on the specific measures installed and information substantiating the influence of the Program Administrator on the installation decision. Research on the specific characteristics of the energy efficient equipment installed and the baseline and operating conditions needed to estimate savings may be done in one of two ways: (1) a detailed battery of measure specific questions may be administered as part of the initial survey, or (2) a separate in-depth follow-up interview may be conducted by the engineer or analyst responsible for the energy savings calculation.[64] Projects installed within the last two years of the nonparticipant spillover study data collection effort may be counted as spillover, provided program attribution and energy savings can be substantiated. In either case, an engineer or analyst will use the collected data to develop an estimate of spillover savings for each project.

Sample Frame. The sample frame for nonparticipant end user spillover research is composed of customers who have not participated in any programs within the last three years. Because evaluated spillover savings associated with the sample are being extrapolated to the nonparticipant population, it is important that the sample frame be limited to nonparticipants for whom spillover may potentially be claimed.

[64] See http://www.ilsag.info/il_ntg_methods.html for detailed example questions designed to collect information required to estimate spillover savings for a variety of measures.

Sample frames should be constructed in accordance with the following guidelines:

- Exempt electric customers as defined by 220 ILCS 5/8-103B(k)(1) should be excluded from the sample frame for electric spillover.
- Self-directing customers as defined by 220 ILCS 5/8-104(m) should be excluded from the sample frame for natural gas spillover.
- Customers of municipal electric utilities should be excluded from the sample frame for electric spillover.

Timing of Data Collection. Evaluators might administer the nonparticipant end user spillover study in parallel with the program impact evaluation, potential study or saturation study research, or at a different time.

Approach for Identifying and Quantifying Spillover

Key Nonparticipant Spillover Survey Questions. The nonparticipant end user spillover question module is designed to be a general inquiry that seeks to: (1) assess whether additional energy efficiency improvements were implemented during the study period; (2) confirm that these measures had not received program incentives and that there were no plans to submit them for program incentives in the future; (3) gather basic information about the additional energy efficiency measure(s), e.g., the type, size, quantities, and energy efficiency rating; and (4) establish the Program Administrator importance ratings. Note that while the example questions can be customized to assess the influence of a specific program in the Program Administrator portfolio, they are currently worded to capture influence of the Program Administrator, regardless of program source.

Below are example questions that might be used in a nonparticipant spillover survey. They are grouped by the following topics:

- **Threshold conditions:** Is there some credible evidence that it was at least possible for the Program Administrator to have influenced the decision to install additional energy efficient measures?
- **Measure description:** Enough information needs to be collected for the measure and its operation to support a credible estimate of savings
- **Attribution:** Is there credible evidence that the Program Administrator had substantial influence on the end user's decision to install the efficient measure outside of any of the programs in the Program Administrator portfolio?

Threshold Conditions. Spillover cases are identified using a threshold approach in which certain minimal conditions must be met for a customer's installation to be considered for spillover. The following are example questions that evaluators may use (individually or in combination) to determine that program administrator influence on the installation is possible:

1. Before installing these measures, did you know that <PROGRAM ADMINISTRATOR> offers energy efficiency programs, incentives, and information to help their business customers make energy efficiency improvements at their facilities?
2. <PROGRAM ADMINISTRATOR> offers incentives for energy efficient equipment upgrades and improvements through its <PORTFOLIO NAME> programs. Before installing these measures, had you heard about the <PORTFOLIO NAME> programs?

If the answer to either question is "yes", then the threshold condition is met.

Measure Description. The interview (either the initial interview or a separate in-depth follow-up interview) can be used to determine the following basic attributes (as applicable) required to support a credible estimate of savings:

1. Type
2. Efficiency
3. Size
4. Other attributes

The named measure(s) must represent equipment that is more energy efficient than either: (1) equipment required by codes or standards; (2) industry-standard practice for certain types of equipment; or (3) for Custom measures, the minimum efficiency equipment available to meet the customer's requirements. For detailed example questions

designed to collect engineering information required to estimate spillover savings for a variety of measures, see http://www.ilsag.info/il_ntg_methods.html.

Attribution. The following questions are suggested to assess attribution. These questions should be asked separately for each potential spillover measure:

1. Earlier you mentioned that you knew that <PROGRAM ADMINISTRATOR> offers incentives to customers for installing energy efficient equipment, and also provides information to customers to help them reduce their energy usage. Thinking about all of the reasons you chose to install the energy efficient <MEASURE>, did your knowledge of these incentives and information available through <PROGRAM ADMINISTRATOR> have ANY INFLUENCE on your decision to install <MEASURE>?

ASK IF Q1=YES

2. Using a scale of 0 to 10, where 0 is not at all influential and 10 is extremely influential, how much influence did your knowledge of the incentives and information <PROGRAM ADMINISTRATOR> offers have on your decision to install your energy efficient <MEASURE>?
3. Just to make sure that we understand you correctly, please answer the following hypothetical question. If you had NOT known about the incentives and information <PROGRAM ADMINISTRATOR> offers, would you still have installed your energy efficient <MEASURE>? Please use a scale of 0 to 10, where 0 means you definitely WOULD NOT have installed your energy efficient <MEASURE> and 10 means you definitely WOULD have done so.

Consistency Checks

Respondents may be asked one or more questions to facilitate understanding and potentially reconcile apparently inconsistent responses. Evaluators should report on the amount of inconsistency encountered and, on the resolution, to inform future protocol revisions.

ASK IF Q2>7 AND Q3>7 OR Q2<3 AND Q3<3

4. In your own words, can you explain HOW your knowledge of the incentives and information <PROGRAM ADMINISTRATOR> offers influenced your decision to purchase or install your energy efficient <MEASURE>?

The evaluation analyst will assess the response to this open-ended question and its consistency with the other questions, and, if warranted based on clear additional information, they will adjust the score based on expert judgment. If an inconsistency exists and the open-ended response does not resolve the inconsistency, the respondent will be removed from the calculation. All instances of this occurring should be documented in the final report. Additional consistency checks, triggered and resolved within the survey with additional questions to participants, remain optional.

Nonparticipant End User Spillover Algorithm. The response to question #2 cited above is "Measure Attribution Score 1," and the response to question #3 cited above is "Measure Attribution Score 2."

There are two methods by which the attribution may be calculated:

1. Provided that the open-ended responses do not contradict influence of the Program Administrator, spillover is considered to be attributable to the Program Administrator if the average of the Measure Attribution Score 1 and (10 – Measure Attribution Score 2) exceeds 5.0[65]; either the Measure Attribution Score 1 or (10 – Measure Attribution Score 2) could be below 5.0—as long as the average is greater than 5.0, the threshold is met. If the average is greater than 5.0, 100% of the measure energy savings referenced in the question are considered to be attributable to the Program Administrator. If the average is not greater than 5.0, none of the measure energy savings are considered to be attributable to the Program Administrator.
2. Provided that the open-ended responses do not contradict influence of the Program Administrator, the attribution rate is calculated as equal to the sum of Measure Attribution Score 1 and (10 – Measure Attribution Score 2), divided by 20. For instance, if the attribution rate is 0.3, then 30% of the measure

[65] Note that the same 5.0 threshold value is being used for both Participant and Nonparticipant Spillover.

energy savings referenced in the question are considered to be attributable to the Program Administrator.

Calculation of Spillover Measure Energy Savings. Energy savings of spillover measures shall be calculated in one of two ways.

1. Those addressed in the IL-TRM shall be calculated in accordance with the methods and algorithms specified in the IL-TRM, and shall reference the IL-TRM-defined time-of-sale or new construction baseline.
2. For measures not addressed in the IL-TRM, evaluators shall quantify savings using accepted industry-wide savings methods that conform to IPMVP and other industry protocols and documents.

Evaluators will make every effort to ensure that there is no double-counting of nonparticipant spillover energy savings across multiple sources of nonparticipant spillover reporting (such as nonparticipating customer and trade ally surveys) and will document that effort.

Measure implementation must have occurred within the last two years of the nonparticipant spillover study data collection effort in order to be countable as nonparticipant spillover.

For the purposes of accounting for spillover savings attributable to the Program Administrator, spillover will only be quantified for measures implemented within the Program Administrator's service territory.

Reporting of Results

Evaluators will report the following information relating to nonparticipant spillover data collection and analysis in annual EM&V reporting: 1) how the sample frame was defined, 2) the number of customers surveyed; 3) the number of survey respondents reporting spillover; 4) the number of survey respondents who meet the spillover attribution threshold; 5) the number of respondents for which spillover savings were actually quantified; 6) the spillover savings for each project and overall; 7) the nonparticipant spillover rate, and 8) the calculation of the weights used to extrapolate the spillover to the population of nonparticipants from which the sample was drawn.

The EM&V report should also describe the means by which the nonparticipant spillover (NPSO) rate is calculated. For each sampled site, the verified spillover savings should be summed across measures to derive the total end user NPSO for the sampled sites.[66] The estimate of site-level end user NPSO for the entire sample is then extrapolated to the entire nonparticipant population using sampling weights.

There are two options for using the estimated NPSO.

1. Allocate the portfolio-level spillover savings to individual programs in the portfolio based on each program's share of the ex post gross savings. For each program, the spillover rate could then be calculated for each program using the equation below in which the spillover allocated to each program would be the numerator and the ex post program-specific gross savings would be the denominator.

   $$Program - Specific\ NPSO\ Rate = \frac{NPSO_{Program-Specific}}{Ex\ Post\ Gross\ Impacts_{Program-Specific}}$$

   The spillover-adjusted NTGR for each program could then be used to adjust the Core NTGR for each program before calculating the TRC. In calculating the Program-Specific NPSO Rate, the numerator and denominator must be consistent in terms of the time period of measure implementation/potential implementation. While this time period must be within the last two years, it may be for a period of less than two years.
2. The NPSO Rate is calculated at the Sector level. The estimated energy savings associated with program-attributable spillover measures implemented during the study period by the entire nonparticipant population is divided by the ex post gross impacts for all the nonresidential programs in the portfolio occurring during the study period. The C&I Sector NPSO Rate is calculated using the following equation

   $$Portfolio\ NPSO\ Rate = \frac{NPSO_{Portfolio}}{Ex\ Post\ Gross\ Impacts_{Portfolio}}$$

The NPSO rate could then be used to adjust the portfolio core NTGR before calculating the portfolio TRC. Again, in calculating the Portfolio NPSO Rate, the numerator and denominator must be consistent in terms of the time period

[66] This includes all samples sites including those that reported no spillover savings.

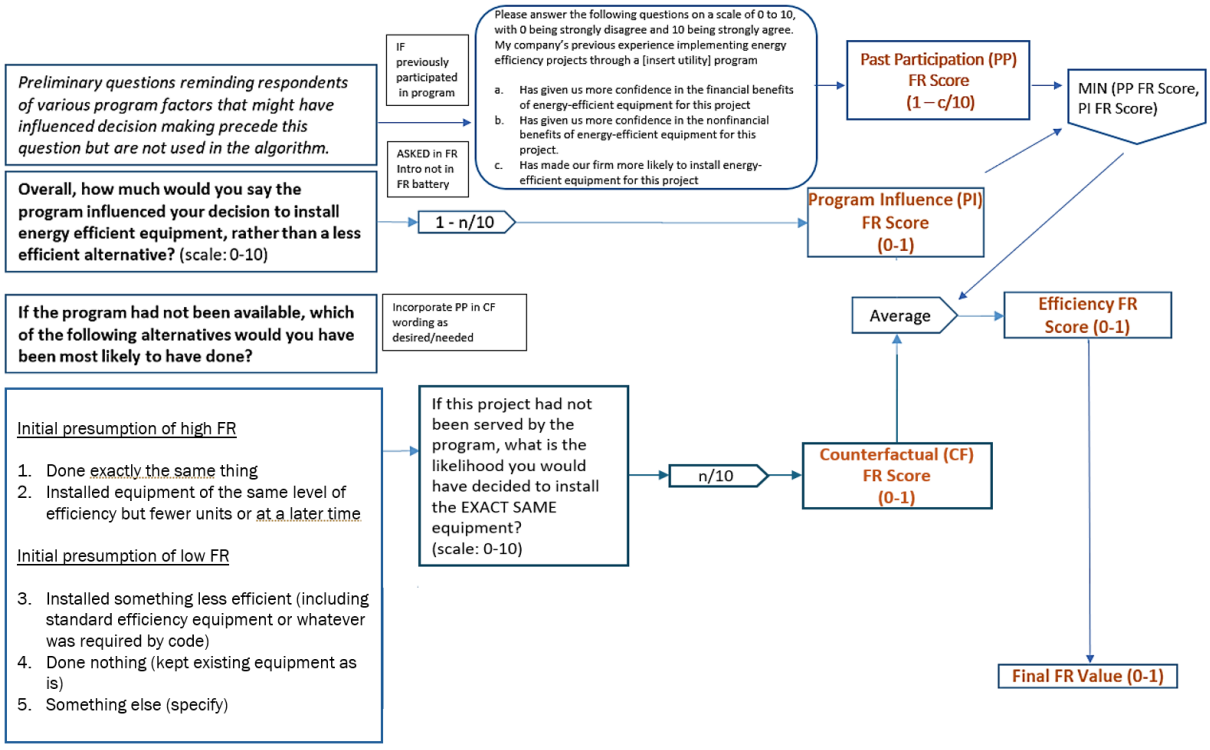
of measure implementation/potential implementation. While this time period must be within the last two years, it may be for a period of less than two years.

3.3 C&I New Construction Protocol

3.3.1 Free Ridership

The FR algorithm for non-residential new construction programs will generally follow the Core Non-Residential FR protocol, with a few exceptions as illustrated in Figure 3-2. First, the algorithm includes a direct accounting of past participation for respondents who confirm having previously participated in the New Construction program. Second, the counterfactual likelihood question will accommodate responses at a sub-project level (e.g., at a measure or end use level of granularity). Third, there is no timing adjustment factor.

Figure 3-2. C&I New Construction Protocol



Prior Participation

Respondents will confirm prior participation early in the survey or interview. For prior participants, evaluators should ask participants to what extent they agree or disagree (using a scale of 0 to 10, with 0 being "strongly disagree" and 10 being "strongly agree") with the fact that their previous experience implementing energy efficiency projects through the New Construction program:

a. Has given them more confidence in the financial benefits of energy-efficient equipment for the project in question;
b. Has given them more confidence in the nonfinancial benefits of energy-efficient equipment for the project in question; and
c. Has made their company more likely to install energy-efficient equipment for the project in question.

The Past Participation (PP) FR Score will be developed based on a participant's responses to question (c) above (i.e., whether their company was more likely to install energy-efficient equipment for the particular project due to their

previous experience with the program). Evaluators will calculate the PP FR Score using the following formula:

$$Past\ Participation\ (PP)\ FR\ Score = 1 - \frac{PP(c)}{10}$$

This score can range from 0 (no free ridership) to 1 (full free rider). For prior participants, evaluators will use the minimum FR score between the PI FR Score and the PP FR Score for that project. For those who have not previously participated in the program, the PI FR Score will be used (similar to the core algorithm).

Counterfactual Granularity

The development of the Counterfactual FR Score for C&I New Construction projects cannot be implemented at the project level due to these projects generally including multiple components with different decision-making. As such, evaluators should allow respondents to provide answers (and scores) to the counterfactual likelihood question **at the measure or end-use level**. As such, these counterfactual likelihood questions will allow for partial effects. The counterfactual scenario question can still be asked at the overall project level, and it should remind respondents to consider their past participation in the program as needed/applicable.

Timing Adjustment

Finally, the concept of project timing and deferred free ridership is not applicable to new construction projects.[67] As a result, the timing adjustment detailed in Section 3.1.1.1. will not be included in the free ridership estimation for new construction projects.

3.4 Study-Based Protocol

3.4.1 Free Ridership

The FR algorithm for non-residential study-based programs (See Figure 3-4) will follow the Core Non-Residential FR protocol, with the following exceptions:

Quantity adjustments are not applicable in the Q&T Adjustment.

- The scenario questions used to develop the Counterfactual FR Score in the Core Non-Residential FR protocol will be preceded by questions to determine the familiarity of upgrades found through the study and ability to address them absent the program, as illustrated below in questions Q1 – Q3b.[68]
- Q.1 A 0-10 scale question about the likelihood that the participant would have conducted the study absent the program will be included when the study is the incented service (i.e., RCx, IS), but not for pay for performance programs (i.e., VCx).

At the measure-group level, the following should be included:

- Q.2a A yes/no question to determine if the participant performs regular maintenance on the equipment treated through the program
- Q.2b If the response to Q.2a is "yes," a yes/no question to determine if the maintenance always includes the treatment provided through the program
- Q.3a A yes/no question to determine if the participant had prior awareness of the performance issues identified through the study
- Q.3b A 0-10 scale question about the participant's level of familiarity with the recommended actions to rectify the performance issue.

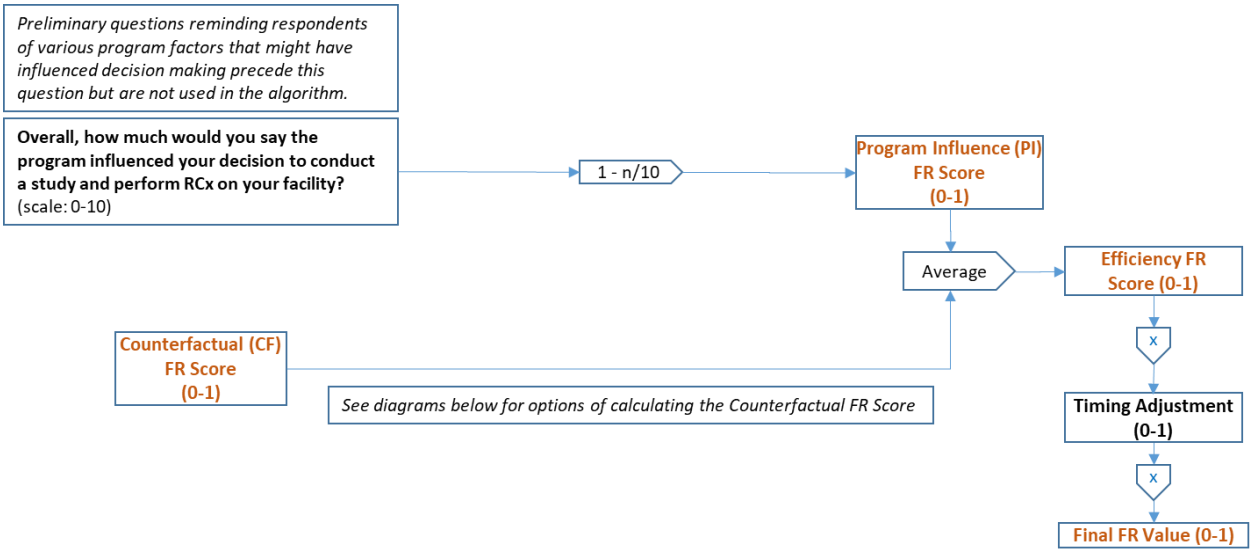
The scenario question will be asked at the measure-group level. Measure-group level responses will be aggregated to the project level, using savings-based weights.

[68] It should be noted that the question numbering in Figure 3-5 and Figure 3-6 is for reference purposes only; the additional questions do not have to immediately precede the counterfactual likelihood question.

There will be two options for developing the Counterfactual FR Score:[69]

1. The measure-group level Counterfactual FR Score will be developed following Algorithm 1 of the Core Non-Residential FR approach.
2. The measure-group level No-Program FR Scores will be assigned, based on responses to Q.1, Q.2b, Q.3a, and Q.3b, as follows:
    a. If Q.2b = Yes, then Counterfactual FR Score = 1. This assumes that if the participant performs regular maintenance on the treated equipment and that maintenance always includes the issue addressed through the program, then the participant is a full free rider for that measure group for purposes of calculating the Counterfactual FR Score.
    b. If Q.3a = No and Q.1 = 0 and Q.2b ≠ Yes, then Counterfactual FR Score = 0. This assumes that if the participant was not aware of the performance issue and had a zero likelihood of performing the study absent the program and their maintenance practices do not always include the issue addressed through the program, then the participant is not a free rider for that measure group for purposes of calculating the Counterfactual FR Score since they would not have found out about the issue absent the program.
    c. If Q.3b = 0 and Q.1 = 0 and Q.2b ≠ Yes, then Counterfactual FR Score = 0. This assumes that if the participant had no familiarity with how to rectify the performance issue, had a zero likelihood of performing the study absent the program, and their maintenance practices do not always include the issue addressed through the program, then the participant is not a free rider for that measure group for purposes of calculating the Counterfactual FR Score since they would not have known how to address the issue absent the program.
    d. For all other combinations of responses to Q.1, Q.2b, Q.3a, and Q.3b, the measure-group level Counterfactual FR Scores will be developed following the Core FR approach.

Figure 3-3. Study-Based Free Ridership—Overview



[69] Option 1 shall be used in all cases for Virtual Commissioning™ programs.

Figure 3-4. Study-Based Free Ridership—No-Program FR Score Option #1

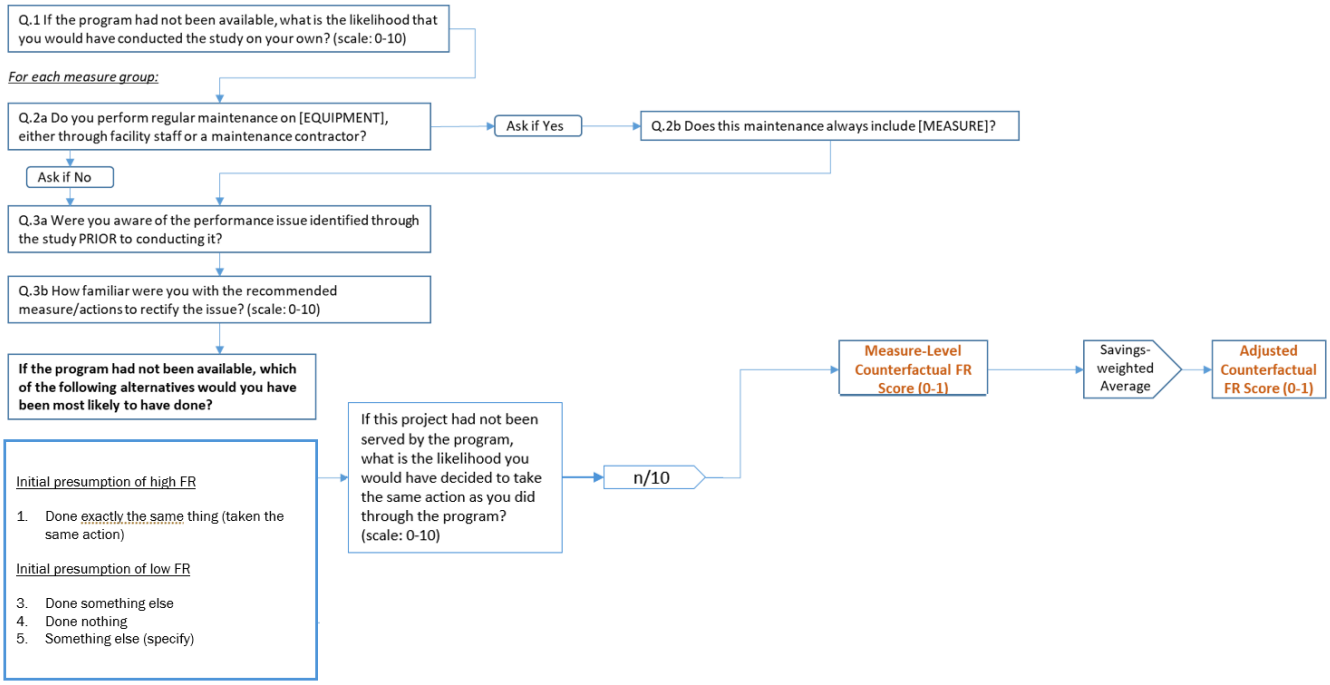
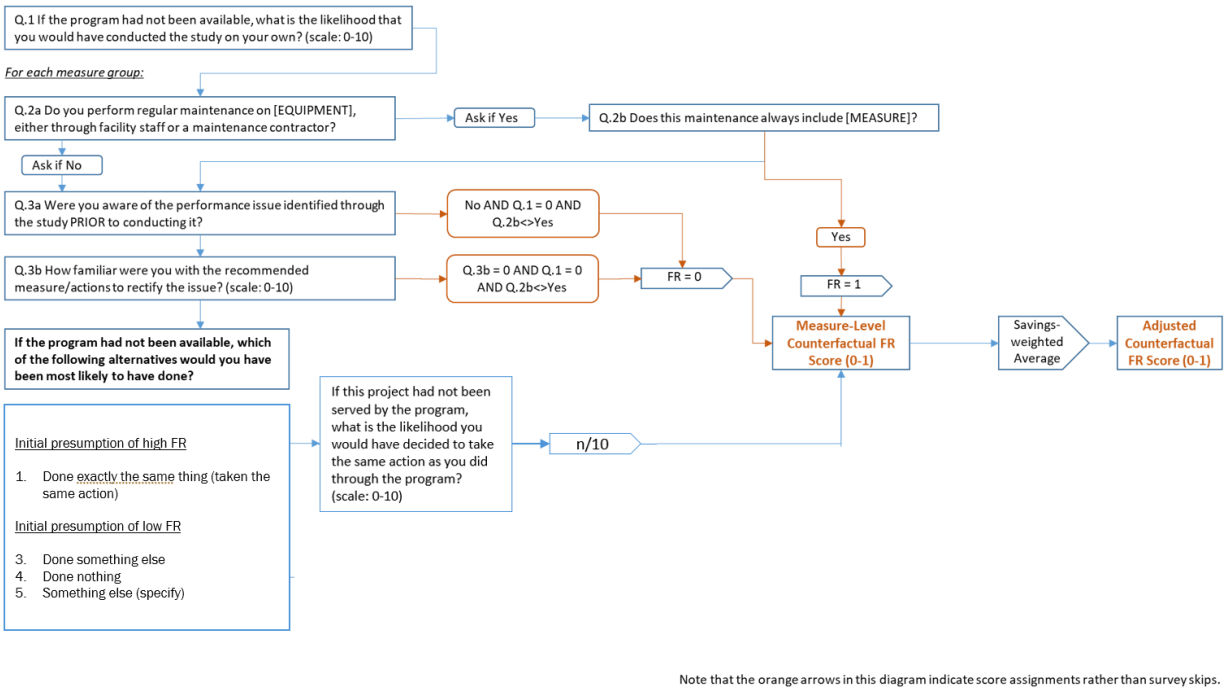


Figure 3-5. Study-Based Free Ridership—No-Program FR Score Option #2



Note that the orange arrows in this diagram indicate score assignments rather than survey skips.

Evaluators will calculate free ridership values for study-based programs as follows:

FR = AVERAGE([Program Influence FR Score], [Counterfactual FR Score])*[Quantity & Timing Adjustment]

Evaluators will develop estimates of free ridership based on the two Counterfactual FR Score options outlined above. Evaluators will select one of these for purposes of calculating the annual incremental energy savings for comparing to the legislated goal. Evaluators will present the results of both estimates of free ridership in EM&V reporting.

3.5 Technical Assistance Protocol

This protocol is applicable to programs that provide technical assistance to encourage the adoption of energy efficiency measures in non-residential facilities, but do not provide financial incentives.

Program-attributable savings from Technical Assistance programs are achieved when a program participant—as a result of the program's influence via the training or technical assistance provided—undertakes energy efficiency improvements on their own, without any direct financial assistance from any other Illinois energy efficiency program.

An initial determination of program-attributable savings is made based on self-reported findings from surveys of program participants. At a minimum, surveys collecting data pertaining to participant measure implementation will obtain general information on the specific measures installed and information substantiating their attribution to the program. Research on the specific characteristics of the energy-efficient equipment installed and the baseline and operating conditions needed to estimate savings may be done in one of two ways: 1) a detailed battery of measure specific questions may be administered as part of the initial survey; or 2) a separate in-depth follow-up interview may be conducted by the engineer or analyst responsible for the energy savings calculation. These collected data may be augmented by detailed facility and measure characteristics if provided by program staff.

3.5.1 Free Ridership

- The FR algorithm for Technical Assistance programs is identical to the Core Non-Residential FR protocol, with the following exception:
    - Key program factors differ extensively from conventional programs and therefore, are described in some detail here. Examples of Technical Assistance program factors that may be included are:

- Documentation in a program-provided technical report of the energy saving opportunities from installing the measure.
- Verbal information or guidance provided by a program representative or energy auditor during a training course or an on-site visit.
- A follow-up communication from the utility regarding implementing the recommendations provided through the audit, training, or technical assistance.

Examples of items that would not be considered Technical Assistance program factors are:

- Information from trade shows, conferences, or other professional gatherings
- Recommendation from an equipment vendor that sold you the measure and/or installed it
- Previous experience with the measure
- A recommendation from a design or consulting engineer
- Standard practice in your business/industry
- Corporate policy or guidelines
- Payback on the investment

4 Residential and Low Income Sector Protocols

The table below lists Illinois residential programs and the NTG protocol applicable to each program.[70] If the design of a given program changes significantly, then it may mean that the NTG protocol listed for that program in this document is no longer appropriate. If that happens, the evaluator should follow the procedures outlined in Section 1.4: Diverging from the IL-NTG Methods.

Table 4-1. Residential and Low Income Programs

Program Administrator	Free Ridership Protocol	Program Name
Ameren Illinois	0 Evaluators will make every effort to ensure that there is no double-counting of nonparticipant spillover energy savings across multiple sources of spillover reporting (such as nonparticipating customer and trade ally surveys) and will document that effort (see also discussion in Section 2.3). 4.2 Appliance Recycling Protocol	Appliance Recycling Initiative
	0 4.3 Residential Upstream Lighting Protocol	Retail Products Initiative – EISA-Exempt Lighting Products
	0 4.5 Prescriptive Rebate (With No Audit) Protocol	Retail Products Initiative – Market Rate Participation
	4.5 Single-Family Home Energy Audit Protocol	Market Rate Single Family Initiative – Home Efficiency
	0 4.7 Multifamily Protocol	Market Rate Multifamily Initiative
	0 5.3 Consumption Data Analysis Protocol	Behavior Modification
	5.4 Midstream Protocol	Market Rate Single Family Initiative – Midstream HVAC Channel
	†	Retail Products Initiative – Income Qualified Participation Income Qualified Initiative Public Housing Initiative Direct Distribution of Efficient Products Initiative
ComEd	0 4.3 Residential Upstream Lighting Protocol and 5.4 Midstream Protocol	Retail/Online (mid- and up-stream measures)
	0 4.5 Prescriptive Rebate (With No Audit) Protocol	Retail/Online (end-user rebated measures) Contractor/Midstream Rebates (end-user rebated measures) Appliance Rebates Heating and Cooling Rebates Weatherization Rebates Efficient Choice*
	0 4.8 Energy Saving Kits and Elementary Education Protocol	Product Distribution (market rate component)
	5.3 Consumption Data Analysis Protocol	Behavior – Res/IE
	5.4 Midstream Protocol	Contractor/Midstream Rebates (mid- and up-stream measures)

[70] The "Free Ridership Protocol Name" in the second column of the table refers to the numbered sections in this document, e.g., "0 4.7 Multifamily Protocol."

Program Administrator	Free Ridership Protocol	Program Name
	Attachment C Market Transformation	Electric Homes New Construction
	†	Retail/Online (income eligible component) Product Distribution (income eligible component) Single-Family Upgrades (income eligible component) Multifamily Upgrades (income eligible component) New Construction – IE Third Party – IE
Nicor Gas	0 4.5 Prescriptive Rebate (With No Audit) Protocol	Home Energy Efficiency Rebates (Single Family)
	0 4.6 Single-Family Home Energy Audit Protocol	Home Energy Savings (Single Family Assessment/ Direct Install)
		Weatherization (Wx) Prescriptive (Air/Duct Sealing and Insulation)
	0 4.7 Multifamily Protocol	Multi-Family (Assessment/ Direct Install /Direct Distribution) Multi-Family Prescriptive Rebates
	0 4.8 Energy Saving Kits and Elementary Education Protocol	Elementary Education Kits Energy Saving Kits Home Energy Savings/Assessment Leave-Behind Kit
	0 4.9 Residential New Construction Protocol	Residential New Construction
	†	Income Qualified/Eligible Programs
	0 5.3 Consumption Data Analysis Protocol	Behavioral Energy Savings, Advanced Thermostats, Air Sealing with Attic Insulation
	5.2 Code Compliance Protocol	Code Compliance
Peoples Gas/ North Shore Gas	0 4.5 Prescriptive Rebate (With No Audit) Protocol	Home Energy Rebates
	0 4.6 Single-Family Home Energy Audit Protocol	Market Rate Single Family Epic Savers Kit
	0 4.7 Multifamily Protocol	MF Custom MF Partner Trade Ally MF Prescriptive Multifamily (Direct Install)
	0 4.8 Energy Saving Kits and Elementary Education Protocol	Elementary Energy Education Home Energy Jumpstart Leave-Behind Kit
	†	Income Eligible/Qualified Programs
	0 5.3 Consumption Data Analysis Protocol	Home Energy Reports, Advanced Thermostats, Air Sealing with Attic Insulation
All	5.4 Midstream Protocol	(Midstream Programs)

† The evaluation teams should follow the Policy Manual regarding NTG for Income Eligible programs.

4.1 Residential Cross-Cutting Approaches

The approaches in this section can apply to more than one program type but do not supersede program-specific approaches presented in later sections.

4.1.1 Survey Design Issues

Free ridership questions should be asked near the beginning of a participant survey, before asking satisfaction questions. This should prevent participants from confusing free ridership questions with the satisfaction questions, which could influence free ridership scores. In particular, evaluators have observed that some respondents have interpreted the No Program – Efficiency question to be a satisfaction question, synonymous with, "Do you like this item? Would you purchase this?" Evaluators may add an explanation that this question is not about respondents' satisfaction with the item.

4.1.2 Participant Spillover

Effective program marketing, outreach, and education generates program participation and increases general energy efficiency awareness among customers. Spillover can be calculated using participant survey questions, which ask participants about energy-savings actions they have taken on their own since participating in the program. Questions should be sufficiently specific to ensure energy savings associated with spillover can be reasonably well-quantified. These may include questions about measure types or measures installed, quantities, and efficiency levels. When program implementers provide recommendations to participants and can provide data on the types of recommendations made to specific participants, evaluations should attempt to determine whether participants took the recommended actions outside of the program at sites within the program administrator's service territory; if so, savings from those recommended actions should be attributed to the program.

To reduce the respondent's burden, the survey should first ask participants about the influence the program had on their taking additional energy-saving actions without a rebate from any <PROGRAM ADMINISTRATOR> program. In particular, the evaluation team should ask two close-ended questions to determine program influence on spillover actions. The two required questions, preceded by an optional warm-up question, are:

- OPTIONAL: Did the program influence you in any way to make these additional improvements?

1. How important was your participation in the <PROGRAM NAME> on your making additional energy efficiency improvements without a rebate from any <PROGRAM ADMINISTRATOR> program? [Scale from 0-10 where 0 is "not at all important" and 10 is "extremely important"]
2. If you had not participated in the <PROGRAM ADMINISTRATOR'S> program, how likely is it that you would still have implemented this measure, using a 0 to 10, scale where 0 means you definitely WOULD NOT have implemented this measure and 10 means you definitely WOULD have implemented this measure?

The response to the first required question cited above is "Measure Attribution Score 1," and the response to the second required question cited above is "Measure Attribution Score 2." The specific measures referenced in the question are considered to be attributable to the program if the "Spillover Score" is greater than 5.0:

$$\textit{Spillover Score} = (\textit{Measure Attribution Score 1} + (10 - \textit{Measure Attribution Score 2}))/2 > 5.0$$

If these conditions are met, the evaluator determines that the specific measures referenced in the question are attributable to the program; otherwise, the evaluator determines that the specific measures referenced in the question are not attributable to the program. The attribution criterion represents a threshold approach, in which energy impacts associated with measures implemented by program participants outside the program are either 100% program-attributable or 0% program-attributable.

For each measure mentioned, customers will be asked how they know the measure is more efficient than other models. If the respondent can identify the measure as ENERGY STAR or name an efficiency level that the evaluator confirms as being above the minimum federal standard, or if they identify a technology that the evaluator can confirm is above the minimum federal standard, it will count towards Participant Spillover.

Finally, depending on the measure type cited by the customer, follow-up questions should ask customers to provide reasonable information to allow the evaluator to estimate the amount of savings using IL-TRM protocols, such as quantity of appliances or the location and amount of insulation.

To calculate the spillover energy and demand savings for these actions, the appropriate version of the IL-TRM should be used. To develop the spillover rate, the total energy and demand impacts from the sampled participants who

installed additional measures due to participation in the program are summed, and this sum is divided by the total verified gross impacts from all participants who took the survey:

$$Participant\ Spillover\ Rate\ (PSO) = \frac{Sum\ of\ Energy\ or\ Demand\ from\ Additional\ Measures\ Installed}{Sample\ Verified\ Gross\ Energy\ or\ Demand\ Impacts}$$

The equation used to adjust the Core NTGR based on participant spillover is as follows:

$$NTGR = (1 - FR + PSO)$$

Evaluators will make every effort to ensure that there is no double-counting of participant spillover energy savings across multiple sources of spillover (such as participating customer and trade ally surveys) and will document that effort (see also discussion in Section 2.3).

4.1.2.1 Data Collection

Respondents should be drawn from a random sample of current or up to one year of previous program participants. Regardless of the participation year, spillover should be measured within the last 12 months (from the survey date), but after previous participation; the tracking database should supply this information.

4.1.2.2 Data Analysis

The following four steps calculate spillover:

1. Calculate total spillover savings for each participant installing an efficient measure not rebated through the program where the Spillover Score is greater than 5.0:

$$\text{Measure Spillover} = \text{Measure Savings} * \text{Number of Units}$$

2. Total savings associated with each program participant to calculate overall participant spillover savings.
3. $$\text{Spillover Percentage Estimate} = \frac{\sum \text{Sample Spillover kWh Savings}}{\text{Sample Evaluated Program kWh Savings}}$$

4.1.3 Nonparticipant Spillover Measured from Customers

The evaluation may perform research to measure nonparticipant spillover (NPSO). If so, care should be taken to ensure spillover is not double-counted with a trade-ally approach. The basic method uses a two-step process: (1) conduct a nonparticipant survey to identify potential spillover measures and (2) if needed, conduct a follow-up call or on-site visit by technical staff to confirm attribution and obtain information needed to estimate energy savings.

4.1.3.1 Basic Method

Sampling

As spillover may be rare in the nonparticipating population, determining spillover will likely require a large sample of customers who have not participated in any energy efficiency programs, including a behavioral program, within the past three years. Customers will be removed from the sample frame if their account numbers can be cross-referenced against a list of program participants from the previous three years. The survey should target household members responsible for paying utility bills. Survey respondents will be asked a screening question (whether they have participated in a program in the past three years) to confirm their household qualifies as a true nonparticipant.

Measure-Specific Questions

Depending on the spillover measure type reported by the customer, follow-up questions should be included to gather sufficient information to reasonably assess the saving amount by applying the IL-TRM, understanding that assumptions must be made if IL-TRM inputs cannot be easily supplied by the participant. Such assumptions should be conservative, or, if not conservative, reasons for deviating from the conservative application should be documented. Measures that cannot be reasonably quantified within available evaluation budgets should be excluded from spillover calculations.

For measures included in the IL-TRM, savings will be assessed using the IL-TRM algorithms. Baselines for measures not in the IL-TRM will be assessed based on appliance standards and building codes, if applicable, and, if not, through

engineering judgements of existing or market conditions. Engineering assumptions and analysis by the evaluator will be applied for measures not included in the IL-TRM. Key assumptions should be documented in the report.

4.1.3.2 Attribution Approach

To receive credit for energy savings, the nonparticipant must fit the following criteria: (1) be familiar with the Program Administrators energy efficiency campaign (e.g., ActOnEnergy for Ameren); and (2) indicate that some aspect of the Program Administrator's energy efficiency programs motivated their purchases. Influence will be measured on a scale of 0 to 10, where 10 is extremely influential and 0 is not at all influential. Savings attribution requires a Spillover Score of greater than 5.0.

Survey respondents will be asked a series of questions following the logic shown in Figure 4-1. First, the customer will indicate whether they know about their Program Administrator's energy efficiency programs and/or marketing messages. If the customer is aware, the survey will ask if they or anyone in their household made an energy efficiency improvement within the last year, and if so, what improvements they made. Responses to these questions will generate a list of potential spillover measures (shown at point "[A]" in Figure 4-1). Customers will be asked how they know the measure is more efficient than other models. If the respondent can identify the measure as ENERGY STAR or name an efficiency level that the evaluator confirms as being above the minimum federal standard, or if they identify a technology that the evaluator can confirm is above the minimum federal standard, it will count towards NPSO. At this point in the NPSO process, the customer could be referred for a follow-up call with a technical interviewer.[71]

To assess attribution for each spillover measure mentioned, the customer will be asked questions to be scored in two areas. Spillover may be program-attributable for those measures for which self-report data meet the following threshold condition:

$$Spillover\ Score\ =\ (Attribution\ Score\ 1\ +\ (10\ -\ Attribution\ Score\ 2))/2\ >\ 5.0$$

Attribution Score 1

The first score, "Attribution Score 1," measures the influence level (on a scale of 0 to 10, where 10 is extremely influential and 0 is not at all influential) their Program Administrator had on the purchase of the measure.

Influence can derive from the following:

1. General information about energy efficiency provided by the Program Administrator (e.g. through a bill insert)
2. Information from a contractor or retailer related to the Program Administrator's programs.
3. Word-of-mouth from people installing energy-efficient equipment and receiving a rebate from the Program Administrator.

Attribution Score 1 is the maximum score (or Yes response) assigned to any source of influence from the Program Administrator.

Attribution Score 2

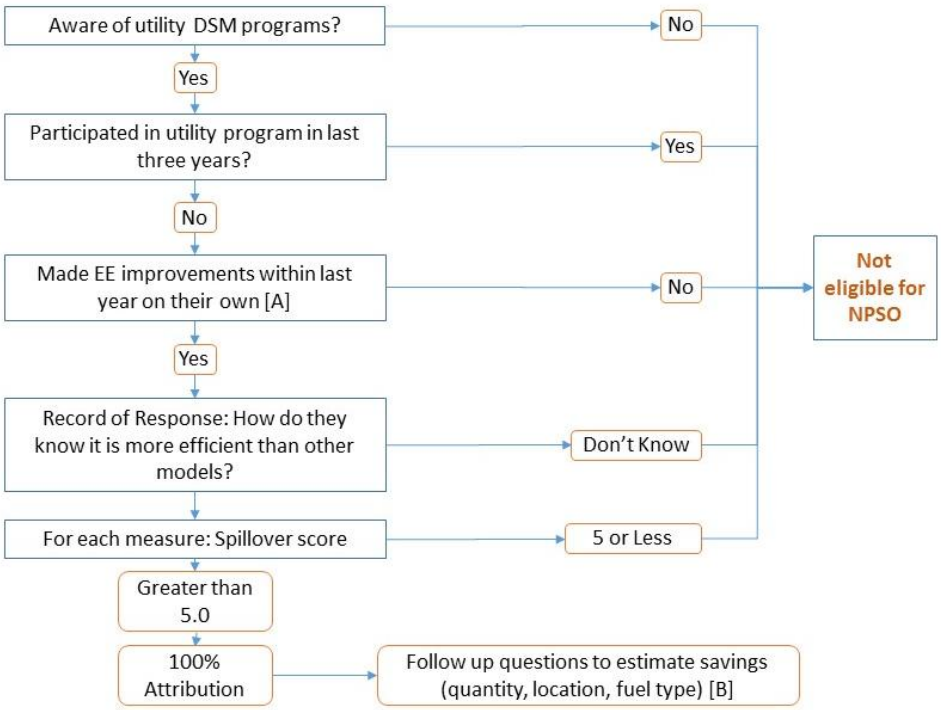
The second score, "Attribution Score 2," comes from the customer's response to a single question to assess the counterfactual, asking about the likelihood (on a scale of 0 to 10, where 10 is extremely likely and 0 is not at all likely) that the customer would have installed the measure had they not been influenced by the program.

The Spillover Score is then the average of the Attribution Score 1 and (10 – Attribution Score 2). If that Spillover Score is greater than 5.0, 100% of the savings are attributed to the Program Administrator for that measure.

Finally, depending on the measure type cited by the customer, follow-up questions will gather information to enable an estimate of savings (shown in the figure as [B]), such as quantity of appliances or the location of insulation.

[71] Customers who installed efficient lighting (CFL/LED) will not be eligible for NPSO if those savings are already claimed by an upstream lighting program. A separate NPSO protocol is provided specifically for upstream lighting programs.

Figure 4-1. NPSO Question Logic



4.1.3.3 Scoring

Survey respondents' answers to the NPSO questions will determine total energy and demand savings attributed to the program. Table 4-2 lists NPSO measures under column A, the Spillover Score under column B, the estimated measure savings under column C, the percentage of allocated savings under column D, and the total allocated savings under column E. Column F shows the calculated average energy savings per spillover measure, determined by dividing the total allocated savings (the sum of column E) by the number of surveyed nonparticipating customers. The table shows how kWh NPSO savings would be calculated; calculations of therm or demand savings would be accomplished in the same manner.

Table 4-2. Estimation of Respondents' NPSO Savings

A	B	C	D	E	F
Spillover Measure	Spillover Score	Measure Savings (kWh)	Allocated Savings	Total kWh Savings	Average kWh Per Surveyed Customer
Measure1	Scale of 0 to 10	Savings1	100% if [B] > 5.0	[C] x [D]	N/A
Measure2	Scale of 0 to 10	Savings2		[C] x [D]	
MeasureN	Scale of 0 to 10	SavingsN	0% if [B] ≤ 5.0	[C] x [D]	
				Sum of column E = Total kWh Savings	Total kWh Savings ÷ Number of Completed Surveys

Table 4-3 shows the process for estimating total NPSO generated by the Program Administrator during the program year (for electric savings). The savings attributed from the survey population will be extrapolated to the nonparticipating residential customer population to determine the overall NPSO savings. Then NPSO energy savings will be converted into a percentage using the total evaluated electric savings for the program year. A similar process would apply for calculating therm or demand NPSO.

Table 4-3. Calculation of Total NPSO Generated

Variable	Description	Source/Calculation
F	Average kWh Energy Savings per Surveyed Customer	Survey data and Savings Calculation
J	Total Nonparticipating Residential Population	Customer database
K	NPSO MWh Energy Savings Extrapolated to Nonparticipating Population	[F × J] ÷ 1,000 kWh/MWh
S	Total Evaluated MWh Savings	Residential Portfolio Savings
G	NPSO Spillover Rate	K ÷ S

Evaluators will make every effort to ensure that there is no double-counting of nonparticipant spillover energy savings across multiple sources of spillover reporting (such as nonparticipating customer and trade ally surveys) and will document that effort (see also discussion in Section 2.3).

4.2 Appliance Recycling Protocol

Appliance recycling programs (ARPs) typically offer some mix of incentives and free pickups for the removal of old but operable refrigerators, freezers, or room air conditioners. These programs encourage consumers to undertake the following:

- Discontinue use of secondary or inefficient appliances;
- Relinquish appliances previously used as primary units upon their replacement (rather than keeping the old appliance as a secondary unit); and
- Prevent the continued use of old appliances in other households through direct transfers (i.e., giving it away or selling it) or indirect transfers (resale in the used appliance market).

As the program theory and logic for appliance recycling differ significantly from standard "downstream" incentive programs (which typically offer rebates for purchases of efficient products), the free ridership estimation approach also significantly differs.

The basic and enhanced methods are described next.

4.2.1 Basic Method

4.2.1.1 Free Ridership

Free ridership is based on participants' anticipated plans had the program not been available, thus classifying a free rider as a participant who would have removed the unit from service regardless of the program.

Estimating net savings for ARPs should adopt a multistep process to segment participants into different groups, each with specific attributable savings.

In general, independent of program intervention, participating appliances would have been subject to one of the following options:

1. The appliance would have been kept by the participating household.
2. The appliance would have been discarded in a way that transfers the unit to another customer for continued use.
3. The appliance would have been discarded in a way that would have permanently removed the unit from service.

Only Option 3 constitutes free ridership (the proportion of units that would have been taken off the grid absent the program). Options 1 and 2 both indicate non-free riders. However, these respondents need to be further classified to account for secondary market impacts, described below.

Data Collection

A participant survey—drawn from a random sample of participants—will serve as the primary source of data

collected for estimating NTG for the ARP. To determine the percentage of participants in each of the three options, evaluators will begin by asking surveyed participants about the likely fate of their recycled appliance had it not been decommissioned through the program. Responses provided by participants generally can be categorized as follows:

1. Kept the appliance.
2. Sold the appliance to a private party (either an acquaintance or through a posted advertisement).
3. Sold or gave the appliance to a used-appliance dealer.
4. Gave the appliance to a private party, such as a friend or neighbor.
5. Gave the appliance to a charity organization, such as Goodwill Industries or a church.
6. Had the appliance removed by the dealer from whom the new or replacement appliance was obtained.
7. Hauled the appliance to a landfill or recycling center.
8. Hired someone else to haul the appliance away for junking, dumping, or recycling.

Additionally, follow-up questions will be included to validate the viability of all responses.

Next, evaluators will assess whether each participant's final response indicates free ridership:

- Some final responses clearly indicate free ridership, such as: "I would have taken it to the landfill or recycling center myself."
- Other responses clearly indicate no free ridership, as when the appliance would have remained active within the participating home ("I would have kept it and continued to use it") or used elsewhere within the Program Administrator's service territory ("I would have given it to a family member, neighbor, or friend to use").

If the respondent planned to have the unit picked up by the retailer and the retailer would likely resell the unit in the secondary market, they are not a free rider. Absent retailer survey primary research described in the Enhanced Options below, the evaluators will utilize data from the most recent research conducted of the ComEd program to determine the proportion of free riders unless another metric is mutually agreed upon by the evaluators.[72]

Secondary Market Impacts

In the event that the unit would have been transferred to another household (Option 2 above), the question then becomes what purchasing decisions are made by the would-be acquirers of participating units now that these units are unavailable. Such would-be acquirers could:

1. Not purchase/acquire another unit.
2. Purchase/acquire another used unit.

Adjustments to savings based on these factors are referred to as the program's secondary market impacts.

If it is determined that the participant would have directly or indirectly (through a market actor) transferred the unit to another customer on the grid, the next question addresses what that potential acquirer did because that unit was unavailable. There are three possibilities:

A. **None of the would-be acquirers would find another unit.** That is, program participation would result in a one-for-one reduction in the total number of appliances operating on the grid. In this case, the total energy consumption of avoided transfers (participating appliances that otherwise would have been used by another customer) should be credited as savings to the program. This position is consistent with the theory that participating appliances are essentially convenience goods for would-be acquirers. (That is, the potential acquirer would have accepted the appliance had it been readily available, but because the appliance was not a necessity, the potential acquirer would not seek out an alternate unit.)

[72] Note that such retailer interviews are being conducted annually for the ComEd ARP evaluation, and answers are used directly in the calculation of the NTG ratio in cases where: (1) the respondent planned to have the unit picked up by the retailer; and (2) the retailer was interviewed.

B. **All of the would-be acquirers would find another unit.** Thus, program participation has no effect on the total number of appliances operating on the grid. This position is consistent with the notion that participating appliances are necessities and that customers will always seek alternative units when participating appliances are unavailable.

C. **Some of the would-be acquirers would find another unit, while others would not.** This possibility reflects the awareness that some acquirers were in the market for an appliance and would acquire another unit, while others were not (and would only have taken the unit opportunistically).

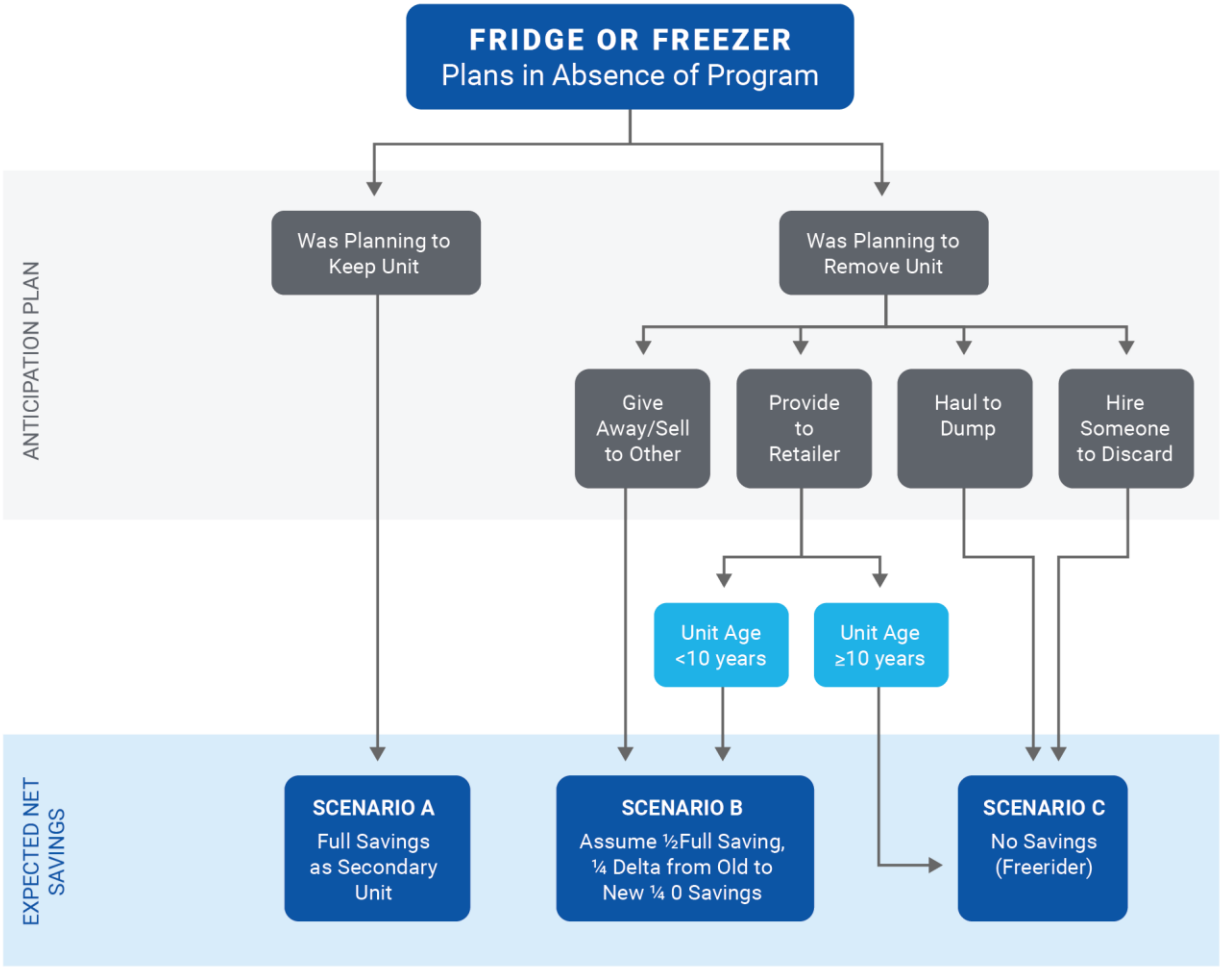
The evaluators will assume Possibility C unless primary research within a Program Administrator's service territory to assess the secondary appliance market is undertaken as described in the Enhanced Options below. Specifically, evaluators will assume that half (0.5, the midpoint of Possibilities A and B) of the would-be acquirers of avoided transfers found an alternate unit.

Once the proportion of would-be acquirers who are assumed to find alternate units is determined, the next question is whether the alternate unit was likely to be another used appliance (similar to those recycled through the program) or, with fewer used appliances presumably available in the market due to program activity, would the customer acquire a new standard-efficiency unit instead.

4.2.1.2 Integrating Free Ridership and Secondary Market Impacts

The flow chart shown in Figure 4-2 illustrates how net savings will be derived for an ARP. As shown below, expected savings fall into three different scenarios.

Figure 4-2. Appliance Retirement Scenarios



Source: Adapted from the Pennsylvania Statewide Evaluator Common Approach for Measuring Net Savings for Appliance Retirement Programs, Guidance Memo-026, March 14, 2014.

4.2.1.3 Scoring Algorithm

Net savings will be assigned individually to each respondent, based on responses provided to the questions discussed above. Net savings will be averaged across all respondents to calculate program-level net savings. The following equation will be used:

$$FR = (free\ ridership\ and\ secondary\ market\ impacts\ \% - induced\ replacement\ \%)$$

Table 4-4 demonstrates the proportion of a sample population classified into each of the eight potential (Tertiary Classification) categories and the resulting weighted net savings.

Table 4-4. Net Savings Example for a Sample Population*

Primary Classification	Secondary Classification	Tertiary Classification	Population (%)	UEC (kWh) w/out Program	UEC (kWh) w/ Program	kWh Savings
Would have kept unit	Scenario A: Kept No Induced Replacement	N/A	25%	1,026	0	1,026
Would have	Scenario B:	N/A	30%	1,026	520	506

Primary Classification	Secondary Classification	Tertiary Classification	Population (%)	UEC (kWh) w/out Program	UEC (kWh) w/ Program	kWh Savings
removed unit	Transferred No Induced Replacement					
	Scenario C: Removed from Service	Recycled/ Destroyed	20%	0	0	0
		Retailer would Recycle	13%	0	0	0
Net Savings (kWh)						475

*The percent values presented in this table serve only as examples; actual research should be conducted to determine the percentage of units falling into each of these categories. Note that UEC (Unit Energy Consumption) values presented in the table represent example values, factoring in part-use.

4.2.2 Enhanced Method

Results can be enhanced by including three additional research efforts. The basic method has defaults where primary research on enhanced approaches cannot be performed:

1. A retailer survey, to determine the quantity and/or proportion of units returned to a retailer and that the retailer would deconstruct or recycle. Through this survey, one would determine a retailer's criteria for reselling used units vs. deconstructing them, based on unit age and condition. Results from the survey and analysis would be used to determine the proportion of those who would have returned an old appliance to the retailer that should be included in Scenario D (free riders). This research was conducted for ComEd in EPY6 evaluation, and those results were applied to Ameren.
2. An appliance market assessment study to determine the size of the secondary appliance market and whether removal of participating units from the market would cause an otherwise would-be receiver to purchase an alternative used or new unit. Savings attributable to these participants are the most difficult to estimate, as the scenario attempts to estimate what the prospective buyer of a used appliance would do in the absence of finding a program-recycled unit in the marketplace (i.e., the program took the unit off the grid, so the prospective purchaser faced, in theory, a smaller supply of used appliances). It is difficult to answer this question with certainty, absent Program Administrator-specific information regarding the change in the total number of appliances (overall and used appliances specifically) that were active before and after program implementation. In some cases outside of Illinois, evaluators have conducted in-depth market research to estimate both the program's impact on the secondary market and the appropriate attribution of savings for this scenario. Although these studies are imperfect, they can provide Program Administrator-specific information related to the program's net energy impact. Where feasible, evaluators and utilities should design and implement such an approach. Unfortunately, this type of research tends to be cost-prohibitive, or the necessary data may simply be unavailable.
3. However, it is possible to estimate through nonparticipant surveys which of the disposal responses given by nonparticipants were most likely to have been to an opportunistic would-be-acquirer. Transfers that would most likely have been opportunistic are determined primarily based on the cost to the recipient. If the appliance was sold or transferred to a retailer, there would have been a cost to the recipient of that appliance. If the recipient was willing to pay for the appliance or was willing to exert the effort to visit a retail location, this suggests the recipient was actively seeking an appliance. However, if the unit were given away for free, there was little cost to the recipient, and it is a reasonable proxy for the proportion of opportunistic acquirers. This proportion would replace the 50% default assumption (scenario C in Figure 4-2) of would-be-acquirers that would or would not find an alternate unit.
4. A nonparticipant survey can be used to assess how nonparticipants acquire and dispose of used units. As nonparticipants do not have the same perceived response bias as participants, they can help offset some of this potential bias in estimating the true proportion of the population that would have recycled their units in program's absence. The evaluators will average the results of the nonparticipant survey with the participant survey if the nonparticipant survey is of sufficient sample size. Otherwise, results may be used

for a qualitative characterization of potential bias. Though recommended, use of a nonparticipant survey need not be required, given budget and time considerations. A nonparticipant survey was completed as part of ComEd's EPY6 evaluation and used qualitatively to validate participant results.

4.3 Residential Upstream Lighting Protocol

The Illinois Residential Upstream Lighting programs to date have provided discounts on efficient lighting through retailers at the point of purchase. Such programs often remain transparent to customers purchasing incentivized lighting. Program administrators also do not know the identity of most customers purchasing the program-discounted lighting; so these customers cannot easily be contacted once they leave the store for a traditional self-report NTG evaluation survey (i.e., an after-the-fact, direct solicitation of customers regarding what they would have done in the program's absence). Similar surveys can be conducted with customers within program retailers after they have made their lighting purchasing decision but before they leave the store. For programs such as this, in store customer surveys are preferable to the traditional self-report telephone surveys that ask customers to recall their past light bulb purchases. Light bulbs are a small and relatively insignificant purchase for most people, thus the recall bias could be substantial.

Further, as upstream programs work with multiple market actors and can include wide-reaching marketing campaigns promoting energy efficiency to the general public, they tend to stimulate spillover and "market effects." As a result, estimating NTG for upstream residential lighting programs can be challenging. Multiple methods exist, each with their own strengths and weaknesses.

Ameren and ComEd implement their residential lighting programs comparably, and the evaluation teams have used a consistent primary NTG evaluation method. This section details the consensus NTG methodology, which has been used multiple times for both ComEd and Ameren and is considered the most well-vetted and defensible NTG method that has been successfully used in Illinois.

For EPY5 and EPY6, Ameren and ComEd used a customer self-report methodology to estimate NTG for their upstream residential lighting programs.[73] Customer self-report data in this method are collected during surveys conducted within program retailers with customers purchasing program bulbs (i.e., in-store intercept surveys). This method separately estimates free ridership, participant spillover, and nonparticipant spillover. Details follow on the primary data collection and scoring algorithms.

4.3.1 Basic Method

4.3.1.1 Free Ridership

Free ridership for this program is calculated as the proportion of program bulbs that would have been purchased if the program did not exist. Three alternative scenarios could occur:

1. Full Free Rider: The customer would have purchased the same quantity of efficient bulbs (CFLs or LEDs) in the program's absence.
2. Partial Free Rider: The customer would have purchased fewer efficient bulbs (CFLs or LEDs) in the program's absence.
3. Non-Free Rider: The customer would not have purchased any efficient bulbs (CFLs or LEDs) in the program's absence.

Free ridership is calculated as the average of two distinct scores: a Program Influence Score and a No-Program score. These scores are defined as follows:

1. The Program Influence Score captures the maximum level of program influence, reported by a survey respondent, of the residential lighting program on their decisions to purchase program bulbs on the day of the survey. This program influence can take a number of forms, such as: the monetary incentive provided to decrease the cost of high-efficiency bulbs; program-sponsored educational materials that explain the

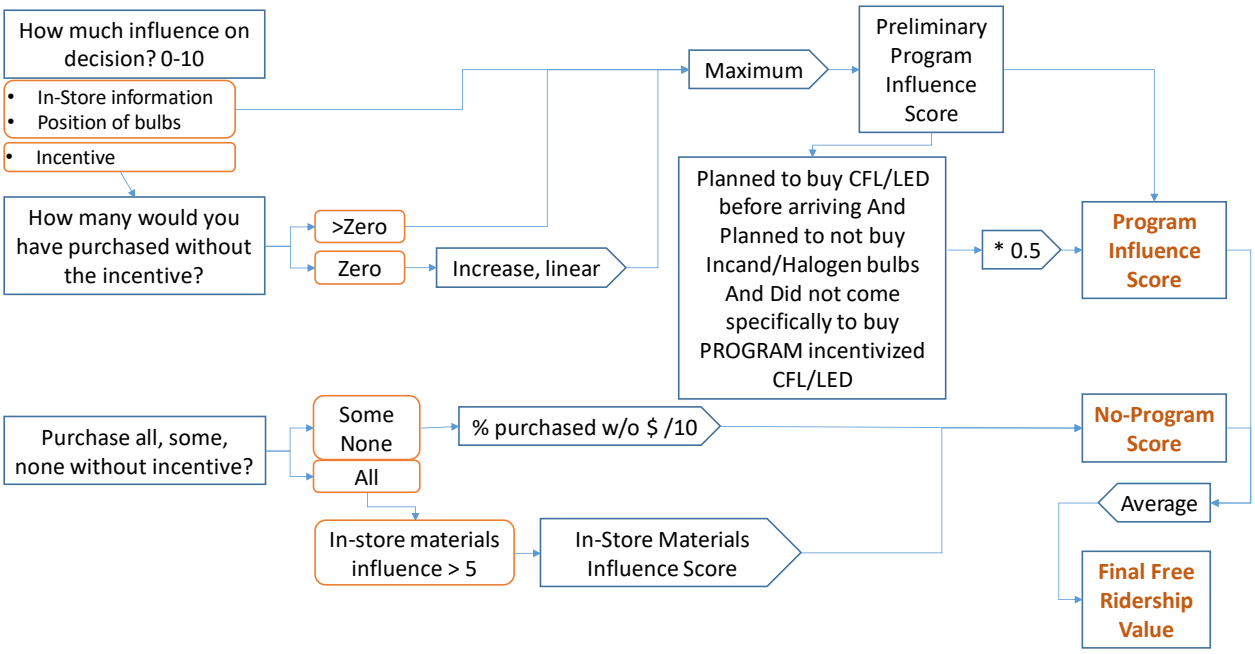
[73] ComEd has used this method since EPY2. Ameren began using it in EPY5.

benefits of efficient lighting; in-store product placement of efficient bulbs; and program bulb recommendations provided by retail store personnel.

2. The No-Program Score is used to estimate how many program bulbs a survey respondent would have purchased in the absence of the residential lighting program.

Figure 4-3 illustrates the scoring algorithm for Residential Upstream Lighting Free Ridership via In-Store Intercepts.

Figure 4-3. Residential Upstream Lighting Free Ridership via In-Store Intercept



4.3.1.2 Data Collection

To estimate free ridership, the evaluation teams will conduct in-store intercept surveys with customers purchasing program-discounted lighting at participating retailers. Customers are asked questions that are used to estimate a Program Influence Score and a No-Program Score for each customer and efficient bulb type purchased.

Primary Program Influence Score Questions

1. Light bulb purchasing plans for current shopping trip (Yes/No)
2. If planning to purchase bulbs:
   a. Bulb type (CFL, LED, Incandescent, Halogen)
   b. Program administrator-incentivized bulbs (Yes/No)
3. Influence of various program factors:
   a. Program incentive
   b. In-store information (printed materials or information from Program Administrator representatives or retail personnel)
   c. Positioning of discounted bulbs within the store

Primary No-Program Score Questions

1. Stated preference of light bulb purchases had the Program Administrator incentive not been available (purchase all, some, or none of efficient bulbs)
2. Quantity of light bulbs purchased absent the incentive

4.3.1.3 Scoring Algorithms

Using the data collected from program participants during the in-store intercept surveys, Program Influence and No-Program Scores are calculated for each survey respondent and then combined to estimate a respondent-specific Free Ridership Score.

Calculation of the Program Influence Score

Survey respondents purchasing one or more program-discounted bulbs are assigned a Preliminary Program Influence Score based on the maximum program influence level (on a 0 to 10 scale) they assigned to one or more program factors (e.g., monetary incentive/informational materials [printed or from store personnel]/product positioning). The influence level assigned to the monetary incentive should be increased for survey respondents (using a linear decreasing function)[74] who indicated that, absent the incentive, they would not have purchased any of the program bulbs they were purchasing that day.

After the Preliminary Program Influence Score is assigned, a secondary algorithm is run that adjusts the preliminary program influence based on survey data regarding the customers purchasing plans when they entered the store. Survey respondents who indicated they planned to purchase high-efficiency bulbs prior to entering the store and who had not come to the store specifically to buy Program Administrator-incentivized program bulbs, should have their Program Influence Score cut in half. This adjustment makes the final Program Influence Score reflective of their stated planned intention to purchase efficient bulbs in the program's absence.

Calculation of the No-Program Score

The No-Program Score is based on whether a respondent states they would have purchased all, some, or none of the program-discounted bulbs in the absence of Program Administrator incentives. Respondents reporting they would have purchased all of the efficient bulbs without the incentive should be considered free riders and receive a No-Program Score of zero. Those reporting they would have purchased none of the efficient bulbs without the incentives should be classified as non-free riders and receive a No-Program Score of 10, the maximum. Respondents reporting they would have purchased some of the efficient bulbs without the incentive should be assigned a No-Program Score between 0 and 10, reflective of the percentage of efficient bulbs they would not have purchased absent the program.

Respondents reporting they would have purchased all of the program-discounted bulbs in the program's absence, but in-store materials provided by the Program Administrator had a moderate to high influence on their decision, should have their No-Program Scores adjusted to equal the level of influence they attributed to these program-sponsored informational materials.

4.3.1.4 Calculation of Free Ridership

The Free Ridership rate is calculated as follows:

$$\text{Free Ridership} = 1 - (\text{Program Influence Score} + \text{No-Program Score})/20$$

Using the calculated Program Influence and No-Program Scores, Free Ridership is calculated as one minus the sum of the two scores (Program Influence Score plus No-Program score), divided by 20. Dividing the sum of scores by 20 results in a ratio (between 0 and 1) that is representative of the average of the two zero to 10 scores. Subtracting this ratio from one reverses the score, thus representing the free ridership level. If either the No-Program or Program Influence Scores are missing, Free Ridership can be calculated using the single available score divided by 10. Evaluators may also reference available data to perform documented modifications to individual free ridership estimates resulting from the application of this free ridership assessment methodology.

[74] The function, adjusted monetary score = (monetary score + 10)/2, increases the monetary score using a decreasing linear function. This function results in an increase in the monetary influence score of between 0 and 5 points depending on their original monetary score (i.e., an original score of 0 would become a 5, a 5 would become a 7.5, and a 10 would remain a 10). In past Illinois evaluations, this adjustment has typically changed less than 10% of all monetary scores.

4.3.2 Participant Spillover

For this program, participant spillover results from purchases of non-discounted efficient bulbs by program bulb purchasers who are influenced by their participation in the residential lighting program to purchase additional non-discounted efficient bulbs.

4.3.2.1 Data Collection

Data collected during in-store intercept surveys with customers purchasing program bulbs should be used to estimate participant spillover. During these surveys, customers purchasing program-discounted and non-discounted efficient bulbs (CFLs or LEDs) should be asked questions to determine whether the residential lighting program influenced their purchases of non-discounted efficient bulbs.

Primary Program Influence Score Question

1. Influence of the lighting program or in-store information on the customer's decision to purchase non-discounted CFLs or LEDs. (0 to 10 scale where 0 is not at all influential and 10 is extremely influential)

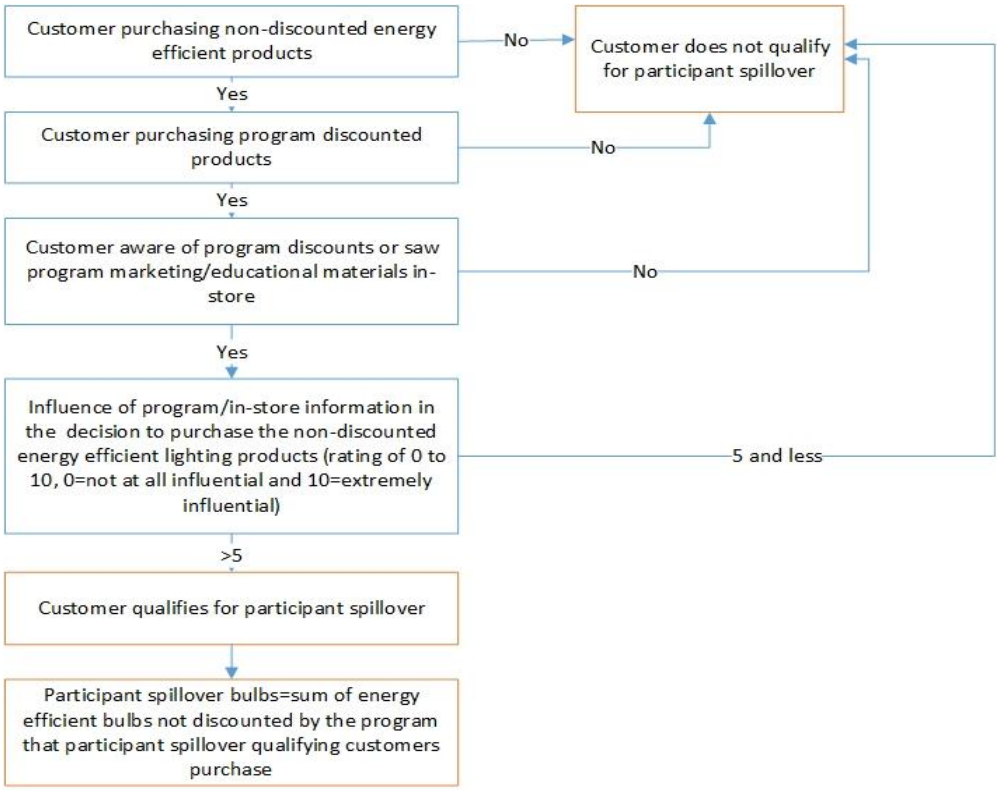
4.3.2.2 Scoring Algorithm

To estimate participant spillover, the number of program-influenced, non-discounted efficient bulbs (CFLs or LEDs) purchased by program participants is divided by the total number of program bulbs purchased by these program participants. This results in the Participant Spillover Rate.

Step 1: Estimate the total number of non-discounted energy efficient bulbs purchased by respondents that had also purchased program-discounted bulbs and were influenced by the program. Respondents who gave a rating of greater than 5 on the program influence question are considered to be influenced by the program.

Figure 4-4 below provides a visual depiction of the process of qualifying non-discounted bulbs as participant spillover bulbs.

Figure 0-4. Residential Upstream Lighting Participant Spillover Determination



Step 2: Calculate the total number of program-discounted bulbs purchased by summing the number discounted bulbs purchased by all respondents.

Program Bulb Purchases = sum(Number of Discounted CFLs or LEDs purchased)

Step 3: Calculate the spillover rate by dividing the total number of spillover bulbs purchased by the total number of program-discounted bulbs purchased.

Spillover Rate = Spillover Purchases/Program Purchases

4.3.3 Nonparticipant Spillover

Nonparticipant spillover results from purchases of non-discounted efficient bulbs by customers who are not purchasing program-discounted bulbs, but report that the residential lighting program influenced their decision to purchase non-discounted efficient bulbs.

4.3.3.1 Data Collection

Data collected during in-store intercept surveys with customers purchasing efficient bulbs not discounted by the program should be used to estimate nonparticipant spillover. During these surveys, customers purchasing non-discounted efficient bulbs (CFLs or LEDs) and not purchasing any program-discounted bulbs should be asked questions about awareness of the program discounts and point-of-purchase program marketing and educational materials. These questions are used to determine whether the residential lighting program influenced their purchases of non-discounted efficient bulbs.

Primary Program Influence Score Question

1. Influence of the lighting program or in-store information on the customer's decision to purchase non-discounted CFLs or LEDs. (0 to 10 scale where 0 is not at all influential and 10 is extremely influential)

4.3.3.2 Scoring Algorithm

The nonparticipant spillover scoring algorithm involves estimating the total number of nonparticipants, the incidence of nonparticipants in the sample, the total number of nonparticipant spillover bulbs, and the average number of nonparticipant spillover bulbs per customer in the sample, and then extrapolating the sample estimates to the population of the utility customers. Below are the steps used to calculate the nonparticipant spillover rate.

Step 1. Determine nonparticipant spillover in the sample by following the steps outlined below.

A. Determine the total number of nonparticipating customers in the survey sample:
Nonparticipating customers (survey) = customers who did not purchase any program-discounted energy efficient lighting products. These customers may have purchased non-discounted energy efficient lighting products, less efficient lighting products or both.

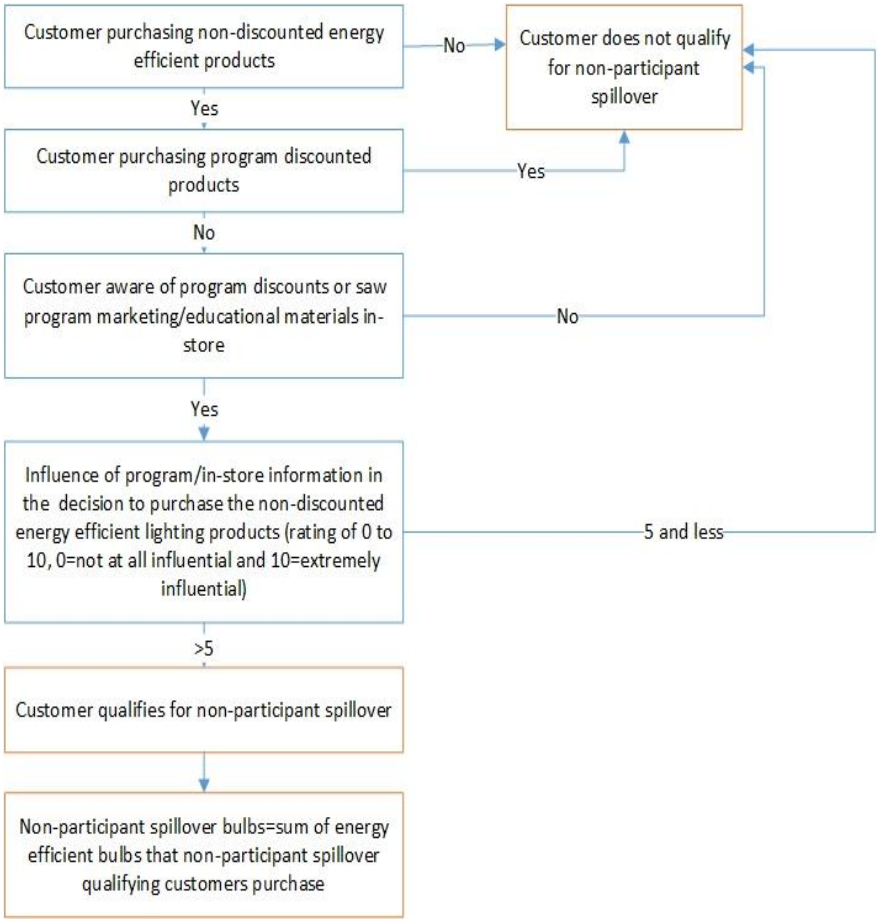
B. Determine the incidence of nonparticipating customers in the survey sample by dividing non-participating customers by total customers in the sample:

Incidence of nonparticipating customers (survey)=Nonparticipating customers (survey)/total customers (survey)

C. Determine total number of nonparticipant spillover bulbs by summing CFLs and LEDs not discounted by the program that were purchased by nonparticipating customers who were aware of the program discounts or marketing promoting energy efficient lighting and were influenced by it. Spillover qualifying bulbs are those purchased by customers who rate the program's influence as greater than 5. The graphic below provides a visual depiction of the process of qualifying non-discounted products as spillover products.

Figure 4-5 below provides a visual depiction of the process of qualifying non-discounted bulbs as nonparticipant spillover bulbs.

Figure 0-5. Residential Upstream Lighting Nonparticipant Spillover Determination



D. Determine the average number of non-participating spillover bulbs per non-participating customer by dividing the total number of non-participating spillover bulbs in the survey by the total number of non-participating customers in the survey.

Average number of nonparticipating spillover bulbs (survey)=total number of nonparticipant spillover bulbs (survey)/nonparticipating customers (survey)

Step 2. Extrapolate nonparticipant spillover to the population

A. Determine the total number of nonparticipating customers in the population by applying the nonparticipant incidence rate from the sample to the population

Total number of nonparticipating customers (population)=Utility residential customer count incidence of nonparticipating customers (survey)*

B. Determine the total number of spillover bulbs by multiplying the average number of spillover bulbs per nonparticipating customer in the survey by the total estimate of nonparticipating customers

*Total number of nonparticipant spillover bulbs=Average number of nonparticipant spillover bulbs (survey)*total number of nonparticipating customers (population)*

Step 3. Calculate nonparticipant spillover rate by dividing the total number of nonparticipant spillover bulbs in the population by the total number of program-discounted bulbs:

Nonparticipant spillover rate=total number of nonparticipant spillover bulbs/total number of program discounted bulbs

4.3.3.3 Method Advantages and Disadvantages

The in-store intercept method described above has certain advantages and disadvantages.

Advantages: This approach catches customers at their point of purchase, before they leave the store and can no longer be contacted directly. Given the interview's timing, customers can more easily recall price factors leading to their purchase choices. Also, as customers are intercepted at the store rather than surveyed by telephone, a higher cooperation rate results.

Disadvantages: Customers may not fully connect the impact that in-store education, product placement, and advertising have on their decision making. While many consumers believe they are not influenced by advertising, retailers know advertising and product placement work. Further, store intercepts typically must be coordinated with education events, and many retailers do not allow interviews to take place in their stores. Consequently, results are not based on random samples of customers purchasing program-discounted lighting throughout the year and across all participating retailers, which could bias the results.

4.5 Prescriptive Rebate (With No Audit) Protocol

Prescriptive Rebate programs typically offer predetermined rebates to residential customers for purchasing measures such as high-efficiency furnaces, clothes washers, brushless/electronically commutated motors (ECMs), boilers, boiler reset controls, water heaters, air-source heat pumps (ASHPs), ground-source heat pumps (GSHPs), central air conditioners (CACs), programmable thermostats, smart thermostats, insulation, air sealing, duct sealing, and desktop power management software. The program may require installation by a registered program ally, but it does not require a home audit (although purchases may be made in response to an audit).

These programs encourage consumers to undertake the following:

- Purchase higher-efficiency equipment than they otherwise would have, had they shopped for such equipment at the same time (replace on burnout); and
- Replace operating but inefficient equipment with higher-efficiency equipment (early replacement).

The basic method for estimating free ridership and participant spillover (See Section 0) for these programs uses a participant self-report, based on a standard battery of questions. An enhanced method may utilize trade ally surveys to provide another quantitative assessment, which may be triangulated with the basic method approach. As discussed further in Section 5.2, trade ally surveys may also be used to assess nonparticipant spillover.

4.5.1 Basic Method

4.5.1.1 Free Ridership

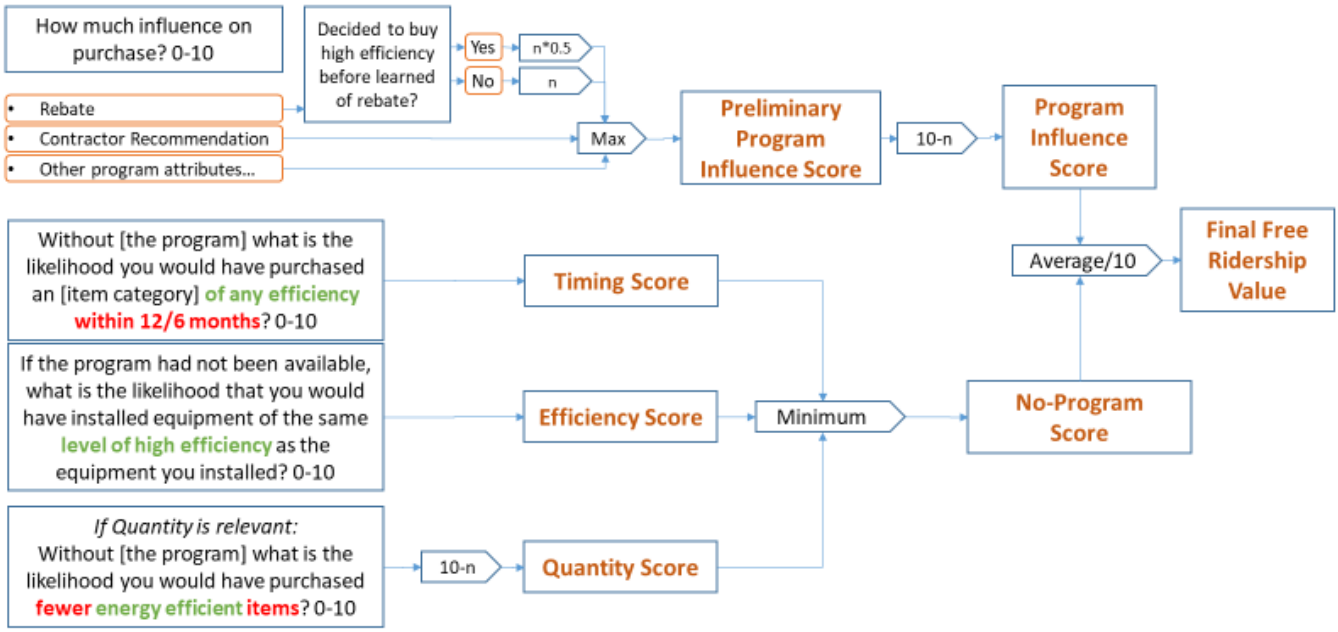
The free ridership assessment battery is brief to avoid applying an undue survey burden, yet it seeks to reduce self-report biases by including two main free ridership components:

- A Program Influence component, based on the participant's perception of the program's influence on carrying out the energy-efficient project; and
- A No-Program component, based on the participant's intention to carry out the energy-efficient project without program funds.

When scored, each component assesses the likelihood of free ridership on a scale of 0 to 10, with the two scores averaged and for a combined total free ridership score. As different and opposing biases potentially affect the two main components, the No-Program component typically indicates higher free ridership than the Program Influence component. Therefore, combining these decreases the biases.

Figure 4-6 illustrates the scoring algorithm.

Figure 4-6. Residential Prescriptive Rebate (With No Audit) Free Ridership



Calculation of the Program Influence Score

Program influence is assessed by asking respondents, on a scale from 0 (not at all important) to 10 (extremely important), how important they found various program elements were on their undertaking the project the way they did. The number of elements included will vary, depending on the program's design. Logic models, program theory, and staff interviews typically inform the list of elements. Programs typically use the following elements to influence customer behavior: information; incentives or rebates; interaction with program staff (i.e., technical assistance); interaction with program proxies, such as members of a trade ally network; building audits or assessments; and financing.

In addition to asking about specific program influences, surveys ask respondents whether they planned to purchase a high-efficiency version of the product before learning of the rebate program. The respondent's rating of the rebate's influence is adjusted by 0.5 for those answering the question "yes."[75] Evaluators should conduct a sensitivity analysis around the use of this adjustment and present it in the report.

The Preliminary Program Influence Score equals the maximum influence rating for any program element rather than, for example, the mean influence rating. This is based on the rationale that if any given program element had a great influence on the respondent's action, then the program itself had a great influence, even if other elements had less influence.

An inverse relationship occurs between high program influence and free ridership: the greater the program influence, the lower the free ridership. The Program Influence (PI) Score = 10 - Preliminary Program Influence Score.

Calculation of the No-Program Score

The No-Program (NP) Score is based on three measures of the likelihood of a participant purchasing equipment of the same level of high efficiency as the unit installed with the program at the same time in the absence of the

[75] The Illinois NTG Working Group discussed using this question to check for consistencies rather than adjusting the score. The NTG working group agreed that it is preferable not to directly ask about conflicting language with residential customers and to utilize an open ended question instead to assess possible reasons for conflicting statements. It is the experience of the NTG working group members that residential customers tend to be more impatient with these types of questions and can typically respond easier to an open-ended question about their motivations.

program. Each of these likelihood measures are assessed on a 0-10 scale in which 0 means not at all likely and 10 means extremely likely.

First, the participant should be asked their likelihood of purchasing an item of *any efficiency* within 12 or 6 months (12 months for a single or big ticket item and 6 months for less expensive items) for the Timing (T) Score. Participants who were influenced by the program to replace still-functioning equipment will likely give a low score to this question, while participants who needed to replace burned out equipment will give a high score. This measure enables the analysis to use a single algorithm for both early replacement and replace-on-burnout scenarios.

Next, the participant should be asked a key question that asks the respondent to gauge their likelihood of purchasing, absent the program, equipment of the same level of high efficiency as the unit installed with the program. This measure forms the Efficiency €€ Score. A respondent stating the likelihood of purchasing an item of the *same level of high efficiency* as a 5 on a scale of 0 to 10 is assigned an Efficiency Score of 5.

If multiple quantities of an item are purchased, the respondent should be asked about the likelihood of purchasing fewer energy-efficient items. The response to this question is subtracted from 10 to compute the Quantity (Q) Score.

The No-Program Score is the minimum of the Timing, Efficiency, and (if applicable) Quantity Scores. Finally, the No-Program Score is averaged with the Program Influence Score to calculate the Final Free Ridership Value.

$$No\ Program\ Score\ (NP) = Min(T, E, Q)$$

$$Free\ Ridership\ (FR) = Mean(PI, NP)$$

Consistency Checks

To address the possibility of conflicting responses (i.e., low intention score and high influence score), the survey should include consistency checks that, at a minimum, ask participants an open-ended question to address the program's influence. For example:

- In your own words, please tell me the influence the program had on your purchase of the <insert measure name>.

In this case, the evaluation analyst will assess the response to this open-ended question and its consistency with the other questions, and, if warranted based on clear additional information, they will adjust the score based on expert judgement. If an inconsistency exists and the open-ended response does not resolve the inconsistency, the respondent will be removed from the calculation. All instances of this occurring should be documented in the final report. Additional consistency checks, triggered and resolved within the survey with additional questions to participants, remain optional.

Missing responses to specific questions should be treated as "missing" for that particular question, but the observation or case will be retained in the analysis. Evaluation reports should note if this affects more than 5% of the responses.

4.6 Single-Family Home Energy Audit Protocol

Single-Family Home Energy Audit programs (or energy assessment programs) seek to secure energy savings for residential customers by providing audits, direct-install measures, and incentives for additional energy efficiency opportunities. The participation process generally begins with an energy audit, performed by a program-affiliated companies or individuals; this involves an auditor assessing the customer's home to identify energy-saving opportunities. At that time, the auditor may install free instant-savings measures, such as CFLs, low-flow showerheads, and faucet aerators. Auditors also may educate customers about incentives available through the audit program (e.g., air sealing, insulation) or other Program Administrator-sponsored energy efficiency programs.

For these programs, free ridership and participant spillover (See Section 0) estimates rely on participant self-reports, gathered through surveys.

4.6.1 Basic Method

Given the multiple components of some audit programs, net impacts should be estimated using survey batteries

tailored to a customer's experience (e.g., receipt of free direct-install measures and discounted or rebated measures). The following sections outline the approach for two program components, one dealing with the direct installation of free low-cost measures and a second dealing with envelope measures, such as air sealing and insulation.

4.6.1.1 No-Cost, Direct Install Measures

For free measures directly installed by program staff due to the audit, free ridership calculations should include the following components: Timing, Efficiency, and Quantity.

This approach provides several important benefits, such as deriving a partial free ridership score based on the likelihood that the participant would take similar actions in the absence of the audit. For example, partial scores can be assigned to customers who planned to install the measure, but the program influenced that installation, particularly in terms of timing (e.g., the program might have accelerated the installation) or quantity (e.g., the program might have led to installation of additional program-qualified measures).

Outlines of components and their associated survey questions follow:

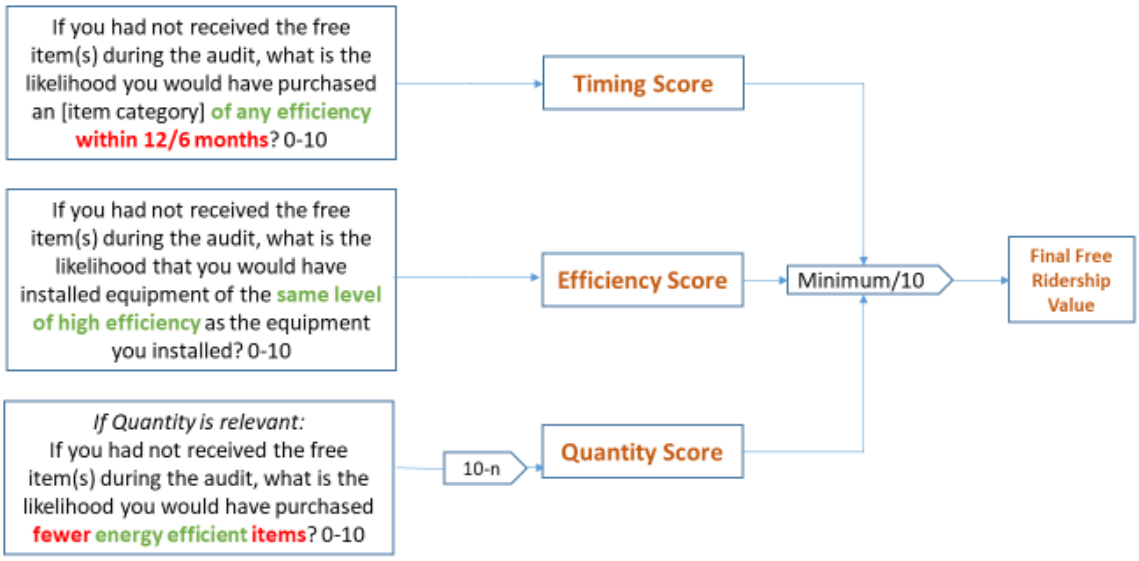
- **Timing (T).** The first question to compute the Timing (T) Score accounts for earlier installation of measures due to the program by asking respondents about their likelihood (0-10 scale) to have installed an item *of any efficiency* within 6 or 12 months, had they not received it through the program (12 months for a single or big ticket item and 6 months for less expensive items).
- **Efficiency (E).** This score reflects the likelihood that customers would have installed equipment, absent the program, of the same level of high efficiency as the unit installed with the program. For free measures, this is based on a question asking respondents to rate the likelihood that they would have installed equipment of the same level of high efficiency as the unit installed had they not received them for free through the audit (on a 0 to 10 scale, where 0 is not at all likely and 10 is extremely likely). A higher likelihood value means a higher level of free ridership (i.e., a lower attribution level for the program).
- **Quantity (Q).** The question to compute the Quantity (Q) Score asks respondents about the likelihood that they would have installed fewer measures or performed less weatherization without the program. The response to this question is subtracted from 10 to compute the Quantity Score, as a lower score means a greater likelihood the respondent would have installed the same or a greater number of measures.

Given the low cost of the measures provided through the direct-install component of most audit programs and the number of measures received per participant, efforts have been made to streamline the free ridership battery to reduce the respondent's burden. As such, the overall Final Free Ridership Value per measure can be calculated by taking the minimum of the Timing, Efficiency, and Quantity Scores, as shown in the following equation:

$$Free\ Ridership\ (FR) = Min(T, E, Q)$$

Figure 4-7 illustrates the algorithm for no-cost measures.

Figure 4-7. Single-Family Home Energy Audit Free Ridership—No Cost Measures



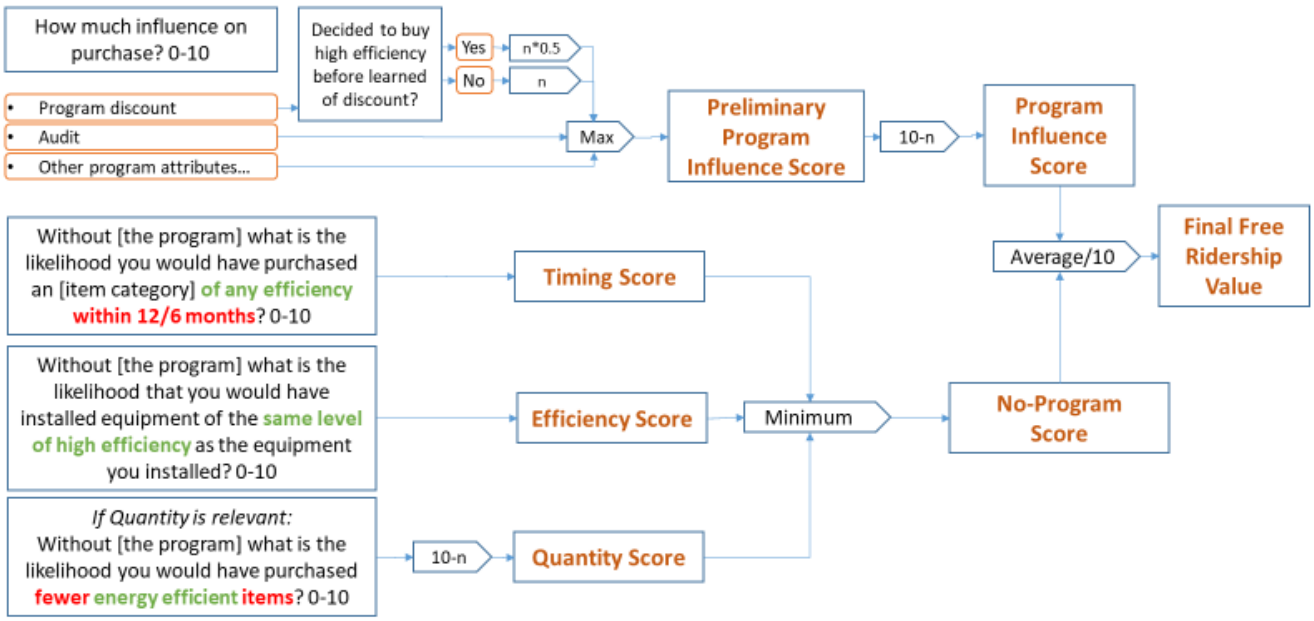
4.6.1.2 Rebated/Discounted Measures

Estimating NTG for rebated measures (typically for building shells) requires a more rigorous process than estimating NTG for free direct-install measures. In particular, the approach integrates an assessment of various program components that may have influenced the participant's installation of the measures. For discounted envelope measures, the basic free ridership factor consists of the following two components:

- A Program Influence component, based on the participant's perception of the influence of various program elements—including the discount and the audit itself—on carrying out the energy-efficient project; and
- A No-Program component, based on the participant's likelihood of purchasing equipment, absent the program, of the same level of high efficiency as the unit installed at installed at the same time.

The free ridership method for discounted measures is identical to that used in the Prescriptive Rebate (With No Audit) protocol, with the one exception that the questions about program influence should be sure to include the audit itself as one of the program attributes. Evaluators should refer to Section 0 for details of the method. Figure 4-8 illustrates the algorithm for discounted measures.

Figure 4-8. Single-Family Home Energy Audit Free Ridership—Discounted Measures



4.6.1.3 Consistency Checks

To address the possibility of conflicting responses (e.g., the high likelihood to install the same measure in the program's absence and the high importance of program factors), the survey should include consistency checks that, at a minimum, ask participants an open-ended question to address a program's influence, such as the following:

- In your own words, please tell me the influence the program had on your purchase of the <insert measure name>.

For low or no-cost, direct-install measures, surveys should include two questions to assess a program's influence on the respondent. The first should be asked at the beginning of the NTG battery, and the second should be asked at its conclusion. Questions include the following:

- Prior to the audit, had you purchased any <measures>? Y/N
- IF YES AND LIKELIHOOD TO INSTALL WITHOUT THE PROGRAM IS <7: Given that you had purchased <measures> before receiving the audit, why didn't you purchase additional <measures> on your own without the program? [OPEN END]
- IF NO AND LIKELIHOOD TO INSTALL WITHOUT THE PROGRAM IS >6: Given that you have not purchased <measures> before, why were you likely to purchase <measures> on your own without the program? [OPEN END]

In both cases, the evaluation analyst will assess responses to open ended questions and their consistency with the other questions; if warranted, based on clear additional information, the evaluator will adjust the original question score if required. If inconsistency occurs and the open-ended response does not resolve it, the original question response will be removed from the calculation. Final reports should document all instances of such adjustments. Optionally, additional participant questions can be included to trigger and resolve additional consistency checks.

Missing responses to specific questions (e.g., don't know or refused) should be treated as "missing" for those particular questions, but the analysis retains the observation or case. The evaluation reports should note if this affects more than 5% of responses.

4.7 Multifamily Protocol

Multifamily energy efficiency programs typically offer direct installation of low-cost, energy-efficient measures in multifamily dwelling units, in addition to rebates for common area lighting retrofits, air sealing, insulation, and improvements to HVAC systems and controls. These programs have various target audiences from owners, managers, or developers of market rate multifamily housing to those operating lower income or assisted living housing. Across these groups, properties must generally have a minimum of between three and five units to qualify for the programs.

Most multifamily program savings are typically achieved by encouraging customers to install higher-efficiency equipment than they would have installed on their own. However, programs may also encourage early replacement of still functioning equipment that is less efficient, thus impacting the timing of the installation, so that savings are realized earlier. The incentive may also make it more affordable for customers to install a greater number of high-efficiency measures.

The basic method for estimation of free ridership and participant spillover (See Section 0) for these types of programs is based on participant self-report gathered through surveys. For common area and building shell components of the program, participants are property managers and owners responsible for building maintenance and renovation. However, depending on the program design for the in-unit component of the program and specifically the installation of efficient lighting, participating in the program (i.e., install program measures) may be driven by either property managers/owners or tenants or, potentially, both. This distinction is due to the fact that in some market-rate apartments, the tenant is responsible for decisions related to the installation of program measures, including light bulbs, while this is not common practice in income-qualified or assisted-living settings. For other in-unit measures, such as faucet aerators and low-flow showerheads, evaluators interview property managers/owners regarding program influence, as these measures are typically direct installed by program staff, and there is a limited likelihood of tenants making changes to these features.

4.7.1 Basic Method

Estimating NTG for rebated measures requires a more rigorous process than estimating NTG for free direct-install measures. In particular, the approach integrates an assessment of various program components that may have influenced the participant's installation of the measures. For discounted measures, the basic free ridership factor consists of the following two components:

- A Program Influence component, based on the participant's perception of the influence of various program elements—including the discount and the audit itself—on carrying out the energy-efficient project; and
- A No-Program component, based on the participant's likelihood of purchasing equipment, absent the program, of the same level of high efficiency as the unit installed at the same time in the absence of the program.

The free ridership method for discounted measures is identical to that used in the Prescriptive Rebate (With No Audit) protocol, with the one exception that the questions about program influence should be sure to include the audit itself as one of the program attributes. Evaluators should refer to Section 4.4.1.1.1 and 4.4.1.1.2 for details of the method. Figure 4-9 and Figure 4-10 also illustrate the algorithms for CFL/LED and non-CFL/non-LED measures[76].

[76] Evaluators should word the survey questions to reflect whether measures were free or purchased with an incentive.

Figure 4-9. Multifamily Free Ridership—Non-CFL/Non-LED Measures

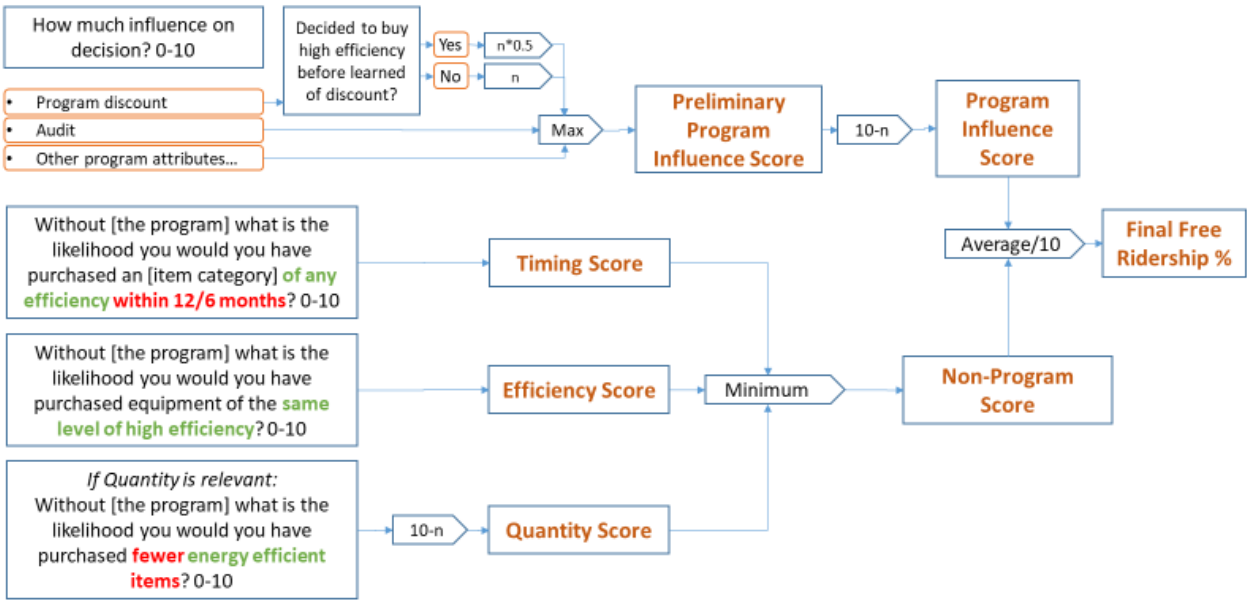
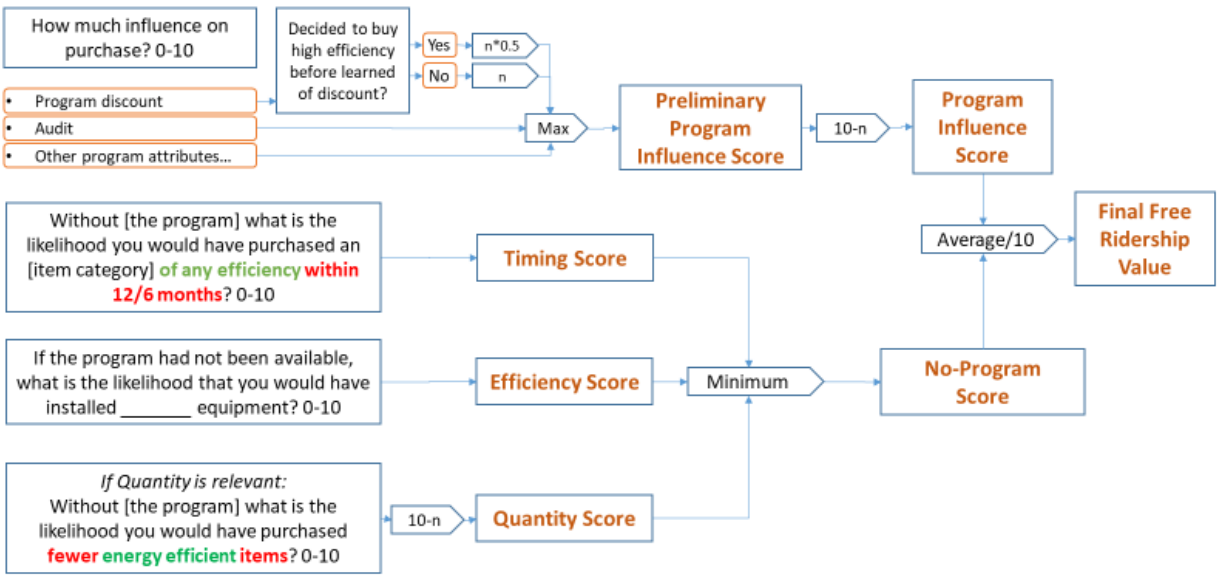


Figure 4-10. Multifamily Free Ridership for Property Managers—CFL/LED Measures



4.7.1.1 Consistency Checks

To address the possibility of conflicting responses (e.g., high likelihood to install the same measure without the program, high importance to program factors), the survey should include consistency checks that, at a minimum,

ask participants an open-ended question to address the program's influence. For example[77]:

- In your own words, please tell me the influence the program had on your purchase of the <insert measure name>.

The evaluation analyst will assess the responses to the open-ended questions and their consistency with the other survey questions, and, if warranted based on clear additional information, will adjust the original question score. If the open-ended response does not resolve the inconsistency, responses to the original question should be removed from the calculation. The survey may include additional consistency check triggers and resolutions through additional participant questions. The final report should document how often the consistency check rules were triggered, how often adjustments were made to scores, and how often inconsistencies could not be resolved.

Missing responses to specific questions (including don't know or refused) should be treated as missing for that particular question, but the analysis should retain that observation or case. Evaluation reports should note if this affects more than 5% of the responses.

4.7.1.2 Data Collection

A participant survey should be used as the primary source of data collected for estimating free ridership in residential multifamily programs. As discussed, evaluators may field surveys with owners, property managers, or tenants, depending on a program's design and theory. Determining the appropriate audience from which to gather information for estimating free ridership depends on the program's design, and, ultimately, the party responsible for deciding to install specific program measures.

4.8 Energy Saving Kits and Elementary Education Protocol

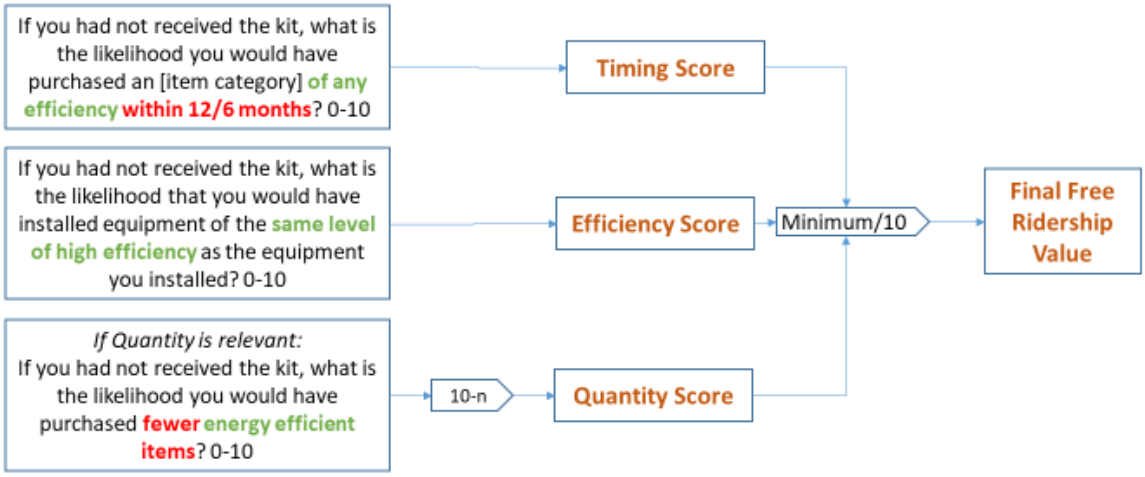
Energy Saving Kits and Elementary Education Programs aim to secure energy savings through the distribution of kits containing various energy-saving measures, including (but not limited to): high-efficiency lighting (CFLs or LED lamps); bathroom and kitchen faucet aerators; and low-flow showerheads. Energy Saving Kits operate as an opt-in program; customers can request a kit by completing an Internet or phone application. Elementary Education Program participants do not request a kit as kits are distributed to all students in a classroom.

Free ridership and participant spillover (See Section 0) estimations for both programs rely upon participant self-report information gathered through surveys, despite the differences in distribution models. This methodology can be used for other energy-saving kit programs, including kits with alternative distribution methods (e.g., kits dropped off at a participant's home).

The following section contains a description of the basic NTG method used. Figure 4-11 illustrates the method.

[77] Evaluators should word the consistency check questions to reflect whether measures were free or purchased with an incentive.

Figure 4-11. Energy Saving Kits and Elementary Education Free Ridership



4.8.1 Basic Method

Free ridership calculations should include the following components: No-Program, Timing, and Quantity.

This approach provides several important benefits, such as the ability to derive a partial free ridership score based on the likelihood that similar actions would have taken place, even if the participant had not received a kit. For instance, partial scores can be assigned to customers with plans to install the measure, but the program at least influenced that installation, particularly in terms of timing (e.g., the program might have accelerated the installation) or quantity (e.g., the program might have led to the installation of additional measures).

Outlines of components and their associated survey questions follow:

- **Timing (T).** The first question computes the Timing (T) Score accounts for earlier installation of measures due to the program by asking respondents about their likelihood (0-10 scale) to have installed an item *of any efficiency* within 6 or 12 months, had they not received it through the program (12 months for a single or big ticket item and 6 months for less expensive items).
- **Efficiency (E).** This score reflects the likelihood that customers would have installed equipment of the same level of high efficiency as the unit installed absent the program. This is based on a question asking respondents to rate the likelihood that they would have installed measures of the same level of high efficiency had they not received them for free through the kit (on a 0 to 10 scale, where 0 is not at all likely and 10 is extremely likely). A higher likelihood value means a higher level of free ridership (i.e., a lower attribution level for the program).
- **Quantity (Q).** The question to compute the Quantity (Q) Score asks respondents about the likelihood that they would have installed fewer measures without the program. The response to this question is subtracted from 10 to compute the Quantity Score, as a lower score means a greater likelihood the respondent would have installed the same or a greater number of measures.

Given the low cost of measures provided in the energy-saving kits as well as the number of measures included in each kit, efforts have been made to streamline the free ridership battery to reduce the respondent's burden. As such, the overall Final Free Ridership Value per measure can be calculated by taking the minimum of the Timing, Efficiency, and Quantity Scores, as shown in the following equation:

$$Free\ Ridership\ (FR) = Min(T, E, Q)$$

Missing responses to specific questions (e.g., don't know or refused) should be treated as "missing" for that particular question. Despite missing responses, the case will be retained in the analysis (pairwise deletion). The

evaluation reports should present the percent missing for each of the three questions.

4.8.1.1 Data Collection

Evaluators should use a participant survey as the primary data collection source for estimating free ridership in Energy Saving Kits and Elementary Education Programs. As a general rule, a free ridership rate should be calculated for each separate kit component, and then be weighted by savings to determine the program-level results.

4.9 Residential New Construction Protocol

Residential New Construction programs typically offer builder training, technical information, marketing materials, and incentives to builders for the construction of eligible homes. Eligible homes must meet specific standards, designed to achieve energy efficiency levels above local building codes. Programs may use different tiers of standards to meet correspondingly different incentives.

The basic method for estimating free ridership and participant spillover for these programs is based on builder participant self-reporting, gathered through surveys.

The following section describes the basic method used.

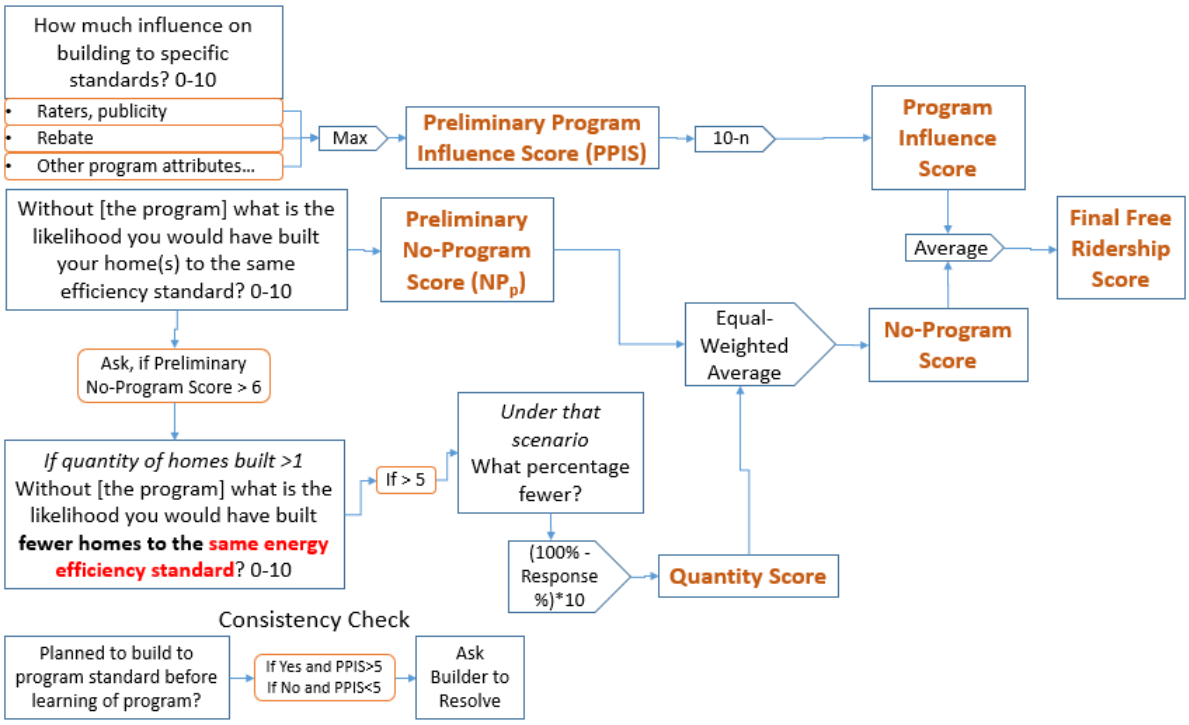
4.9.1 Basic Method

For this program, a free rider is a builder who would have constructed a home at the program's efficiency level in the program's absence. Given the multiple methods available to achieve desired home energy efficiency levels, survey questions consider the builder's likelihood of meeting the same energy efficiency standard, rather than whether or not the builder would have installed certain energy efficiency measures. Figure 4-12 (below) illustrates the method in more detail.

Evaluators assess Program Influence by asking respondents, on a scale from 0 (not at all important) to 10 (extremely important), how important they found various program elements in deciding to build to specific energy efficiency standards. The number of elements included vary, depending on the program's design. Logic models, program theory, and staff interviews typically inform the list of program elements included. Programs typically use the following elements to influence builder actions: marketing materials; incentives or rebates; contacts with HERS Raters; and technical assistance.

In addition to asking about specific program influences, surveys should ask builders whether they planned to build homes to the same standard before learning of the program.

Figure 4-12. Residential New Construction Free Ridership



4.9.1.1 Calculation of the Program Influence Score

The Program Influence Score (PI) equals 10 minus the maximum influence rating for any program element rather than, for example, the mean influence rating. This is based on the rationale that if any given program element had a great influence on the respondent's action, the program itself had a great influence, even if other elements had less influence.

4.9.1.2 Calculation of the No-Program Score

Evaluators calculate the No-Program score using a set of questions that ask respondents to gauge their likelihood of building homes to the same standards and in the same quantities had the program not existed. Three separate responses are considered in calculating the No-Program Score:

- The likelihood, on a scale of 0 to 10, that the builder would have built their homes to the same efficiency standard (Preliminary No-Program Score (NP_p))
- If that likelihood is greater than 6, the likelihood of fewer homes being built to the same efficiency standard.
- If that likelihood is greater than 6, the response to the question "for that scenario, what percentage of fewer homes would be built to the standard?" (Quantity Score = (100% - % answer) * 10, which will be a number between 0 and 10)

The resulting No-Program (NP) Score is calculated as follows:

$$NP = Mean(NP_p, Q)$$

The overall Free Ridership Value derives from the average of the PI and NP scores, as shown in the following formula:

$$FR = Mean(PI, NP)$$

4.9.1.3 Consistency Checks

To address the possibility of conflicting responses (e.g., the high likelihood to build to the same efficiency standards

without the program, the high importance of program factors), the survey should include, at a minimum, consistency checks that ask participants an open-ended question to address the program's influence. For example:

- In your own words, please tell me the influence the program had on your building practices.

If a high (>6) Preliminary Program Influence Score (PPIS) results, yet the builder planned to meet the same efficiency standard prior to learning of the program; or if the Preliminary Program Influence Score is lower (<7), and the builder did not plan to build to the standards prior to learning of the program, the survey should include a question to determine why this occurred, using wording that gets at the following inconsistencies:

- IF Preliminary Program Influence Score is >6 and Builder planned to meet the same efficiency standard prior to learning OF THE PROGRAM: Given that you had plans to meet the standard prior to learning about the program, why do you think the <program elements> were influential in your meeting the standard? [OPEN END]
- IF Preliminary Program Influence Score is <7 and Builder had no plans to meet the same efficiency standard prior to learning of the program: Given that you had no plans to meet the standard prior to learning about the program, why do you think the <program elements> were not more influential in your meeting the standard? [OPEN END]

The evaluation analyst will assess the responses to the open-ended questions and their consistency with the other survey questions, and, if warranted based on clear additional information, will adjust the original question score. If the open-ended response does not resolve the inconsistency, responses to the original question should be removed from the calculation. The survey may include additional consistency check triggers and resolutions through additional participant questions. The final report should document how often the consistency check rules were triggered, how often adjustments were made to scores, and how often inconsistencies could not be resolved.

Missing responses to specific questions (including don't know or refused) should be treated as missing for that particular question, but the analysis should retain that observation or case. Evaluation reports should note if this affects more than 5% of the responses.

4.9.2 Participant Spillover

Participant spillover occurs when, due to program participation, a builder increases the energy efficiency of homes built outside the program (but inside a utility's service territory) by adopting certain building practices used in participating homes. Participant spillover can be calculated based on participant builder survey questions that ask builders about homes built within the utility service territory but outside the program. Survey questions ask whether the builder increased the energy efficiency standards of non-program homes after participating in the program, and the number of homes they applied these increased standards to, within the utility's service territory. Depending on the program characteristics, spillover should be measured as changes in specific building practices or as installation of specific measures. The text below assumes the program has been targeted at modifying building practices.

Spillover may be recorded depending on responses to the following questions:

1. How important was your experience in the <PROGRAM ADMINISTRATOR'S> program in your incorporating this building practice your other homes, using a scale of 0 to 10, where 0 is not at all important and 10 is extremely important?
2. If you had not participated in the <PROGRAM ADMINISTRATOR'S> program, how likely is it that you would still have incorporated this building practice using a 0 to 10, scale where 0 means you definitely WOULD NOT have implemented this practice and 10 means you definitely WOULD have implemented this practice?

Responses to the first question establish the Practice Attribution Score 1, and responses to the second question establish the Practice Attribution Score 2. Spillover may be program-attributable for building practices with self-report data meeting the following condition:

$$\textit{Spillover Score} = (\textit{Practice Attribution Score 1} + (10 - \textit{Practice Attribution Score 2}))/2 > 5.0$$

For responses meeting these conditions, an evaluator determines that specific building practices referenced in the question are attributable to the program; otherwise, the evaluator determines that specific building practices

referenced in the question are not attributable to the program. The attribution criteria represent a threshold approach, in which energy impacts associated with building practices program participants implement outside the program are either 100% program-attributable or 0% program-attributable.

For each building practice discussed, builders will be asked how they know the building practice is more efficient than other options. If the respondent can identify the building practice as ENERGY STAR or name an efficiency level that the evaluator confirms as above the minimum federal standard, or if they identify a technology that the evaluator can confirm is above the minimum federal standard, this counts towards participant spillover.

Finally, depending on the building practice cited by the builder, follow-up questions should ask customers to provide reasonable information to allow the evaluator to estimate the amount of savings using IL-TRM protocols, such as quantity of appliances or the location and amount of insulation.

To calculate the spillover energy and demand savings for these actions, further questions should be asked to assess the gross savings of the building practice, through the appropriate version of the IL-TRM, if available, and the number of homes to which it applied. To develop the Spillover Rate, the total energy and demand impacts from the sampled participants who implemented efficient building practices in other homes due to participation in the program are summed, and then this sum is divided by the total ex post gross impacts from all participants who took the survey.:

$$Participant\ Spillover\ Rate\ (PSO) = \frac{Sum\ of\ Energy\ or\ Demand\ from\ Additional\ EE\ Practices}{Sample\ Ex\ Post\ Gross\ Energy\ or\ Demand\ Impacts}$$

The equation used to adjust the Core NTGR based on participant spillover is as follows:

$$NTGR = (1 - FR + PSO)$$

4.9.2.1 Sample

The sample for a spillover survey should be a random sample of current and up to one year previous program participants. Regardless of the year of participation, spillover should be measured within the set of homes that were completed within 12 months of the survey date.

4.9.3 Builder Nonparticipant Spillover

In addition to participant free ridership and spillover, new construction programs may create NPSO through builders exposed to the program but not actually participating. Rather, they implement some or all of the efficiency measures incorporated through the program in order to compete with builders that are participating.[78] NPSO caused by builders can be determined by surveying two groups of builders:

- "Drop out" builders, who participated in the program previously but have not participated in the past 12 months.
- True nonparticipating builders that report they were aware of the program or that other builders were taking steps to improve new home efficiency, but had never participated.

Surveys ask nonparticipating builders if their knowledge of other builders' increased focus on energy efficiency influenced their building practices and in what manner, to quantify the program's impact on nonparticipating homes. The survey questions will first identify specific building practices that go beyond the implemented energy code for the specific jurisdiction in which the builder is active. Table 4-8 lists the latest building energy code in place for most areas of Illinois. Evaluators should make efforts to ensure the building code under enforcement for each jurisdiction is used as the baseline when evaluating spillover savings.

[78] NPSO also can arise from nonparticipating customers as a direct result of general energy efficiency education and promotion efforts. A separate protocol addresses such NPSO. Care should be taken to ensure the different approaches do not double-count NPSO.

Table 4-8. IECC 2015 Building Energy Code

Component	IECC 2015
Thermostat	Heating 72F; Cooling 75F Programmable Thermostat
Ceiling	U-0.026
Walls	U-0.060
Floors	U-0.033
Slab	R-10, 2ft
Windows	U-0.32
Infiltration	5ACH50
Duct Leakage	4CFM/100CFA
Duct Insulation	R-8 Attic Supply, R-6 Otherwise
Heat Pump	8.2 HSPF
Furnace	80 AFUE
Component	**IECC 2015**
Boiler	82 AFUE
AC	13 SEER
Lighting	75% CFL
Appliances	RESNET Default
Gas Water Heat*	0.58 EF
Electric Water Heat*	0.92 EF

*EF varies based on water heater storage volume and draw pattern; values in table for 40 gallon water heater with medium draw pattern.

For each component that is more efficient than code, the following additional questions are asked:

1. How many homes did you sell in <period> that incorporated this upgrade?
2. Of these homes, how many would have incorporated this upgrade, had the <program> not existed?

Evaluators should ensure that nonparticipant builders receive sufficient time to collect specific data and not rely on "guesses" to respond. Responses should also clarify whether sales counts are specific to the utility service territory in question.

The following steps calculate the program's nonparticipant builder spillover percentage:

1. Compute the difference between the total reported number of efficiency upgrades sold and the total that would have been sold in the program's absence to obtain the total number of upgrades by type of upgrade for that builder.
2. Multiply the total net number of upgrades of each type sold by each surveyed builder by the average gross unit savings for each upgrade type.
3. Sum the result for each builder from the previous step and weight the results by the ratio of the population of non-active builders to the sample to compute the total spillover energy over the program period.
4. Divide the spillover energy savings by program gross savings.

Should a general population survey be implemented for nonparticipant spillover, care should be taken to ensure spillover is not double-counted.

5 Cross-Sector Protocols

The following sections include protocols that may be applicable to programs in the residential as well as in the commercial, industrial, and public sectors. Table 3-1 Commercial, Industrial, and Public Sector Programs and Table 4-1 Residential and Low Income Programs present information regarding the applicability of these protocols to specific programs.

5.1 Combining Participant and Trade Ally Free Ridership Scores

For a program where trade allies play a prominent role in delivering the energy efficiency measure and promoting the program, an estimate of free ridership from trade allies can be combined with one from participants to form a combined free ridership value. This section discusses combining a **program-level** free ridership score from trade allies with a program-level free ridership score from participants.

If an evaluation uses this approach, the evaluator's NTG report should present the conditions that support the argument that the combined value is more likely to be reflective of reality. That argument should consider the following topics:

1. **Trade Ally Role.** What role do the trade allies play in the program? How were participating trade allies chosen? How might they differ from nonparticipating trade allies? Why does that support the proposition that their view on free ridership is accurate and reasonably unbiased?
2. **Participant Role**. What role do the participants play in deciding which measures are installed and why does that support the proposition that their view on free ridership is accurate and reasonably unbiased?
    a. For example, the participant's role in the decision **may** be significantly less in some types of programs like new construction or multifamily direct install programs. (The participant free ridership data collection method may already account for this by, for example, treating the building owner as the participant rather than the tenants.)
3. **Market Conditions**. What conditions exist in the market that support the proposition that either the trade allies' view or the participants' view on market behavior may be more accurate?
    a. For example, if the market was in its infancy before the program began and as a result participants' ability to take the energy efficiency action was limited, the trade allies may have a more accurate view on the counterfactual than the participants.
4. **Bias.** What are the hypothesized biases of the participants and trade allies? Where do they stem from? What evidence is there that they exist? How well has the data collection approach sought to mitigate that bias?
5. **Offsetting Bias.** Do the hypothesized biases of participants and trade allies offset each other, or do they move the free ridership value in the same direction?

5.1.1 Trade Ally Free Ridership Calculation

The NTG protocols do not yet contain a standardized approach for measuring free ridership from trade allies. That approach should be developed for future versions of the TRM. In the meantime, if an evaluation team decides to estimate trade ally free ridership, they should collaborate with other Illinois evaluators on the survey design and calculation algorithm.

5.1.2 Triangulation

Where appropriate, evaluators should combine participant and trade ally free ridership values by weighting each value in the final result. The weighting of each value should be based on considerations of the likely bias, accuracy, and representativeness of the results. The following presents one approach for determining weights. This is an example only. The evaluator should create an approach appropriate for the program.

Example. Combined participant and trade ally free ridership results by rating the analysis methodology and data collected using responses (rated on a scale of 0 to 10) to the following three questions:

1. All things being equal, on a scale of 0 to 10, with 0 being not at all likely and 10 being extremely likely, how likely is the approach to provide a more accurate estimate of free ridership?
2. Similarly, on a scale of 0 to 10, with 0 being not at all valid and 10 being extremely valid, how valid and reliable is the data collected and the analysis performed (i.e., consider non-response bias, missing data (e.g., whether data collected was based on recollection or record keeping?)
3. On a scale of 0 to 10, with 0 being not at all representative and 10 being extremely representative, how representative is the sample (accounting for sampling error {confidence and precision}, and non-response bias, and any sample frame bias)?

The weight for each free ridership estimate is the average score for that estimate divided by the sum of the average scores for both estimates.

Table 5-1 provides an example scoring illustrating the calculated weights.

Table 5-1. Example Triangulation Weighting Approach

NTG Triangulation Data and Analysis	Participants	Trade Allies
1. How likely is this approach to provide an accurate estimate of free ridership?	6	8
2. How valid is the data collected/analysis?	3	5
3. How representative is the sample?	8	10
Average Score	5.7	9
Sum of Averages	14.7	14.7
Weight	39%	61%

5.2 Spillover Measured Through Trade Allies

Many energy efficiency programs rely on trade allies to help spread program awareness and promote energy efficiency among their customers. Some programs establish lists of participating trade allies and provide trade allies with training, education, and/or marketing materials. Spillover might occur when a trade ally's business practices are influenced by a program but at least some of their energy efficient installations do not receive a program incentive.

For the purposes of measuring trade ally spillover, we define trade allies as (1) retailers, contractors or other market actors who work with end-user customers on the selection and installation of energy-using equipment; and (2) distributors who supply equipment to stores and other market actors, rather than to end-user customers. For the purposes of this section, manufacturers are not included in the definition of trade allies.[79] In addition, we differentiate between the following types of trade allies:

1. Active Trade Allies
    a. Trade allies who were active in the program during the evaluation period and appear in program tracking databases. The tracking data contains information on the quantity of incented measures associated with these trade allies and their savings.
2. Inactive Trade Allies
    a. Trade allies who are on the utility's trade ally list (and have received at least some utility training or education) but who were not active during the evaluation period and do not appear in program savings tracking databases for the evaluation period;
    b. Trade allies who were previously active in the program (and may have been on the utility's trade ally list) but have dropped out; and/or
    c. Trade allies who have never been active in the program and were never on the utility's trade ally list.

[79] The exclusion of manufacturers from the definition of trade ally does *not* suggest that manufacturers cannot create spillover. Rather, manufacturers are excluded because the methodologies outlined in this section do not apply to them.

When deciding whether to conduct trade ally spillover research, the evaluator should consider the following:

- **Likelihood of trade ally spillover:** When limited evaluation resources are available, the evaluator should weigh the likelihood of trade ally spillover against the cost of the analysis when prioritizing evaluation efforts. E.g., programs that provide incentives, but no training or education are less likely to generate spillover than programs that do provide training or education. Similarly, spillover from active trade allies is generally more likely than spillover from inactive trade allies, and spillover from inactive trade allies who have previously been active in the program is generally more likely than spillover from inactive trade allies who have never been active in the program.
- **Potential double-counting of spillover reported by end-use customers and trade allies:** Spillover from active trade allies and spillover from inactive trade allies are mutually exclusive, i.e., as long as the populations and samples are correctly defined, there is no danger of double-counting spillover from these two groups (see also discussion in Section 0). However, if the evaluator measures spillover through trade allies and end-use customers for the same evaluation period, care needs to be taken to avoid double-counting. Evaluators should clearly document potential double-counting of spillover and the steps taken to avoid it.

The following subsections provide suggested approaches for measuring spillover from active and inactive trade allies. Different approaches are outlined for these two groups because of the different types of data available for each of them. For active trade allies, program tracking data contains information on their program activity (the quantity of incented measures associated with each active trade ally and their savings). This data allows for a more rigorous spillover methodology than can be used for inactive trade allies, for whom this information does not exist.

5.2.1 Spillover from Active Trade Allies

Trade allies that are active in an energy efficiency program are more likely to create spillover than inactive trade allies, as their exposure to any program messaging and training/education is likely to be current and therefore more influential on their business practices. Active trade allies may create spillover if their program participation changes their business practices and leads to the completion of non-incented energy efficient projects that would otherwise not have happened. For example, as a result of program training, a trade ally might feel more comfortable talking about the benefits of energy efficiency and recommend energy efficient solutions more often. If these recommendations result in energy efficient projects, but no incentive is claimed, spillover from inactive trade allies may be present.

For active trade allies, the spillover methodology varies slightly for downstream programs and midstream programs. Approaches for both types of program are discussed below.

5.2.1.1 Downstream Programs

Surveys can be used to ask active trade allies if the program influenced their sales of high-efficiency equipment to participating or nonparticipating customers and to quantify the program's impact on their high-efficiency sales. To assess if a sampled trade ally created spillover, the following screening criteria are recommended (the order of these may be adjusted by the evaluator):

1. The percentage of the trade ally's installations/sales that are high efficiency and/or the total volume of high efficiency installations/sales increased since the trade ally became exposed to the program.
2. The trade ally rated the program as important to at least one of these (as described above) high efficiency installation increases.
3. The trade ally installed/sold at least some high efficiency equipment or products during the evaluation period that did not receive an incentive.
4. The trade ally's recommendation was influential in the customers' choice of high efficiency equipment/product over standard efficiency equipment/product in instances where the equipment did not receive a program incentive.
5. The open-ended response about why customers with eligible projects do not receive an incentive supported that the non-incented high efficiency installations can be considered spillover.

Sampled trade allies who do not pass one of the above screening criteria do not qualify for spillover and may be skipped out of the rest of the spillover module.

To quantify spillover for each sampled trade ally, the survey collects information on the percentage of the trade ally's total equipment installations/sales (in terms of projects or measures) that was (1) standard efficiency, (2) high efficiency that DID receive a program incentive, and (3) high efficiency that DID NOT receive a program incentive. Based on these responses, the share of a trade ally's high efficiency installations/sales that received an incentive can be calculated as follows:

$$\textit{\% of TA's High Efficiency Equipment that Received Incentive} = \frac{\textit{\% High efficiency that DID receive a program incentive (2)}}{\textit{\% High efficiency that DID receive a program incentive (2) + \% High efficiency that did NOT receive a program incentive (3)}}$$

With this data, and the trade ally's savings from the program tracking database, the following equation is used to calculate the savings of high efficiency equipment that did not receive an incentive:

$$\textit{Savings of Non-Incented High Efficiency Equipment} = \left(\frac{\textit{Savings from Program Database}}{\textit{\% of TA's High Efficiency Equipment that Received Incentive}} - \textit{Savings from Program Database} \right) * \textit{Size Adjustment}$$

The last term in the above equation is a size adjustment that accounts for the possibility that savings from non-incented projects/measures might be different from incented ones. Information on the relative size of incented versus non-incented projects/measures is also collected in the survey.

Using this approach, spillover savings are considered to be equal to the savings of non-incented, high efficiency equipment/products, as calculated in the equation above. To compute the program spillover percentage for active trade allies, the following steps are used:

1. **Develop the spillover ratio for sampled trade allies** by summing their spillover savings and dividing this total by the program-tracked savings associated with the sampled trade allies.
2. **Develop spillover savings for the population of active trade allies** by applying the spillover ratio from Step 1 to all program savings associated with a trade ally (whether a survey respondent or not).
3. **Develop the overall spillover ratio for active trade allies** by dividing the trade ally spillover estimate from Step 2 by total program savings (whether associated with a trade ally or not).

5.2.1.2 Midstream Programs

Similar to downstream programs, surveys can be used to ask active trade allies in midstream programs if the program influenced their sales of high-efficiency equipment to participating or nonparticipating customers and to quantify the program's impact on their high-efficiency sales. To assess if a sampled midstream trade ally created spillover, the following screening criteria are recommended (the order of these may be adjusted by the evaluator):

1. The percentage of the trade ally's sales that are high efficiency and/or the total volume of high efficiency sales increased since the trade ally became exposed to the program.
2. The trade ally sold at least some high efficiency equipment or products during the evaluation period that did not receive an incentive.
3. The trade ally's recommendation, marketing, or equipment/product stocking or placement was influential in the customers' choice of high efficiency equipment/product over standard efficiency equipment/product in instances where the equipment did not receive a program incentive.

Sampled trade allies who do not pass one of the above screening criteria do not qualify for spillover and may be skipped out of the rest of the spillover module.

To quantify spillover for each sampled midstream trade ally, the survey collects information on the percentage of the trade ally's total equipment sales (in terms of projects or measures) that was (1) standard efficiency, (2) high efficiency that DID receive a program incentive, and (3) high efficiency that DID NOT receive a program incentive.

Based on these responses, the share of a trade ally's high efficiency sales that received an incentive can be calculated as follows:

$$\textit{\% of TA's High Efficiency Sales that Received Incentive} = \frac{\textit{\% High efficiency that DID receive a program incentive}}{\textit{\% High efficiency that DID receive a program incentive + \% High efficiency that did NOT receive a program incentive}}$$

Through additional survey questions,[80] the evaluator should develop an attribution percentage, i.e., the proportion of non-incented high efficiency projects or measures that are attributable to the program. With this data, and the trade ally's savings from the program tracking database, the following equation is used to calculate the trade ally's spillover savings:

$$\textit{Spillover Savings} = \left(\frac{\textit{Savings from Program Database}}{\textit{\% of TA's High Efficiency Sales that Received Incentive}} - \textit{Savings from Program Database}\right) * \textit{Size Adjustment (if applicable)}$$

The last term in the above equation is a size adjustment that accounts for the possibility that savings from non-incented projects/measures might be different from incented ones. Information on the relative size of average energy savings of incented versus non-incented projects/measures is also collected in the survey if the evaluator expects a potential difference in relative size.

To compute the program spillover percentage for active midstream trade allies, the following steps are used:

1. **Develop the spillover ratio for sampled trade allies** by summing their spillover savings and dividing this total by the program-tracked savings associated with the sampled trade allies.
2. **Develop spillover savings for the population of active trade allies** by applying the spillover ratio from Step 1 to all program savings associated with a trade ally (whether a survey respondent or not).
3. **Develop the overall spillover ratio for active trade allies** by dividing the trade ally spillover estimate from Step 2 by total program savings (whether associated with a trade ally or not).

5.2.2 Spillover from Inactive Trade Allies

Inactive trade allies may create spillover if they are exposed to the program but do not directly facilitate program participation, i.e., they did not complete any projects through the program during the evaluation period. Rather, they promote and stock higher-efficiency equipment due to the influence of the program on the market.

Surveys can be used to ask inactive trade allies if the program influenced their sales of high-efficiency equipment to participating or nonparticipating customers and to quantify the program's impact on their high-efficiency sales. The general questions take the following form:

- Q.1: How many <measures> did you sell in <utility>'s service territory in <period>?
- Q.2: How many of them were <efficiency level> or higher?
- Q.3: Had the <program> not existed, how many <measures> of <efficiency level> or higher do you think you would have sold in <utility>'s service territory?

Evaluators should attempt to allow trade allies sufficient time to collect specific data (e.g., by sending information ahead of the interview or conducting additional follow-up; this might require providing incentives as inactive trade allies tend to be hard-to-reach) and not rely on "guesses" to respond. Additional questions should be included to document how the program influenced sales of additional energy efficient measures and why these measures did not receive an incentive.

For programs that offer a number of different measures, the evaluator should select and ask about a small number

[80] As some trade allies may find it difficult to directly quantify the program's attribution effect on non-program sales, the evaluator may need to use a series of questions to guide the trade ally to provide an estimate of the overall attribution. Questions may include asking about what factors influence sales of non-program efficient equipment/products and how the program influences individual factors to provide context for an overall attribution estimate.

of measures or measure groups that are most likely to generate spillover, e.g., the program's highest impact measures. The selection of trade allies to include in this research will depend on the measures selected, e.g., if the highest impact measures are lighting measures, the population of trade allies from which to sample should be lighting contractors.

The following steps are used to calculate the spillover percentage for inactive trade allies:

1. **Develop the total number of spillover units for each trade ally** by computing the difference between the total reported number of high-efficiency units sold and the number that would have been sold in the program's absence, for each measure type.
2. **Develop the total spillover savings for each trade ally** by multiplying the trade ally's total number of spillover units (from Step 1) by the average gross unit savings, for each measure type.
3. **Compute the total spillover savings for the program period** by summing the spillover savings from all sampled trade allies (from Step 2) and multiplying this sum by the ratio of the population of inactive trade allies to the sample, for each end-use.
4. **Compute the program spillover percentage** by summing the spillover savings for all end-uses (from Step 3) and dividing this sum by program gross savings.

It should be noted that the methodology for inactive trade allies requires the evaluator to quantify the number of trade allies in the population. Depending on which types of inactive trade allies are targeted by the research, determining the size of the population may be challenging and may lead to uncertainty in the results. When targeting trade allies that are on the utility's trade ally list (but are not active) or those who have been active in the past but have dropped out, program records allow for accurate estimation of the population size. However, when targeting trade allies that have never been active in the program and were never on the utility's trade ally list, secondary market data is required to develop estimates of population size. The evaluator should carefully document the target population for any inactive trade ally research, data sources used to quantify the population size, and any uncertainty associated with their estimates.

5.3 Consumption Data Analysis Protocol

This protocol refers to impact analyses that use consumption data from customer's monthly bills (commonly referred to as billing analysis) or AMI meter reads[81] to estimate program energy savings. This protocol discusses different consumption data methods and where they fall on the NTG spectrum with respect to participant spillover, nonparticipant spillover, and free ridership; this has implications for whether a NTGR needs to be applied after the consumption data analysis estimate is obtained in order to achieve an estimate of net savings. Decisions of whether to apply a NTGR after conducting a consumption data analysis should be made by the evaluator on a case-by-case basis taking into account the guidelines of this protocol for when these methods are net, gross, or somewhere in between.[82] The remainder of this section discusses NTG for various consumption data analysis methods and then goes through some details of the various analysis methods.

In general, consumption data analysis methods split into two approaches. One approach is to use a comparison group in a randomized control treatment (RCT) design, a random encouragement design (RED) or a quasi-experimental design. These comparison group approaches can, under the right circumstances, be used to directly estimate net savings eliminating the need for an NTGR adjustment. A second approach is to estimate savings without a comparison group (for example, using a pre/post regression model for program participants). Approaches without a comparison group produce gross savings and must be adjusted by an NTGR to achieve net savings.

In consumption data analysis, energy consumption of the treatment and control groups can be appropriately

[81] Benefits of using AMI data can include: having more observations per customer, which may improve model precision; obviating concerns over billing periods with differing numbers of days; and, for hourly models, providing the ability to observe intraday load shifting in addition to energy savings.

[82] For example, it is generally accepted that programs for income qualified customers have little to no free ridership as these customers are unlikely to install the measures without the incentive of the program. For specific guidance on income qualified programs see Section 0.

compared through a regression analysis, using time-series observations on the usage of individual customers in the treatment and comparison groups during the pre- and post-treatment periods. Due to the combined time-series/cross-section structure of such data sets, panel regression techniques can be used.[83]

In general, consumption data analysis methods are best suited to the following situations:

1. When the expected net savings per participant (i.e., the effect size) are large or when large participant/nonparticipant sample sizes are possible.
2. When the program can be designed using a randomized controlled trial (see Section 0).
3. Programs where nonparticipant spillover is expected to be trivial within the comparison group.
4. Cases where self-selection bias can be effectively controlled for.

5.3.1 Consumption Data Analysis and NTG

Different consumption data analysis methods produce different savings estimates in terms of the NTG spectrum, as summarized in Table 5-2. These methods will always yield gross savings with respect to nonparticipant spillover and net savings with respect to participant spillover. However, the savings estimates may be net, gross, or somewhere in between with respect to free ridership, depending on the evaluation technique.

Table 5-3. NTG Summary for Consumption Data Analysis

Consumption Data Analysis Method	Free Ridership	Participant Spillover*	Nonparticipant Spillover**
Randomized Controlled Trial (RCT)	✓	✓	§
Random Encouragement Design			
No Instrumental Variable (IV)	†	✓	§
IV	†	✓	§
IV w/ Inverse Mills Ratio (IMR)	†***	✓	§
Quasi-Experimental Design (QED) ****			
Matching			
To Nonparticipants	†*****	✓	§
To Prior or Future Participants	§	✓	§
Regression Discontinuity (RD)	✓	✓	§
Variation-in-Adoption (VIA)	§	✓	§
Without a Comparison Group	§	✓	§

§ Indicates not accounted for (gross)
✓ Indicates fully accounted for (net)
† Indicates partially accounted for (between net and gross)
* Participant spillover within the analysis timeframe in the same building and fuel type is captured. Other sources of participant spillover may not be captured. See the subsection on participant spillover below for details.
** Nonparticipant spillover is not captured as a positive in consumption data analysis and may actually reduce the estimate of savings if it occurs within the comparison group. See the subsection on nonparticipant spillover below for details.
***This method has been tested in simulation but needs further use in practice.

[83] "Panel" refers to the data set consisting of time-series observations on energy consumption of a cross-section of treatment and control customers. Panel estimation techniques refer to the model's inclusion of terms that control for individual customer heterogeneity (e.g., customer fixed effects or a lagged dependent variable), and cluster-robust standard errors, which can accommodate differing error variances across customers and an intracustomer correlation of errors.

**** Note that this is a non-exhaustive list of QED evaluation techniques.
***** As noted in the first few paragraphs of Section 0, these comparison group approaches can, under the right circumstances, be used to produce an estimate of net savings, eliminating the need for an NTGR adjustment (see Goldberg et al., 2017).

When consumption data analysis methods are being used to update the TRM, the update should explicitly state how a NTGR should be applied to the given measure or program in the future. The language used should consider different program delivery mechanisms (which often have different NTG values) and how stable the NTG value is likely to be over time (thus allowing for consideration of how frequently it should be updated).

5.3.2 Nonparticipant Spillover

Nonparticipant spillover is never captured by consumption data analysis, making these savings estimates gross with respect to nonparticipant spillover (i.e., nonparticipant spillover is not accounted for by the estimate directly from the consumption data analysis without further adjustment). To the extent that nonparticipant spillover occurs in the comparison group being used for evaluation, the effect of the program may be underestimated as the difference between the participant group and the comparison group is decreased by the amount of nonparticipant spillover. If nonparticipant spillover is expected to be large (based on the best research available or given the program's logic model) and occur within the evaluation comparison group, that may be a reason to use other methods for evaluating savings. If a billing analysis is done in these cases, a traditional nonparticipant spillover analysis (using techniques like nonparticipant surveys or interviews) should be used to help quantify this effect (these analyses are discussed in various subsections of Chapter 4 of this protocol). Within the comparison group, it can also be difficult to distinguish the effects of nonparticipant spillover, free ridership, and market transformation as all of these effects increase uptake of a measure without going through the program among the nonparticipant group.

In cases where nonparticipant spillover is not expected to occur in the comparison group but may occur in the broader population (for example, if we go from a pilot evaluation where measures were restricted among the comparison group to a full program deployment), adjustments for nonparticipant spillover (or justification for why there is no nonparticipant spillover) should be made as appropriate on a program-by-program basis.

5.3.3 Participant Spillover

Participant spillover is captured by consumption data analysis, making these savings estimates net with respect to participant spillover (i.e., participant spillover is accounted for by the estimate directly from the consumption data analysis without further adjustment). This occurs because consumption data analysis measures all changes in participant usage (captured by the utility billing system or AMI meter reads) regardless of whether the changes are related to the program. A few caveats apply:

1. Consumption data analysis does not capture participant spillover that occurs outside the home or business being analyzed. For example, spillover at a participant's vacation home or spillover at other facilities owned by the same firm.
2. Consumption data analysis does not capture participant spillover that occurs in a different fuel type. For example, if the analysis is done on electric data but there is participant spillover into natural gas.
3. Consumption data analysis does not capture participant spillover that occurs outside the analysis period (typically a one-year period).

If these sources of participant spillover that are not captured are expected to be large (based on the best research available or given the program's logic model), adjustments or additional analysis to capture these types of participant spillover may be required.

5.3.4 Free Ridership

With respect to free ridership, consumption data analysis can produce savings estimates that are net, gross, or somewhere in between (i.e., free ridership can be fully, not at all, or partially accounted for by the estimate directly from the consumption data analysis without further adjustment). Where they fall depends on whether the comparison group accounts for (or nets outs) free ridership in the estimation. For a summary of where each method falls see Table 5-3 above.

Methods that yield gross savings estimates with respect to free ridership have no comparison group or have a comparison group that is made up of other (prior or future) participants. In these cases, a free ridership adjustment (or justification of why there is no free ridership) is necessary. These methods include:

- Matching to older or newer participants[84]
- Variation-in-adoption (VIA)[85]
- Any method without a comparison group

Methods that yield net savings estimates with respect to free ridership have a nonparticipant comparison group that has the same level of free ridership as the participants. In these cases, the comparison group is engaging in energy efficiency activities at the same rate as the participant group would have without the program. This nets out the free ridership and means no free ridership adjustment is necessary. These methods include:

- Randomized controlled trial (RCT)
- Regression discontinuity (RD)
- Random encouragement design (RED) under at least one of the following conditions:
    - Analysis is done using instrumental variables with an inverse mills ratio[86]
    - Designs where only the encouraged group can join the program (and as such the participants who join the program include only compliers and not always takers[87])
    - There is no relationship between how much energy a customer will save by participating and their inclination to participate

Methods where there is a nonparticipant comparison group that is expected to have a different level of naturally occurring adoption than the participant group can result in savings estimates that fall somewhere between net and gross with respect to free ridership. For example, a group of participants would be expected to be comprised of more natural adopters than a group of nonparticipants who never joined the program. These methods include:

- RED (in situations not covered by the previous list showing when RED is net)
- Matching to nonparticipants

In these cases, it is up to the evaluator to decide whether an estimate is most appropriately considered net or gross on an analysis-by-analysis basis. Some guidelines include:

- Measures where instant upstream rebates exist for a large portion of the market are likely gross as there should be very few customers who got the measure in the nonparticipant group
- Measures for income qualified customers are typically considered net as these customers are unlikely to install the measures without the incentive of the program

In some cases, evaluators may be able to implement techniques when using a nonparticipant comparison group such that the savings are sufficiently close to net and do not require further net to gross adjustment. One example of these techniques is the IV-IMR method proposed in Goldberg et. al. (2017). The UMP Chapter 21 (Violette and Rathbun, 2017) also has some discussion of getting net savings estimates using these approaches, although UMP Chapter 8 (Agnew and Goldberg 2017) should be reviewed in conjunction as it is more specific to consumption data methods. However, these techniques often require customer characteristic data that is not readily available to

[84] Except in the case of income qualified programs where the use of future participants can produce an estimate of net savings. For specific guidance on income qualified programs see Section 0.

[85] See Harding and Hsiaw (2013). This is a distinct method from the UMP Chapter 8 (Agnew and Goldberg, 2017) pooled fixed effects approach which can be estimated with multiple years of participants. VIA hinges on rolling enrollment and in essence uses each participant as a control and a treatment customer through time. The Chapter 8 pooled fixed effects approach uses participants from an earlier time period as a comparison group for participants from a later time period.

[86] For details see: Goldberg, M.; Agnew, K.; Train, K.; Fowlie, M. (2017). *Mitigating Self-Selection Bias in Billing Analysis for Impact Evaluation.* Pacific Gas and Electric Company. CALMAC Study ID PGE0401.01. <http://www.calmac.org/publications/Mitigating_Self_Selection_Bias_in_Bill_Analysis_8.4.17.pdf>

[87] See Section 5.

evaluators and some of them need to be further tested beyond theoretical simulations.

5.3.5 Consumption Data Analysis Designs with a Comparison Group

This section discusses descriptions of and considerations for estimating savings via consumption data analysis designs with a comparison group. Although the ideas of net and gross savings are touched upon, the full discussion on whether each of these methods produces net or gross savings and under what circumstances is in Section 0.

5.3.5.1 Randomized Controlled Trials

In a randomized controlled trial (RCT) design, evaluators (and sometimes implementation contractors) randomly assign sampled members of a population of interest to a treatment group or a control group. Among the benefits offered by an RCT—when properly applied—is that it produces net savings estimates by netting out free ridership.[88] The evaluation of a program must be designed and implemented this way from the outset; it is not possible for an evaluation team to apply RCT evaluation techniques after the program has been implemented if random assignment to treatment and control groups was not done before program launch. While such designs are rarely possible outside of Home Energy Report programs, one should not overlook the possibility of such designs in evaluating new pilot programs.

For some programs, evaluators must take a second step to ensure savings are not being double-counted, either counting savings being claimed by other programs or savings already credited to earlier program efforts (often called "legacy uplift"). Only net increases in participation in other programs should be considered in this uplift adjustment; changes to total savings do not need to be made based on decreases in participation in other programs.

5.3.5.2 Random Encouragement Designs

In a random encouragement design (RED), eligible customers are randomly assigned between an encouraged group (who receives incremental encouragement to join the program[89]) and a non-encouraged, or control, group (who does not receive the encouragement). Members of either group can join the program, but the encouraged group is expected to do so at a higher rate.[90] If the encouragement is not effective at driving the encouraged group into the program at a higher rate than the non-encouraged group then the evaluation design breaks down and other (likely quasi-experimental) methods will be needed to estimate program savings.

In an RED, both the encouraged and non-encouraged group are made up of the following:

1. Always takers – customers who will join the program with or without the encouragement
2. Compliers – customers who only join the program if they receive the encouragement
3. Never takers – customers who will never join the program, regardless of whether they receive the encouragement

In the non-encouraged group, the always takers can be distinguished from the compliers and never takers (they're the portion of the non-encouraged group who joins the program), but the compliers and never takers cannot be distinguished from one another (they're both observed not to join the program). In the encouraged group, the never takers can be distinguished from the always takers and compliers (they're the portion of the encouraged group who does not join the program), but the always takers and compliers cannot be distinguished from one another (they're both observed to join the program).

Like RCTs, REDs are a form of experimental design. An RED is known to give an unbiased estimate of net savings

[88] RCTs eliminate free rider bias because the random assignment of customers to treatment and control groups equally distributes such participants between the two. Due to differential attrition and random chance, small differences may occur between the distributions of free riders in the two groups for any given sample. Their expected values, however, will be identical, and in any case the size of any such discrepancies shrinks as sample size increases. Thus, this is only a potential concern for programs with unusually small numbers of participants.) Upon comparing the two groups' energy consumption, free riders' energy savings in the control group cancel out those in the treatment group, eliminating free rider bias.

[89] The encouragement could take many forms including targeted marketing or direct monetary incentives.

[90] This design does not preclude mass marketing of the program to all customers but relies on the encouragement being effective at driving the encouraged customers into the program at a higher rate than the non-encouraged customers.

(with respect to free ridership) for the compliers. Applying this savings to the always takers group requires some explanation of why it is likely to be accurate. Additionally, the RED design provides the average net savings per participant for those who participate because of the encouragement but otherwise would not (compliers). This is not necessarily the same as the net savings for the original program without extra encouragement. In particular, we would expect free-ridership to be lower among those who need extra encouragement. Thus, the RED might be expected to overstate net savings for the original program if free-ridership is present but would still provide useful information.

There are several methods for evaluating REDs using panel data including methods using instrumental variables (IVs) and the inverse mills ratio (IMR).[91]

5.3.5.3 Quasi-Experimental Designs

Where randomized assignments prove infeasible, quasi-experimental design (QED) evaluation methods can be substituted (although experimental designs are typically preferable when possible). Depending on the exact QED implemented, the savings may be net, gross, or somewhere in between with respect to the different pieces of a NTG adjustment (participant spillover, nonparticipant spillover, and free ridership). The specifics of net versus gross estimation are covered in Section 0, this subsection does not rehash this issue but rather describes estimation for a subset of QED methods.

Three quasi-experimental approaches are commonly used to evaluate behavior-based energy efficiency programs that cannot be constructed as experiments:[92]

- Regression discontinuity (RD)
- Variation-in-adoption (VIA)[93]
- Matched controls (MC)

All three rely on a nonrandom comparison group.

Regression Discontinuity. RD requires basing a program's eligibility on a continuous variable (e.g., customers' adjusted gross income falling below a cutoff value for them to qualify for the program). When this is true, the RD method assumes customers just beyond the cutoff likely will be very similar, on average, to those just inside of it. The method compares changes in energy usage for a group just outside of the eligible range to that of a group of participants just on the other side of the eligibility cutoff. The RD approach, however, is susceptible to an important weakness: misspecification of the regression functional form.[94]

Variation-in-Adoption. The VIA model applies only to program participants.[95] For this method, customers must sign

[91] See, for example:
Goldberg, M.; Agnew, K.; Train, K.; Fowlie, M. (2017). *Mitigating Self-Selection Bias in Billing Analysis for Impact Evaluation.* Pacific Gas and Electric Company. CALMAC Study ID PGE0401.01. <http://www.calmac.org/publications/Mitigating_Self_Selection_Bias_in_Bill_Analysis_8.4.17.pdf>
Fowlie, M.; Greenstone, M.; Wolfram, C. (2015). *Are the Non-Monetary Costs of Energy Efficiency Investments Large? Understanding Low Take-up of a Free Energy Efficiency Program*. American Economic Review: Papers and Proceedings 105(5): 201-204. < https://www.povertyactionlab.org/sites/default/files/publications/389_500%20Weatherization%20AER.pdf>

[92] There are many other types of QEDs that may be appropriate for evaluation, but these are some of the most commonly used for evaluation in IL.

[93] See Harding and Hsiaw (2013). This is a distinct method from the UMP Chapter 8 (Agnew and Goldberg, 2017) pooled fixed effects approach which can be estimated with multiple years of participants. VIA hinges on rolling enrollment and in essence uses each participant as a control and a treatment customer through time. The Chapter 8 pooled fixed effects approach using participants from an earlier time period as a comparison group for participants from a later time period. The Chapter 8 pooled fixed effects method is discussed in Section 0.

[94] The most common misspecifications are: mistaking a nonlinear relationship for a discontinuity; and failing to recognize potential interactions between assignments and the treatment studied. See W.R. Shadish, T.D. Cook and D.T. Campbell, *Experimental and Quasi-Experimental Designs for Generalized Causal Inference*, Wadsworth 2002, pp. 229-238.

[95] Harding, M. and Hsiaw, A. 2013. *Goal Setting and Energy Conservation* Available at: http://people.duke.edu/~mch55/resources/Harding_Goals.pdf.

up for the program on a rolling basis. VIA takes advantage of its enrollees' differential timing to compare energy usage of customers opting in to that of customers not yet opting in (but doing so later). The method relies on an assumption that, in any given month, customers that soon opt in have similar characteristics to those who have enrolled, both in observable and unobservable characteristics. For this assumption to prove valid, customers must decide to opt into the program at different times for essentially random reasons (e.g., influenced only by marketing exposure and program awareness).[96] In particular, the decision to opt in should not relate to observable or unobservable household characteristics.[97]

Matched Controls. MC creates a control group by matching each treatment customer to the most similar nonparticipant customer available on the basis of exogenous covariates from the pre-enrollment period known to highly correlate with post-enrollment usage.[98] The covariate most likely to correlate with post-enrollment energy usage in a given time period is customer energy usage during the same period of the preceding year, but other observable factors may be used when available. Implementing MC requires customer usage data for the year preceding all opt-in customers' decisions to participate in the program, along with a large group of nonparticipants who can be assumed to be similar to opt-in customers, aside from their program participation status. Whenever possible, the pool of potential matches should be drawn from the same geography, customer class, and rate category as the participants.

Another option is to pull the nonparticipants from a group of prior or future participants in the program (sometimes referred to as the cohort design[99]). These groups are similar to current participants since we know that they also join the program at an earlier or future date, significantly mitigating the issue of self-selection bias (wherein, customers who join the program are different from those who do not in unobservable ways).[100] However, using this design can significantly decrease the number of participants for analysis and the size of the potential matching group. It can also require the evaluator to delay the analysis if more recent participants are being used as the comparison group.[101]

The MC method involves identifying a nonparticipant customer whose energy usage closely matches that of a program participant in the months preceding the participant's enrollment in the program. The logic inherent in this approach is: if the analyst finds a set of nonparticipants who, on average, are the same as participants regarding energy consumption before program enrollment, these matches will provide a good counterfactual estimate of how much energy participants would have used in the program's absence.

The MC approach does present a main weakness: it can only identify matches based on observable customer characteristics, which leaves open the exclusion of the possible influence of relevant unobservable variables. While factors other than pre-enrollment energy usage plausibly could be used (e.g., household income, demographics, geographic location) in the matching process to address relevant unobservable characteristics (e.g., attitudes toward

[96] This differs from an RCT with a recruit-and-delay design, in which customers do not choose when to opt in, but instead are randomly assigned different times to opt in, and from an RCT with a recruit-and-deny design, where customers are randomly denied access to the program.

[97] As the validity of the VIA method depends on this assumption, it should be empirically tested to the extent possible. If program marketing is punctuated and dates of marketing exposure are known, it is possible to test whether household enrollment in any particular month is driven by marketing activity, as opposed to observed household characteristics or unobserved heterogeneity. A test of whether the energy usage of households before they opt in differs from households that opt in during any particular month as opposed to another month is built into the VIA regression model's functional form. See Harding and Hsiaw, op. cit., for details.

[98] See Daniel E. Ho, Kosuke Imai, Gary King, and Elizabeth Stuart, 2007, "Matching as Nonparametric Preprocessing for Reducing Model Dependence in Parametric Causal Inference." *Political Analysis* 15(3): 199-236.

[99] See W.R. Shadish, T.D. Cook and D.T. Campbell. (202). *Experimental and Quasi-Experimental Designs for Generalized Causal Inference*. New York: Houghton Mifflin Company, pp. 148-153

[100] Though there could still be a selection issue based on when customers choose to join the program. As with VIA, the assumption is that the timing of participation is basically random.

[101] The cohort design has also been used, under certain conditions, to control for exogenous factors when estimating gross savings. See Agnew, K. and M. Goldberg. (2017). Whole Building Retrofit with Consumption Data Analysis Evaluation Protocol: Chapter 8 of the Uniform Methods Project, National Renewable Energy Laboratory.

energy conservation and environmental concerns), this assumption cannot be directly tested.[102]

There is a special case of MC called propensity-score matching. This develops a binary choice (logistic regression) model to predict the probability that a customer will opt into the program, and then, for a comparison group. The logistic regression reduces each household's set of covariates to a single propensity score. Nonparticipants are then matched to participants based on their propensity scores. This functions well if observable variables used to calculate the propensity score sufficiently correlate with relevant unobservable variables to explain differences between treatment and control customers that cannot be explained by matching on observable variables. With most evaluations of energy efficiency programs, however, little (if any) data are available on nonparticipating customers other than their energy usage. In some cases, the demographic data necessary to estimate these models can be obtained from providers such as Experian and assigned to each participant and nonparticipant.

Self-Selection Bias and QED. Self-selection bias due to observable and unobservable variables is always a possibility with QEDs. One can collect as much information as possible on both participants and members of the comparison group and include them as covariates in the regression model, but there may still be self-selection bias related to unobservable variables. Several techniques have been developed to help mitigate it. Efforts to address the biasing effects of *unobserved* differences using Inverse Mills Ratios began at least as early as the late 1980s. Since then, Train (1993) and Goldberg and Train (1995), using simulated datasets, demonstrated that failing to correct for self-selection can overestimate net savings, but that there are effective strategies to reduce this bias substantially.

One approach is to calculate and enter the propensity score, based on observable variables, as an additional covariate into the regression model. Of course, the most difficult issue to address is the differences between participants and nonparticipants that are unobserved and unobservable. To mitigate both overt and hidden bias, a variety of approaches that attempt to take advantage of recent developments in statistics and econometrics are available:

- Sample selection models (e.g., Heckman's two-step estimator (1978, 1979); treatment effect model (Green, 2003); instrumental variables estimator (Wooldridge, 2002)
- The propensity score matching model (Rosenbaum and Rubin, 1983, 1985; Hansen and Klopfer, 2006; Guo and Fraser, 2014)[103]
- Matching estimators and synthetic controls (Abadie and Imbens, 2002, 2006)
- Instrumental variables approach with the predicted probability of participation serving as the instrumental variable and the inclusion of an Inverse Mills Ratio (IMR) (Goldberg et al., 2017)

Another issue that should be considered is that, when using a comparison group in a QED, the composition of the comparison group needs to be carefully considered.[104,105] For example, simply selecting a random sample of nonparticipants from the general nonparticipant population could result in an estimate of savings that is somewhere between net and gross, thus overestimating net savings. For a single-measure residential program like an air conditioner (AC) replacement program, the eligible population is the population of customers who have purchased a new air conditioner. That is, part of the eligible population appropriate to a net effects comparison group would be those who purchased and installed some air conditioner, whether efficient or not. Simply selecting from the general residential population would include households with no air conditioner, those with older ACs of varying vintages, those with new standard efficient ACs and those with new program-qualified ACs. The results would be virtually uninterpretable. Of course, for more complex multi-measure programs, finding the appropriate comparison group is far more challenging.

[102] Such secondary, observable characteristics are rarely available to evaluators of energy efficiency programs, except for geographic location (e.g., postal zone of customer premise).

[103] Note that propensity scores cannot remove hidden biases except to the extent that unmeasured variables are correlated with the measured covariates used to compute the propensity score

[104] See Agnew at al., Section 8.1.3 (The Importance of Measures Applicability)

[105] Katherine Randazzo, Richard Ridge and Seth Wayland. Evaluating Whole-Building Programs: It is harder and easier than you think! Presented at the International Energy Program Evaluation Conference in August 2017.

5.3.6 Consumption Data Analysis Designs without a Comparison Group

Although less common, consumption data methods can also be used to estimate savings without the use of a comparison group. These methods typically estimate gross savings, and net savings are found by multiplying gross savings by a separately estimated NTGR. There are basically two types of pre/post models to estimate gross savings:

- the pooled participant-only linear fixed-effects approach
- site-specific regression models

In both modeling approaches, exogenous factors must be controlled for.[106]

Pooled Approach. The pooled approach addresses exogenous change without the inclusion of a separate comparison group. In this model, participants who received a measure installation during a certain time interval serve as a steady-state comparison for other participants in each other time interval. Almost all observation points include premises that are still in their pre-installation period and premises that are in their post-installation period, so the effect of post- versus pre- is estimated to control for exogenous trends. Note that if changes at the site that affect energy use are not or cannot be explicitly modelled the estimated gross savings will be biased. This method is typically used in analysis of residential and small (and occasionally for large) commercial programs.

Site Specific Regression Models. This approach involves the estimation of site-specific regression models to estimate savings. This method is often used for large commercial and industrial customers or in other situations where it is difficult to identify an adequate comparison group (for example, in evaluation of Strategic Energy Management programs). In these cases, single customer regressions are typically run as a time series without a cross-section of customers.

Note that both the pooled approach and the site-specific approach and the conditions that must be met before using them are discussed in Agnew and Goldberg (2017).

5.3.7 Program Implementation and Consumption Data Analysis

The approach the evaluation can use to estimate net savings is greatly dependent on the design of the program and the size of the expected savings (i.e., the signal-to-noise ratio).

RCT and RED: These designs must be integral to a program's implementation. Without the ability to randomly assign customers to the control and treatment groups (or at least randomly encourage customers to participate in a program), the ability of the design to yield unambiguous estimates of net impacts is compromised. Evaluators often help design how a program is implemented. However, if they are not involved at the outset, they cannot carefully review choices made by the implementation team. RCT and RED designs are difficult to perform well within the commercial and industrial sectors due to a low signal-to-noise ratio. One solution for these two sectors is to increase the sample size, but this is not always feasible.

QED: A QED may be designed after a program has been implemented. It relies on determination of an equivalent comparison group, which is often chosen based on energy use and other variables, if available. QED is also difficult to perform well within the commercial and industrial sectors due to a low signal-to-noise ratio. One solution for these two sectors is to increase the sample size, but this is not always feasible.[107]

Methods without a Comparison Group: These methods can also be implemented by the evaluator after the program has been designed. They are most appropriate in situations where it is difficult to construct an appropriate comparison group.

For any kind of evaluation design, evaluators may also analyze the data to help understand the savings within specific segments if sufficient information and data points are available.

[106] Exogenous factors include non-program-related effects due to the economy and other factors affecting energy consumption.

[107] A power analysis can be undertaken before the actual analysis to determine whether the sample size available is likely to be large enough to produce statistically significant savings at the desired confidence level.

References

- Abadie, Imbens, 2002, 2006
- Agnew, Goldberg, 2017
- Donaldson, 2009
- Fowlie, Greenstone, Wolfram, 2015
- Goldberg, Agnew, Train, Fowlie, 2017
- Goldberg, Train, 1995
- Green, 2003
- Guo, Fraser, 2014
- Hansen, Klopfer, 2006
- Harding, Hsiaw, 2013
- Heckman, 1978, 1979
- Ho, Imai, King, Stuart, 2007
- Mohr, 1995
- Shadish, Cook, Campbell, 2002
- Scriven, 2008
- Randazzo, Ridge, Wayland, 2017
- Rosenbaum, Rubin, 1983, 1985
- Train, 1993
- Wooldridge, 2002

5.4 Midstream Free-Ridership Protocol[108]

Typical energy efficiency programs offer incentives to end-use customers to purchase more efficient equipment. These can be referred to as "downstream" incentives, or downstream programs. Moving up the supply chain, the next entities are distributors, contractors, and design professionals. Programs aimed at influencing these market actors are referred to as "midstream" programs. "Upstream" programs target manufacturers and potentially retailers.

5.4.1 Using This Protocol

The methods described in this section should be applied for estimating NTGRs for midstream programs in which the incentives are paid directly to distributors who have the option of sharing some or all of these incentives with the end-use customers in the form of price reductions. This midstream protocol can be used for estimating NTGRs for both residential and non-residential midstream programs that focus on distributors.[109] As discussed in further detail later in this section, programs of this type are designed to influence the behavior of distributors, and indirectly end-users, and intermediaries such as contractors, installers, or design professionals (to various degrees).[110]

As a result, in midstream programs where it is believed that multiple parties are aware of the utility intervention, it is desirable for evaluators to conduct research that produces multiple estimates of free ridership from different perspectives, and to combine these estimates using guidance provided in Section 5.1: Combining Participant and

[108] Note that the method for assessing trade ally spillover is included in Section 5.2.

[109] See Section 4.3 for a description of an approach for calculating NTG specifically for Residential Upstream Lighting programs.

[110] Note that the Illinois TRM does not currently prescribe a specific method for assessing free ridership from a trade ally perspective. Consistent with Section **Error! Reference source not found.**, until such a prescribed methodology becomes available, evaluators should coordinate on survey design and calculation algorithms for trade ally free-ridership estimation.

Trade Ally Free Ridership Scores to estimate a NTGR that is inclusive of multiple perspectives.[111]

In these cases, care should be taken to design an evaluation approach that most appropriately reflects the theory of program influence and selects perspectives to research free-ridership commensurate with program theory. For example, in many midstream HVAC program models, intermediaries (contractors/installers) have an influential role in the sales process with end-use customers, and to the extent that program design attempts to influence intermediary behavior as well as distributor and end-user behavior, research with these actors may be appropriate. Conversely, in other midstream program models, intermediaries may not be a target for program activity and/or may not play an influential role in the sales process, in which case research with these actors would not be appropriate.

All midstream programs should collect contact information for participating distributors and make it available to evaluators. Midstream programs may or may not collect information for other actors such as end-use customers and/or intermediaries. In cases where midstream programs do not collect customer information, end-user research will generally not be feasible, and free ridership estimates will not be able to include an end-user perspective on free-ridership. In cases where midstream programs do not collect intermediary information, intermediary research may still be feasible, but will require care in order to define an appropriate sample that accurately represents the pool of intermediaries relevant to the program. For example, some midstream programs may not track installing contractors but may maintain a list of qualified program allies who would be expected to complete a significant share of installations receiving program incentives.

If evaluation constraints do not allow for high quality research to be conducted from multiple perspectives, it is likely preferable to conduct high quality research from only one perspective rather than lower quality (e.g., minimal sample size) research from multiple perspectives, and the evaluator may choose to utilize only one approach without it being considered a divergence from the IL-NTG Methods. In this case, the evaluator should carefully consider the specific design and intent of a given program when choosing the appropriate protocol(s) for evaluation and must document the rationale for their decision in the evaluation plan.

Ultimately, the protocol(s) to be used for a given program is defined in Table 3-1 and Table 4-1. If the design of a given program changes significantly, then it may mean that the NTG protocol listed for that program in Table 3-1 or Table 4-1 is no longer appropriate. In addition, the evaluator may determine that the defined customer or distributor NTG algorithms need to be substantially modified to accommodate the specific design of a midstream program. If the evaluator chooses to use an alternative method or approach to estimate the NTG, the evaluator should follow the procedures outlined in Section 1.4: Diverging from the IL-NTG Methods. For new programs, the choice of protocol(s) will be ultimately at the discretion of the evaluator.

Midstream Influence Pathways

Knowing that they will receive an incentive for selling high efficiency units, distributors may choose to increase their stock of high efficiency units, and/or to upsell high efficiency units to contractors. Distributors may also choose to offer training sessions or marketing campaigns aimed at engineers, architects, and contractors to increase awareness of these high efficiency units. As a result of the program's actions:

- Contractors/customers may be more likely to purchase high efficiency units because they are in stock,
- Contractors/customers may be more likely to purchase high efficiency equipment because the distributor upsold these units,
- Contractors/customers may be more likely to purchase high efficiency units because the incremental cost is lower than it would have been without the incentive (assuming the distributor uses the incentive to reduce the price of the equipment), and
- Design professionals and contractors may be more likely to specify or recommend high efficiency units because they are more aware or more familiar with these options.

The expected overall outcome is that a greater proportion of customer purchases will be high efficiency units. As

[111] In cases where midstream programs require distributors to pass the entire incentive to a customer and collect customer information, it is still likely that the program is affecting distributor behavior, and distributor research is still valuable.

distributors sell more high efficiency units, manufacturers will respond by producing more high efficiency equipment. Ultimately, the overall market in a utility's service territory will become more efficient than it otherwise would have been, or it will achieve this efficiency sooner than if no intervention had occurred.

To assess impacts from this type of program, the evaluator needs to determine if the distributor changed their practices in a way that ultimately influenced the customer's buying decision. Assessing the influence of the program involves conducting in-depth interviews with participating distributors and asking them how they would have behaved – or how outcomes would have differed – in the absence of the program. While interviews with others, such as contractors and design professionals, can also be conducted in order to develop a more complete understanding of the influence of the program, the focus of the protocol in Section 0below is on the distributor interviews.

For estimating program influence from other perspectives (e.g., contractors, end users, etc.), evaluators should use the protocols described in sections 3.1.1: Core Non-Residential Free Ridership Protocol and 4.4.1: Residential Prescriptive Rebate (With No Audit) Protocol, as appropriate.

To ensure that the midstream NTGR approach covers all avenues of program influence, one should develop a logic model based on discussions with utility program staff, implementer staff, and a general review of midstream programs. The midstream NTGR approach recommended here is designed to be flexible, as the midstream incentives may be impacting distributors' businesses in one of many ways—including via changes in stocking, upselling, price reduction, etc. Ultimately, the midstream program should be given credit for influence via any of these causal pathways. Note that a midstream program might have longer-term impacts that are not immediately measurable. Such longer-term impacts manifest as "market effects," which signify a transformation in the underlying structure and functioning of the market. This midstream protocol does not address the measurement of such market effects.

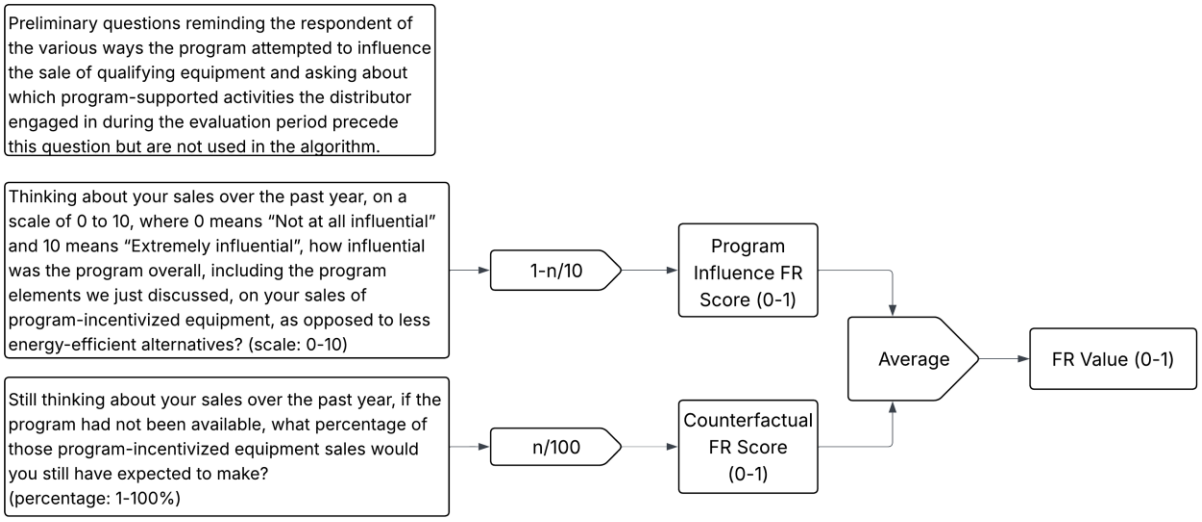
5.4.2 Distributor Free Ridership Estimation Methodology

This methodology uses two indicators of free ridership:

- Program Influence (PI) FR Score, and
- Counterfactual (CF) FR Score

These scores are then averaged to arrive at a final free ridership value for each interviewed distributor. The algorithm shown in Figure 5-1 can be used to calculate the free-ridership. The resulting distributor-level NTGR values should be weighted proportionately to the ex post gross kWh savings contributed by each distributor.

Figure 5-1. Distributor Free Ridership Protocol



Distributor Practices

Before asking program influence and counterfactual questions, the evaluator should introduce the various ways the program attempts to influence the sale of program-qualified equipment (per the program theory/logic model) and ask questions about which program-supported activities the distributor has engaged in during the evaluation period. These questions serve two purposes: (1) they establish which of the potential causal pathways (or program factors) are relevant for each distributor, and (2) they help set up the following questions by making sure the distributor thinks about the program holistically.

Program-supported activities to encourage the sale of program-qualified equipment may include, but are not limited to, the following:

___ Upselling customers (e.g., contractors, installers, design professionals) to higher efficiency equipment

___ Conducting training workshops for customers

___ Using marketing materials or other promotional tools to promote program-qualified units

___ Reducing the prices of program-qualified units

___ Using program incentives to support program participation (e.g., SPIF or "Sales Performance Incentive Fund")

___ Discussing the benefits of program-qualified units with design professionals

___ Participating in roundtables and/or trainings (e.g., of sales staff)

Program Influence FR Score

The PI FR Score measures the overall influence of the program on the distributor's sales of program-qualified units instead of a less efficient alternative. It is developed based on a single question that asks the distributor to rate the overall importance or influence of the program on their *sales* of program-incentivized equipment in a given time period (which would align with the evaluation period, likely, the past year), using a scale from 0 to 10, with 0 being not at all important or influential and 10 being extremely important or influential. In other words, this question attempts to assess the influence of the program on distributors' sales volume. Depending on the specific midstream program, evaluators may decide to allow for responses to this question to be split by equipment type or end use.

Evaluators will calculate the PI FR Score for each respondent using the following equation:

$$Program\ Influence\ FR\ Score\ = 1 - \left(\frac{[Influence\ Rating]}{10}\right).$$

This score can range from 0 (no free ridership) to 1 (full free rider).

Counterfactual FR Score

The Counterfactual FR score also focuses on distributors' sales volume of program-incentivized equipment. As such, distributors will be asked to think about their sales of program-incentivized equipment (i.e., equipment for which they provided an incentive or discount) in a given time period[112] and indicate what percentage of those sales they would still have expected to make in the absence of the program. Depending on the specific midstream program, evaluators may decide to allow for responses to this question to be split by equipment type or end use.

Evaluators will calculate the CF FR Score for each respondent using the following equation:

$$Counterfactual\ FR\ Score\ = \left(\frac{[\%\ of\ Sales\ distributors\ still\ would\ have\ made\ ]}{100}\right).$$

This score can range from 0 (no free ridership) to 1 (full free rider).

Consistency Checks

Evaluators should perform the following consistency check that focuses on discrepancies between the Program Influence and Counterfactual FR scores. When triggered, evaluators will ask distributors to describe how the program did or did not influence their sales of program-incentivized equipment in the given time period. This consistency check is triggered when either of the following conditions is met:

$$Program\ Influence\ FR\ Score - Counterfactual\ FR\ Score \geq 0.4$$

OR

$$Counterfactual\ FR\ Score - Program\ Influence\ FR\ Score \geq 0.4$$

Additional consistency check questions to resolve identified inconsistencies remain optional, but may be used by the evaluator to resolve inconsistencies in real time if desirable. For example, if distributors indicate they would have sold a high proportion of program-incentivized equipment without the program (e.g., CF FR Score > 0.75), evaluators may ask distributors how they would have been able to achieve the number of sales without the financial assistance provided by the program.

Additional Questions

Evaluators may incorporate additional questions to gather more information about distributors' practices, such as their stocking and upselling practices. This information could be valuable to place free ridership results in context and inform future discussions about the Midstream FR protocol. Examples of additional questions are:

- Since you started participating in the program, have you increased the stocking or assortment of program-qualified equipment?
- How influential has the program been on your stocking decisions related to program-qualified equipment relative to your stocking practices before participating?
- What proportion of your stock is program-qualified equipment?
- What proportion of your stock would be program-qualified equipment if the program were not available?
- Thinking of the last year or so, if program-qualified equipment was not available, how long would it usually take to have it back in stock?
- How influential was the program in increasing your success rate when promoting program-incentivized equipment in the last year?
- How influential was the program in how often you tried to promote program-incentivized equipment in the

[112] Some Midstream programs might have a budget cap and cease providing incentives part way through a given year once that budget cap is reached. Respondents should be prompted to think of their sales just during the period when the program was providing incentives when answering the Counterfactual question.

last year?

- In what percent of cases do you currently recommend program-incentivized equipment to your customers?
- In what percent of cases would you recommend program-incentivized equipment if the program were not available?
- What were the most important drivers that led you to upsell program-incentivized equipment over the last year?

6 Appendix A: Overview of NTG Methods

The evaluation teams present information in this appendix to provide a relatively quick overview of NTG methods for readers unaccustomed to the possible methods that evaluators may deploy. It is not meant to be a complete or deep discussion about each of the methods presented. However, the evaluators in Illinois considered the inclusion of this appendix to be very important in acknowledging the current suite of methods deployed by evaluators throughout the U.S. and giving a framework for work within Illinois.

Much of the information shown below is taken directly from a single source—the national Uniform Methods Project, Chapter 23: Estimating Net Savings: Common Practices. (Violette and Rathbun, 2014). This document has done a nice job of summarizing the eight most common attribution methods currently in use across the U.S. The evaluation teams recommend that readers go first to this reference for further information. Additionally, while there are slightly over 100 references within the Violette and Rathbun document, other non-duplicative references are included where reasonable as additional resources for those interested in further research into any specific method.

6.1 Survey-Based Approaches

Virtually all Illinois based evaluations use a survey-based approach for programs where primary data is used to determine net savings. (The main exception is for behavioral programs which use statistical analysis based on a randomized control trial program design.) Survey-based approaches obtain data from program participants and nonparticipants using a structured data collection instrument implemented via phone, in person, or online.[113] At times, evaluators create and use an unstructured depth-interview guide to collect information about attribution, and this provides both contextual data and quantitative data about a given project.

6.1.1 Self-Report Approach

The self-report approach relies on the abilities of customers to discuss the program influence as well as the somewhat abstract ideas of the counterfactual (i.e., what would have occurred absent the program) after making a choice to purchase an energy efficient item or take an energy efficient action unrelated to a purchase. For program participants, this could include doing nothing (i.e., leaving the existing equipment as-is), installing the same energy efficient equipment as they did through the program, or an intermediate step of installing equipment that is more efficient than what they had in place previously, but less efficient than what they installed through the program. Evaluators also use this approach when collecting information from trade allies or distributors. This self-report approach is not new, nor is it exclusively used by the energy efficiency industry. An important attribute of this approach is its reliance on well-designed and fielded survey questions; so that the data underlying subsequent analyses are accurate and complete.

The output of this approach is an NTG ratio which can be considered an index of the program's influence on the decision to install energy-efficient equipment. The NTG ratio is applied to gross savings in order to obtain an estimate of net savings. The NTG ratio may include free ridership, spillover, or market effects, depending on the survey and analytical design. NTG ratios may be calculated at the measure, suite of measures, or program level and are typically average values weighted by savings. If sufficient information is available, analysis of NTG ratios among certain customer segments may be done to further inform changes to program design.

References

- Sudman, 1996
- Stone, et al., 2000
- Bradburn, et al., 2004

[113] Historically, evaluators in Illinois have collected the majority of primary data via telephone surveys. As evaluations increasingly leverage online surveys to collect information relevant to attribution, careful attention should be paid to mode effects that are due to interviewer-administered versus self-administered surveys (e.g., scale direction effects). It is recommended that evaluators, where possible, assess the differences between telephone and online survey methods for the purposes of future updates to these protocols.

6.1.2 Econometric/Revealed Preference Approach

The econometric/revealed preference approach, while still considered a survey approach due to how data is collected, moves beyond asking people about the counterfactual and instead uses the observations of the evaluator to collect information for analysis of a NTG ratio. Within this approach, evaluators typically deploy similar sampling designs as for the self-report approach to collect data, but actively gather what a person is doing (i.e., what is being purchased in a store) to determine attribution.

6.2 NTG with Consumption Data Analysis

As mentioned in Section 0, evaluators use randomized control trials (RCTs), random encouragement designs (REDs), and quasi-experimental designs (QEDs) using consumption data (like monthly bills or AMI meter reads) to estimate savings for a variety of programs. RCTs estimate net savings by design but other consumption data analysis methods may be net, gross, or somewhere in between. In some cases, evaluators may be able to use methods that produce estimates that are acceptably close to net without further adjustment, while in other cases an NTGR may need to be developed outside the consumption data analysis and then multiplied by the estimate to produce net savings. Therefore, the NTG adjustment method will differ and needs to be justified by the evaluator on a case-by-case basis.

6.3 Deemed or Stipulated NTG Ratios

A deemed (or stipulated) NTG ratio is a value known prior to implementing a program and applied to estimate net savings for that program in a certain year.

Deemed or stipulated NTG ratios may be based on previous primary data collection, a review of secondary data, or agreed to among stakeholders. In Illinois, deemed or stipulated NTG ratios should reflect best estimates of likely future actual NTG ratios for the relevant program year, taking into consideration stakeholder input, the evaluator's expertise, and the best and most up-to-date information.

6.4 Common Practice Baseline Approaches

For this method, the evaluation team estimates what a typical consumer would have done at the time of the project implementation. Essentially, what is "commonly done" becomes the basis for baseline energy consumption and calculation of net savings. No gross impacts are calculated in this approach. This baseline is defined as the counterfactual "i.e., what would have occurred absent the program" and has been referred to as current practice, common practice, or industry standard practice. Evaluators determine these practices through multiple methods, but often can be from self-report or on-site audits. The difference between the energy use of measures installed in the program and the energy use associated with current practice is considered by some to be sufficiently close to the net savings.

This approach is not in use in Illinois, but it is used elsewhere in the country, such as the Pacific Northwest and Delaware.

6.5 Market Analyses

Market analyses can be done in several ways. Market analyses are often used in theory-driven evaluations of market transformation programs.

Other non-sales data market analyses can be postulated on changes specified in program logic such as: 1) changes in the number of energy-efficient units manufactured; 2) changes in market actor behavior around promotion or stocking of energy-efficient items; or 3) reductions in prices. The analyses involving non-sales data must make a clear link between the program intervention and the changes found in the market. Additionally, outside of Illinois, while evaluators have extrapolated the market changes to specific energy or demand reductions, this activity may be viewed as tenuous due to assumptions that evaluators must make within the analysis.

Illinois is in a position to begin to discuss market analyses and how specific research may be able to interpret changes that have occurred (or may occur in the future) because of the program interventions over the past eight years. Market analyses can be backward looking through historical tracing, but it is best used when the logic of an

intervention is described, and specific market metrics are tracked over time.

6.6 Structured Expert Judgment Approaches

Closely tied to market analysis, this approach is a way for evaluators to gather credible evidence of changes that arise due to the intervention of a program. When deployed, it is often used as a cost-effective approach to estimate market effects or reach agreement on an NTG value when several different types of evidence are available. The key premise of this approach is the use of a select group of known experts that all stakeholders agree can provide unbiased information as well as having sufficient knowledge to judge what may have occurred absent a program intervention.

A Delphi Panel is an example of this approach where data are collected from two or more rounds of data collection (which can occur via e-mail, Internet, or in person). A round is when experts make their thoughts known about a specific subject; the evaluation team synthesizes the data and provides this collated data back to the group to discuss again. Allowing the full experts to see how their peers think about a topic helps to move the group towards consensus.

References

- Mosenthal, et al., 2000
- Powell, 2002

6.7 Program Theory-Driven Approach

This approach is not included in the Violette and Rathbun (2017) document as a high-level method, but it is discussed by the authors under the historical tracing method. The Illinois evaluators believe that it deserves at least a short discussion within this framework.

A program theory is the written narrative about why the activities of a program are expected to bring about change. Typically associated with this approach is the direct graphical explication of the linkages between activities, outputs, and outcomes through an impact logic model.[114]

A theory-driven evaluation denotes "[Any evaluation strategy or approach that explicitly integrates and uses stakeholder, social science, some combination of, or other types of theories in conceptualizing, designing, conducting, interpreting, and applying an evaluation." (Coryn 2011) Within this approach, the ultimate conclusions regarding the efficacy of a program are based on the preponderance of the evidence and not on the results of any single analysis. Coryn and colleagues systematically examined 45 cases of theory-driven evaluations published over a 20-year period to ascertain how closely theory-driven evaluation practices comport with the key tenants of theory-driven evaluation as described and prescribed by prominent theoretical writers. One output from this analysis was the identification of the core principles and sub-principles of theory-driven evaluation. If interested, please review the reference under Coryn 2011.

As an approach, it is best used for complex programs and/or causal mechanisms that extend far into the future. Evaluators collect evidence that supports or rejects hypotheses that are explicit in the logic model. The case for program attribution is strengthened based on the extent to which an evaluation shows that the expected changes occur. Additionally, the evaluation team may be able to collect data that will answer questions about the longer-term outcomes of a program. This type of data collection may be very similar to market tracking activities described briefly above under Market Analyses.

This approach does not specifically estimate a NTG value, but Program Administrators can choose to keep, drop, or change a program based on intermediary data. Regulators must be convinced that the logic of a program is sound and that the intermediary outcomes are causally linked to expected savings.

[114] Evaluators may use logic models to show program processes as well, but this is a program flow chart, not an impact model.

References

- Weiss, 1997
- Chen, 2000
- Coryn, 2011

6.8 Case Studies Design

Case studies are used extensively in social sciences as well as many other disciplines or practice-oriented areas, such as political science, economics, education, and public policy. Case studies help to understand the how and why of a situation and typically retain a holistic aspect of real-life events. As such, they may be a useful approach to determine attribution. As with program theory design, though, the data collected and analyzed within a case study approach will not typically yield a specific NTG value, but can provide credible evidence and insight that supports or refutes the changes brought about by program intervention.

To be used to assess attribution, evaluators must carefully design case studies to assure they account for the threats to causality (i.e., internal validity) that arise in any design. While not typically thought of in this manner, case study design can address multiple types of validity such as construct, internal, and external validity as well as assuring reliability. When establishing construct validity and reliability, evaluators must use multiple sources of evidence, create and maintain a study database, and maintain a "chain of evidence" within the analysis. Internal validity is shown through analytic tactics such as pattern matching, explanation building, addressing rival explanations, or using logic models. External validity centers on the ability to generalize the analytical findings to other similar situations. External validity may be shown through the replication of findings.

References

- Yin, 2003
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7 Appendix B: References

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Attachment B: Effective Useful Life for Custom Measure Guidelines

The following guidelines should be used to determine the EUL values for custom measures and programs:

- The EUL values in TRM Section 3 and Section 4 are deemed. Attachment B **Error! Not a valid bookmark self-reference.** and Table 1-4 are a result of research into EUL values for custom measures and are also considered to be deemed.
- Identify the custom measure and consider if there are similar measures with EUL values already in TRM Section 3, Section 4, Table 1-3, or Table 1-4.
- Use the EUL for the similar measure or follow the guidance of Table 1-3 or Table 1-4 for Custom Other categories.

The evaluator will not change deemed values presented here for applicable custom measures and projects within the applicable program year of this TRM. The deemed values will apply to the verified lifetime savings and CPAS. As a result, the implementation team should be consistent and comprehensive in its documentation of the identified EUL if seeking a change for future years. Guidance for EUL research is offered following Table 1-4.

Table 1-3. Non-Residential Custom Measure End-Use Categories, Subcategories and Effective Useful Life Values

Program/End-Use Category	End-Use Subcategory	Sample Mapped Measures	EUL (years)	Notes
Combined Heat and Power	Combined Heat and Power	CHP	Capped at 25	Project specific
Compressed Air	Custom Compressed Air – Equipment	Compressed Air Pressure Reduction	15	Default value Future research may show that EULs for compressed air measures vary significantly between equipment and controls.
		Low-Pressure Blower System (replacing compressed air)		
	Custom Compressed Air – Controls	Compressed Air Flow Controller		
	Compressed Air Leak Repair	Compressed Air Leak Repair	1 - 5	A range of possible lifetime values is provided. Therefore, the implementers of this measure must justify the reason for selecting an appropriate measure life for each project and the decision will be subject to evaluation with the risk of adjustments.[115]
Data Centers	Custom Data Centers - Equipment	Data Center	15	Default values Future research may show that EULs for data center measures vary significantly between equipment and controls.
	Custom Data Centers – Controls		15	
Energy Management System	Energy Management System	Energy Management System	15	Default values

[115] Note during IL TRM v7.0 updates, this assumption was discussed at length with the realization that there is a lack of a strong source for defaulting the lifetime and different applications may vary significantly.

Program/End-Use Category	End-Use Subcategory	Sample Mapped Measures	EUL (years)	Notes
HVAC	Custom HVAC – Equipment	Custom Electric HVAC	13	Default values
		VAV Fume Hood		
	Custom HVAC - Controls	Chilled Water Reset	15	
		Fume Hood Occupancy Controls		
		Electric HVAC Controls		
		Low-Flow High Performance Hood -		
		Reduce/Optimize Air Change per Hour (ACH) Rate - Chiller		
		Sash Stops		
Lighting	New Construction/ Custom Lighting	Ceramic MH Lamp	15	Section 4.5.8 of the TRM covers 'Miscellaneous Commercial/Industrial Lighting'. It applies to "energy efficient lighting upgrades that are not captured in other measures within the TRM". The measure applies to retrofits and appears to be applicable to any non-prescriptive lighting measures, which would imply a 15-year measure life for custom lighting measures. It does not cover new construction or controls, thus the recommendation to include these subcategories.
		New Construction Lighting		
	Custom Lighting - Controls	Advanced Lighting Control Systems	10	
Non-Res New Construction	Non-Res New Construction	New Construction – Electric Measures	17.4	Based on research of measure level breakdown of typical projects in a program year.
		New Construction – Gas Measures	20.6	
Commercial Behavioral and Operations and Maintenance Programs	Commercial Behavioral and Operations and Maintenance Measures[116]	Remote HVAC or Lighting Control Changes	6	Based on Delphi panel analysis with consideration of ongoing engagement opportunities.
		Manual HVAC or Lighting Control Changes	2	
		Unknown (manual or remote)	4	

[116] These behavioral and O&M measures differ from other measure types in that a person must perform an action and this action must be checked periodically to ensure compliance. The savings of these measures depend on ongoing human interventions that may or may not continue to occur over time.

Program/End-Use Category	End-Use Subcategory	Sample Mapped Measures	EUL (years)	Notes
Refrigeration	Custom Refrigeration	Efficient Refrigeration Condenser	15	Default value Research may show that EULs for refrigeration measures vary significantly between equipment and controls. If that is not the case, the recommended end-use subcategory will continue working well. If that is the case, at that time the end-use subcategories should be updated to the following: Custom Refrigeration – Equipment Custom Refrigeration – Controls
		Floating Head Pressure Controls		
		Refrigerated Cases		
		Refrigeration Compressor		
		Refrigeration Controls		
Commissioning	Retro commissioning	RCx Measures	8.6	Research may show that EULs for RCx measures vary significantly between RCx categories or RCx delivery methods. If that is not the case, the recommended program level value will continue working well.

	Virtual Commissioning	Remote and Onsite Control Adjustments	7.3	Based on assuming that 70% of program activity is implemented via the building automation system and 30% are by other means:
				• RCx EUL of 8.6 years (weighted at 70% reflecting the BAS implemented measures)
				• Non-BAS implemented measures use a proxy averaging the following values to 4.3 years (weighted at 30%):
				  ○ SEM EUL of 5 years
				  ○ Remote changes of 6 years
				  ○ Manual changes of 2 years
				This weighted average calculates to an EUL of 7.3 years.

Strategic Energy Management	Strategic Energy Management	SEM	7	Only applicable to behavior or operational measures.

Program/End-Use Category	End-Use Subcategory	Sample Mapped Measures	EUL (years)	Notes
Business Energy Analyzer	Business Energy Analyzer	BEA	7.8	Based on Guidehouse survey on ComEd BEA users between December 15, 2022 and January 12, 2023 [117]
Custom	Custom – Gas	Process Furnace Replacement Process Dryer Process Heaters	Custom	Confirmed case-by-case, or use 25 years where available information is not definitive
		Grain Dryer	20	
		Dock Door Seals	7.5	
		Industrial Laundry Equipment	14 (barrier washer) 14 (washer extractor) 13 (pass-through tumble dryer) 13 (tumble dryer) 15 (cabinet dryer)	
		Cremators	18	
		Steam Generators	20	
		Boiler Blowdown Controls	25	
		Reverse Osmosis (RO) System	15	
		Barrel Wraps for Injection Molders and Extruders	Custom	This category is intended to capture unique, one-off projects/measures that do not fall under the other recommended end-use categories. Each project/measure should have a custom EUL. To achieve this, the implementer will provide an ex ante EUL for the project/measure and the evaluator will assess it for reasonableness and revise as necessary. As a last resort where there is no basis for a custom EUL a default of 13 years is provided and is deemed appropriate for electric measures, and a default of 17.4 years is provided and is deemed appropriate
		Blowers		
		Building Envelope		
		Controls		
		Cooling Tower/Heat Exchanger		
		Filter		

[117] Respondents were included in the sample if they logged onto the BEA portal at least once (not including their initial enrollment) in 2021 and 2022. This led to a final sample of 1,881 unique user accounts for the survey, with 151 completing the survey. Guidehouse reviewed the responses and estimated an EUL of 7.8 years for energy efficiency activity completed in 2021 and 2022, within the timeframe of using the BEA tool, outside of activity within existing ComEd programs. This weighted EUL of 7.8 years is based on the effective useful life of the measures implemented outside of other programs when the users also indicated influence in completing these measures from the BEA tool.

Program/End-Use Category	End-Use Subcategory	Sample Mapped Measures	EUL (years)	Notes
		Injection Molding Machine		for natural gas measures.
		Low Pressure Drop High Efficiency (Non-HEPA) Air Filters		
		Piping/Duct Modification		
		Pump/Fan Replacement		
		Vacuum System		

Table 1-4. Residential Custom Measure End-Use Categories, Subcategories and Effective Useful Life Values

Program/End-Use Category	End-Use Subcategory	Sample Mapped Measures	EUL (years)	Notes
HVAC	Thermostat Optimization	Thermostat Optimization	2	For up to two year's application of the optimization to the same customers. A third or more year applications would have a one year measure life until evidence of persistence is available.[118]
Res New Construction	Res New Construction	New Construction Electric Measures	18	
	Affordable Housing New Construction	Affordable Housing New Construction	-	Varies by project based on implemented measures

Guidance for EUL Research

The complexities of the various approaches for custom-like programs require a program-by-program perspective. The following process should be used when researching a new EUL value for custom measures. Similar to first year energy savings calculations, appropriate documentation should be provided to support the EUL value which may include references, approach, and reasons.

1. Identify the non-TRM measure and consider if there are similar measures with high quality EUL values already in the TRM. This initial step provides a benchmark for the EUL value.

[118] This limit to the two year measure life is due to the fact that the optimization builds upon itself; that is, if a thermostat is optimized during a cooling season the setpoints will remain at the optimized levels when that thermostat switches back into cooling mode in the following year, and further optimization applied in that year will change setpoints even further compared to the pre-optimization levels. As the setpoints get more and more extreme from repeated optimizations it is likely that the rate of manual adjustments to the setpoints goes up (thus overriding the optimized setpoints) which shortens the measure life.

2. Review the sources used to determine the EUL values for those similar measures. See **Error! Reference source not found.** and Table 1-4.
3. If the sources do not have EUL documentation for the non-TRM measure, research additional sources. The level of research effort should be commensurate with the savings potential for the non-TRM measure.
4. Submit the recommended EUL value and documentation for the non-TRM measure to the TRM Technical Advisory Committee for review through the annual TRM update process.

Source quality will be determined using hierarchy to describe the strength of the identified source as shown in **Error! Reference source not found.** below. In cases where a range of values are provided by a source versus an absolute EUL, the median value should be used. In other cases, if more than one high quality source is available with conflicting values, the one with primary research data with strong confidence in the findings should prevail, otherwise, the average EUL should be calculated.

	Source Name	Description
TYPE 1: Sources identified as highest strength: Primary research conducted or vetted by third-party entities such as trade organizations, national labs, or government organizations		
1.1	U.S. Department of Energy Federal Energy Conservation Standards	The U.S. Department of Energy (DOE) produces Technical Support Documents (TSD) detailing the analysis behind the federal conservation standards established for each product it regulates. Each TSD contains a chapter, often titled "Life Cycle Cost and Payback Period Analysis", that offers DOE's EUL estimate for the product and explains how this value was derived. Although the method depends on the data available for a given product, DOE's analysis generally relies on some combination of primary research, secondary research, modeling, and/or input from industry experts. The TSDs are linked from DOE's rulemaking page for each product, https://energy.gov/eere/buildings/standards-and-test-procedures. The TSD measure life values are based on shipment data, secondary literature research and primary research which include discussions with industry experts. Navigant considers as high quality because of the stakeholder review process and due diligence required to create these documents. Only the best available sources are used to support the EUL values used in life-cycle cost analysis for DOE federal equipment standards.
1.2	LED lighting reports prepared by Navigant	Navigant has performed extensive market research on the state of LED lighting for the US. DOE Solid State Lighting Program most recently published in 2016. It includes typical lifetime operating hours for each lamp type by sector. https://energy.gov/sites/prod/files/2016/09/f33/energysavingsforecast16_2.pdf
1.3	Appliance Magazine	Appliance Magazine publishes an annual report on the market value, life expectancy, and expected unit replacements for a range of consumer appliances. The appliances listed in this report change from year to year, so older versions of the report may be referenced for products no longer listed. As noted in the report, these EUL estimates represent the expert judgment of magazine staff based on input obtained from many sources. Portrait of the U.S. Appliance Industry (2001-2009). U.S. Appliance Industry: Market Share, Life Expectancy and & Replacement Market, and Saturation Levels (2010). U.S. Appliance Industry: Market Value, Life Expectancy and Replacement Picture (2011-2014).

	Source Name	Description
1.4	C&I Measure Life and Persistence Project	In 2011, Northeast Energy Efficiency Partnership sponsored this study of EUL of commercial and industrial lighting. The primary objective of this study was to conduct primary and secondary research and analysis for estimates of measure lifetimes that included on-site verification of CFL bulbs and fixtures, LED exit signs, HID fixtures, and T8 fixtures. Installations occurred from 1999-2009. http://www.neep.org/sites/default/files/resources/NEEP_CI_Persistence_Report-FINAL.pdf
TYPE 2: Sources identified as medium-high strength: Meta-analyses conducted by third-party organizations, that show some level of evaluating the studies that comprise the dataset		
2.1	California DEER	The most recent and comprehensive DEER documentation of EUL sources was from 2008 and 2014. The 2008 version identifies all the sources reviewed and justification for selected measure life. The 2014 measure list identifies the source used for the measure life. Many of the original references are from 2005, http://deeresources.com/files/deer2005/downloads/DEER2005UpdateFinalReport_ItronVersion.pdf, p. 11-1.
2.2	Regional Technical Forum (RTF) reference workbook	Ongoing revisions as measures undergo review. Similar to the 2008 DEER, the RTF identifies all the sources reviewed and justification for selected measure life.
2.3	GDS Reports	GDS Measure Life Report Residential and Commercial/Industrial Lighting and HVAC Measures – 2007. This study used various data sources such as DEER, state TRMs, and evaluation studies with a working group to review and decide on each value.
2.4	Focus on Energy Report	Focus on Energy Evaluation Business Programs: Measure Life Study Final Report: August 25, 2009 – this is a critical review of studies, workpapers and technical guides including a review of the underlying sources or supporting research.
2.5	ASHRAE	Original source is from Akalin, M.T. 1978. Equipment life and maintenance cost survey (RP-186). ASHRAE Transactions 84(2):94-106; Recent work is ASHRAE system life database (research project 1237-TRP) - which is a crowd-sourced approach to collecting actual system data. https://xp20.ashrae.org/publicdatabase/system_service_life.asp?selected_system_type=7
TYPE 3: Sources identified as medium strength: Compilations conducted by third-party organizations. Original sources should be cited, and locatable where applicable		
3.1	State TRMs	Many state TRMs reference each other and other sources of varying strength. Due diligence on reference documentation is not always present for the measure life. Many TRMs are reviewed via a stakeholder process.
3.2	ENERGY STAR calculators prepared by U.S. EPA and DOE (depending on the references used)	EPA's Energy Star offers calculators to help consumers and businesses estimate the energy and cost savings that could be realized by choosing to buy Energy Star certified products. Within these calculators, Energy Star offers a typical EUL and cites the source. Energy Star generally cites a single high-quality source (e.g., DOE, Appliance Magazine) for each EUL value and offers no analysis or discussion of the selected value. Energy Star's calculators can be accessed at www.energystar.gov. For example, their appliance calculator is available at www.energystar.gov/sites/default/files/asset/document/appliance_calculator.xlsx.

	Source Name	Description
TYPE 4: Sources identified as medium-low strength:		
Primary research conducted by interested parties such as manufacturers, distributors, retailers or installers		
4.1	Interview with interested parties (with no statistical rigor or analysis)	Manufacturer, distributor, installer, etc. have a vested interest and may overstate the benefit.
TYPE 5: Sources identified as low strength:		
Source where the basis of measure life is anecdotal, based on design specs, warranty period, etc.		
5.1	Industry blogs, Implementer or evaluator experience	Typically based on professional judgment and not rooted in any data.

Attachment C: Framework for Counting Market Transformation Savings in Illinois

1 Market Transformation Context

This Attachment was developed in 2019 within the Illinois Energy Efficiency Stakeholder Advisory Group (SAG) Market Transformation Savings Working Group, to describe a high-level framework for estimating savings from Market Transformation (MT) initiatives. MT protocols will need to be developed for individual MT initiatives as they are launched and may be documented in the IL-TRM or by posting agreed-upon protocols to the SAG website. The development and future inclusion of MT initiative-specific protocols in the IL-TRM will (1) help to ensure consistent evaluation approaches are used for similar MT initiatives that are offered throughout the state and (2) provide utilities with greater certainty as to how specific MT initiatives will be evaluated.

This Attachment is divided into two sections. The first gives the context of Market Transformation and describes some of its unique features that influence the estimation of savings. The second describes high-level methodologies for determining savings from MT initiatives.

1.1 Market Transformation Definition

This attachment uses the following definition for Market Transformation which is also used by the Midwest Market Transformation Collaborative and is very similar to definitions used by other organizations:

> *Market Transformation is the strategic process of intervening in a market to create lasting change that results in the accelerated adoption of energy efficient products, services and practices.*

1.2 Market Transformation and Resource Acquisition

An MT initiative (MTI) can include intervention activities similar to those seen in standard Resource Acquisition[119] (RA) programs, such as incentives that reduce first costs, training for trade allies, and marketing and case study materials[120]. However, MT initiatives additionally include activities that specifically seek to affect the long-term structure of a market in ways that are not easily undone; for example, working directly with manufacturers on product specifications and features or engaging with ENERGY STAR and DOE on test procedures and rulemakings.

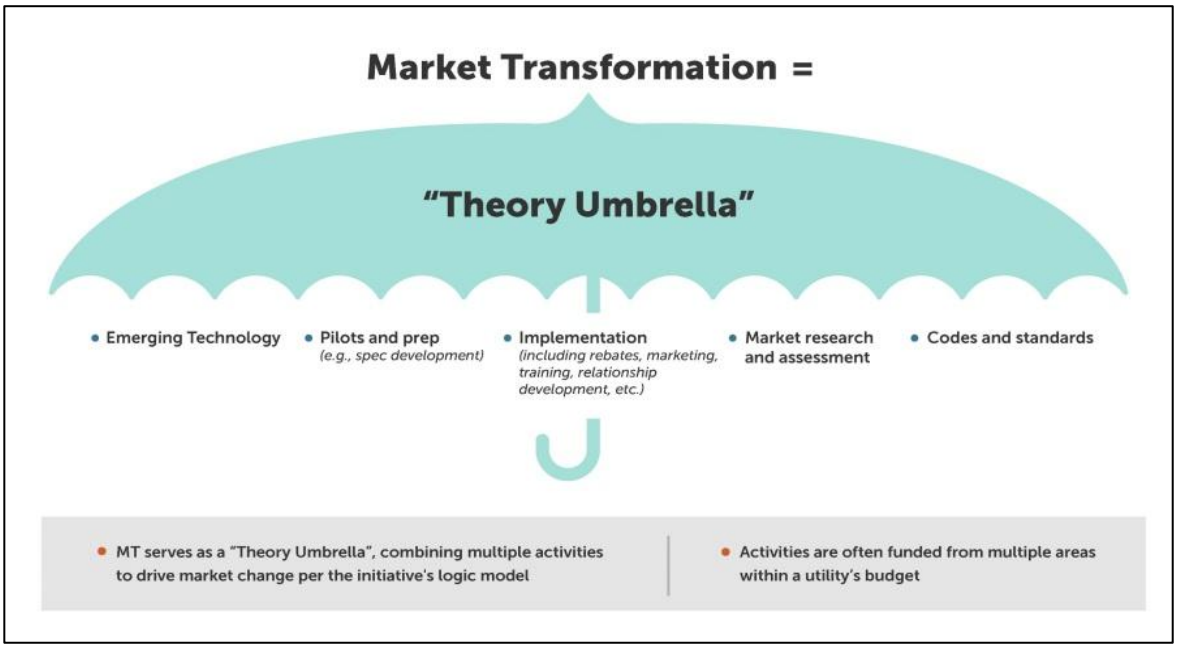
Figure 1 depicts the types of activities that might be included in an MT initiative. There are a number of other potential actions, such as discussions with stakeholders and setting up an evaluation plan, but that is not the subject of the figure. An example of an MTI with multiple interventions is the Heat Pump Water Heater (HPWH) Initiative[121] in the Northwest. Interventions include: technical support for development of ENERGY STAR specifications; laboratory testing of new HPWH to prove performance claims; upstream manufacturer engagement including incentives to encourage aggressive market pricing; customer facing retail rebates; providing technical information to the US DOE standards process in support of HPWHs being cost-effective for large tank sizes; and working with local jurisdictions to develop code provisions that provide “extra-credit” for HPWH in new construction.

[119] Resource acquisition is defined in the glossary but is used loosely in this Attachment to refer to more traditional utility driven energy efficiency programs that typically work at the individual consumer level, rather than the market level.

[120] For a review of best practices for designing and implementing market transformation initiatives, see Keating (2014).

[121] A description of this initiative can be found in recent reports from NEEA: https://neea.org/resources/northwest-heat-pump-water-heater-initiative-market-progress-evaluation-report-3 or https://neea.org/resources/northwest-heat-pump-water-heater-initiative-market-progress-evaluation-report-4

Figure 1. Examples of Potential MT Activities Under a "Theory Umbrella"



Each MT initiative must establish its own unique overarching MT theory with an "umbrella hypothesis" under which a variety of strategic activities, including those that may occur through other parts of the utility or even other organizations, can be combined to affect the desired market change. The goal of this set of activities is to reduce market barriers and leverage opportunities to create lasting market change. The entire set of activities is incorporated in the overall MT initiative hypothesis and logic model, even if some of those activities might be funded or implemented from different budgets or organizations.

RA activities can also result in market changes,[122] and RA savings approaches may also include documenting market effects for those programs independently from an MT initiative. However, RA savings are normally measured through participation in a program rather than whole market effects. There are further differences between RA and MT that influence the methods for calculating savings; key differences are shown in Table 1 below. Accounting for overlap in MT and RA program savings is discussed in a later section of this attachment.

Although an MT initiative might include activities similar to those employed in an RA program under the MT Theory Umbrella, the significant differences between MT and RA program types provide important context for planning, implementation and evaluation. As summarized in Table 1 below, these differences include: the scale of the intervention, the target market, the ultimate goal, the fundamental program approach, the time frame over which cost effectiveness must be evaluated, the amount of program administrator (PA) control, and the set of activities that are tracked, measured and evaluated.

Table 1. Comparing Resource Acquisition Programs and Market Transformation Initiatives[123]

	Resource Acquisition	Market Transformation
Scale	Program Administrator's service territory	Entire defined market

[122] For example, NMR Group, Inc. (2014) reviews methods for the evaluation of market effects primarily (though not exclusively) for RA programs.

[123] Source: adapted from Prahl and Keating, 2014; derived in turn from Keating, et al. and Sebold et al., 2001.

	Resource Acquisition	Market Transformation
Target	Whoever can be induced to participate	All consumers of a particular product or service
Goal	Near-term savings	Structural changes in the market leading to long term savings
Approach	Save energy through customer participation	Save energy through mobilizing the market
Scope of Effort	Results from a single program	May result from effects of multiple programs or interventions
Level of Program Administrator Control	PAs can control the pace, scale, geographic location, and can usually identify participants	Markets are very dynamic, and the PAs are only one set of actors. If, how, where, and when the impacts occur are usually beyond the direct control of the program administrators
Evaluation and Measurement	Energy use and savings, participants, free-ridership, and sometimes spillover	Interim and long-term indicators of market progress and structural changes, attribution to the program, and cumulative energy impacts
Timeframe for planning, savings measurement, and cost-effectiveness	Typically based on annual or multi-year planning and reporting cycle savings	Typically planned and implemented over a 10-20 year timeframe

Historically, the differences between the two approaches have resulted in challenges for MT initiatives to thrive in states where policy frameworks are strongly focused on resource acquisition.[124] The much longer time frame for MT initiatives and the lesser degree of program administrator control can be difficult to reconcile with policy rules that are focused largely on the precise quantification of annual savings.[125] Evaluation of savings can be fraught in jurisdictions where financial incentives or penalties are determined based on evaluated results, and can be particularly challenging for MT initiatives, which require market analyses that introduce additional uncertainty. Operating MT initiatives under these conditions requires upfront negotiation on evaluation processes to set clear expectations on measurement approaches.

1.3 Market Transformation and Attribution

The concept of attribution - or the attempt to assess the extent to which observed outcomes are caused by the program(s) of interest as opposed to events that would have happened regardless of any intervention - is fundamental to the evaluation of energy efficiency programs[126]. Without attribution, it is difficult to understand the success or failure of a program – or to improve (or to justify continued public funding for) a program whose success or failure is not understood.

[124] Note, for example that a regulatory framework supporting the MT initiative is cited as one of three "must-have components" for MT to thrive in a recent Illinois Summit on MT. ComEd Energy Efficiency Program "Energy Efficiency Market Transformation Summit Report", Navigant Consulting, February 2019.

[125] For a comprehensive discussion of the challenges of reconciling MT and RA within an RA-dominant policy framework, see Prahl and Keating (2014).

[126] See additional discussion on attribution in the Illinois Technical Reference Manual, Volume 4: Cross-Cutting Measures and Attachments, Section 2.

While attribution is relevant to both market transformation initiatives and resource acquisition programs, there are important differences to approaching attribution between the two types of programs. For resource acquisition programs, it has long been the norm in much of the US to treat attribution as a continuous variable that can be quantitatively scored (often in the form of a net-to-gross ratio that adjusts for free ridership and spillover) and applied to savings claims at frequent intervals with relative granularity. RA programs can ask questions directly of actual participants to ascertain attribution. However, MT initiatives typically do not lend themselves to this type of quantitative approach. More often than not, there is too much elapsed time over the lifecycle of a MTI and too many other market forces at work for a strictly quantitative attribution score to be meaningful on an annual basis. Instead, market transformation also requires qualitative judgements as to whether the initiative was generally successful in causing the intended market changes over extended periods of time.[127]

Successful incorporation of MT initiatives into a program portfolio that is dominated by resource acquisition programs generally requires that stakeholders accept these methodological differences between the two program approaches.

It is important to note this does not imply that quantitative estimates of savings should not be made for MT initiatives; fundamentally, all Illinois efficiency programs will need to quantitatively estimate saving, as long adopted policy requires counting the savings toward goals and estimating program cost-effectiveness. It simply means that savings for MT initiatives will be significantly less certain by nature than those for pure RA programs. Defensible methods for dealing with the limits to quantifying attribution for MT initiatives are discussed at length later in this attachment.

1.4 What Makes an MT Initiative Recognizable?

Because of the difference in evaluation approaches between an MT initiative and an RA program, it is important to first confirm whether an initiative falls into the MT category or the RA category before developing savings estimates.

To qualify as an MT initiative, there needs to be a clearly delineated target market,[128] as well as a documented theory of change in this market (or MT hypothesis) that is embedded in a defensible logic model.[129] This logic model provides the linkages between program activities and the anticipated lasting market change that accelerates the adoption of energy efficiency. The logic model is documented in the MT Business Plan[130] or similar document and is developed in advance of executing market interventions. MT initiatives are not created by looking backward and claiming credit for market changes from previous programs. Nor are all "upstream" programs MT by default. For example, an upstream program may not be designed to affect lasting change to the market; instead, the market would revert to its prior condition once the program incentive is removed.

2 Market Transformation Energy Savings and Evaluation

Energy savings from MT initiatives are the end result of increased and accelerated market adoption over and above a hypothesized future that would have happened without the MT initiative. Attributing savings to MT initiatives requires the assumption that some portion of the observed changes in market adoption are the direct result of a targeted, strategic market intervention that was designed and implemented to achieve that result. The MT framework requires both validation of the MT initiative logic and an evaluation of program implementation and progress towards specific market progress indicators (MPIs) before savings can be estimated.

[127] In this regard, the evaluation of market transformation initiatives closely resembles most other fields of social program evaluation, and it is actually the evaluation of resource acquisition programs that is unusual. For example, evaluations of early intervention education programs such as Head Start routinely concern themselves with the issue of attribution, but they generally do not seek to construct a quantitative attribution score for a specific program, region, and year.

[128] As shown in the glossary, this paper uses the following common definition of a market: an actual or nominal place where forces of demand and supply operate, and where buyers and sellers interact (directly or through intermediaries) to trade goods, services, or contracts or instruments, for money or barter.

[129] In some regions of the country, this is called a "program theory."

[130] The content of an MT Business Plan is listed in Appendix A.

The following section discusses several core concepts specific to the evaluation of MT initiatives.[131]

2.1 Theory-based Evaluation

Methodologically, MT evaluation tends to rely heavily on Theory-Based Evaluation (TBE).[132] TBE starts with a theory of change that explains how an intervention is expected to produce results. Because the subject of evaluation is an entire defined market rather than a program and its readily identifiable participants, MT evaluations tend to require numerous pieces of evidence that 1) change is occurring; and 2) the program is influential in causing that change.[133] This theory of change is embodied in the logic model that is the core of an MT initiative. A logic model provides the relationships and connections between program activities and anticipated changes in the market over the short, medium, and long term.

Evidence of a program's influence on its target market is gathered through an assessment of Market Progress Indicators designed to judge whether the program is achieving its intended outcomes. MPIs are market-based milestones associated with progress hypothesized in the logic model and confirmed as appropriate real-world indicators of progress. Examples of MPIs include market share of an efficient product option, changes in product availability, or evidence of promotional activity by affiliated or unaffiliated market actors. It is important to have a mix of leading indicators which provide timely feedback on the near-term progress of the program and the market (such as early shifts in market share), as well as lagging indicators which can be used to help assess longer-term outcomes (such as new entrants in the supply chain for the energy-efficient product). Regular assessment of MPI progress plays a central role in building a qualitative case for attribution over time via theory-based evaluation.

Assessment of MPIs will require incorporation of multiple judgements of progress based on a preponderance of evidence approach. It is important to note that "preponderance of evidence" does not require that all indicators show overwhelming evidence of programmatic influence, but rather that multiple indicators show consistent direction. This information can be qualitative (based on in-depth interviews or observational data collection) or quantitative (based on market share or production data). Evaluation plans for MT initiatives should propose evidence-gathering approaches to meet the "Preponderance of Evidence" standard.

Potential research needs and other evidence-gathering activities should be discussed and agreed upon by Program Administrators, Stakeholders, and Evaluators and documented in the MTI Evaluation Plan.

2.1.1 Market Progress Evaluation Reports

To evaluate a market transformation initiative effectively, it is essential to conduct regular research to understand market changes and implications for program adaptation. The Northwest Energy Efficiency Alliance (NEEA) refers to these regular evaluations as Market Progress Evaluation Reports (MPERs) and typically executes one per initiative yearly.[134] MPERs include components of impact and process evaluation, market research, and planning and market

[131] For a comprehensive review of best practices for the evaluation of market transformation initiatives, see NMR Group, Inc. (2013). For a more condensed discussion, see Prahl and Keating (2014). Metrics, Tracking, and Performance Assessment Working Group (2018) provides a regional perspective by discussing New York state's approach to the evaluation of its market transformation efforts. Also see Navigant (2018) for a discussion of bet practices in MT design. Finally, it is important to keep in mind that both market transformation initiatives and resource acquisition programs can cause market effects; NMR Group, Inc. (2014) reviews methods for the evaluation of market effects primarily (though not exclusively) for RA programs.

[132] See Chen (1990) or Weiss (1998). TBE is also often useful for resource acquisition programs but tends to be particularly central for the evaluation of market transformation initiatives. For a discussion of the application of TBE to energy efficiency programs in general, see Section 6.9 in Attachment A of the cross-cutting protocols.

[133] Examples might include: changes in efficient market share or product positioning; changes in leading indicators such as distributor stocking practices, consumer awareness, or new vendors entering into the market; self-reports of program effects from market actors; evidence of change in the prevalence of training/credentials, sales or installation data,—basically, evidence that the efficient option is being "normalized".

[134] In other regions, such recurring efforts may go by other names. However, the general concept of regular, recurring efforts to understand the progress of a market transformation initiative is widely accepted in the energy efficiency industry. This paper uses the term MPER for envisioned MT evaluations in Illinois. For examples of completed MPERs, see https://neea.org/resources-reports

assessments and are designed to document progress and market change over the initiative's life cycle. It usually takes multiple MPERs over time to tell the complete story of an initiative. The MPER scope is centered around 1) an assessment of the strength of remaining barriers and 2) measurement of Market Progress Indicators.[135]

2.2 Energy Savings Framework

Along with a program logic model, it is recommended that an Energy Savings Framework (ESF) be developed for every MT initiative. The ESF is the quantitative service-territory-level characterization of the market history and projections of the energy-efficient product or service, including 1) the expected energy and demand impact of the MT initiative and 2) the SAG-reviewed natural market baseline with defined utility attribution methodology. The ESF is a component of the MT Business Plan and reflects the impact of the MT initiative and program logic on the utility's portfolio. ESFs need to be developed for each MT initiative that doesn't already have one. For existing MTI's, the ESF should be evaluated each year to assess the need for an update, as described in section 2.3.

For each new MTI, sponsoring utilities and their implementation contractors, with input from evaluators, should submit an initial Energy Savings Framework to other Program Administrators, Commission Staff, and the SAG by September 1 of the ~~current~~ year prior to implementation. The ESF shall follow a consistent format that includes the requisite information. In early September, the utilities will present the rationale supporting the specific details for the ESF to the evaluator and other stakeholders and provide the SAG, in their advisory role, with an opportunity to review, question, and suggest modifications to the initial ESF. This process also applies to revisions to existing ESFs for in-process MTIs.

SAG participants shall make best efforts to reach consensus regarding new ESFs and revisions to existing ESFs. If the SAG reaches consensus regarding an appropriate ESF, or revision to an existing ESF, by October 1, then the SAG agreed-upon ESF shall be applied to the upcoming Program Year, even if it differs from the initial recommended ESF. If the SAG cannot reach consensus on an ESF, or revision to an existing ESF, prior to October 1, then the Evaluators' final recommended ESF shall be applied, which may be different from the initial proposed ESF[136]. In developing the final ESF, the Evaluator shall review SAG feedback, consider all comments and discussions, with the intent of making the best revisions to the ESF for the upcoming Program Year.

A "Comparison Exhibit of Non-Consensus TRM Update Issues" will be developed by the Evaluator with input from the parties and document the various parties' positions concerning a non-consensus. This Exhibit will be included with the Staff Report submitted to the Commission.

Gas utility annual energy savings goals will be adjusted for the entire Plan period, prior to the start of the first Plan Year of an approved Plan so that they are aligned with all current IL-TRM values, and the most recent SAG-agreed-upon (or Evaluator-recommended) MTI ESF.

2.2.1 Data Sources

In practice, planning a market transformation initiative requires developing a process for obtaining sufficient market data to enable the establishment of a reasonable baseline, as well as for on-going estimation of savings from the MT initiative. The ESF should identify these sources of information and how the data will be used. Below are a few of the approaches to meet this requirement:

[135] Market Progress Indicator is the term used in the Pacific Northwest. A closely related term that is often used in other regions of the country is "market indicator," although there are shades of differences in the meanings of the terms.

[136] SAG consensus is the desired outcome, but if consensus cannot be reached, the SAG will follow the same process outlined in sections 3.10 Consensus Decision-Making and 7.2 Net-to-Gross Policy, in the Illinois Energy Efficiency Policy Manual. https://www.ilsag.info/wp-content/uploads/IL_EE_Policy_Manual_Version_2.1_Final_12-7-2021-1.pdf

1. **Full category sales[137] or market practice data.**[138] Market analyses are most comprehensive when they include full category data from key actors in the supply chain, such as retailers or distributors. They can reveal unexpected trends in product categories that inform both trendlines and program interventions. These data make it possible to understand the market share of the efficient product relative to its competitive set.
2. **Primary data collection and extrapolation.** Because full category data is rarely available, primary research within the target market is frequently used to develop an understanding of the current level of market activity, including the portion consistent with the efficiency threshold sought by the program. Surveys with robust samples of trade allies, design professionals, and distributors can provide data on the square footage, sales in dollar value, project volume or denominator of interest. In cases where downstream rebate programs are operating in tandem with MT engagement, rebate processing data can provide a detailed look at a slice of the total market. Similarly, some upstream programs will be able to collect actual primary sales data on market share for some or all of the market.
3. **Secondary market data.** Regardless of the data available to the program, it is also best practice to include a scan for other sources of market data that might be available outside of the energy-efficiency community. Investment briefs, product trend analyses, JD Power or Consumer Reports data, and industry data often gathered by trade associations or similar organizations such as the Association of Home Appliance Manufacturers, NPD Group, Heating Air-conditioning Refrigeration Distributors International, etc. may provide important insights.

2.2.2 Factors in Estimating MT Savings

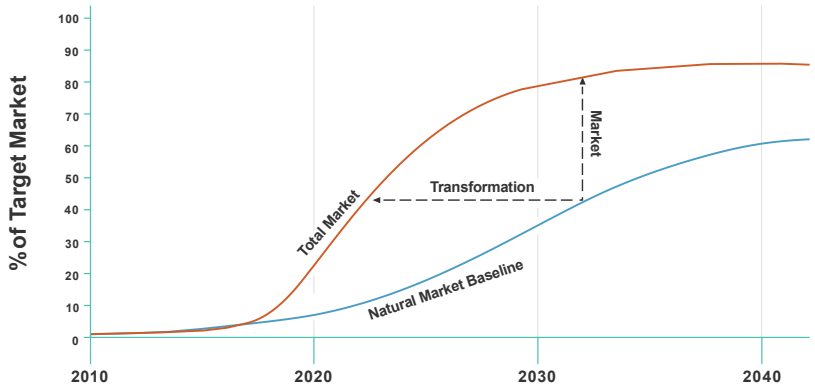
Three key factors must be considered when estimating MT savings. The first is the Total Market Savings that result from the entire market adoption of energy efficiency products or services. The second is the Natural Market Baseline, which is a forward-looking estimate of the market in the absence of any utility-funded energy efficiency activities. Figure 2 illustrates these two factors.[139]

[137] MT initiatives can also operate on buildings (like multi-family ordinances), engage corporations (like Strategic Energy Management), or even drive behavior change (like Building Operator Certification) – assuming they are structured as MT. The goal is still to gather total units as well as efficient units.

[138] Full category sales data includes all sales within a product category such as clothes washers -- both efficient and inefficient units.

[139] Not illustrated in the figure are further adjustments for savings from RA programs operating in the same market or allocations of the market savings to individual utility service territories. These are discussed in subsequent sections.

Figure 2. Framework for MT Savings



The third and final factor in estimating MT savings is the removal of savings specifically tied to RA programs operating in the same market to prevent double counting; this is described in Section 2.4. After all three factors are considered, then MT savings are typically allocated to individual service territories.

2.2.3 Estimating Total Market Units

Each market will have unique characteristics and data sources for tracking units. In many markets, extrapolations or approximations based on best available information will need to suffice. Ideally, the initiative should try to track both the total number of units in the market and the portion of units that meet the efficiency specification in the MT initiative (efficient units). Over time, Market Progress Evaluation Reports will describe shifts in the relationship between the numbers of efficient units and total units; the ratio of efficient units to total units represents the market share of efficient units.

In the case of gas-heated new home construction, for example, Market Progress Evaluation Reports would collect public information on new gas-heated housing starts and track the number of new homes meeting a particular efficiency specification. In mass markets, like appliances and commercial food service equipment, the best market data often resides with key market actors, like large distributors or manufacturers. In these cases, the design of the initiative should include a plan to secure sales data for the whole product category and the efficient units as an inherent part of the initiative's implementation. If not secured at the beginning of an initiative, this data can be difficult or impossible to secure later. As a result, it is optimal to design this data collection into the initiative when starting strategic partnerships with the market actors.

In many cases an initiative is unlikely to have participation from distributors, manufacturers and/or retailers that cover sales in 100% of the market. In this case factors need to be developed to extrapolate the data that is available for a portion of the market to the rest of the market.

2.2.4 Estimating Total Market Savings

Estimating total market savings requires the estimation of MT Units and Unit Energy Savings (UES). MT Units are the result of subtracting Natural Market Baseline Units from Total Market Units. The definition of "units" will depend on the energy-efficient product or service that is the focal point for the MT initiative. Units are defined upfront and typically are measured as: a device; square footage; number of housing units; number of operators; pound of product, etc. The appropriate unit definition will be identified in the MT Business Plan.

Savings are measured in kwh/unit, therms/unit, and kW/unit. Unit Energy Savings are defined as the difference between the unit energy consumption of the baseline product or service and that of the efficient one. This savings delta can be a deemed value already included in the TRM, calculated as part of the planning and baseline work that

informs typical MT programs, or directly tracked or researched. Note that the average savings per unit for a specific market likely will be the weighted average savings per unit for different categories of product (e.g., top-load or front-load clothes washer categories). For the purposes of this document, UES reflect the weighted average of all the categories included in the target market. MT UES is the result of subtracting the Unit Energy Consumption (UEC) of the efficient product/service from the UEC of the baseline product/service, as shown below.

MT Energy Savings = Number of MT Units (Units) x Unit Energy Savings (UES)

Where:

- *Number of MT Units = Number of Total Market Units – Number of Natural Market Baseline Units*
- *Unit Energy Savings = Unit Energy Consumption (UEC) of baseline product/service – UEC of EE product*

Note: Units are adjusted in a subsequent step to account for any overlap between RA and MT.

For MT programs that rely on shifts in practices or sales mixes, an appropriate approach to calculating savings may use the energy consumption embodied in the "standard practice" or "average sales mix," rather than a single widget-based calculation. When data are not available for the consumption of standard practice or average sales, modelling of an applicable energy code or standard can also be used.

Analysts can review and use existing sources of savings-per-unit information (or base- and efficient- consumption), if applicable. These sources could include TRMs; load forecasts; existing energy efficiency programs within the utility; emerging technology/R&D results; negotiated settlements on particular savings values, or other sources. Relevant information and associated data sources should be included in the ESF document.

If existing sources are not available or do not seem sufficiently reliable, the analyst should develop and implement a plan for securing more information on savings per unit. This may include product testing, piloting, or developing an agreed-upon proxy for use in the near term with a plan for developing more robust savings estimates over the longer term.

2.2.5 The Role of Natural Market Baseline and Attribution

The Natural Market Baseline (NMB) is a forecast of the future in which no utility-funded energy-efficiency programmatic intervention exists. Natural Market Baseline is removed from the Total Market Savings to ensure that the savings counted from ratepayer-funded activities do not include savings that would have occurred absent the utility-funded programs. This is the MT version of "attribution" and no further adjustment for free riders is needed.

As discussed earlier, attribution is typically in part established qualitatively for MT initiatives, yet under the policy framework in place in Illinois, a "net" savings figure must be determined. Subtracting the Natural Market Baseline from Total Market Units is the mechanism by which this is accomplished. Once an initial forecast has been made, the focus of evaluation efforts turns to building a case over time as to whether sufficient evidence exists to establish a link between program activities and market effects that are consistent with that forecast. As discussed below, depending on the body of evidence that emerges over time, the initial forecast for both Total Market Units and the Natural Market Baseline may be revised periodically (as described in Section 2.3). In addition, quantitative adjustments may be made to allocate total savings between sponsors or between MT and RA programs as discussed below.

In principle, subtracting the Natural Market Baseline from total market units yields by definition an estimate of total net savings[140]. Market influence and energy savings characterized in the Energy Savings Framework could be adjusted to account for market impacts due to non-Program causes in the following circumstances:

[140] This "net" savings includes savings from both MT and RA programs, so the "net" is further adjusted for RA savings, which is discussed in a section below.

- In the case where a utility joins an on-going Market Transformation initiative after the program is already underway and MPI evaluation shows progress prior to the utility joining, savings may be adjusted.
- A Market Transformation Program may target market actors willing to directly participate in the program. The program may indirectly influence the actions of similar market actors who do not participate in the program. Accounting for this indirect influence may result in partial or delayed market impact and savings.
- In the case where the ultimate goal of a Market Transformation Program is to influence the adoption of a new code or equipment standard, the program influence should be considered in the context of other independent influencers seeking the adoption of the same standard. In this case, an additional adjustment to the impact and savings may be applied to account for the attribution of influence on the standard adoption to others.

2.2.6 Natural Market Baseline Units[141]

2.2.6.1 Theory

The Natural Market Baseline should be modeled during the development of the MT initiative with the best available information, and then adjusted over time if significant new data becomes available during the implementation of the initiative, or because of unexpected market disruptions, such as those associated with substitute products.

Typically, the Natural Market Baseline will reflect at least some naturally occurring adoption of the targeted measure or practice because as Prahl and Keating (2014) note:

> With market transformation, the gross market changes observed over the time horizon of a market transformation initiative are not all linked to the utility or other public policy intervention. Some of it is naturally occurring – even a slow growing product, if it is moving into the market will have an increasing penetration, even without a strategic market transformation intervention. This equates to the non-net portion of resource acquisition. (pp. 45-46)

Forecasting Natural Market Baseline units often assumes that, over time, adoption of energy-efficient technology will follow a normal distribution consistent with Diffusion of Innovation theory. In this theory, market share is small due to a few innovators and early adopters participating in the market in early years, increasing to a majority of adopters during the peak years of market growth and then over time decreasing again to a small number of laggards adopting the product/service. Sometimes MT initiatives are primarily attempting to shift the adoption curve forward in time. Other times, they may be attempting to increase the slope and/or maximum values of the adoption curve

The Natural Market Baseline is probably the most challenging piece of estimating savings from MT because it is a prediction of the future that will never actually exist and therefore cannot be measured. As a result, it is important to involve evaluators and stakeholders in advance to ensure transparency, alignment and understanding of the data and judgement that will ultimately be used to estimate savings. All Market Transformation documents – The Program Plan & Logic Model, the Energy Savings Framework and the MT Program Evaluation Plan should be presented and discussed with Illinois stakeholders as early as possible.

2.2.6.2 Practice

The basic task is to develop a baseline of how the energy-efficient product, service or behavior would have grown in the market independent of utility activity. There are several elements for effectively developing the Natural Market Baseline:

1. **Identify existing data sources** that could inform the Natural Market Baseline and include these in the MT Business Plan. Market or sales data are the best sources, particularly if they are “full category” (or include the full efficiency mix, not just the qualified, efficient units). Other data sources can also be

[141] The term “Naturally Occurring Market Adoption” or NOMAD is synonymous with “Natural Market Baseline Units”.

used, including industry forecasts, market intelligence and trend information, primary data collected as part of market research or market characterization to support the initiative development, hedonic price modeling, or other information about how efficiency is positioned relative to other market drivers. In addition, trade associations, advisors to the target market/industry, investment grade forecasts or organizations related to regulatory oversight (like Lawrence Berkeley National Laboratory) can be good sources of data. Manufacturers or distributors themselves are excellent sources, but they may be unwilling to share proprietary information.

2. **Use available data, quantitative modeling, best judgement, proxy data or other techniques** to develop a Natural Market Baseline. Some projects lend themselves to modeling or model averaging using statistical approaches to estimating baseline sales behavior. These can incorporate different assumptions about how a program affects product sales. In many cases, multiple approaches can be used. For example, an evaluation completed for Consolidated Edison included a sales model, market share model, probit model[142] and a model averaging model, which were used in a single project to test different ways of estimating baseline sales.[143] In some cases, a comparison group (such as different but similar region that is not intervening in this market) may be used as a proxy.

3. **Develop the initial baseline curve** and have the shape of baseline curve and underlying assumptions reviewed by stakeholders. Several key product characteristics should be considered when determining the shape of the Natural Market Baseline curve. These characteristics include the maximum potential market share, the pace of innovation within a given market, the lifecycle or time between purchase decisions, the presence of non-energy benefits, and the incremental cost associated with the efficient product without the MT intervention. It is also important to consider the strength of identified barriers to adoption for a given product. These barriers often emerge from market research or market characterization studies and can point to installation or supply barriers that might otherwise be missed. In some cases, the Natural Market Baseline can be zero for a number of years. This might be the case when an MT initiative catalyzes the entrance into the market of a technology that otherwise would not have emerged for many more years.

4. **Incorporate anticipated changes to codes and standards** to the extent they are known in the baseline**.** The special case of savings from energy codes and standards is discussed further in the Energy Codes and Standards section of this protocol.

5. **Identify any known data gaps** that emerged in the planning process needed to improve the forecast over time and monitor these gaps as the initiative progresses.

Relevant information and their sources should be included in the Energy Savings Framework (ESF) document.

2.3 Reviewing Natural Market Baseline Over Time

It is important to track the baseline forecast periodically as part of MPERs or other recurring efforts to assess the progress of the program and the target market. Changes should be made to the Natural Market Baseline if a determination is made that new evidence suggests that the original forecast needs to be adjusted in order to accurately portray market behavior going forward, as discussed below.

Criteria for Updating the Natural Baseline Market Forecast

The fundamental reason for periodically reviewing the initial baseline forecast is because better information is likely to become available over time that may allow improvements in the accuracy of the initial forecast. The Natural Market Baseline forecast is a major determinant of the estimated savings attributable to the program. Given the challenges inherent in forecasting a counterfactual scenario, Natural Market Baseline often constitutes the biggest

[142] In statistics, a probit model is a type of regression where the dependent variable can take only two values, for example married or not married.

[143] EMI Consulting. Con Edison 2017 Retail Products Platform (RPP) Evaluation. June 15, 2018.

individual source of uncertainty surrounding estimated savings. As such, incorporating enhanced information regarding the Natural Market Baseline forecast helps both in building an improved qualitative case for attribution for observed market changes, and in supporting adaptive management of the program.

At the same time, it can be counterproductive and costly to update the baseline forecast too easily or too often. What is typically most readily available to the evaluator is the actual trajectory of total number of efficient units appearing in the market, which may well reflect effects from the MT program itself. This raises the risk that evaluators may decide that an observed acceleration in efficient market share is due to an acceleration in the Natural Market Baseline when it is actually due to the effects of the MT program, thereby leading to underestimation of the program's accomplishments – or the reverse can happen. Deciding how often to update the baseline forecast requires stakeholders to balance the desirability of incorporating valuable new information with the importance of ensuring reasonable treatment.[144]

Criteria for triggering an adjustment of the NMB should be agreed upon by program administrators and evaluators at the same time as development of the original baseline. At a minimum, each MT initiative's ESF should be re-assessed once per plan cycle regardless of the MTI's reopening criteria. Evaluators should examine all critical aspects of the ESF during this time including, but not limited to, the natural market baseline, unit energy savings, forecasted sales, market shares, and known codes and standards. Should the Evaluator determine a revision to an ESF is required, the existing ESF will apply to the funding utility for a maximum of two years, or until a new ESF is complete and adopted, whichever is shorter. As an example, if the 2023 program year evaluation triggers the need to revise the ESF, the utility will apply the existing ESF through 2025 at the longest, as the new ESF is drafted. Revisions to the ESF for a MT initiative apply prospectively to future program years.

The following are examples of some key `circumstances where it may be appropriate to update the initial Natural Market Baseline forecast:

1. **Key assumptions underlying the initial forecast have proven to be incorrect.** For example, the initial forecast may have reflected an assumption that in the absence of intervention, manufacturers would have little naturally-occurring incentive to incorporate a key energy-saving feature into their products, and it might become clear with the passage of time that this assumption was incorrect.
2. **The timing of key anticipated events has changed.** Examples might include a product launch being substantially delayed, a key partner ceasing operations, or an energy code or standard opportunity being delayed. All of these factors could affect the baseline forecast if it was built assuming certain events would impact the naturally occurring adoption.
3. **Changes in exogenous conditions affecting the target market have altered the initial trajectory of the Natural Market Baseline.** Examples might include a substantial change in public policy brought about by an electoral outcome, or economic conditions that create unexpected shifts in the level of economic activity (e.g. recession, housing booms, tariffs, unforeseen jump in the price of raw materials, etc.).
4. **Significant improvements in the availability of sales data demonstrate that the initial forecast can be improved without introducing a significant risk of over- or under-estimating program impacts.** For example, the initial forecast may have been based on limited information from key market informants, but over time full category sales data may become available and show that the initial estimate of efficient market share was off base.

[144] It is important to note that trying to strike this balance can and does lead to differences in baseline assumptions between MT initiatives and related RA programs. The mission of RA programs is generally to achieve measurable, reliable, near-term savings. From that perspective, it is important that the baseline assumptions reflect the realities at work in the marketplace at any one time. However, the mission of an MT initiative is to gradually achieve large-scale improvements in the way markets work, so it is important that the baseline forecast reflect the conditions facing the initiative at its onset. Resolving these potential differences in the handling of baseline assumptions between MT initiatives and related RA programs is an example of the broader issue of accounting, which is discussed elsewhere in this paper.

5. **The criteria for what constitute an "efficient" product have changed in a manner that tends to superannuate the initial baseline forecast.** Examples might include changes in test procedures or qualifying standards.
6. **Substitute products or innovations have been introduced that change the energy consumption profile of an entire product category.** Examples might include LEDs displacing CFLs, laptop computers overtaking desktops, and the addition of 4k or 8k features to televisions.

Stakeholders should recognize that Evaluators will likely need to conduct additional research to understand and incorporate the new market fundamentals. This will require budget resources and take time. The MT Program Evaluation should include a review of the on-going applicability of the ESF and recommend any additional research required to update the ESF. The specific recommendations and the basis for those changes should be presented to the SAG.

2.4 Accounting for RA Savings

Ideally, customer-facing RA programs would be an integrated part of MT activities. This would allow for counting all savings in the target market regardless of assignment to either MT or RA. However, in the near-term, RA programs are likely to continue to be implemented and evaluated separately from MT programs. As a result, if RA and MT programs are operating simultaneously in the same market, there is a need to parse the savings between the MT and RA efforts. This accounting is done within the Energy Savings Framework.

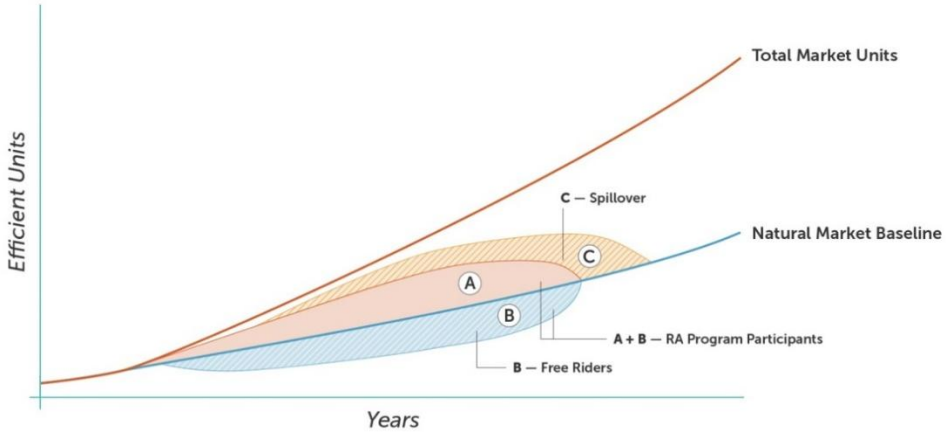
While the goal of not double counting is clear, the actual practice is complicated by the fact that RA and MT use different methodologies to get to a "net" savings. For example, both methodologies adjust for a counterfactual baseline; designated as free-ridership for RA programs and Natural Market Baseline for MT initiatives. Both methodologies also attempt to estimate market effects that occur beyond the direct program intervention; in an RA program, these effects are designated as spillover, while in an MT context they are accounted for in the NMB. To successfully avoid double counting of savings, the MT Energy Savings Framework must include consideration for all components of the RA framework.

Figure 3 is a depiction of the typical components of RA savings overlaid on the MT savings framework. Area A represents participants who wouldn't have taken the action without the program, area B is free riders and area C is spillover. As described above, MT savings are Total Market minus Natural Market Baseline.

To avoid double counting with RA programs, the default approach is to subtract all non-Market Transformation verified savings within the same market being targeted by the MT initiative from the MT savings calculated in previous sections[145]. If accuracy could be improved or greater cost-efficiency created in the evaluation process from using another method, that can be proposed by the evaluator. An example might be separating the units between the MT and RA activities but using the MT savings per unit (if it differs from the RA savings per unit) as the factor to multiply by the MT units.

[145] Note that the traditional use of the terms "net" and "gross" savings can be confusing in the MT framework. The MT savings calculation described in the first equation in Section II results in savings that are attributed to utility programs (both MT and RA) – typically called "net" in RA evaluation. This section then further nets out RA savings so MT savings can be separately analyzed.

Figure 3. Accounting for RA and MT Program Savings



A key benefit of netting out all RA claimed savings is that it allows for a straightforward assertion that "all savings counted through the RA program have been removed from the MT initiative savings". This simple statement may satisfy the needs of regulators and stakeholders without requiring further detail on the differences between the RA and MT frameworks.

On the other hand, this technique creates a bias against MT initiatives in favor of counting the savings in RA. This is because it has the unfortunate consequence of removing legitimate market effects (like spillover) from the MT initiative. This could discourage coordination and collaboration between MT initiatives and RA programs.

2.5 Allocating Energy Savings to Individual Utility Sponsors

Market boundaries rarely, if ever, align completely with the geographic boundaries of utility service territories. While it is possible for an individual utility to operate a market transformation program that is limited in scope to the boundaries of their own service territory, it is more likely that utilities will be implementing MT initiatives in collaboration with other entities at a state, regional, or even nationwide level. In multi-sponsored MT initiatives, an allocation scheme should be used to distribute savings to each sponsoring utility/efficiency organization. Historically, there have been several different approaches to utility allocation, although most of them attempt to base the proportion to each utility on estimated savings that land in that utility's service territory. The method used should be selected in advance.

1. **Allocation by Sponsor Funding Shares** In this approach, energy savings are allocated to each funder according to their share of the total MT initiative funding across all participating sponsors. In the Northwest, this approach is applied at a portfolio level to the total savings, partially because funding shares are based on the relative energy loads of the utilities.
2. **Allocation by Service Territory Delivery** This approach allocates energy savings based on an attempt to track market adoption of the energy efficient units (and therefore savings) to the geographic boundaries of the sponsoring utility. Unfortunately, most MT initiatives track efficient units at a scale different than utility service territory (such as to the point of distribution or retail sale), and methods must be used to scale these units to the service territory of the utilities operating the initiative. In these cases, a factor is developed in advance to share retail sales from the point of sale or distribution into an allocation to each of the utility service territories served by that channel. It is best to develop this factor ahead of time and use it consistently throughout the program, unless compelling data becomes available that would justify a change in the methodology. The adjustment can sometimes be made by working with the channel to get estimates of the zip codes of their clientele and then correlate that to the service territory zip codes. In the Northwest,

for example, Bonneville Power Administration developed a retail sales allocation tool where retail locations are divided up by how they serve customers from different utilities.

3. **Allocation by Tracking Participants** There may be initiatives where it is possible to track all participants – for example, Building Operator Certification where every tracked operator comes through the initiative itself. This can then be a direct measurement.
4. **Allocation by Survey of Market** This approach samples the entire market and asks survey questions about in which service territory the efficiency is occurring.
5. **Allocation by Customer Proportions or Energy Consumption** This approach allocates energy savings based on the share of total customers or energy consumption within the sponsoring utilities service territories, or if known, shares within a particular market. Customers or consumption in this approach are a proxy for relative market share for the MT initiative. Examples include total residential single-family homes with a certain type of appliance, number of industrial customers of a certain size, or total energy consumption of commercial end use loads for the market end use in question.

2.6 Estimating Savings Post Active-Market Engagement in Markets without Codes or Standards as an Endpoint

Not all MT initiatives have the possibility of a code or standard to lock-in sustained market change or will be successful in the achieving the desired code or standard. For example, programs seeking to change standard practice in operations and maintenance, influence recommendations for building upgrades in existing buildings (not typically affected by new construction codes) or create change via training often cannot rely on a code or standard to ensure sustained adoption. Even without a code or standard, it is still possible for estimated MT savings to become significant as the market adoption rate can grow exponentially. Therefore, it is important to design market evaluation components that support ongoing measurement and estimation of total market adoption and efficient units, even after MT investments have subsided. There may also be exogenous market factors that could trigger a reforecast of the Natural Market Baseline during this post period (see Section 2.3). A periodic independent evaluation of these elements is recommended to support continued and accurate calculation of successful, long-term MT savings.

Key considerations for post-active market engagement energy savings estimation include:

- **Total Market Units** Data collection for total market units may be more challenging if the market actors who previously provided full market data are not willing to continue doing so without an active value transaction. In some situations, access to sales data could continue via contractual agreements with key market actors. In many scenarios, however, analysts will need to infer market changes through surveys, adjustments to purchased third-party data, or on-going market studies.
- **Unit energy savings** Given the wider market adoption at this point; it may be necessary to adjust the unit energy savings estimate. For example, with wider adoption there may be better data about the actual energy savings performance of the efficient measure. Key assumptions that affect UES during this period may also change as a wider group of users engage with the product or service.
- **Natural Market Baseline** As adoption grows, often other market forces become more apparent and may warrant review and possible adjustment of the Natural Market Baseline. Also, exogenous variables can come into play in the market that simply could not have been foreseen during the initial forecast of the Natural Market Baseline.

2.6.1 Duration of Savings Post Active Market Engagement in Markets without Codes or Standards as an Endpoint

It is important to establish the length of time that savings will be credited to the utility post-active-market engagement. This time period is separate from the lifetime of the measures embodied in savings measures. Instead it reflects the amount of time that a utility will receive credit for having changed the market even when it has no or minimal engagement. In some circumstances, the Natural Market Baseline will be expected to increase over time

until some point where it essentially overtakes the Total Market. This provides a natural ending point for claiming savings from the MT initiative.

In some markets, the Natural Market Baseline will never approach the Total Market, or it will do so in an unreasonably long time frame. In these cases, there is no quantitative analysis to determine duration directly; instead, it requires a policy call that balances an appropriate level of credit to make it worth the effort to support MT initiatives without counting savings into perpetuity. Factors to consider in crafting this determination include the likelihood of the baseline changing over time and the lifecycle of the product (which influences when things would have changed anyway). The duration of energy savings should be addressed and captured in the Energy Savings Framework. Given that this is a policy call, it is usually best to make this decision early in the MT initiative design process to provide certainty to program designers and implementers.

2.7 Energy Codes and Appliance Standards

Best practice in MT initiative design will identify applicable codes or standards early on and design interventions over the life of the initiative to accelerate early adoption of more efficient energy codes and standards when possible. If an MT initiative can successfully influence the code or standard to incorporate higher levels of efficiency, the initiative can effectively "lock-in" sustained efficiency changes for virtually the entire market. Logic models for MT initiatives will often include activities that are deliberately targeting and driving towards adoption of enhanced energy codes or standards (C&S). Energy savings that occur following successful adoption of efficient C&S[146] are often a significant portion of the energy savings claimed. In California[147] and the Northwest, savings from C&S currently represent significant portions of the energy savings in their energy efficiency program portfolios.

Illinois does not yet count savings from energy codes or increased compliance, but as of this writing is discussing possible activities to influence energy code compliance and potential adoption of higher efficiency levels in energy codes and standards. This Attachment describes savings estimates from energy codes adoption[148] because these are often part of MT efforts[149] and energy code compliance enhancement activities because they increase the effectiveness of the codes.

Figure 4[150] depicts the course of an MT initiative with an emphasis on the portion that affects energy codes[151]. This figure shows a market where the natural market baseline does not have a regular code adoption cycle, but if that is the practice for the market being analyzed, anticipated energy code adoptions and their efficiency level would be included in the baseline. Area A represents the savings that accrue to activities in an MT initiative that prepare the market before C&S adoption and can include the wide variety of activities that are shown in Figure 1. Area B represents the savings following adoption of a new C&S. There are many activities that could be sponsored by utilities at the point of adopting a code or standard (just before the "code effective" vertical line). Some examples include developing model C&S language, providing technical and economic analysis and support, or submittal of C&S proposals.

[146] Energy code compliance is a key factor in the actual savings resulting from a code, and this is discussed in a later section.

[147] See TRC (2019) Codes & Standards Program Advocacy & Attribution study for a review of California's methods for codes and standards savings.

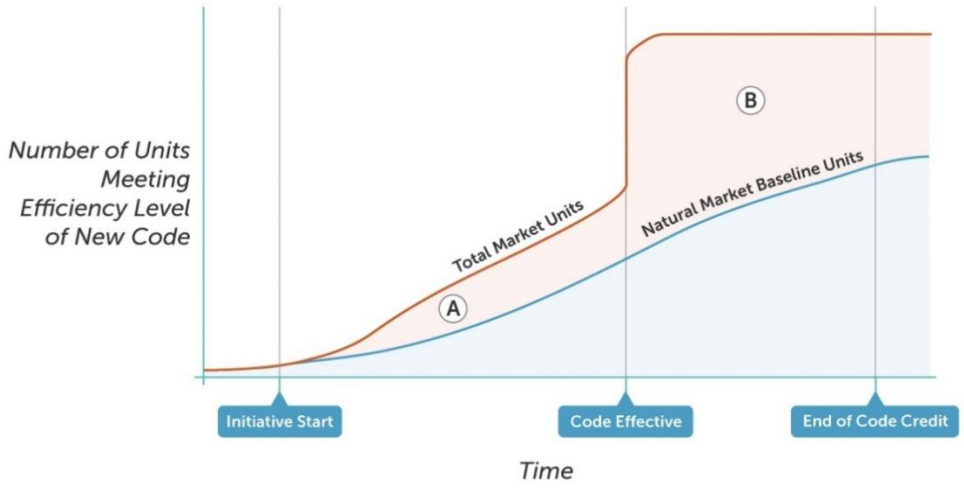
[148] Savings for "stretch" codes are covered by this discussion of codes and standards. If allowed by the state, a stretch code means local jurisdictions can adopt a code that is beyond the state code and is mandatory only for builders within that local jurisdiction. Savings would be calculated per this section, but only applied to buildings in the adopting jurisdiction.

[149] It should be noted that California has similar calculation methods for savings from codes and standards, although they weren't developed specifically under an MT framework. Massachusetts has developed a method for savings for code compliance that is similar to RA program analysis other than how attribution is estimated.

[150] Note that compliance with the energy code is usually less than -- and can sometimes be greater than 100%. Compliance greater than 100% can occur, for example, if the typical measure most readily available is more efficient than the code requirement; builders will simply use the available measure.

[151] In calculating savings, the effective date of the energy code or standard adoption drives the uptick in the number of efficient units meeting the efficiency level. In this paper, the term "adoption" is short-hand for the energy code or standard adoption, which would have an effective date by which most units will comply.

Figure 4. The Effect of Energy Code Adoption



If an MT initiative includes C&S activities as part of its logic model, energy savings from the pre-adoption period A in Figure 4 are counted using the methods described earlier. In addition, it can be credited with energy savings post-adoption B, which are also derived using the methods described earlier, but with some additional considerations, described below.

2.7.1 Additional Considerations for Savings from Codes and Standards[152]

This section describes the additional items needed to calculate savings from Codes and Standards (C&S). Per unit savings and total market units are calculated as described above. Additional factors that need consideration for C&S include:

- **Compliance rates when a new energy code is adopted:** Total Market Savings should be adjusted for measured or estimated compliance rates. Measured compliance pre- and post-adoption of the new energy code is strongly preferred, but not always available. In this case, a baseline compliance rate pre-adoption either measured or estimated is usually assumed to be the same post-adoption for purposes of energy savings estimation.
- **Post-adoption Natural Market Baseline:** Special attention should be given to the segment of the Natural Market Baseline (from energy code adoption to the end of energy code credit). The best representation of the counterfactual might be a fixed post-adoption baseline that changes to full adoption rates during the next scheduled change in the C&S processes (e.g. 3 years for the International Energy Conservation Code). Another option is some form of declining savings credit, such as a baseline that increases over time.
    - Determining the timing of this counter-factual movement in some alternate future has been difficult in those regions already counting savings from energy code adoption. One approach involves expert subject matter panels (Delphi panels) to establish this alternative future. However, finding enough independent experts and achieving convergence of opinion can be challenging. Trending market data or comparison with other similar code provision adoptions may also be used as alternatives. Ultimately, as with all counterfactual baseline estimation, there will need to be an aspect of professional judgement to determine the appropriate treatment of post-adoption baseline.

[152] A paper by Cadmus *et. al.* in 2013 describes the estimation of energy code adoption and energy code compliance savings in depth starting on page 52.

- **Accounting:** Accounting of savings between RA and MT programs is not generally used for C&S. This is because utility RA programs typically have ended operations before or at the point that the energy code adoption process takes place.
- **Allocation:** In principle, allocation of energy savings that occur from an MT initiative supported by multiple sponsoring utilities and targeting statewide code changes should be no different than during the voluntary portion of the MT initiative (see above section on allocation). In addition, there may need to be a split between utilities and other parties working on code adoption. This is often a negotiated number, sometimes informed by a Delphi panel, evaluators, stakeholders, or other entities.
- **Duration of Energy Savings Claims[153]:** It is important to establish the length of time that savings will be credited to the utility for the new code or standard. This is shown in Figure 4 as the time between "Code Effective" and "End of Code Credit". This time period is separate from the lifetime of the measures embodied in the energy code. Instead, it reflects the amount of time that a utility will receive credit for having changed the energy code.
    - There is no quantitative analysis that can determine the duration of an energy code credit to the utilities; instead, it requires a policy that provides an appropriate level of credit to implementers that makes it worth the effort to support MT initiatives that target code changes, while not being so large as to be unfair to ratepayers. The policy call can be informed by when the code or standard would have been updated anyway to the level targeted in the MT initiative. Given that this is a policy call, it is usually best to make this decision early in the MT initiative design process to provide certainty to the program designers and implementers. For example, the Northwest negotiated a standard policy that allows for claiming code savings for ten years post the code effective date. For the residential code, NEEA does not report savings units six months after the code becomes effective, and then counts savings for a full ten years. This was a negotiated number among the parties involved at the time. If a new, more efficient code comes into play during that period, the incremental savings for that change are also counted for ten years.

2.8 Energy Savings from Enhanced Energy Code Compliance Activities

From work in other regions, a number of activities, such as training and education, increased support for enforcement, and third-party plan-review have been shown to result in increased compliance of energy codes, which in turn results in energy savings[154]. Efforts are underway in Illinois to analyze and discuss activities for improving compliance with existing energy codes.

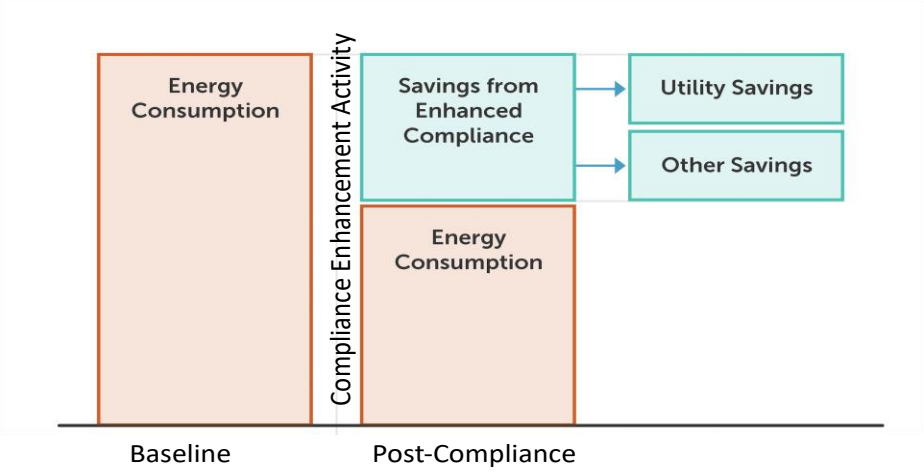
Savings from enhancing code compliance activities are derived by documenting compliance rates before the initiative starts[155], and compliance after the initiative has operated for a period of time. See Figure 5.

[153] Duration of savings claims can interact with the considerations in the Natural Market Baseline since this baseline can sometimes equate to Total Market Units over time, and therefore savings effectively become zero.

[154] For examples of recent evaluation reports analyzing the effects of compliance support programs on compliance rates in the residential and non-residential sectors, respectively, see NMR Group, Inc. (2018) and NMR Group, Inc. and Cadmus (2018):
NMR Group, Inc. 2018. Residential New Construction and CCSI Attribution Assessment (TXC48). http://ma-eeac.org/wordpress/wp-content/uploads/TXC_48_RNCAttribution_24AUG2018_Final.pdf
NMR Group, Inc. and Cadmus. 2018. Massachusetts TXC47 Non-Residential Code Compliance Support Initiative Attribution and Net Savings Assessment. http://ma-eeac.org/wordpress/wp-content/uploads/TXC_47_Nonres_CCSI_Attribution_Assessment_26July2018_Final-1.pdf.

[155] The Midwest Energy Efficiency Alliance is currently developing field data to determine compliance with current energy codes, and analyze which measures create the largest gap in savings.

Figure 5. Savings from Enhancing Energy Code Compliance



Unit energy savings[156] is the difference between the average unit energy consumption in the pre-enhanced-compliance case compared to the post-case[157] multiplied by the number of new units each year in the market that are affected. This is typically developed using building energy-use modeling of the baseline and post-compliance cases, and then subtracting the two. The building energy modeling should follow the practices for new construction modeling in the TRM for residential or commercial buildings as appropriate.

The per unit energy consumption for the baseline case is computed based on total building energy consumption with either measured or assumed compliance for all energy-impacting measures in the building. The per unit energy consumption for the post-compliance-enhancement activities is similarly calculated but using the energy-impacting measures of the post-compliance-enhancement building. For example, per building energy savings for wall insulation would be calculated by subtracting the building energy use assuming post-compliance-activity insulation amounts in the walls from an equivalent building energy use with the baseline wall insulation amounts. These building level savings are then divided by the square feet of the building to derive an average UES/square foot. This in turn is multiplied by the number of square feet in the market that are affected to derive the total compliance-enhancement related savings.

Total savings are then reviewed for the savings directly resulting from the efforts of the utility, versus other causes. Examples of other causes that can create enhanced code compliance include suppliers who might stock only "above code" materials or "spillover" from other larger jurisdictions that make it uneconomical for builders to change practices across jurisdictions. Most often, the split between utilities and other causes is a negotiated number among utilities and stakeholders which is sometimes informed by a Delphi panel that gives input to a third-party evaluator on their opinion of the utility's contribution if there are enough independent experts to form a Delphi panel.

2.8.1 Duration of Enhanced Energy Code Compliance Savings

Similar to the duration of savings credit for other MT initiatives, the actual value is a policy call. However, in the case of enhanced code compliance activities, duration of the activities is usually deemed to be the period of time that the particular code is in place. Once the code changes, (for example, every three years for the International Energy Conservation Code (IECC)), then credit for compliance-enhancement savings from the prior code would be stopped. This is because compliance savings are tied to a specific set of measures, and those measures may change when the

[156] In some cases, enhancing the compliance or effectiveness of measures in the code can have an impact on savings already incorporated in a TRM. If Illinois moves forward with enhanced code compliance, this could be an adjustment in the future to other sections of the TRM.

[157] If both compliance and increased efficiency happen at the same time, the savings can be calculated separately for each and summed.

code changes.

2.9 Uncertainty and Risk in MT Savings Estimates

MT interventions operate with a different level of certainty than many resource acquisition (RA) programs. Experimental design and tight error bounds on realized energy savings are not realistic expectations for initiatives that seek to animate, but not control, market shifts. One key reason for this greater uncertainty, as discussed above, is the greater difficulty of establishing attribution. In addition, needed market data (particularly sales data) can be hard to obtain. Finally, uncertainty also stems from items such as a rapidly changing product category or a reliance on the level of influence of retail salespeople.

To help utilities and other stakeholders assess the risks associated with this uncertainty, program designers should engage early with planning and evaluation professionals with experience in market transformation. Establishing energy savings methods associated with the proposed intervention and gaining acceptance for the proposed baseline often requires multiple rounds of review and refinement as data and assumptions are vetted. At the time of this writing, it is anticipated that the Illinois Stakeholder Advisory Group Working Group on Market Transformation Savings will serve as a forum to effectively plan MT initiatives and navigate unexpected market events.

2.10 Market Transformation Savings Protocol Process Recommendation

In 2022, the SAG Market Transformation Savings Working Group (SAG MT Savings Working Group) developed the Market Transformation Savings Protocol Process Recommendation which aims to:

- Formalize the MT process to streamline activities to reach consensus on MT Savings Protocols
- Define a set of recommended deliverables and work products that build to final MT Savings Protocols
- Provide recommendations on the order of operations for deliverables and work products
- Define a recommended set of activities and components
- Define a dashboard through which utilities can provide regular updates to SAG MT Savings Working Group participants

The Process Recommendation document is posted on the SAG MT Savings Working Group webpage: https://www.ilsag.info/mt_savings_working_group/

The processes outlined in this document are recommendations that provide guidance for actors working on MT initiatives in Illinois to help minimize the time necessary to reach consensus on MT Savings Protocols; the Process Recommendations document is not meant to be a formal checklist with requirements for each step. The Process Recommendations describes the foundational information and components of MT Savings Protocols that can be agreed on prior to utility implementation of a MT initiative. The specific process steps are likely to differ by MT initiative.

2.11 Market Transformation Program Design, Savings Protocol and Evaluation Plan Documentation

For Program Administrators, Stakeholders and Evaluators to be able to have an informed discussion and reach consensus on the anticipated savings for an MT Program, the Program Design (Logic Model) and ESF (the Market Characterization and Projection), along with supporting analyses, need to be documented. In addition, the MT Program Evaluation Plan should be developed and shared before a program is initiated. The Evaluation Plan will provide and explain the set of EM&V research tasks and how they will collectively meet the Preponderance of Evidence criteria explained in Section 2.1. These documents and the process for their development and review are summarized in Table 2.

Table 2. Summary of Market Transformation Program Supporting Documents

Document	Energy Savings Framework	Program Plan/Logic Model	Evaluation Plan
Summary of Document	*Market Characterization (Historical trends; market projection with NMB; unit sales & energy savings)*	*Program actions & intent; expected short-term and long-term outcomes; MPI's & measurement*	*Proposed evaluation research methods and plan – MPI's & ESF*
Document Developer	*Program Administrator (utility) with Implementation Contractor*	*Program Administrator (utility) with Implementation Contractor*	*Program Evaluator*
Review	*Program Evaluator (especially NMB); SAG*	*Program Evaluator; SAG*	*Program Administrator (utility) with Implementation Contractor; SAG*
Updating Process	*Evaluator assesses on-going adequacy of ESF; Change Recommendation reviewed by Program Administrator (utility) with Implementation Contractor and SAG*	*As needed by Program Administrator (utility) with Implementation Contractor with Recommendations by Evaluator*	*Updated annually by Evaluator; reviewed by Program Administrator (utility) and SAG*

3 Appendices

3.1 Appendix A: MT Initiative Business Plan Outline

The MT Initiative Business Plan is intended to document the strategy, data, and assumptions about the initiative at the time of launch. It is a document that can evolve as knowledge of the market and the initiative evolves but is essential to prepare and guide launch of the initiative into the market.

Key components of the Business Plan include:

1. Identification/description of the specific market to be targeted
2. Description of the "leverage" point(s) that catalyze transformation
3. Logic Model or hypothesis of how the planned intervention will result in the desired market change
    a. Barriers that prevent market adoption
    b. Activities/interventions that will catalyze the change
    c. Outputs that result from the activities
    d. Market Outcomes (short-, medium- and/or long-term) that are measurable responses to the activities
    e. Ultimate desired impact – which is the final state of the market after it is transformed.
4. Market Progress Indicators
    a. Data collection/management plan
    b. Document any input from evaluators
5. Multi-year budget
6. Multi-year savings, including description of baseline over time
7. Estimate of cost-effectiveness
8. Names of utilities most likely to be involved with operating this initiative
9. Description of interaction with other programs (if any) by utility

10. Description of Jobs or Disadvantaged Community Impacts
11. Discussion of risks specific to this initiative
12. Date of adoption and Date of amendment(s), if any

3.2 Appendix B: Glossary of Terms

Above Natural Market Baseline Savings Net of RA Savings – The residual estimated energy savings computed by subtraction of energy savings claimed by an RA program.

Accounting – For purposes of this document, accounting refers to the practice of adjusting MT above market baseline savings to net out energy savings being claimed through any RA programs operation in the same market.

Adoption Date (of Code or Standard) – The date when the change in a building code or appliance/equipment standard was adopted by the rule-making authority.

Allocation – The process of allocating energy savings from MT programs to multiple sponsors of an MT initiative that operates across multiple sponsoring utilities; e.g. at a state or multiple state regional level.

Attribution, general – The concept of attributing causality for claimed energy savings to specific or general actions by the utility(s) as opposed to other agents acting in the same market. Attribution provides credible evidence that there is a causal link between the program activities and the outcomes achieved by the program.

Attribution, MT Programs – Attribution of all energy savings not counted in the Natural Market Baseline to utility funded interventions, including RA, MT, and supporting infrastructure. Note that this is not actually a statement of causality but rather a measurement by subtraction of Natural Market Baseline.

Attribution, RA Programs – In traditional RA program attribution is generally approached through application of an adjustment factor that adjusts "gross energy savings" measured through the program participants to account for "free-ridership"; i.e., those participants that would have acted without the RA program. For RA programs, this adjustment is usually represented in a "net-to-gross" (NTG) factor that is multiplied by gross energy savings to get "net" energy savings that can be "attributable" to the RA program.

Counterfactual – A constructed alternative future that might have happened without the intervention of either the MT or RA programs.

Estimated Market Transformation Savings – The residual estimated energy savings computed by subtraction of the natural market baseline savings from total market savings. These estimated savings are assumed to be associated with all utility funded market interventions including MT and RA programs, supporting infrastructure, and codes and standards activities. Analogous to the space above the Natural Market Baseline in Figure 2.

Estimated Market Transformation Savings Net of RA – The residual estimated energy savings after subtracting energy savings claimed by a resource-acquisition (RA) program from Estimated Market Transformation energy savings operating in the same geographic service territory.

Free Riders – A program participant who would have implemented the program's measures or practices in the absence of the program. Free riders can be: (1) total, in which the participant's activity would have completely replicated the program measure; (2) partial, in which the participant's activity would have partially replicated the program measure; or (3) deferred, in which the participant's activity would have partially or completely replicated the program measure, but at a future time beyond the program's time frame.

Full Category Data – Sales data (individual SKU, price and numbers sold) for all units of a specific product including both efficient and inefficient versions typically sold through a retail or distributor channel. May also refer to data available from manufacturers or trade associations that includes all units manufactured or sold.

Hedonic Price Modelling – a statistical approach that controls for a variety of variables and attempts to isolate the incremental cost associated with the feature of interest.

Logic Model – a graphic depiction of the shared relationships among the activities, outputs, and outcomes of a program. The theory of change should be visible in the logic model.

Market – an actual or nominal place where forces of demand and supply operate, and where buyers and sellers interact (directly or through intermediaries) to trade goods, services or contracts or instruments, for money or barter.

Market Progress Evaluation Report (MPER) – A report on MT program progress, usually conducted in parallel with program implementation over a relatively short (e.g. 12 months) timeline. Best practices would have these evaluation activities conducted by a third party. [Note that there are regionally distinct terms for similar evaluation products, including Market Evaluation. The specific term is less important for the purpose of this framework than the need to acknowledge that market transformation requires a somewhat different evaluation scope and product than might be required of other programs.]

Market Progress Indicator (MPI) – A measurement of market progress for a specific indicator of an element of MT theory described in the program logic that defines the associate barrier/opportunity/intervention strategy and anticipated outcomes from successful implementation. [Note that regional differences exist in how these indicators are labeled, including the term Market Indicator. The specific term is less important than the fact that the indicator refers to activities occurring within the market, rather than within the program, and that they will likely include long-term indicators that can take years to emerge.]

Market Transformation (MT) – The strategic process of intervening in a market to create lasting change that results in the accelerated adoption of energy efficient products, services, and practices.

MT Business Plan - A document embodying the strategy, data, and assumptions about the MT initiative at the time of launch. It includes a description of the efficiency opportunity, targeted markets, assessment of barriers and opportunities, intervention strategies, near-, mid- and long-term market outcomes, market progress indicators and key energy savings estimation assumptions.

Natural Market Baseline Savings – The estimated energy savings computed based on a market adoption rate forecast of what would have happened without any utility funded interventions that may include both MT and RA programs as well as enabling infrastructure support. The forecast of Natural Market Baseline is generally established before the start of the MT initiative but may be revised periodically.

Resource Acquisition (RA) – An approach to capture energy efficiency grounded in a regulatory framework which views EE as a resource that can be "acquired" through direct utility action analogous to any other "resource" considered by a utility to meet its existing and future energy requirements. These can be thought of as traditional utility-driven energy efficiency programs that typically work at the individual consumer level, rather than the market level.

Spillover – Reductions in energy consumption and/or demand caused by the presence of an energy efficiency program. There can be participant and/or nonparticipant spillover:

- **Participant spillover** is the additional energy savings that occur as a result of the program's influence when a program participant independently installs incremental energy efficiency measures or applies energy-saving practices after having participated in the energy efficiency program.
- **Nonparticipant spillover** is energy savings that occur when a program nonparticipant installs energy efficiency measures or applies energy savings practices as a result of a program's influence.

Summative Report – An evaluation report that attempts to quantify and assess the outcome effects for a given program period. Distinguished from "process evaluation" and consistent with "impact evaluation" in energy efficiency.

Total Market Savings – The estimated energy savings computed based on all market adoption above and beyond the adoption rate at the start of the MT initiative.

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