

Initial Feedback to IL Utilities on 2022-2025 EE Plans (non-IQ portions)

From non-financially interested stakeholders
(NRDC, CUB, ELPC, NCLC, AG, City of Chicago, Staff)

November 17, 2020

Caveats

- Initial “high-level” feedback
- Likely more after we delve into batch files
 - Didn’t have most of them
 - Time constraints
- May not yet be consensus from all non-financially interested parties on all items listed
 - Time constraints
- This is only on non-IQ programs.
 - Separate slides on IQ proposals
 - Would oppose reducing IQ \$ to pay for any specific non-IQ requests presented here
- Provide initial thoughts on policy proposals, but believe all policy changes should be addressed through Policy Manual update process rather than plan filings
- City of Chicago feedback only applies to ComEd, Peoples

North Shore/Peoples

- Goals:
 - Need to do more analysis before drawing conclusions on reasonableness
- Portfolio Allocations
 - Appreciate proposal to increase IQ budget – good start
 - Want to explore potential for shifting some C&I budget to Res-non-IQ
- Program Approaches - General
 - No concerns with overall structure
- C&I Programs
 - Support midstream Food Service Equipment program
 - Question why small biz DI not jointly delivered w/ComEd program (save \$)

North Shore/Peoples (2)

- Res (non-IQ) Programs
 - Appreciate/support pilot effort on air sealing at time of Jumpstart audit
 - Would like to discuss expansion
 - Support virtual assessment option
 - Support reallocation of Home Energy Report budget
 - Question increased furnace rebate
 - Continue to question not having joint rebate on smart t-stats
- Pilots/R&D/MT
 - Would like participation in triple-glazed window MT initiative
 - Would like support for municipal building performance standards (as MT)
 - Concerns about R&D given significant portfolio budget constraints
 - Oppose spending on non-commercialized technology like gas heat pumps – let other states/utilities develop new tech, focus R&D on pilots for already commercialized tech
- Other
 - Will want average measure life, maybe other constraints

Ameren

- Goals:
 - Appreciate proposal to at least grow savings consistent w/statutory AAIG
 - **But need to do a little more analysis before concluding that is reasonable end point** (or if more could be done to catch up on statutory CPAS shortfalls from 2018-2021)
- Portfolio Allocations
 - Appreciate increase to IQ budget (relative to last plan) – good start
- Program Approaches - General
 - Support proposal to move more upstream
 - Support proposal to consolidate programs
- C&I Programs
 - Support proposal to join other IL utilities in upstream food service program
 - Support proposal to invest in networked lighting controls
 - **But want to understand plan/approach better, maybe suggest refinements**

Ameren (2)

- Res (non-IQ) Programs
 - Support one-stop shop approach to MF (IQ and non-IQ)
 - Support increase focus on heat pumps for electric resistance heat MF
 - Good participation levels for non-IQ (but not high enough on IQ)
 - Would like to see bigger gas investment in whole building EE for non-IQ
- Pilots/R&D/MT
 - Would like to see super-efficient all electric new construction pilot
 - Would like to see pilot weatherization of small biz in IQ neighborhoods
 - Would like to see MT programs on municipal performance standards, triple-glazed windows
- Policy
 - Oppose redefining “expired savings”
 - Support exploring potential NTG study frequency, oppose gross savings
 - Support capturing market effects – where reasonably documentable
 - Support leveraging other funding sources – devil in the details on attribution
 - ***Should all be addressed through Policy Manual update process***

ComEd

- Goals:
 - Appreciate and support proposal to meet statutory goals
- Portfolio Allocations
 - Appreciate substantial increase in IQ budget – good start
- Program Approaches - General
 - Support proposal to move more upstream
 - Support proposal to consolidate programs
- C&I Programs
 - **Want to see ComEd move back into non-IQ Res whole building retrofits**
 - Joint delivery with gas utilities, but at reasonable cost per kWh saved
 - Need to better understand networked lighting controls approach
 - **Potential concern about not enough focus/priority**

ComEd (2)

- Res (non-IQ) Programs
 - Would like to see offering on whole building EE to non-IQ
 - Virtual assessments
 - Financial support for gas utility programs (at reasonable \$/kWh saved)
 - Need to understand res program targeting to <150% of poverty better
 - Okay to target marketing, but don't prohibit participation by other income groups
 - Continue to question lack of joint rebate w/gas utilities on smart t-stat
- 3rd Party Programs
 - Support focus on industry specific initiatives
 - But need to leave option to address other portfolio "gaps"
- Other
 - Support monitoring actual bill impacts (vs. deemed savings)
 - but need to provide all such data to evaluators
 - Want commitment to EE/DR communication coordination
 - Want to explore potential to reduce portfolio level costs in earlier years
 - Want to understand more about what plans are for MT and R&D
 - Would like MT efforts on municipal building performance standard, triple-glazed windows

Nicor

- Goals:
 - Need to do more analysis before drawing conclusions on reasonableness
- Portfolio Allocations
 - Appreciate proposal to increase IQ budget – good start
- Program Approaches - General
 - No concerns with overall structure, but have some specific program concerns
- C&I Programs
 - Support Midstream Food Service Program

Nicor (2)

- Res (non-IQ) Programs
 - Would like to see bigger gas investment in whole building EE for non-IQ
 - Would support reductions in Home Energy Reports, Kits to enable that
- Pilots/R&D/MT
 - Support MT efforts, particularly appreciate triple-glazed window initiative
 - Concerns about R&D given significant portfolio budget constraints
 - Question spending 3%
 - Oppose spending on non-commercialized technology like gas heat pumps – let other states/utilities develop new tech, focus R&D on pilots for already commercialized tech
- Policy
 - Oppose conversion of electric savings to gas therm equivalents
 - Need to analyze/discuss proposed adjustable goals for mid-cycle NTG changes
- Other
 - Will want average measure life, maybe other constraints