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| **Illinois EE Stakeholder Advisory Group (SAG) Meeting:Tuesday, May 14, 2024Utility Responses to Submitted Energy Efficiency Ideas** | **Color Codes for Utility Responses** |
| **Green** | Utility is interested in exploring further; will follow-up with idea submitter with any questions |
| **Light Green** | Utility is already offering EE idea proposed + plans to include in next EE Plans |
| **Yellow** | Utility thinks further analysis is needed; may require follow-up discussion or input from additional parties |
| **Red** | Utility has concerns about the idea proposal + not interested in pursuing |
| **Blue** | Idea should be submitted now through current utility Research & Development (R&D) process (if applicable), or utility thinks further analysis is needed - idea could be considered within Breakthrough Equipment & Device (BED) program; or the idea could be considered as a pilot program |
| **Gray** | Not applicable to utility |
| **Purple** | Outside scope of EE |

**Utilities Respond to April 9 Energy Efficiency Ideas**

Illinois utilities respond to EE Ideas presented to SAG on [April 9](https://www.ilsag.info/event/tuesday-april-9-sag-meeting/), referenced below

**Recurve EE Ideas:**

| **Recurve EE Ideas** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
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| Electrification Targeting Analysis (rows 53-56) | AIC already has the ability to target customers for electrification projects. No further input necessary at this time. | ComEd does not understand the value proposition of this Idea and interprets this idea as a means for a private company to solicit business through this process. We do not feel this is the proper forum for such consideration and encourage any such ideas to be submitted through our R&D process.  | N/A | PGL/NSG suggests vendor product proposals be submitted though business development or RFP processes. |
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| FLEXMarket (rows 57-60) | AIC does not believe this idea assists utilities in achieving the goals required by CEJA. | ComEd does not understand the value proposition of this Idea and interprets this idea as a means for a private company to solicit business through this process. We do not feel this is the proper forum for such consideration and encourage any such ideas to be submitted through our R&D process.  | N/A | PGL/NSG suggests vendor product proposals be submitted though business development or RFP processes. |  |
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**Joint Stakeholder Small Business EE Ideas:**

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| **Small Business EE Idea** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| Customize small biz DI delivery services for strategic market segments, with vendors that can address unique needs (e.g., food service, refrigeration, laundry, etc.) (row 34) | AIC will consider as part of program design/delivery with next plan. No further input necessary at this time. | ComEd has experience with segment programs (e.g. Grocery, Agriculture, Telecom) in Plan 5. However, given the market confusion and costs we folded these programs to our existing offerings. We will continue to explore this delivery approach to understand it's effectiveness in bring in new specialized vendors that can identify and implement more savings opportunities, instead of having the same EESPs participate in multiple segments. Additionally, it should be noted we don't believe a separate food service delivery channel is needed as we already have joint utility funded Commercial Kitchen Program | Will consider but for gas segments where this is practicable. | PGL/NSG provides comprehensive solutions leveraging specialized contractors for our small business customers.  |
| Expand small business DI programs to promote more comprehensive treatment of larger (non-lighting) savings opportunities, including weatherization where applicable (row 33) | Ameren is working to add and expand standardized weatherization rebates | ComEd is committed to promoting comprehensive energy savings opportunities for customers. ComEd's small business program already identifies and incentives non-lighting opportunities, including weather stripping. We are constantly working to improve measure comprehensiveness in our programs.  | We're assessing the size and costs of the program. Our BOP is starting to address this issue. We need examples. | PGL/NSG provides comprehensive solutions for our small business customers.  |

**Joint Stakeholder C&I Lighting EE Ideas:**

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| **C&I Lighting EE Ideas** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| All electric C&I: significantly increase focus on and savings from LLLC and networked lighting controls (row 32) | AIC is focused on continued education and training of customers, installers, and distributors for NLC to increase participation and project volumes.  | ComEd has already placed a significant emphasis on lighting controls. Over the last several years, our NLC and lighting control projects have significant grown. In 2023, approximately 66 net GWH of savings were from NLC. While ComEd is committed to continuing to grow the NLC market – it needs to be cost effective. Additionally, as LED fixtures approach saturation, opportunities to add or include controls become more cost prohibited.  | N/A  | N/A  |
| All electric C&I: stop all upstream/midstream or downstream rebates for TLEDs (row 31) | AIC believes further discussion is required | There still is a customer opportunity to switch from baseline fluorescent to TLEDs since the market is not yet saturated. As long as fluorescent technology is baseline, there is still an opportunity to offer product to customers and claim energy savings, along with very good NTG. We should not "stop" because the market is evolving in CT or MA, but rather monitor the IL market. We strongly believe that customers would be forgoing LED upgrade projects without these incentives and would like to wait until outcomes of potential study to better understand savings impact for TLEDs. | N/A  | N/A  |

**Joint Stakeholder C&I EE Idea:**

Limit new CHP projects to those that use biogas or waste products (e.g., wood, sawdust, etc.) (EE Idea tracker row 27)

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC believes further discussion is required | ComEd agrees to explore this idea, but would like to recognize that topping cycle CHP can still provide a clean energy solution. ComEd believes that Topping Cycle Combined Heat and Power (CHP) projects still provide an effective and efficient vehicle for industrial and commercial customers to reduce energy usage while providing valuable process fuels such as steam and hot water. As it currently stands, CHP projects are still more efficient than the grid and are still included in the Illinois Technical Reference Manual for potential to claim EE savings.  | CHP is an effective EE measure that we are allowed to utilize to create savings. | PGL/NSG supports providing a diverse portfolio of solutions for all customers. |

**Joint Stakeholder C&I EE Idea:**

Ameren and ComEd outreach ASAP to large industrials to identify needs and what could be offered to get them to not opt out (EE Idea tracker row 26)

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| Ameren has reached out to large customers to communicate benefits of EE and offer further discussion if interested. | The contact and engagement process for >10MW customers that was established in Plan 6 was enhanced for Plan 7 and was initiated in late Q1 2024. Outreach includes customers already over 10MW, currently opted-out customers, and customers that could potentially exceed 10MW before 12/31/25. ComEd’s Large Customer Services account managers are directly engaged to ensure all customers are contacted and informed of the energy efficiency program opportunities in addition to their eligibility to opt out. Customers are also invited to recurring customer office hours (Q&A) calls. ComEd also coordinated with Ameren on the general approach and updates to the Plan 7 opt-out form. | N/A  | N/A  |

**Joint Stakeholder Cross-Cutting EE Ideas related to Contracting:**

| **Contracting EE Idea** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
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| Implementer 3rd Party Ombudsman (row 17) | In accordance with its current stipulated agreement, AIC has designated a liaison support channel for implementers to express concerns or grievances. This channel allows AIC to address concerns raised. | ComEd disagrees with this Idea and struggles to understand the benefit or necessity of such role. We believe adding and paying for an additional company to serve as an Ombudsman, adds layers of administration and costs by adding additional admin burden on utilities with questionable benefit. Additionally, we'd like to point out that the Policy Manual says the Program Administrator is responsible for overseeing program ICs and the program implementation process. SAG's role is advisory. This idea blurs the line between the two roles. | What issue are we solving? Is the cost-benefit analysis worth it?  | PGL/NSG believes this is an unnecessary administrative expense. We do conduct regular Trade Ally surveys for feedback and responses can remain anonymous. |
| Diverse contracting (row 18) | Ameren Illinois developed the MDI program to grow local/diverse workforce and employ those vendors in program implementation. As a result, AIC has created tremendous growth of the local/diverse workforce. | As far as it pertains to presence, resources and services provided to our customers, all of our ICs and service providers are local. Contracting with companies that have a local presence bolsters job creation and wage growth in the local economy. Results from the CY2022 Economic Non-Energy Impact (NEI) analysis indicate that the ComEd energy efficiency portfolio generated 16,454 job-years, $1.14B in total labor income, and $4.05B in industry output in 2022, the most recent year for which data was available. | Most important aspect is having local offices/employees vs. incorporation state | PGL/NSG supports diverse contracting and largely leverages implementers that have an Illinois office and utilize Illinois workforce. |
| Transparency provisions on contracting (row 19) | AIC is not supportive of ideas that limits its ability to fulfill its statutory obligations, nor does it support ideas that expand the stakeholder role defined in the IL EE policy manual | ComEd cannot allow outside parties to participate in our internal contracting process. Additionally, we'd like to point out that the Policy Manual says the Program Administrator is responsible for overseeing program ICs and the program implementation process. SAG's role is advisory. This idea blurs the line between the two roles. | Goes beyond EE and this a corporate business practice. | PGL/NSG follows corporate procurement requirements for all RFPs. |
| Non-Profit Bidding (row 37) | AIC supports scoring criteria that show preference to non-profits when services are bid out. | ComEd has its own policies for bidding and providing special consideration for diverse and local contractors, we will continue to follow those internal policies.  | Will need to assess with corporate-wide supplier diversity. There are concerns about the definition of "local." | PGL/NSG follows corporate procurement requirements for all RFPs. |

**Joint Stakeholder Cross-Cutting Process EE Idea:**

Quarterly Deep Dives from Implementors (EE Idea tracker row 16)

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC does not support additional SAG meetings nor does it support ideas that expand the stakeholder role defined in the IL EE policy manual.  | Contributions and feedback from IC's and EESP's are included in ComEd's deep dives. EESPs are surveyed on a yearly basis and ICs make adjustments on how they manage their EESPs based on survey results. IC's are included by nature of their contract to ComEd in administrating these programs. Therefore, ComEd feels we are already fulfilling this request and further interactions between the SAG and IC's add layers of administration and costs by adding additional admin burden on utilities with questionable benefit. Additionally, we'd like to point out that the Policy Manual says the Program Administrator is responsible for overseeing program ICs and the program implementation process. SAG's role is advisory. This idea blurs the line between the two roles. | This appears to be within the current mechanics of the SAG process for some report-outs. What exactly are we trying to solve? | PGL/NSG incorporates implementing contractor input in required quarterly reporting. |

**Joint Stakeholder Market Transformation (MT) EE Ideas:**

| **MT EE Ideas** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
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| Support market transformation program for triple glazed windows (row 24) | AIC has been participating in this initiate with the other IL utilities and is supportive of continued efforts to increase market penetration of cost-effective measures. | ComEd has supported research efforts into the potential savings and market barriers for high-performance windows along with other IL utilities. We continue to monitor developments in the market and will evaluate additional opportunities to support MT initiatives in the future. Side note- most of the energy savings for improved windows in the residential space are recognized through reduced heating demand; as most homes are gas heat, the cost-effectiveness of improving windows as an EE strategy for ComEd is limited. As more homes are electrically heated going forward, that equation will improve from ComEd’s perspective. We'd like to continue to explore this idea to better understand ideal targeted market as well as capacity of benefits.  | We're currently pursuing this opportunity in MT. | PGL/NSG currently supports triple-glazed windows within its Market Transformation effort. |
| Support municipalities interested in adopting stretch codes (row 25) | AIC believes further discussion is required. Work previously conducted by MEEA found that only one municipality in AIC service territory has potential for stretch code adoption and that it was unlikely to adopt stretch codes. | ComEd has been working directly with municipalities over the last few years on an Market Transformation initiative to advance stronger energy codes for new buildings and building performance standards (BPS) for existing buildings; this includes all types: residential, MF, and C&I. The purpose of the initiative is not only to encourage/support municipalities during their rulemaking processes but to provide financial/technical support and incentives to assist in enforcement of the new rules by the municipality and compliance for the buildings subject to the new rules.  | Exploring with various municipalities. | PGL/NSG may consider incorporating this idea into the 2026-2029 Plan. |
| Work with one or more municipalities to develop a multi-family rental energy efficiency standard (row 15) | AIC believes further discussion is required | ComEd has been working directly with municipalities over the last few years on an Market Transformation initiative to advance stronger energy codes for new buildings and building performance standards (BPS) for existing buildings; this includes all types: residential, MF, and C&I. The purpose of the initiative is not only to encourage/support municipalities during their rulemaking processes but to provide financial/technical support and incentives to assist in enforcement of the new rules by the municipality and compliance for the buildings subject to the new rules. To date, there has not been a specific focus on MF but they would be covered by the new codes.  | Working with municipalities for Building Performance Standards (BPS) primarily targeting commercial bldgs but need more info on what "support" entails. | PGL/NSG will require further information regarding this idea to consider for inclusion in the 2026-2029 Plan. |

**Utility Responses to April 16 Energy Efficiency Ideas**

Illinois utilities respond to EE Ideas presented to SAG on [April 16](https://www.ilsag.info/event/tuesday-april-16-sag-meeting/), referenced below

**DarkSky Chicago EE Idea:**

Efficient and Effective Use of Outdoor Lighting (EE Idea tracker rows 40-42)

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC will consider enhanced incentives for adopting outdoor lighting that meets the DarkSky principals.as part of program design/delivery with next plan. No further input necessary at this time. | ComEd is interested in looking into this recommendation further. We would be supportive as long these specs don't drive customers away from LED saving projects and projects are cost-effective | N/A  | N/A  |
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**The Mendota Group EE Idea:**

Market Access Program Design (EE Idea tracker row 62)

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC has concerns with how this concept impacts installer participation. | ComEd is initially in support of such an idea but needs more information to fully understand the benefits and consider further. The CPUC included quite a bit of information on metrics, but how would the aggregators be qualified and managed? Also, what messaging to customers on this aggregated approach seems to work? Finally, what NTG, RR, and cost-effectiveness values have been found elsewhere? We believe this should be run through our R&D process to better understand the answers to these questions.  | Underdeveloped idea; additionally, incorporating varying baselines would be challenging. | PGL/NSG delivers cost-effective and comprehensive solutions for C&I customers. PGL/NSG suggests vendor product proposals be submitted though business development or RFP processes. |

**RMI and the Advanced Building Construction Collaborative EE Idea:**

Industrialized Decarbonization Retrofits (EE Idea tracker row 61)

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| Idea requires more research and information, appears to fall outside of EE scope. | ComEd recognizes the numerous benefits listed but struggles to understand the energy efficiency savings potential behind the idea. We would be happy to explore such an idea and understand the energy savings implications further through our R&D process.  | Underdeveloped idea better suited for R&D. | PGL/NSG suggests further research would be necessary to consider this proposal. |

**Joint Stakeholder Residential EE Ideas:**

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| **Residential EE Ideas** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| Strong commitments to leveraging Inflation Reduction Act funding, especially HOMES/HEERA rebates, to maximize reach of utility programs and the number of customers served (row 6) | AIC will continue working with IL EPA on program design that leverages IRA funding for its utility delivered programs. AIC has been promoting tax credits currently available to market rate customers. | While ComEd is interested in leveraging IRA funding into braided programs, we are also monitoring the development of IRA funding policies and procedures being developed by the Illinois EPA. Pursuit of projects with IRA funding depends on resolution of attribution issues.  | We're committed to working w/ the State however we need to understand the program structure first. | PGL/NSG will require further information regarding how the IL EPA will begin implementing IRA-funded programs before committing to this proposed idea.  |
| For gas or dual fuel utilities, start (if not already in place) or significantly ramp up residential market rate weatherization program savings (row 11) | AIC believes further discussion is required | N/A  | Will require portfolio balance trade offs. | PGL/NSG will require further information regarding this idea to consider for inclusion in the 2026-2029 Plan. |

**Elevate EE Idea:**

Home EE Electrification (EE Idea tracker rows 43-44)

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| Idea requires more research and information, potential as a Breakthrough Equipment and Devices (BED) project. | ComEd has developed leave behind materials and is working with participating Energy Efficiency Service Providers to ensure equipment maintenance requirements are clear for Whole Home Electric participants.In response to the 4-part suggestion: 1. ComEd is pursuing a post-project equipment monitoring study for a subset of Whole Home Electric participants through R&D. 2. ComEd will investigate the energy savings associated with Clean and Check services and if this can be implemented within Whole Home Electric in coordination with the participating Energy Efficiency Service Providers3. ComEd will consider expanding the R&D monitoring scope to assess how 'Clean and Check Services' impact system performance4. If ComEd is able to incorporate suggestion #2, it will be feasible to also incorporate this suggestion as part of the Clean and Check service and expectations.We believe this idea needs further investigation to understand the energy savings potential and suggest it should be submitted through our R&D team.  | N/A  | N/A  |
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