Guidehouse

Peoples Gas 2022-2025 Summary Impact and Cost Effectiveness Evaluation Report

Fourth Energy Efficiency Plan (Plan 4):

Gas Program Years 2022-2025

(01/01/2022-12/31/2025)

Prepared for:

Peoples Gas Company

PEOPLES GAS®

FINAL

November 13, 2026

Prepared by:

Yeab Lakew
Guidehouse Inc.

Ensar Biscevic
Guidehouse Inc.

Charles Ampong
Guidehouse Inc.

DRIFTLESS ENERGY

ECOMETRIC

INCA ENERGY EFFICIENCY

utilivatetechnologies

Submitted to:
Peoples Gas
200 East Randolph Street
Chicago, IL 60601

Submitted by:
Guidehouse Inc.
167 N. Green Street
12th Floor
Chicago, IL 60607

Contact:

Charles Maglione, Partner
202.481.7352
cmaglione@guidehouse.com

Charles Ampong, Associate Director
608.616.4922
charles.ampong@guidehouse.com

Laura Agapay-Read, Associate Director
312.583.4178
laura.agapay.read@guidehouse.com

This report was prepared by Guidehouse for Peoples Gas Company. The work presented in this report represents Guidehouse's professional judgment based on the information available at the time this report was prepared. Use of this report by any other party for whatever purpose should not, and does not, absolve such party from using due diligence in verifying the report's contents. Neither Guidehouse nor any of its subsidiaries or affiliates assumes any liability or duty of care to such parties and hereby disclaims any such liability.

Table of Contents

1 Introduction 1
2 Portfolio Summary 2
2.1 Portfolio Net Energy Savings Verified Results 2
2.2 Portfolio Cost Effectiveness Test Verified Results 3
2.3 Portfolio Economic Impact Summary of Verified Results 5
3 Program Specific Results 6
3.1 Program Specific Verified Savings and Costs Summary 6
3.2 Program Specific Cost Effectiveness Results Summary 8
Appendix A. Cost Effectiveness Methodology 11
Appendix B. Economic Impact Analysis Methodology 14

Table of Tables, Figures, and Equations

Table 1. Peoples Gas Plan 4 Portfolio - Verified Net Energy Savings 2
Table 2. Total Incremental Annual Savings (PY2022-PY2025) 2
Table 3. Total Incremental Annual Savings by Sector (2022-2025) 3
Table 4. Portfolio Cost Effectiveness Test Results (2022-2025) 4
Table 5. Cumulative First Year Job Impacts – Peoples Gas 5
Table 6. Cumulative Economic Impacts by Time Period (2022 - 2025) 5
Table 7. Summary of Verified Savings and Program Costs for 2022-2025 7
Table 8. Summary of Program Level Benefits, Costs and Illinois TRC Test for 2022-2025 9
Table 9. Summary of Program Level Benefits, Costs and Illinois PACT for 2022-2025 10
Table 10. Data Points Needed to Conduct the Illinois TRC Test 13

Figure 1. Annual Incremental Therms Savings by Sector (2022-2025) 3
Figure 2. Economic Impact Assessment Methodology 14

1 Introduction

This report provides Guidehouse's summary reporting of verified energy savings and cost effectiveness results for the Peoples Gas Energy Efficiency Plan (EEPS) portfolio of programs for 2022 through 2025 (Plan 4). The report fulfills the Illinois Public Utilities Act (PUA) requirement for a review of the 4-year results of the broader net program impacts for Program Year 2022 (PY2022) starting on January 1, 2022, through Program Year 2025 (PY2025) which ended on December 31, 2025. In Plan 4, Peoples Gas implemented 16 programs for which final impact evaluation reports have been submitted by Guidehouse to Peoples Gas and the Illinois Commerce Commission (ICC).

© 2026 Guidehouse Inc. All rights reserved.

2 Portfolio Summary

2.1 Portfolio Net Energy Savings Verified Results

Table 1 and Table 2 summarize the incremental energy savings the Peoples Gas portfolio achieved in PY2022-PY2025. The 4-year verified first-year annual net savings of 36,768,032 therms[1] exceeded its Plan 4 Approved Net Energy Savings Goal[2] of 33,976,058 net therms by eight percent.

Table 1. Peoples Gas Plan 4 Portfolio - Verified Net Energy Savings

Program Year	Verified Net Energy Savings (Annual Therms)
Program Year 2022	9,699,483
Program Year 2023	9,839,935
Program Year 2024	9,053,143
Program Year 2025	8,175,471
Plan 4 Portfolio Verified Total	**36,768,032**
Plan 4 Compliance Goal	**32,293,240**
Portfolio Percent of Compliance Goal	**114%**
Plan 4 Approved Goal	**33,976,058**
Portfolio Percent of Approved Goal	**108%**

Source: Peoples Gas tracking data and evaluation team analysis.

Table 2. Total Incremental Annual Savings (PY2022-PY2025)

Savings Category	2022 Energy Savings (Therms)	2023 Energy Savings (Therms)	2024 Energy Savings (Therms)	2025 Energy Savings (Therms)	2022-2025 Total (Therms)
Ex Ante Gross Savings	10,839,381	10,731,972	9,369,033	8,423,844	39,364,229
Portfolio Gross Realization Rate*	1.00	1.00	1.00	1.01	1.00
Verified Gross Savings	10,811,116	10,706,495	9,402,692	8,541,027	39,461,330
Portfolio Net-to-Gross Ratio (NTG) †	0.90	0.92	0.96	0.96	0.93
Verified Net Savings	9,699,483	9,839,935	9,053,143	8,175,471	36,768,032

** Realization Rate (RR) is the ratio of verified gross savings to ex ante gross savings, based on evaluation research findings.*
† Guidehouse calculated the portfolio NTG ratio by dividing the total net savings by the total verified gross savings.
Source: Peoples Gas tracking data and evaluation team analysis.

[1] Unless noted, therm values are first year annual savings.
[2] The Approved Net Energy Savings Goal (Approved Goal) refers to the most updated portfolio-level savings goal. In the case of Section 8-104 programs, the values match the Adjusted Energy Savings Goal contained in the Program Administrator's updated 2025 Adjustable Savings Goal Template. The Original Plan Savings Goal (Compliance Goal) approved in the Commission's Final Order submitted in Docket 21-0154 for 2022 through 2025 is 32,293,240 net therm savings.

© 2026 Guidehouse Inc. All rights reserved.

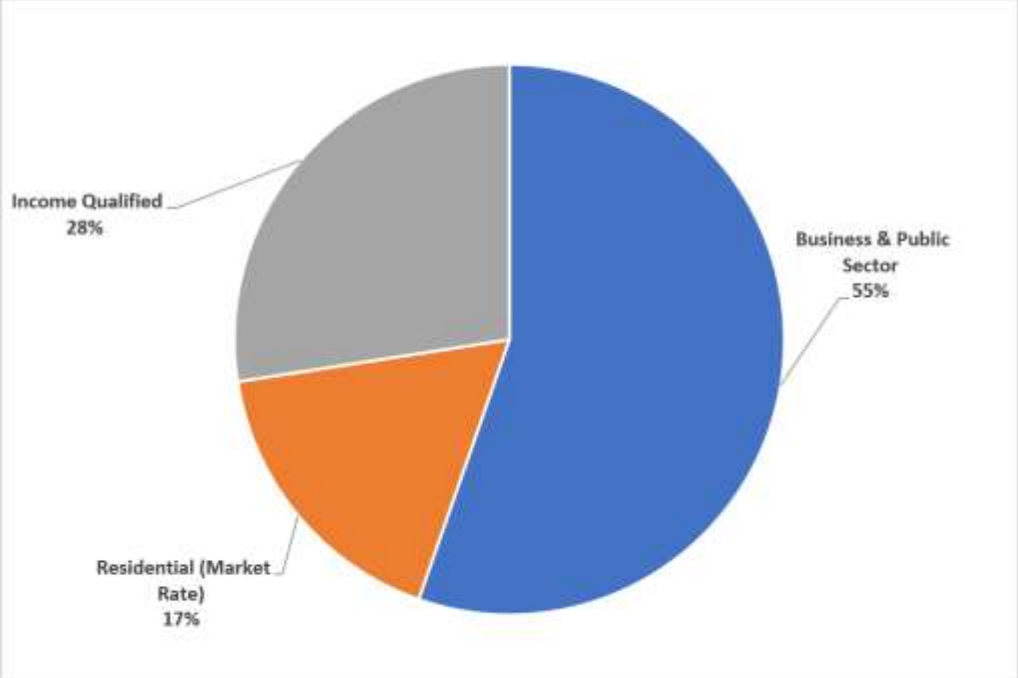
Table 3 shows the total savings realized by sector. Over the 4-year period, the Business and Public Sector programs produced 55% of the portfolio net savings, Residential Market Rate programs contributed 17%, and the Income Qualified programs contributed 28% (see Figure 1).

Table 3. Total Incremental Annual Savings by Sector (2022-2025)

Savings Category	2022 Net Savings (Therms)	2023 Net Savings (Therms)	2024 Net Savings (Therms)	2025 Net Savings (Therms)	2022-2025 Net Total (Therms)
Business & Public Sector	5,729,665	5,762,116	4,687,806	4,175,278	20,354,865
Residential (Market Rate)	2,018,141	1,471,128	1,393,736	1,438,284	6,321,289
Income Qualified	1,951,678	2,606,690	2,971,600	2,561,909	10,091,877
Total Net Savings	9,699,483	9,839,935	9,053,143	8,175,471	36,768,032

Source: Peoples Gas tracking data and evaluation team analysis. Numbers are rounded.

Figure 1. Annual Incremental Therms Savings by Sector (2022-2025)



Source: Peoples Gas tracking data and evaluation team analysis.

2.2 Portfolio Cost Effectiveness Test Verified Results

This section summarizes findings regarding the cost-effectiveness of the Peoples Gas portfolio of energy efficiency programs over Plan 4, from PY2022 through PY2025. The cost effectiveness methodology and description of data inputs are provided in the Appendix.

© 2026 Guidehouse Inc. All rights reserved.

Table 4**Error! Reference source not found.** summarizes the four-year combined results for the Peoples Gas portfolio at the program, sector, and portfolio levels. The results presented in this table are based on the Illinois Total Resource Cost (TRC) test, which includes benefits from avoided environmental and societal costs, and is the primary test defined by the Climate and Equitable Jobs Act (CEJA) for ascertaining the portfolio's cost effectiveness. The table also shows results for the Program Administration Cost Test (PACT).

Throughout all four program years, the results indicate that the Plan 4 portfolio was cost effective, achieving a TRC ratio of 2.8 (including societal non-energy impacts (NEIs)) and 1.0 (excluding societal NEIs). The TRC with NEI without income qualified is 3.2, and the TRC without NEI and income qualified is 1.2.

Table 4. Portfolio Cost Effectiveness Test Results (2022-2025)

Program*	Verified Net Savings (Therms)	TRC Test (w/ NEI)	TRC Test (w/o NEI)	PACT Test (w/ NEI)	PACT Test (w/o NEI)
C&I and PS Joint New Construction	375,506	3.6	1.5	4.7	3.3
C&I and PS Retro-Commissioning	1,320,924	13.0	4.0	3.5	3.5
C&I and PS Custom	1,850,349	7.1	2.4	1.8	1.8
C&I and PS Prescriptive	11,273,662	4.2	1.3	1.4	1.3
C&I Gas Optimization	695,933	4.3	1.4	1.5	1.5
Small and Midsize Business	4,763,858	3.7	1.2	1.3	1.2
Strategic Energy Management	74,634	1.7	0.7	0.6	0.6
Business and Public Sector Total	**20,354,865**	**4.5**	**1.5**	**1.6**	**1.4**
Elementary Education Kits (EEE)	427,242	8.9	4.9	6.3	2.0
Epic Savers Kit (ESK)**	-	-	-	-	-
Home Energy Jumpstart/Assessment	163,705	2.4	1.2	1.2	0.5
Home Energy Rebates - HVAC, Smart Thermostats, Weatherization	1,927,792	3.9	1.7	2.6	1.6
Multi-Family Energy Savings	3,802,550	4.8	1.9	1.9	1.4
Residential Sector Total	**6,321,289**	**4.4**	**1.9**	**2.3**	**1.4**
Community Joint Kits	2,092,668	9.4	4.5	5.8	2.6
Income Qualified Multi-Family	5,656,759	1.9	0.7	0.9	0.7
Income Qualified Single Family	1,594,439	1.6	0.6	0.4	0.4
IQ Elementary Education Kits (IQ EEE)	609,971	6.6	3.5	4.7	1.7
Public Housing Energy Saving (PHES)	138,041	0.6	0.2	0.2	0.2
Income Qualified Total	**10,091,877**	**2.3**	**0.9**	**1.0**	**0.7**
Portfolio Total, with IQ	**36,768,032**	**2.8**	**1.0**	**1.1**	**0.8**
Portfolio Total, without IQ	**26,676,155**	**3.2**	**1.2**	**1.2**	**1.0**

Notes: Totals may not sum due to rounding. This 4-year summary impact and TRC and PACT analysis account for Other Portfolio (Admin) Costs, which had previously been omitted from the Annual Summary Impact Reports.
** C&I – Commercial and Industrial; PS – Public Sector*

© 2026 Guidehouse Inc. All rights reserved.

*** PGL did not offer the Epic Savers Kit program in Plan 4.*
Source: Evaluation Research

2.3 Portfolio Economic Impact Summary of Verified Results

Table 5 presents the cumulative first year only job impacts. First year impacts[3] are the total direct, indirect, and induced jobs created from portfolio activity in PY2022-PY2025. Table 6 presents results of the cumulative economic and employment impacts created from portfolio activity in PY2022-PY2025.

Overall, Peoples Gas Plan 4 Energy Efficiency Portfolio created 734 first year jobs, 2,321 job-years[4] and $688 million dollars of industry output[5] across the state of Illinois.

Table 5. Cumulative First Year Job Impacts – Peoples Gas

Period	Direct	Indirect	Induced	Cumulative Total*
2025 – 2049	57	49	82	189
2024 – 2048	62	49	82	193
2023 – 2047	60	47	85	193
2022 – 2046	123	79	-43	159
2021 – 2045	178	82	43	304
2020 – 2044	176	83	58	317
2020 – 2049	**656**	**390**	**307**	**1,355**

* The 4-year first year only jobs is the sum of the 2022 through 2025 cumulative total jobs (total of 734 jobs).
Source: Guidehouse analysis of Peoples Gas annual evaluation of economic impacts of EE programs.

Table 6. Cumulative Economic Impacts by Time Period (2022 - 2025)

Period	Impact Type	Job Years	Labor Income ($ Million)	Industry Output ($ Million)
2025 – 2049	Direct	75	$8.1	$28.3
	Indirect	60	$5.4	$14.3
	Induced	411	$26.9	$129.7
	Total	**547**	**$40.5**	**$172.2**
2024 – 2048	Direct	112	$10.5	$37.2
	Indirect	70	$6.3	$16.5
	Induced	469	$30.5	$145.5

[3] First year impacts are the total direct, indirect, and induced jobs created from portfolio activity in a particular year (summed for 2022-2025).
[4] Job-years are a cumulative measure of employment impact equal to one full-time equivalent job sustained for one year. Under CEJA economic impact analyses, job-years are used to quantify the statewide employment effects generated over time by utility energy efficiency investments and the resulting long-term energy bill savings. The evaluation team advises against use of employment impacts reported in job-years because employment impacts are long-term effects not confined to a particular year, using job-years can be misleading as to the effects produced.
[5] Industry output is the total annual production value of an industry; it can be described as business sales or revenues.

© 2026 Guidehouse Inc. All rights reserved.

Period	Impact Type	Job Years	Labor Income ($ Million)	Industry Output ($ Million)
	Total	**651**	**$47.2**	**$199.2**
2023 – 2047	Direct	110	$10.7	$34.4
	Indirect	72	$6.4	$17.2
	Induced	453	$29.7	$141.1
	Total	**635**	**$46.8**	**$192.7**
2022 – 2046	Direct	219	$20.3	$64.9
	Indirect	122	$11.8	$29.2
	Induced	148	$9.8	$30.1
	Total	**488**	**$41.9**	**$124.2**
2021 – 2045	Direct	221	$20.7	$48.6
	Indirect	112	$8.2	$21.5
	Induced	408	$23.0	$94.9
	Total	**741**	**$51.9**	**$164.9**
2020 – 2044	Direct	189	$15.2	$41.2
	Indirect	97	$7.0	$18.4
	Induced	251	$14.1	$55.7
	Total	**538**	**$36.3**	**$115.3**
2020 – 2049	**Cumulative Total**	**3,599**	**$264.5**	**$968.5**

Note: Totals may not sum due to rounding.

Source: Guidehouse analysis of Peoples Gas annual evaluation of economic impacts of EE programs.

3 Program Specific Results

3.1 Program Specific Verified Savings and Costs Summary

A summary of the components of the verified savings and costs for each program are shown in Table 7 over the four years of Plan 4. The table includes the summary at the sector level as well as the portfolio level total.

© 2026 Guidehouse Inc. All rights reserved.

Table 7. Summary of Verified Savings and Program Costs for 2022-2025

Programs	Ex Ante Gross	Realization Rate	Verified Gross		Deemed / Used	Verified Net				Program Costs		Other Energy Benefits		Participation		Verified Gross Weighted Average Measure Life	GHG Savings		Water Savings		Incremental Costs		Net Savings
	Annual Savings	Annual Savings (Verified Gross / Ex Ante Gross)	Annual Savings	Lifetime Savings	Net-to-Gross Ratio	Annual Savings	Lifetime Savings	Cost per Annual Savings	Cost per Lifetime Savings	Non-Incentives	Incentives	Energy Savings	Demand Reductions	# Units	Units Definition	Years	Annual Verified Net CO2 Savings	Lifetime Verified Net CO2 Savings	Annual Verified Net Water Savings	Lifetime Verified Net Water Savings	Gross IMC	Net IMC	
	Therms	%	Therms	Therms	%	Therms	Therms	$/Therms	$/Therms	$	$	kWh	kW				metric tons CO2	metric tons CO2	Gallons	Gallons	$	$	%
(a)	(b)	(c=d/b)	(d)	(e)	(f=g/d)	(g)	(h)	(i=(k+l)/g)	(j=(k+l)/h)	(k)	(l)	(m)	(n)	(o)	(p)	(q=h/g)	(r)	(s)	(t)	(u)	(v)	(w)	(x)
C&I and PS Joint New Construction	898,879	96%	865,128	17,821,629	43%	375,506	7,735,423	1.35	0.07	219,178	287,756	11,320	-	38	Projects	20.6	1,987	40,928	5,254,537	108,243,463	4,521,845	1,967,059	1.0%
C&I and PS Retro-Commissioning	1,457,414	95%	1,378,775	11,840,550	96%	1,320,924	11,343,366	0.72	0.08	153,006	793,935	-	-	57	Projects	8.6	6,989	60,018	-	-	793,935	793,935	3.6%
C&I and PS Custom	2,087,516	107%	2,238,217	33,029,026	83%	1,850,349	27,404,666	2.01	0.14	-	3,710,545	-	-	81	Projects	14.8	9,790	144,998	-	-	3,754,881	3,739,527	5.0%
C&I and PS Prescriptive	11,968,407	101%	12,098,035	69,185,980	93%	11,273,662	64,564,789	1.34	0.23	10,068,658	5,033,776	60,103	-	2,991,013	Projects	5.7	59,649	341,612	38,518,711	231,112,265	7,865,320	7,460,433	30.7%
C&I Gas Optimization	780,132	94%	735,857	11,860,304	95%	695,933	11,231,713	2.62	0.16	-	1,824,349	-	-	34	Projects	16.1	3,682	59,427	-	-	2,667,012	2,598,513	1.9%
Small and Midsize Business	5,099,272	100%	5,086,225	34,269,779	94%	4,763,858	32,003,855	1.56	0.23	4,156,492	3,253,567	22,094	-	980,306	Projects	6.7	25,206	169,332	15,873,371	104,045,707	5,341,585	5,042,473	13.0%
Strategic Energy Management	78,883	98%	76,942	538,594	97%	74,634	522,438	3.19	0.46	223,458	14,788	-	-	3	Projects	7.0	395	2,764	-	-	14,788	14,788	0.2%
Business and Public Sector Total	**22,370,502**	**100%**	**22,479,179**	**178,545,863**	**91%**	**20,354,866**	**154,806,249**	**1.46**	**0.19**	**14,820,793**	**14,918,717**	**93,517**	**-**	**3,971,532**	**Projects**	**7.6**	**107,698**	**819,080**	**59,646,619**	**443,401,435**	**24,959,366**	**21,616,728**	**55.4%**
Elementary Education Kits (EEE)	407,109	100%	407,625	3,802,139	105%	427,242	3,988,190	1.15	0.12	247,595	245,761	96,786	-	329,202	Projects	9.3	2,261	21,102	44,155,295	284,752,098	490,390	519,086	1.2%
Epic Savers Kit (ESK)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Home Energy Jumpstart/Assessment	164,755	100%	164,740	1,670,899	99%	163,705	1,659,456	5.59	0.55	552,890	362,380	49,596	9.82	19,999	Projects	10.1	866	8,780	7,756,845	77,568,453	463,737	470,771	0.4%
Home Energy Rebates - HVAC, Smart Thermostats, Weatherization	2,169,674	100%	2,161,384	31,340,670	89%	1,927,792	27,457,678	2.14	0.15	2,548,886	1,573,282	1,177,695	789.19	909,844	Projects	14.2	10,200	145,279	-	-	7,182,866	5,667,601	5.2%
Multi-Family Energy Savings	4,132,256	101%	4,156,525	38,893,002	91%	3,802,550	35,439,518	1.83	0.20	2,429,597	4,539,373	205,142	86.02	670,233	Projects	9.3	20,119	187,510	75,106,937	458,248,478	6,668,006	6,166,559	10.3%
Residential Sector Total	**6,873,794**	**100%**	**6,890,274**	**75,706,711**	**92%**	**6,321,289**	**68,544,841**	**1.98**	**0.18**	**5,778,967**	**6,720,796**	**1,529,219**	**885.03**	**1,929,277**	**Projects**	**10.8**	**33,446**	**362,671**	**127,019,077**	**820,569,029**	**14,804,999**	**12,824,017**	**17.2%**
Community Joint Kits	2,092,014	100%	2,092,668	26,570,348	100%	2,092,668	26,570,348	1.18	0.09	494,320	1,977,746	290,866	-	3,380,942	Projects	12.7	11,072	140,584	150,305,860	1,064,015,782	3,420,848	3,420,848	5.7%
Income Qualified Multi-Family	5,683,912	100%	5,656,759	79,761,214	100%	5,656,759	79,761,214	5.16	0.37	9,341,772	19,856,232	207,848	0.89	2,966,375	Projects	14.1	29,930	422,017	130,774,672	948,629,136	40,160,350	40,160,350	15.4%
Income Qualified Single Family	1,596,933	100%	1,594,439	28,424,013	100%	1,594,439	28,424,013	10.91	0.61	4,205,539	13,187,807	30,788	-	2,135,492	Projects	17.8	8,436	150,391	12,319,047	123,190,468	13,886,802	13,723,841	4.3%
IQ Elementary Education Kits (IQ EEE)	609,025	100%	609,971	6,462,660	100%	609,971	6,462,660	1.63	0.15	454,223	537,135	185,294	-	294,503	Projects	10.6	3,227	34,194	59,345,189	397,699,645	1,184,147	1,184,147	1.7%
Public Housing Energy Saving (PHES)	138,049	100%	138,041	538,044	100%	138,041	538,044	6.75	1.73	214,244	716,893	1,459	-	5,036	Projects	3.9	730	2,847	361,719	2,545,592	749,112	749,112	0.4%
Income Qualified Total	**10,119,934**	**100%**	**10,091,877**	**141,756,279**	**100%**	**10,091,877**	**141,756,279**	**5.05**	**0.36**	**14,710,098**	**36,275,812**	**716,255**	**0.89**	**8,782,348**	**Projects**	**14.0**	**53,396**	**750,032**	**353,106,486**	**2,536,080,623**	**59,401,260**	**59,238,299**	**27.4%**
Market Development Initiative										**2,745,962**													
Other Portfolio Costs										**18,822,605**													
Portfolio Total w IQ	**39,364,229**	**100%**	**39,461,330**	**396,008,853**	**93%**	**36,768,032**	**365,107,369**	**$3.12**	**$0.31**	**$56,878,425**	**$57,915,326**	**2,338,991**	**885.92**	**14,683,157**	**Projects**	**9.9**	**194,540**	**1,931,783**	**539,772,183**	**3,800,051,086**	**99,165,626**	**93,679,044**	**100.0%**
Portfolio Total w/o IQ	**29,244,296**	**100%**	**29,369,453**	**254,252,574**	**91%**	**26,676,155**	**223,351,091**	**$2.39**	**$0.29**	**$42,168,328**	**$21,639,514**	**1,622,736**	**885.03**	**5,900,809**	**Projects**	**8.4**	**141,144**	**1,181,751**	**186,665,696**	**1,263,970,464**	**39,764,365**	**34,440,745**	**72.6%**

Notes: Totals may not sum due to rounding. The total Program Cost includes Other Portfolio (Admin) Costs which had previously been omitted from the Annual Summary Impact Reports.
Source: Evaluation summary of analysis of 2022 through 2025 program and portfolio verified summary reports[6]

[6] https://www.ilsag.info/evaluation-documents/final-evaluation-reports/#people

© 2026 Guidehouse Inc. All rights reserved.

3.2 Program Specific Cost Effectiveness Results Summary

A summary of the components of the cost effectiveness calculations for each program are shown in Table 8 for the Illinois TRC calculations and Table 9 for the PACT calculations. The tables include the value of each benefit and cost component for each program totaled over the four years. The portfolio results are shown with or without NEI or income qualified.

A summary of the annual reports of the Peoples Gas Illinois TRC and PACT benefits and costs for each program are provided in the accompanied excel spreadsheet for this report.

© 2026 Guidehouse Inc. All rights reserved.

Table 8. Summary of Program Level Benefits, Costs and Illinois TRC Test for 2022-2025

Programs	Benefits			Costs			IL Total Resource Cost (TRC) Test w NEIs				IL Total Resource Cost (TRC) Test w/o NEIs			
	Avoided Gas Savings	All Other Benefits w NEI	All Other Benefits w/o NEI	Non-Incentive Costs	Incentive Costs	Incremental Costs	IL TRC Benefits	IL TRC Costs	IL TRC Test Net Benefits	IL TRC Test	IL TRC Benefits	IL TRC Costs	IL TRC Test Net Benefits	IL TRC Test
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h) = (b+c)	(i) = (e+g)	(j) = (h-i)	(k) = (h/i)	(l) = (b+d)	(m) = (e+g)	(n) = (l-m)	(o) = (l/m)
C&I and PS Joint New Construction	$2,404,780	$5,503,239	$970,638	$219,178	$287,756	$1,967,059	$7,908,020	$2,186,237	$5,721,782	3.6	$3,375,418	$2,186,237	$1,189,181	1.5
C&I and PS Retro-Commissioning	$3,800,665	$8,525,048	$-	$153,006	$793,935	$793,935	$12,325,713	$946,941	$11,378,772	13.0	$3,800,665	$946,941	$2,853,723	4.0
C&I and PS Custom	$8,798,630	$17,867,533	$-	$-	$3,710,545	$3,739,537	$26,666,162	$3,739,537	$22,926,625	7.1	$8,798,630	$3,739,537	$5,059,092	2.4
C&I and PS Prescriptive	$21,530,905	$51,436,287	$2,043,218	$10,068,658	$5,033,776	$7,460,433	$72,967,193	$17,529,091	$55,438,101	4.2	$23,574,123	$17,529,091	$6,045,032	1.3
C&I Gas Optimization	$3,642,886	$7,594,493	$-	$-	$1,824,349	$2,598,513	$11,237,379	$2,598,513	$8,638,866	4.3	$3,642,886	$2,598,513	$1,044,373	1.4
Small and Midsize Business	$10,556,276	$23,605,986	$902,783	$4,156,492	$3,253,567	$5,109,623	$34,162,262	$9,266,116	$24,896,146	3.7	$11,459,060	$9,266,116	$2,192,944	1.2
Strategic Energy Management	$163,815	$250,114	$-	$223,458	$14,788	$14,788	$413,929	$238,247	$175,682	1.7	$163,815	$238,247	$(74,432)	0.7
Business and Public Sector Total	**$50,897,956**	**$114,782,701**	**$3,916,640**	**$14,820,793**	**$14,918,717**	**$21,683,889**	**$165,680,657**	**$36,504,682**	**$129,175,975**	**4.5**	**$54,814,596**	**$36,504,682**	**$18,309,914**	**1.5**
Elementary Education Kits (EEE)	$1,289,519	$5,568,988	$2,455,392	$247,595	$245,761	$519,086	$6,858,508	$766,680	$6,091,827	8.9	$3,744,912	$766,680	$2,978,231	4.9
Epic Savers Kit (ESK)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Home Energy Jumpstart/Assessment	$546,754	$1,938,372	$721,130	$552,890	$362,380	$470,771	$2,485,125	$1,023,661	$1,461,464	2.4	$1,267,883	$1,023,661	$244,222	1.2
Home Energy Rebates - HVAC, Smart Thermostats, Weatherization	$8,829,211	$23,258,368	$4,888,651	$2,548,886	$1,573,282	$5,667,601	$32,087,578	$8,216,487	$23,871,092	3.9	$13,717,862	$8,216,487	$5,501,376	1.7
Multi-Family Energy Savings	$11,571,751	$29,708,839	$4,359,317	$2,429,597	$4,539,373	$6,166,559	$41,280,590	$8,596,156	$32,684,435	4.8	$15,931,068	$8,596,156	$7,334,912	1.9
Residential Sector Total	**$22,237,235**	**$60,474,566**	**$12,424,490**	**$5,778,967**	**$6,720,796**	**$12,824,017**	**$82,711,802**	**$18,602,984**	**$64,108,818**	**4.4**	**$34,661,725**	**$18,602,984**	**$16,058,741**	**1.9**
Community Joint Kits	$8,555,111	$28,321,505	$9,173,384	$494,320	$1,977,746	$3,420,848	$36,876,616	$3,915,168	$32,961,448	9.4	$17,728,495	$3,915,168	$13,813,327	4.5
Income Qualified Multi-Family	$25,668,171	$69,180,825	$8,154,358	$9,341,772	$19,856,232	$40,160,350	$94,848,996	$49,502,122	$45,346,874	1.9	$33,822,528	$49,502,122	$(15,679,594)	0.7
Income Qualified Single Family	$8,979,198	$20,402,477	$1,076,869	$4,205,539	$13,187,807	$13,723,841	$29,381,675	$17,929,379	$11,452,295	1.6	$10,056,067	$17,929,379	$(7,873,313)	0.6
IQ Elementary Education Kits (IQ EEE)	$2,113,007	$8,686,944	$3,539,979	$454,223	$537,135	$1,184,147	$10,799,951	$1,638,370	$9,161,581	6.6	$5,652,986	$1,638,370	$4,014,616	3.5
Public Housing Authority (PHES)	$176,496	$433,447	$22,412	$214,244	$716,893	$749,112	$609,943	$963,357	$(353,413)	0.6	$198,907	$963,357	$(764,449)	0.2
Income Qualified Total	**$45,491,983**	**$127,025,199**	**$21,967,001**	**$14,710,098**	**$36,275,812**	**$59,238,299**	**$172,517,181**	**$73,948,397**	**$98,568,785**	**2.3**	**$67,458,984**	**$73,948,397**	**$(6,489,413)**	**0.9**
Market Development Initiative				**$2,745,962**			**$-**	**$2,745,962**	**$(2,745,962)**		**$-**	**$2,745,962**	**$(2,745,962)**	
EEPS Portfolio Costs				**$18,822,605**			**$-**	**$18,822,605**	**$(18,822,605)**		**$-**	**$18,822,605**	**$(18,822,605)**	
EEPS Portfolio Total	**$118,627,174**	**$302,282,466**	**$38,308,131**	**$56,878,425**	**$57,915,326**	**$93,746,205**	**$420,909,640**	**$150,624,630**	**$270,285,010**	**2.8**	**$156,935,305**	**$150,624,630**	**$6,310,675**	**1.0**
EEPS Portfolio Total, without Income Qualified (IQ)	**$73,135,192**	**$175,257,267**	**$16,341,130**	**$42,168,328**	**$21,639,514**	**$34,507,906**	**$248,392,459**	**$76,676,234**	**$171,716,225**	**3.2**	**$89,476,321**	**$76,676,234**	**$12,800,088**	**1.2**

Notes: Totals may not sum due to rounding. Other Portfolio (Admin) Costs are now included in the TRC results, which had previously been omitted from the Annual Summary Impact Reports.
Source: Evaluation summary of analysis of 2022 through 2025 program and portfolio verified summary reports[7]

[7] https://www.ilsag.info/evaluation-documents/final-evaluation-reports/#people

© 2026 Guidehouse Inc. All rights reserved.

Table 9. Summary of Program Level Benefits, Costs and Illinois PACT for 2022-2025

Programs	Benefits		Costs			Program Administrator Cost Test (PACT) w NEIs				Program Administrator Cost Test (PACT) w/o NEIs			
	Avoided Gas Savings	All Other Benefits w NEI	Non-Incentive Costs	Incentive Costs	Incremental Costs	PACT Benefits	PACT Costs	PACT Test Net Benefits	PACT Test	PACT Benefits	PACT Costs	PACT Test Net Benefits	PACT Test
(a)	(b)	(c)	(d)	(e)	(f)	(g) = (b+c)	(h) = (d+e)	(i) = (g-h)	(j) = (g/h)	(k) = (b)	(l) = (d+e)	(m) = (k-l)	(n) = (k/l)
C&I and PS Joint New Construction	$1,696,400	$688,711	$219,178	$287,756	$1,967,059	$2,385,112	$506,935	$1,878,177	4.7	$1,696,400	$506,935	$1,189,466	3.3
C&I and PS Retro-Commissioning	$3,278,292	$-	$153,006	$793,935	$793,935	$3,278,292	$946,941	$2,331,351	3.5	$3,278,292	$946,941	$2,331,351	3.5
C&I and PS Custom	$6,751,438	$-	$-	$3,710,545	$3,739,538	$6,751,438	$3,710,545	$3,040,893	1.8	$6,751,438	$3,710,545	$3,040,893	1.8
C&I and PS Prescriptive	$19,229,174	$1,856,310	$10,068,658	$5,033,776	$7,460,433	$21,085,484	$15,102,434	$5,983,051	1.4	$19,229,174	$15,102,434	$4,126,740	1.3
C&I Gas Optimization	$2,768,979	$-	$-	$1,824,349	$2,598,513	$2,768,979	$1,824,349	$944,630	1.5	$2,768,979	$1,824,349	$944,630	1.5
Small and Midsize Business	$9,197,418	$761,805	$4,156,493	$3,253,567	$5,109,623	$9,959,223	$7,410,059	$2,549,164	1.3	$9,197,418	$7,410,059	$1,787,358	1.2
Strategic Energy Management	$141,681	$-	$223,458	$14,788	$14,788	$141,681	$238,247	$(96,566)	0.6	$141,681	$238,247	$(96,566)	0.6
Business and Public Sector Total	**$43,063,383**	**$3,306,827**	**$14,820,793**	**$14,918,717**	**$21,683,889**	**$46,370,210**	**$29,739,510**	**$16,630,700**	**1.6**	**$43,063,383**	**$29,739,510**	**$13,323,873**	**1.4**
Elementary Education Kits (EEE)	$1,006,298	$2,106,223	$247,595	$245,762	$519,086	$3,112,522	$493,356	$2,619,165	6.3	$1,006,298	$493,356	$512,942	2.0
Epic Savers Kit (ESK)	-	-	-	-	-	-	-	-	-	-	-	-	-
Home Energy Jumpstart/Assessment	$447,994	$612,409	$552,890	$362,380	$470,771	$1,060,403	$915,270	$145,133	1.2	$447,994	$915,270	$(467,276)	0.5
Home Energy Rebates - HVAC, Smart Thermostats, Weatherization	$6,785,377	$3,862,044	$2,548,886	$1,573,282	$5,767,173	$10,647,422	$4,122,168	$6,525,254	2.6	$6,785,377	$4,122,168	$2,663,210	1.6
Multi-Family Energy Savings	$9,423,016	$3,938,568	$2,429,597	$4,539,373	$6,166,559	$13,361,584	$6,968,969	$6,392,614	1.9	$9,423,016	$6,968,969	$2,454,046	1.4
Residential Sector Total	**$17,662,686**	**$10,519,244**	**$5,778,967**	**$6,720,797**	**$12,923,589**	**$28,181,930**	**$12,499,764**	**$15,682,166**	**2.3**	**$17,662,686**	**$12,499,764**	**$5,162,922**	**1.4**
Community Joint Kits	$6,520,886	$7,873,578	$494,320	$1,977,747	$3,420,848	$14,394,464	$2,472,067	$11,922,397	5.8	$6,520,886	$2,472,067	$4,048,820	2.6
Income Qualified Multi-Family	$19,253,477	$7,010,765	$9,341,772	$19,856,231	$40,160,350	$26,264,242	$29,198,004	$(2,933,762)	0.9	$19,253,477	$29,198,004	$(9,944,527)	0.7
Income Qualified Single Family	$6,464,427	$912,140	$4,205,539	$13,187,807	$13,758,984	$7,376,568	$17,393,346	$(10,016,778)	0.4	$6,464,427	$17,393,346	$(10,928,918)	0.4
IQ Elementary Education Kits (IQ EEE)	$1,635,858	$3,069,918	$454,222	$537,135	$1,184,147	$4,705,776	$991,358	$3,714,419	4.7	$1,635,858	$991,358	$644,501	1.7
Public Housing Authority (PHES)	$164,717	$19,512	$214,244	$716,893	$749,112	$184,229	$931,137	$(746,908)	0.2	$164,717	$931,137	$(766,420)	0.2
Income Qualified Total	**$34,039,366**	**$18,885,913**	**$14,710,098**	**$36,275,813**	**$59,273,441**	**$52,925,279**	**$50,985,910**	**$1,939,369**	**1.0**	**$34,039,366**	**$50,985,910**	**$(16,946,544)**	**0.7**
Market Development Initiative			**$2,745,962**			**$-**	**$2,745,962**	**$(2,745,962)**		**$-**	**$2,745,962**	**$(2,745,962)**	
EEPS Portfolio Costs			**$18,822,605**			**$-**	**$18,822,605**	**$(18,822,605)**		**$-**	**$18,822,605**	**$(18,822,605)**	
EEPS Portfolio Total	**$94,765,435**	**$32,711,984**	**$56,878,425**	**$57,915,326**	**$93,880,919**	**$127,489,544**	**$114,793,752**	**$12,683,667**	**1.1**	**$94,765,435**	**$114,793,752**	**$(20,028,317)**	**0.8**
EEPS Portfolio Total, without Income Qualified (IQ)	**$60,726,069**	**$13,826,071**	**$42,168,328**	**$21,639,514**	**$34,607,478**	**$74,564,265**	**$63,807,841**	**$10,744,298**	**1.2**	**$60,726,069**	**$63,807,841**	**$(3,081,773)**	**1.0**

Notes: Totals may not sum due to rounding. Other Portfolio (Admin) Costs are now included in the PACT results, which had previously been omitted from the Annual Summary Impact Reports.
Source: Evaluation summary of analysis of 2022 through 2025 program and portfolio verified summary reports[8]

[8] https://www.ilsag.info/evaluation-documents/final-evaluation-reports/#people

© 2026 Guidehouse Inc. All rights reserved.

Appendix A. Cost Effectiveness Methodology

As part of the evaluation of Peoples Gas energy efficiency programs for PY2022 through PY2025, Guidehouse performed benefit-cost calculations with data provided by Peoples Gas and Guidehouse-evaluated program results, referencing the IL TRM or Guidehouse research. The focus of this review is on the basis and calculations used to conduct the Illinois TRC test. The Illinois TRC test is defined in 220 ILCS 5/8-104(b)[9] as follows:

> *"Cost-effective" means that the measures satisfy the total resource cost test which, for purposes of this Section, means a standard that is met if, for an investment in energy efficiency, the benefit-cost ratio is greater than one. The benefit-cost ratio is the ratio of the net present value of the total benefits of the measures to the net present value of the total costs as calculated over the lifetime of the measures. The total resource cost test compares the sum of avoided natural gas utility costs, representing the benefits that accrue to the system and the participant in the delivery of those efficiency measures, as well as other quantifiable societal benefits, including avoided electric utility costs, to the sum of all incremental costs of end use measures (including both utility and participant contributions), plus costs to administer, deliver, and evaluate each demand-side measure, to quantify the net savings obtained by substituting demand-side measures for supply resources. In calculating avoided costs, reasonable estimates shall be included for financial costs likely to be imposed by future regulation of emissions of greenhouse gases. The low-income programs described in item (4) of subsection (f) of this Section shall not be required to meet the total resource cost test.*

The Illinois TRC test differs from a traditional TRC test in its requirement to include a reasonable estimate of the financial costs associated with future regulations and legislation on the emissions of greenhouse gases (GHG). Additional benefits included in the calculation are the NEIs and water savings. This difference adds an additional benefit to investments in efficiency programs that typically are included in the Societal Cost Test in other jurisdictions.

In contrast, the PACT approaches cost-effectiveness from the perspective of the utility as program administrator and determines the ratio of energy supply costs avoided by the utility to the overhead and cost outlays that the utility incurred to implement energy efficiency programs. Since the PACT is primarily focused on utility outlays, incentives paid by the utility to either participants or third-party implementers are included in the calculation, rather than incremental or participant costs. Additionally, since non-energy benefits accrue to society rather than to utility implementing the energy efficiency programs, those benefits are not included in the PACT formula.

[9] Public Utilities Act, Illinois Compiled Statutes maintained by the Legislative Reference Bureau, http://www.ilga.gov/legislation/ilcs/fulltext.asp?DocName=022000050K8-104.

© 2026 Guidehouse Inc. All rights reserved.

Incremental Measure Cost Approach

Incremental cost is the difference between the cost of the efficient measure and the cost of the most relevant baseline measure that would have been installed (if any) in the absence of the efficiency program. The Illinois Energy Efficiency Policy Manual[10] instructs that installation costs (material and labor) and Operations and Maintenance (O&M) costs shall be included if there is a difference between the efficient measure and the baseline measure in O&M costs. In cases where the efficient measure has a significantly shorter or longer life than the relevant baseline measure, the avoided baseline replacement measure costs should be accounted for in the TRC analysis. The incremental cost input in the TRC analysis is not reduced by the amount of incentives.

Data Assumptions in the Cost-Effectiveness Calculations

Guidehouse identified the following data points in Table 10 for conducting the Illinois TRC test. The data are divided into generic and program-specific categories. The program-specific data points are further subdivided into those (1) provided by the utility, (2) are a result of evaluation activities, and (3) from multiple sources.

[10] Illinois Energy Efficiency Policy Manual, Version 3.0, available at: https://www.ilsag.info/policy/

© 2026 Guidehouse Inc. All rights reserved.

Table 10. Data Points Needed to Conduct the Illinois TRC Test

Category	Data Point	Source
Generic	• Avoided Natural Gas Costs: Plan 4 • Avoided Electricity Costs • Loss Factor (Unaccounted-for-Gas Factor) • Plan 4 Non-Energy Impacts Additional Quantifiable Benefit • Weighted Average Cost of Capital	PGL and NSG, ComEd
Generic	• Societal Discount Rate • Greenhouse Gas (GHG) Adder	Illinois TRM[11] and Energy Efficiency Stakeholders Advisory Group
Program Specific	• Verified Participants / Measure Count • Verified Gross and Net Energy Savings • Realization Rate • Net-to-Gross Ratio	Final Evaluation Reports[12]
	• Non-Incentive Costs • Utility Incentive Costs	PGL and NSG
	• Incremental Measure Costs • Measure Life • Water Savings in Gallons and Avoided Water Costs • Electric Savings in kWh and Avoided kWh Costs	PGL and NSG, Guidehouse Evaluation, Illinois TRM, Other

Source: Evaluation Research

[11] Illinois Statewide Technical Reference Manual (Illinois TRM). Available at: https://www.ilsag.info/technical-reference-manual/
[12] Evaluation documents are available at: https://www.ilsag.info/evaluation-documents/final-evaluation-reports/

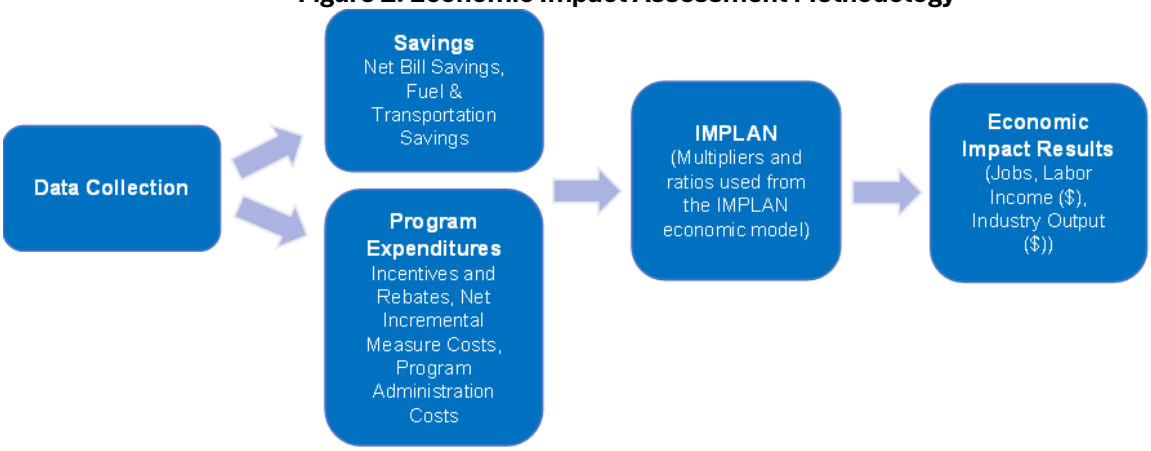
© 2026 Guidehouse Inc. All rights reserved.

Appendix B. Economic Impact Analysis Methodology

The economic impact assessment for energy efficiency programs follows a three-step process (depicted in Figure 2):

1) Data collection of the economic activities of the energy efficiency programs
2) Economic modeling of these activities using IMPLAN[13]
3) Analysis of the results – summarizing and assessing the economic measures (e.g. industry output, labor income, and jobs)

Figure 2. Economic Impact Assessment Methodology



Source: Evaluation Research

[13] IMPLAN is an economic analysis software used to estimate the impact of an economic activity on a specific geographic area. The analysis uses IMPLAN 2021 data for Illinois to capture the effect of program spending on the Illinois economy. For more information, see https://implan.com/

© 2026 Guidehouse Inc. All rights reserved.