



# Peoples Gas and North Shore Gas Evaluation Plans 2026-2029 Compendium

Energy Efficiency Plan

Program Year 2026

**Prepared for:**

**Peoples Gas and North Shore Gas**

**FINAL**

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# 1 Introduction

This document presents evaluation, measurement, and verification (EM&V) plans for evaluating Peoples Gas (PGL) and North Shore Gas (NSG) (“the Companies”) portfolio of energy efficiency programs in 2026 through 2029, which is Energy Efficiency Plan (EEP) 2026-2029 (Plan 5). The next sections include an overview of evaluation approaches and a proposed high-level schedule for program year evaluation tasks. The Appendix includes program-level evaluation plans.

When developing and implementing this plan, Guidehouse will coordinate with and/or seek input from other Illinois utilities (ComEd, Nicor Gas, Ameren Illinois) and their evaluators, the SAG, ICC staff, and the TRM administrator:

- When planning evaluation research and survey activities
- When conducting evaluation research where collaboration to achieve broader coverage and larger sample sizes may improve the research results

This portfolio EM&V plan will be updated annually to reflect updated research priorities. Specifically, Guidehouse will submit proposed updates to the portfolio EM&V plan annually by December 15. This updated draft evaluation plan shall be submitted to Program Administrators, the SAG Facilitator, and ICC Staff concurrently for review and comment, including a summary outline of actual evaluation activities that have occurred already, as well as tentatively planned and proposed evaluation activities for the four-year portfolio EM&V plan.

## 2 Core Evaluation Tasks

The next sections present an overview of the core evaluation tasks with summary tables. The Appendix provides detailed, program-level evaluation plans. The core evaluation tasks are:

- Impact Evaluation
- NTG Research and Framework Application
- Market Transformation Evaluation
- Portfolio Research
- Evaluation Portfolio Support and Reporting

### 2.1 Impact Evaluation

The primary goal of impact evaluation is to verify the gross and net savings claimed by PGL and NSG to be applied toward statutory goals. The effort has secondary goals of improving the accuracy of ex ante impact estimates, improving the accuracy and relevance of the TRM, improving the accuracy and usefulness of the program tracking systems, and verifying the number of customers served.

### 2.1.1 Guiding Principles

1. Verify the gross and net savings to be applied toward statutory goals for all programs in each PGL and NSG program year. Use gross savings calculated from the Illinois Technical Reference Manual (TRM) or custom impact evaluation research and calculate net savings by applying the Illinois Energy Efficiency Stakeholder Advisory Group (SAG) deemed net-to-gross (NTG) value. When programs are delivered jointly with electric utilities, calculate verified gross natural gas savings without interactive effects from the reduction of electricity usage.
2. Where practical, conduct impact evaluations and measure research using randomized controlled trials (RCT) or quasi-experimental design (QED) and energy consumption data. When Guidehouse believes that RCTs or QEDs are not practical, as part of its evaluation plan, we will provide an explanation and support for its decision.
3. Coordinate impact evaluation of jointly delivered programs with the ComEd evaluation team to reduce duplication of work, customer disruption, and evaluation spending.
4. Conduct technical reviews and gather Illinois-specific data to update the TRM and recommend updated verification approaches for applicable measures.

### 2.1.2 Approach

The impact analysis of a program portfolio will typically include the following components:

- **Program Tracking Data Review.** Verify the type of measures installed and the quantities claimed, and the number of unique customers served, for accuracy as reported in the program tracking database and supplemental data provided by implementation contractors.
- **Savings Verification for TRM-Based Measures.** For TRM-based measures, Guidehouse will verify ex ante gross measure savings against the allowable input values and algorithms provided in the relevant ICC-approved version of the TRM.
- **Savings Verification for Custom Measures.** For non-TRM “custom” measures, Guidehouse will conduct evaluation research to verify gross impacts. For each project selected for the participant research sample, an in-depth application review is performed to assess the engineering methods, parameters, and assumptions used to generate all ex ante impact estimates. For each measure in the sampled project, engineers estimate verified gross savings based on their review of documentation and engineering analysis. Validation of savings through gas consumption (billing) data analysis may be used in combination with the engineering review for individual sites. Site-specific data will be collected for a subset of sampled projects, either through telephone interviews with site contacts, or an onsite visit that follows required safety protocols. For most projects, onsite data collection includes interviews completed at the time of the onsite visit, visual inspection of the systems and equipment, recording EMS settings, and collecting energy management system (EMS) trend data or production records when available and necessary. To support this review, Guidehouse requests project documentation in electronic format for each sampled project.
- **Gross Realization Rates.** The evaluation team will calculate gross savings realization rates to adjust ex ante savings based on verified gross savings estimates. The realization rate is defined as

the percentage of ex ante gross savings achieved as determined through the independent evaluation review. A realization rate of 1.0, or 100%, indicates no difference between the ex ante gross and verified gross savings for a particular measure. For 2026, the evaluation team will consider applying the 2025 realization rates to reported savings for programs that have a history of measures or overall program with realization rates near 100%. In such instances, the evaluation team will confirm the program tracking data is consistent with the previous year and calculate verified net savings by applying the previous year's realization rate to the program tracking data review results. If the program tracking data is inconsistent (for example, due to a substantial savings calculation change or new measure added to the program), the evaluation team may adjust the plan to re-evaluate the identified discrepancy (at the measure, end use, or program level, as appropriate, based on the program and portfolio savings impact).

- **Parallel Path / Large Project Review.** Guidehouse will conduct project file reviews that fall under a “Parallel Path” designation. These are projects that the implementation contractor has identified early in the project application cycle that may pose a risk to realization of verified gross impacts, either due to size of the project, the complex technical nature, or difficulty in baseline determination. As budget allows, Guidehouse conducts a review of project documentation and energy saving estimates and prepares a brief response that identifies further questions or revisions to the gross savings estimates. The findings are discussed with the implementation contractor who then adopts the findings going forward or proceeds as originally intended with a better knowledge of evaluation risk for the project.
- **Impact Sampling.** For custom measures, impact-related sampling will be designed to achieve a 90%/±10% level of confidence and precision at the program level and may also include selected high priority measures at the 90/10 level. Savings verification of TRM-based measures is performed on a census of claimed installations (not sampled).
- **Consumption Data (Billing) Analysis with Statistical Validation Check.** A standard regression approach for estimating program natural gas energy savings is a preferred method for evaluating the energy use impacts of certain programs and measures. Guidehouse will perform billing analysis to evaluate programs, projects, and measures when appropriate. Where practical, program evaluations will be conducted using RCTs or QEDs. When Guidehouse believes that RCTs or QEDs are not practical, we will provide an explanation and support for this decision as part of the program's evaluation plan.
- **Net Savings Verification.** The net savings impact evaluation for each measure will apply the NTG ratio deemed through the Illinois SAG consensus process.
- **Jointly Implemented or Coordinated Programs.** Evaluations of joint or coordinated programs will be designed to meet the needs of PGL, NSG, and ComEd, as well as other Illinois utilities, when appropriate. When programs are delivered jointly with electric utilities, Guidehouse calculates verified gross natural gas savings without applying an interactive effects penalty from the reduction of electricity usage.

### 2.1.3 Deliverables and Timing

- **Interim Impact Evaluation.** Where necessary, Guidehouse will conduct mid-year impact evaluation for some programs if data are available prior to the end of the year. Programs that have a

history of measures or overall program with realization rates near 100% may not receive interim impact review.<sup>1</sup> Guidehouse will conduct an engineering review of the Master Measure Database at mid-year, checking for correct adoption of the latest impact evaluation findings, updated TRM algorithms, and NTG values. For programs with TRM-based measures, Guidehouse will conduct an interim review of per-unit savings from tracking data during the third quarter (results by September 16 if data is available by July 5). For programs with non-TRM custom measures, Guidehouse will draw savings verification samples one to three times during the program-year, depending on the number of completed projects, with the first sample drawn about July 1. Guidehouse will review implementer developed ex ante savings calculations if requested or when a new delivery channel is added to the portfolio. Guidehouse will conduct annual adjustable savings goal review in December (if available) and January, checking for correct adoption of updated TRM algorithms and inputs before PGL/NSG files the information with the ICC.

- **End of Year Impact Evaluation.** Final program year impact evaluation will take place after the program-year ends when we receive final tracking data, expected by January 30. For PGL and NSG programs jointly implemented with ComEd, Guidehouse will make best efforts to deliver a draft report by March 15 and a final report by April 30.<sup>2</sup> However, this schedule is dependent on delivery of final tracking data by January 30 of each year and adherence to review schedules. For PGL- and NSG-only programs with only TRM-based measures, we expect draft delivery not later than April 15, with final reports by June 3. For PGL- and NSG-only programs with custom measures, we expect draft delivery not later than May 6, with final reports by June 24. We expect billing usage analyses will occur after the end of the program year when final billing data is available (which may be several weeks after January 30) and may include multiple program years to accommodate a full heating season.
- **End of Year Summary Report, Cost Effectiveness, and Economic Impacts.** Work on the annual summary report and cost-effectiveness spreadsheet reports will begin May 1, with draft results available thirty days after all annual impact evaluation reports are final and receiving final program cost data from PGL/NSG. Assuming all final reports and cost data are received by July 15, the first draft of the Cost Effectiveness test, and Job and Macroeconomic Impact Reporting will be delivered August 31, and the final report by October 30, or best efforts.
- **IQ Reporting Metrics.** Data collection and evaluation of the Income Qualified Multi-Family<sup>4</sup> and Single-Family Equity and Affordability<sup>5</sup> Reporting Metrics will begin during the end of year impact evaluation and report will be delivered by June 30. Guidehouse will provide monthly reporting of Tier 2 direct spend to support PGL/NSG' Diverse Contracting (Tier 2 Suppliers) reporting to the ICC.

Table 2-1 and Table 2-2 summarize the impact evaluation approach by program and market offering.

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<sup>1</sup> If a program has completed an interim impact review and measures or program realization rates are consistent with historic values, the evaluation may use the interim realization rates for the end of year evaluation.

<sup>2</sup> Utilizing “best efforts” is Illinois Energy Efficiency Policy Manual Version 3.1, draft impact evaluation reports.

**Table 2-1. Income Qualified and Residential Programs Impact Evaluation Approach for 2026**

Program / Market Offering	Gross Impact Evaluation Approach	Custom Project Parallel Path Review	Interim Review Type
<b>Income Eligible Programs</b>			
<b>Single Family</b>			
Home Energy Savings Retrofits*	TRM		TRMS
IHWAP*	TRM		TRMS
Home Energy Assessment*	TRM		TRMS
Income Eligible Community Kits‡	2025 RR		TRMS
<b>Multi-Family*</b>			
Retrofits	TRM		TRMS
IHWAP	TRM		TRMS
Public Housing Authority‡	2025 RR		TRMS
<b>Residential Programs</b>			
<b>Single Family Program</b>			
Home Energy Rebate	TRM		TRMS
Home Energy Assessment	TRM		TRMS
Epic Savers Kits	TRM		TRMS
Smart Thermostat‡	TRM		TRMS
<b>Multi-Family Program</b>			
Assessments and DI	TRM		TRMS
Rebates: Prescriptive/PTA	TRM		TRMS
Rebates: Custom	Custom	If Requested	Q3, Q4 Samples

Source: Guidehouse.

\* Jointly implemented with ComEd

† Coordinated with ComEd

‡ Programs where evaluation may use previous year’s realization rate.

§ Interim review will be conducted only if our review of the tracking database finds substantial changes from 2025.

**Table 2-2. Business and Public Sector Programs Impact Evaluation Approach for 2026**

Program / Market Offering	Gross Impact Evaluation Approach	Custom Project Parallel Path Review	Interim Review Type
<b>Business and Public Sector Programs</b>			
<b>Small/Mid-Size Business</b>			
Rebates: Prescriptive/PTA	TRM		TRM‡
Rebates: Custom	Custom		Q3, Q4 Samples
<b>Commercial Food Service*</b>	TRM		TRM‡
<b>C&amp;I Programs</b>			
Prescriptive Rebates	TRM		TRM‡
Custom Rebates	Custom	If Requested	Q3, Q4 Samples
Gas Optimization	Custom	If Requested	Q3, Q4 Samples
Coordinated Retro-Commissioning†	Custom		Quarterly Sample
<b>Public Sector Programs</b>			
Prescriptive Rebates	TRM		TRM‡
Custom Rebates	Custom	If Requested	Q3, Q4 Samples
Gas Optimization	Custom	If Requested	Q3, Q4 Samples
Coordinated Retro-Commissioning†	Custom		Quarterly Sample

Source: Guidehouse.

\* Jointly implemented with ComEd

† Coordinated with ComEd

‡ Interim review will be conducted only if our review of the tracking database finds substantial changes from 2025.

## 2.2 NTG Research and Framework Application

The primary goal of NTG research is to estimate the change in energy consumption that is attributable to a particular energy efficiency program or to the combined influence of the energy efficiency portfolio. The net savings analysis requires the evaluator to assess the influence of PGL and NSG programs versus other factors on the customer’s decision to install energy efficiency measures, either through the programs or outside of these. This change in energy use may include consideration of factors such as free-ridership, participant and non-participant spillover, and induced market effects. The NTG research efforts have secondary goals of identifying strategies for improving net savings and gathering additional feedback from participants to improve the program.

### 2.2.1 Guiding Principles

1. Estimate the NTG ratio for each program, including adjustments for free-ridership and spillover, to support annual prospective deeming of NTG ratios consistent with the Illinois NTG Policy. Conduct NTG research at least once during the four-year program cycle for each program following the NTG

protocols in the TRM and when the program or market changes substantially. Some programs do not require primary NTG research when NTG values are deemed by consensus without primary research.

2. Where budget and schedule can accommodate, target a larger number of completions for NTG surveys than the minimum required for a 90%+/-10% level of confidence and precision program-level result.
3. Wherever possible, consider performing free-ridership research online in real time (soon after the participant decision is made), following TRM protocols, and collecting spillover information after participants have had ample opportunity to take additional actions.
4. A sector or Portfolio-level Spillover analysis should be considered by each utility at least once every Plan period when it is feasible and considered viable by evaluation.<sup>3</sup>

### 2.2.2 Approach

Evaluation efforts will measure net savings considering free-ridership and participant spillover in all programs (except those where consensus values are deemed statewide without further research), and, where supported by the program delivery model, non-participant spillover, and market transformation effects. The NTG surveys may include process questions as an optional research task, decided on a case-by-case basis in consultation with the Companies.

The NTG analysis will apply, follow, and incorporate the Illinois Statewide NTG Methodologies Framework (NTG Framework or Framework) agreed to among the Illinois SAG participants, approved by the Illinois Commerce Commission, and documented in the effective Illinois TRM Version and any subsequent updates to the Illinois NTG Methodologies Framework. Guidehouse will use project data to determine eligibility for a NTG of 1.0 based on the Disadvantaged Areas NTG policy; eligible projects will be excluded from NTG analysis.

Guidehouse expects that most NTG research can be conducted through online surveys, supplemented by telephone interviews in some studies. Using program tracking data with participants' email addresses, telephone numbers, and mailing addresses, we will conduct research on participant free ridership through a survey via online (preferred) and/or telephone (if needed). The surveys will target customers as well as trade allies if they are important to the program delivery approach. If the program supports it and the Companies are willing, we may survey participants who submit their program applications online whereby they can click through the application confirmation page to take the survey. Otherwise, shortly after completing their project, participants with email addresses will receive an email invitation to the online survey. Participants without email addresses may be solicited through the postal service to take an online survey or sampled for a telephone survey.

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<sup>3</sup> Illinois Energy Efficiency Policy Manual Version 3.1, Section 7.5, Free Ridership and Spillover.

Spillover surveys may be conducted online or through telephone interview, but timing must allow ample time for spillover actions to take place, usually 12 to 18 months after project completion. Guidehouse will target participating customers for participant spillover research and, if indicated by the program theory, the trade ally perspective on participant and non-participant spillover. Non-participating customers are the target for sector-level non-participant spillover.

### 2.2.3 Deliverables and Timing

Deliverables include:

- Draft and final survey research instruments
- Non-confidential data from survey respondents, upon request
- Draft and final NTG research findings memos
- NTG recommendations for SAG consensus

The timing for NTG research is driven by an Illinois energy efficiency policy requirement for the evaluators to send initial NTG recommendations to the SAG for the upcoming program year by September 1.

- **December 1 to February 27:** Initiate the next round of NTG research with interviews with program staff on program design, delivery, and marketing and customer targets to inform survey development. Produce a draft survey instrument during the period, allow the Companies 15 days for initial review, revise, and reach a final version by February 27.
- **February 27 to May 30:** Prepare survey for fielding and launch. Survey field data collection occurs for four months when online surveys and rolling telephone interviews are employed. The survey ends when sample quotas are reached.
- **May 30 to July 31:** Analyze NTG data and report results. When NTG research is conducted on a program, the results will be summarized in a memo that is delivered in draft not later than July 31.
- **July 31 to August 31:** Finalize all NTG research memos.
- **September 1:** Evaluators send initial NTG recommendations to the SAG, as required by Illinois Policy.
- **September 1 to September 30:** Evaluators present initial recommended NTG ratios for each energy efficiency program, subprogram, and/or measure group (where applicable) to the SAG, intended to represent the best estimates of future actual NTG values likely to occur for the upcoming program year. SAG participants, the Companies, and Guidehouse will make best efforts to reach consensus by October 1 regarding NTG ratios appropriate for deeming for the upcoming program year.
- **October 1:** Final consensus NTG ratios for deeming for the upcoming program year beginning January 1.
- **January 1:** New consensus NTG ratios in effect.

Table 2-3 and Table 2-4 summarize the NTG research approach and timing by program and market offering.

**Table 2-3. Residential NTG Research Approach and Timing**

Program / Market Offering	Previous NTG Research <sup>†</sup>	Free-ridership Approach	Spillover Approach	Reporting Year	New NTG Effective
<b>Sector Level NPSO</b>	2023	-	Online	2027	2028
<b>Single Family Program</b>					
Home Energy Rebate	2025 <sup>1</sup>	Online + Telephone / Real-Time Post-Participation	Online	2029	2030
Epic Savers Kits	2025 Secondary	Online + Telephone / Real-Time Post-Participation	Online	2027	2028
Joint Home Energy Assessment	2023	Online + Telephone / Real-Time Post-Participation	Online	2028	2029
Coord. Advanced Thermostat	2023	Online + Telephone / Real-Time Post-Participation	Online	2028	2029
<b>Multi-Family Program<sup>1</sup></b>					
Rebates: PTA, Prescriptive / Custom, Joint Home Energy Assessment	2025	Online + Telephone	Online + Telephone	2028	2029

Source: Guidehouse.

<sup>1</sup>Home Energy Rebate Advanced Thermostats program was evaluated in 2023.

<sup>2</sup> Multi-Family Program data collection is slated for 2027 and 2028; reporting activities will commence in 2028, incorporating findings from both years.

**Table 2-4. Business and Public Sector NTG Research Approach and Timing**

Business and Public Sector Programs/Market Offering	Previous NTG Research	Free-ridership Approach	Spillover Approach	Reporting Year	New NTG Effective
<b>Small/Mid-Size Business<sup>1</sup></b>					
Rebates: Prescriptive/PTA, Custom	2025	Online + Telephone / Real-Time Post-Participation	Online + Telephone	2027	2028
<b>C&amp;I Programs &amp; Public Sector Programs</b>					
Prescriptive Rebates	2025	Online + Telephone / Real-Time Post-Participation	Online + Telephone	2027	2030
Custom Rebates <sup>2</sup>	2024 <sup>3</sup>	Online + Telephone / Real-Time Post-Participation	Online + Telephone	2029	2030
Gas Optimization	2025 Secondary	Online + Telephone / Real-Time Post-Participation	Secondary	2029	2030
Coord. Retro-Commissioning	2024	Online + Telephone	Online + Telephone	2028	2029
<b>Coord. Commercial Food Service<sup>4</sup></b>	Secondary	Online + Telephone	Online + Telephone	2028	2029

Source: Guidehouse.

<sup>1</sup> Small Business data collection is slated for 2026 and 2027; reporting activities will commence in 2027, incorporating findings from both years.

<sup>2</sup> C&I & Public Sector Custom Rebates Programs include non-prescriptive measures, new construction, and engineering studies. Public

<sup>3</sup> Public Sector Custom Rebates Program was evaluated in 2021 and C&I Custom Rebates Program was evaluated in 2024.

<sup>4</sup> Commercial Food Service NTG research will be conducted jointly statewide.



attribution to the program, and cumulative energy impacts. Guidehouse will participate in the SAG MT Working group, communicating methodologies to the Working Group and documenting refinements in the TRM. This may include developing and verifying a Natural Market Baseline, Energy Savings Framework and Market Progress Indicators.

3. **Evaluate:** Perform annual review of savings calculator, work paper, and market transformation program tracking data. Evaluate available data and collect additional data including surveys to support the review of Market Progress Indicators. Assign attribution of savings if standards of evidence are achieved. Additional activities may be assigned to the annual evaluation plan including reviews of the Natural Market Baseline and execution of the structured expert judgement panel.

Evaluation research plans for specific market transformation initiatives will be provided in the Appendix as they are developed.

## 2.4 Portfolio Research

Guidehouse conducts additional research above and beyond annual impact and process evaluation activities as requested, keeping budget priorities in consideration. Guidehouse will work with the Companies and other Illinois parties to identify the programs and measures that could most benefit from these supplemental research activities, being mindful of overall budget availability. Additional research may be requested as needed and considered as a part of the annual evaluation planning process. Guidehouse will leverage research opportunities through jointly funded studies with ComEd, Nicor Gas, and Ameren Illinois when possible.

Guidehouse will work with the Companies to identify research priorities and document these in the annual evaluation plans. Areas for portfolio research include:

- Support for TRM Updates
- Process Evaluation Research
- Other Cross-cutting Research

### 2.4.1 Guiding Principles

1. There are limited evaluation resources and Guidehouse will work with the Companies to identify priorities and document these in the annual evaluation plans. Activities will focus first on programs that have not been evaluated, have been significantly modified, provide the most savings, or have activities that were not fully evaluated in an earlier round of evaluations.

2. Gather participant data, perform analysis, and produce recommendations to help improve the functioning and effectiveness of the Companies programs.
3. Within budget constraints, collaborate with Nicor Gas, ComEd, and other Illinois utilities to identify, prioritize, and conduct research, including process evaluation of joint programs and studies of energy efficiency technologies, industry best practices, non-participant characteristics, market characterizations, or other topics of interest.
4. When available to evaluators and appropriate, use gas consumption data when analyzing impacts and customer usage patterns.

## 2.4.2 Support for TRM Updates

### *Activities*

The evaluation team will provide support to improve the TRM by participating in the Technical Advisory Committee (TAC) meetings and update process. Guidehouse will work with the Companies to identify priorities and research needs for new measures or updates.

Activities may include reviewing TRM draft versions; developing workpapers for new measures or to update existing measures; and analyzing data from completed evaluation activities to support new measures or update TRM assumptions. Guidehouse will provide technical review for workpapers developed by PGL and NSG and their implementation contractors if requested.

### *Deliverables*

- When identified, submit TRM update or new measure requests to the TRM Administrator
- If a TRM new measure or update request is accepted, produce the corresponding TRM update workpaper

### *Timing*

The TRM is updated annually based on input from Program Administrators, evaluators, and other interested stakeholders through a consensus-based decision-making process. The following TRM schedule will be followed, unless changes are accepted by the TRM TAC:

- **February 26:** Submit TRM update requests to the TRM administrator.
- **April 1:** TRM TAC informs Program Administrators, evaluators, and SAG which measures are high priority measures, for which work papers need to be prepared.
- **May 15:** Proposed updates to existing measure work papers to clarify terms or approaches, as well as proposed work papers for new measures, are submitted to the TRM Administrator.
- **May 15 – September 24:** Ongoing TAC meetings and review/comment on submitted workpapers to reach consensus on TRM updates.

- **October 1:** Final TRM values effective January 1 for the following program year.
- **October/November:** Discussions on evaluation priorities for TRM updates.

### 2.4.3 Process Evaluation Research

#### *Activities*

We will work closely with the Companies to select which programs, measures and issues would benefit most from process evaluation. The procedure for selecting process evaluation work will be informed by the latest information on program performance, market status, joint-program collaboration opportunities, budget, and Company priorities. We will develop study-specific plans, conduct the evaluation, and deliver insights and recommendations in time for the Companies to incorporate these into the next program year. We will work with the Companies throughout the year to identify emerging issues that could be illuminated by new research (not anticipated in the evaluation plan process) and schedule and implement that research (budget allowing). As appropriate, Guidehouse will coordinate process activities across programs and across utilities for joint programs to address the whole of the Companies approach to the market.

The process evaluation for each program, when conducted, will include in-depth qualitative interviews with Program Administration staff and Program Implementers. These interviews will be used to develop a complete understanding of the final design, procedures, and implementation strategies for each program. Through these interviews, available program materials, including marketing and outreach materials such as web-based promotional content, point of purchase (POP) materials, print and radio advertising copy, and any cooperative marketing materials developed, will be collected.

While the process evaluation methods for each individual program will vary depending on the program's needs and stage of development, key tasks in conducting process evaluations using interview techniques and documentation review include:

- Develop interview and/or online survey guides.
- Identify appropriate parties to interview or survey. Frequently, the evaluation will include in-depth qualitative interviews with those directly involved in each program, including program managers and implementation contractors, and conduct interviews or online surveys with participating trade allies and participating customers.
- Conduct interviews or online surveys and other research data collection tasks.
- Analysis and reporting of findings and recommendations.

Depending upon the circumstances, Guidehouse will use either a survey house to conduct structured surveys, online survey tools, or senior staff members to complete interviews. Process evaluation surveys will be conducted concurrently with NTG surveys, when appropriate, to minimize the burden on the customer and/or trade ally. Process evaluation findings and recommendations may be summarized in a report separate from the impact evaluation report.

### *Deliverables*

- Presentation of process evaluation research findings and recommendations in memo format or PowerPoint presentation

### *Timing*

- A schedule will be established for each process evaluation deliverable. To support the Companies' annual planning process for program implementation, initial draft process findings and recommendations will be delivered prior to September 15.

## **2.4.4 Equity Metrics Reporting**

In alignment with Policy Manual 3.0 mandates and the PGL/NSG's strategic goals, Guidehouse will review IQ metrics and include them in annual impact evaluation reports. This task includes:

1. For the IQ Multi-Family metrics (Policy § 6.8), Guidehouse will report data in annual evaluation reports on the number of buildings and apartments receiving various measures. In addition, for shell and heat pump measures, reporting includes separate reporting on whether the measures are applicable (qualified project), and if a project is qualified but the measures were not installed, the reasons why. The annual evaluation reports will include the IQ Multi-Family reporting metrics spreadsheet populated with data. Within a given program year, the data will reflect cumulative year-to-date data.
2. For Equity and Affordability metrics (Policy § 6.10), Guidehouse will include the following reporting metrics in a spreadsheet format in annual evaluation reports, separately for each applicable EE program:
  - Total number of IQ single family whole building program participants.
  - Total number of IQ single family whole building program participants adopting air sealing.
  - Total number of IQ single family whole building program participants adopting insulation.
  - Total number of IQ single family whole building program participants with electric resistance heating adopting heat pumps.
  - Total number of IQ single family whole building program participants with fossil fuel heating adopting heat pumps.
  - Total number of IQ single family whole building program participants adopting heat pump water heaters.
  - Total number of IQ single family whole building program participants with fossil fuel heating or hot water systems replaced with another fossil fuel system.

3. Guidehouse will support the Program Administrator in the data collection on diverse contracting (Tier 2 Suppliers) through reporting Tier 2 direct spend.

In addition to the semi-annual reporting metrics for Income Qualified Multi-Family (Policy § 6.8), Guidehouse will investigate the level and effectiveness, in both reducing barriers to participation and comprehensively addressing efficiency opportunities, offering one-stop-shopping services and jointly or in a coordinated fashion delivering the IQ MF programs. Utilities and interested stakeholders will work together with independent evaluators through the annual SAG evaluation plan process to determine the scope and timeframe for this evaluation.

### 2.4.5 Other Cross-Cutting Research

In addition to TRM support and process research, cross-cutting evaluation research includes initiatives that contribute toward energy savings and other portfolio goals, such as EUL and new measure research, NTG research, and non-energy impacts (NEIs) research. Evaluation research is coordinated statewide with the evaluators for ComEd, Ameren Illinois, and Nicor Gas and jointly funded and implemented when possible.

### 2.4.6 Evaluation Research Activities

Table 2-6 summarizes proposed impact evaluation research. The evaluation team will revisit this list on an ongoing basis as, for example, the SAG releases new updates on TRM research priorities and the PGL and NSG portfolio measure mix shifts over time. This regular review will enable Guidehouse’s research to focus on the most important topics for the Companies’ evaluation and SAG stakeholders. Guidehouse will develop research plans over the course of 2026 and as new needs arise and include them in the appendices.

**Table 2-6. Portfolio Evaluation Research**

Research Task	Description	Joint	2026	2027	2028	2029
Commercial Gas Heat Pumps (Savings Verification)	<i>Review IL TRM commercial gas heat pump measures to confirm savings assumptions and compliance with federal energy conservation standards. This includes evaluating performance data, baseline comparisons, and benchmarking against other jurisdictions to ensure consistency and alignment with TRM protocols for gas savings verification.</i>	TBD	✓	✓		
Water Heater Measure Costs (Verification)	<i>Review IL TRM Water Heater measure cost assumptions and update incremental costs for gas water heaters. Incorporate clarifications related to gas water heater specifications and installation requirements, ensuring alignment with market pricing, TRM protocols, and cost-effectiveness standards.</i>	TBD	✓	✓		
Spray Foam Gas Savings (Verification)	<i>Conduct research on spray foam insulation/sealant measures sold through ComEd’s Retail/Online Program to inform and validate TRM assumptions for gas savings. This includes in-store and web survey data collection to</i>	Yes	✓			

Research Task	Description	Joint	2026	2027	2028	2029
	<i>update gross savings parameters, develop and refine net-to-gross (NTG) ratios, and assess product use cases and installation locations. The research will also inventory stocking practices at participating retailers, analyze sales data, and support workpaper development for TRM updates. Findings will ensure that TRM savings estimates accurately reflect real-world measure usage and market conditions.</i>					
Behavior Savings Persistence Adjustments	<i>Update the secondary literature review in the TRM for measure 6.1.1 “Adjustments to Behavior Savings to Account for Persistence.” This literature review would feed into updates to the Electric and Gas persistence factors including the full duration of persistence (i.e., the measure EUL) and the shape of the multiyear persistence curve.</i>	TBD		✓	✓	
Insulation in HDD for Conditioned vs Semi-Conditioned Spaces	<i>Review and refine IL TRM insulation savings assumptions based on HDD and space classification. Define and standardize conditioned, unconditioned, and semi-conditioned spaces to ensure consistent application of modeling approaches and savings estimates. Validate these definitions and assumptions against other jurisdictions to support applicability across Res and C&amp;I sectors.</i>	TBD	✓	✓		
Evaluation Research – Usage of AMI	<i>Investigation into advanced meter infrastructure (AMI) data to assist programs such as custom and gas optimization. AMI enables more accurate and timely verification of program impacts, development of customer loadshapes, and improved profiling of participation patterns.</i>	TBD	✓	✓		
Air Sealing and Insulation Measures Update	<i>Update air sealing and insulation measures in the IL TRM using new consumption data analysis, leveraging AMI gas interval data. Utilities will provide granular AMI data and support secure data transfer for this research.</i>	TBD	✓	✓		

## 2.5 Evaluation Portfolio Support and Reporting

### 2.5.1 Annual Review of the Companies’ Adjustable Savings Goals

Each year, the Companies request that Guidehouse, as its Independent Evaluator, verify the accuracy in the TRM calculations used to derive the measure savings that form the savings goals in the adjustable savings goal spreadsheet in advance of filing the completed adjustable savings goal spreadsheet.

Guidehouse will work with the Program Administrator to review the Adjustable Savings Goals Spreadsheet each year for 2026 through 2029. This review will occur January and February every year. After our review, if we find instances of measures that do not accurately match the effective Illinois TRM Version, Guidehouse

will recommend the Companies make updates. Guidehouse will review a revised version of the Adjustable Savings Goals Spreadsheet provided by the Companies to confirm they implemented our recommended measure updates correctly.

### ***Deliverables***

- Findings and recommendations from review of draft annual Adjustable Savings Goals templates for the Companies.
- A verification memo certifying the completeness of the annual adjustable savings goals template in respect to the TRM. The memo will testify that the annual portfolio WAML has been appropriately recalculated based on adjustments from the IL TRM changes. The memo will also summarize any TRM changes that would have impacted the current programs.

## **2.5.2 Ad-Hoc Evaluation Support Requests**

Guidehouse will produce periodic ad-hoc memos and presentations to assist the Companies and Program Implementer with guidance and program development assistance through the lens of the evaluation contractor perspective, when requested.

## **2.5.3 Cost-Effectiveness Review and Summary Reporting**

Guidehouse will conduct a TRC cost-effectiveness analysis at the conclusion of the four-year program plan pursuant to Section 8-104(f)(8). Guidehouse will provide a brief annual portfolio summary report for each program year, 2026 through 2029, and will produce a final report summarizing the combined results for the four program years after the conclusion of 2029. The annual portfolio summary reporting will be presented in three spreadsheet documents, using templates recommended by the SAG, accompanied by a memo describing Guidehouse's approach and source of assumptions. The tables included are:

1. TRC and Program Administrator Cost Test (PACT) Cost-Effectiveness Results Tables
2. Verified Energy Savings and Program Cost Summary Tables
3. High-Impact Measures Tables

Results will include benefit-cost ratios as well as the net present value (NPV) of benefits, costs, and net benefits for the following scenarios:

- With and without non-energy impacts (NEIs) (if available at the time of evaluation), as well as,
- At the portfolio-level TRC, with and without income qualified programs.

The final summary for the four years will include the annual and four-year results in a standard report format. The annual and four-year cost-effectiveness reporting will include a separate joint-utility memo providing the gas and electric costs, benefits, and TRCs for the joint energy efficiency programs that the gas companies offer in conjunction with electric program administrators.

Guidehouse will summarize program tracking data to estimate the total number of customers participating in PGL/NSG’s programs. The approach will vary by program depending on the nature of the data as described below.

- When the program tracking data has an account number and those numbers generally correspond to single customers, the evaluation will use unique account numbers as a proxy for customer counts. We will calculate and aggregate unique customers for programs meeting these criteria, applying this method to most Residential and Business programs. Totals will be reported by program, sector, and for the entire portfolio.
- For programs targeting multifamily dwellings, sometimes buildings have a single account for the building and sometimes each dwelling unit has an account. When the program tracking data has a field with the number of dwelling units, we will use that as a proxy for customers and report it within the sector and portfolio number of customers. If the program tracking data does not have a field with the number of dwelling units (or it is not adequately populated), we will have no way to calculate the number of individual dwelling units and will only include the number of accounts in the sector and portfolio totals. This approach may undercount the actual number of customers.
- The program tracking data does not include account numbers for the programs shown in **Table 2-8**. Typically, these are midstream programs where the actual end user is not known. As a result, the evaluation cannot create customer counts for these programs. **Table 2-9** presents counts of measures installed for these programs.

The Summary Report will present the results in a table patterned after the following prototype.

**Table 2-7. Number of Accounts Participating in PGL/NSG’s Programs**

Program *	Number of Unique Accounts	Notes
<b>Residential</b>		
<b>Program a</b>	###	Number of unique accounts
<b>Program b</b>	###	Number of unique accounts
<b>Program c (multifamily)</b>	###	When the data includes the number of dwelling units then this count uses that number. For all other records it counts each unique account number. The evaluation cannot eliminate double-counting for dwelling units that do not have account numbers from the counts coming from other programs.
<b>Residential Total</b>	###	Number of unique accounts, not the sum of the program counts.

<b>Business</b>		
<b>Program d</b>	###	Number of unique accounts
<b>Program e</b>	###	Number of unique accounts
<b>Program f</b>	N/A	Customer account numbers are not available
<b>Commercial</b>	###	Account numbers are only available for a portion of the participants, so this understates the actual number.
<b>Food Service</b>		
<b>Business Total</b>	###	Number of unique accounts, not the sum of the program counts.
<b>Portfolio Total</b>	###	Number of unique accounts, not the sum of the program counts.

\* The actual program names will be used instead of the placeholders used here.

The programs and program components that are NOT included in the table above are shown in the following table.

**Table 2-8. Programs Where Customer Counts Are Not Available**

Program	Notes
<b>Residential</b>	
<b>Midstream</b>	Customer account numbers are not available.
<b>Business</b>	
<b>Midstream</b>	Customer account numbers are not available.
<b>Market Transformation</b>	
<b>Codes and Standards</b>	This should be a point of discussion as the program develops.

**Table 2-9. Measure Counts Where Customer Counts Are Not Available**

Program *	End Use Type	Quantity Installed †
<b>Residential</b>		
<b>Program a</b>	<type>	###
<b>Program a</b>	<type>	###
<b>Program b</b>	<type>	
<b>Program b</b>	<type>	###
<b>Business</b>		
<b>Program c</b>	<type>	###
<b>Program c</b>	<type>	###
<b>Program d</b>	<type>	###
<b>Program d</b>	<type>	

\* The actual program names will be used instead of the placeholders used here.

† The units represented by the quantity may vary within a given measure type.

*Deliverables and Timing*

- Assuming all final reports and cost data are received by July 15, the first draft of the annual portfolio impact savings and cost effectiveness will be delivered August 31, and the final report by October 30, or best efforts.
- A four-year summary report of portfolio summary impact savings and cost effectiveness reporting produced after the end of 2029.
- Annual and four-year joint-utility memo providing the gas and electric costs, benefits, and TRCs for the joint energy efficiency programs.

#### **2.5.4 Job and Macroeconomic Impact Reporting**

Guidehouse will produce a draft and final report annually encompassing economic and employment impacts analysis for the Companies energy efficiency portfolio. This analysis will be aligned with the Illinois Energy Efficiency Policy Manual (the Policy Manual) requirement that each program administrator in Illinois must annually report estimates of the economic development and employment impacts of its energy efficiency programs. The reports may also include estimated impacts for individual Programs. Estimates will include direct, indirect, and induced effects on employment, industry output, and labor income.

Direct effects may include, but are not limited to, the initial changes in employment and demand for regional production triggered by the implementation and management of utility Energy Efficiency Programs. These effects include jobs managing and implementing Programs, Program Implementation Contractor incentives, participant rebates, and bill savings.

Indirect effects may include, but are not limited to, secondary impacts generated from business-to-business spending as firms and households directly impacted by the Energy Efficiency Programs increase purchases from their suppliers who must in turn increase purchases from their suppliers and so forth as the initial expenditure ripples through interconnected industries. These effects include the impact of contractors purchasing equipment from distributors or manufacturers that is needed to implement programs.

Induced effects may include, but are not limited to, secondary impacts generated from household to business spending as labor income changes that result from both direct and indirect activity affect the local economy. This is the effect of additional household income resulting from jobs that are created.

##### *Deliverables and Timing*

- Annual program summary reporting of verified impacts, cost-effectiveness results and job and macroeconomic reporting.
- A four-year summary report of job and macroeconomic reporting produced after the end of 2029.

#### **2.5.5 Quantifying and Monetizing Societal Non-Energy Benefits**

Guidehouse will conduct an evaluation to quantify and monetize the societal Non-Energy Impacts (NEIs) associated with Peoples Gas and North Shore Gas 2026-2029 energy efficiency portfolio.

Societal public health NEIs occur when energy efficiency programs reduce natural gas usage which reduces air pollution emissions, including particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxide (NO<sub>x</sub>), volatile organic compounds (VOCs), ammonia (NH<sub>3</sub>), Ozone (O<sub>3</sub>), and carbon dioxide (CO<sub>2</sub>). This reduction in emissions causes reduced adverse health impacts, which are monetizable. We will use U.S. Environmental Protection Agency (EPA) emissions factors for natural gas and CO–Benefits Risk Assessment (COBRA) Health Impacts Screening and Mapping Tool to quantify and monetize these health impacts. At a high level, Societal NEIs associated with a Peoples Gas or North Shore gas energy efficiency program are represented by the total monetary value of illnesses and deaths avoided due to program-induced reduced emissions over 30 years, discounted to the year of implementation.

***Deliverables and Timing***

- Guidehouse will include annual societal NEIs in PGL/NSG’s TRC values, reporting the TRCs with and without the societal NEIs.

## 2.6 Evaluation Budget

The evaluation budget per calendar year for work represented in this evaluation plan is presented in Table 2-10.

**Table 2-10. Evaluation Budget**

EMV Service Year	Evaluation Description	2025	2026	2027	2028	2029	2030	Total
2026-2029	Evaluation Plan	\$29,625	\$30,498	\$31,446	\$32,395	\$0	\$0	<b>\$123,964</b>
2026-2029	Impact Evaluation	\$0	\$118,151	\$319,583	\$301,710	\$339,671	\$252,952	<b>\$1,332,067</b>
2026-2029	NTG Research	\$5,000	\$167,894	\$232,211	\$260,293	\$194,029	\$0	<b>\$859,427</b>
2026-2029	TRC & Jobs Reporting	\$0	\$0	\$41,087	\$42,297	\$43,612	\$84,969	<b>\$211,966</b>
2026-2029	Equity Metrics Reporting	\$0	\$14,570	\$29,569	\$30,464	\$31,397	\$15,932	<b>\$121,932</b>
2026-2029	Process Evaluation	\$0	\$47,212	\$38,603	\$39,803	\$0	\$0	<b>\$125,618</b>
2026-2029	TRM Support	\$0	\$12,300	\$24,962	\$25,718	\$26,505	\$13,449	<b>\$102,934</b>
2026-2029	Supplemental Research	\$0	\$48,566	\$49,997	\$30,931	\$30,377	\$0	<b>\$159,870</b>
2026-2029	Technical Support	\$0	\$14,570	\$29,569	\$30,464	\$31,397	\$15,932	<b>\$121,932</b>
2026-2029	Adjustable Goals Review	\$12,437	\$4,356	\$17,288	\$17,825	\$18,363	\$0	<b>\$70,269</b>
2026-2029	SAG/ICC Support	\$0	\$14,570	\$29,569	\$30,464	\$31,397	\$15,932	<b>\$121,932</b>
2026-2029	Project Management	\$15,546	\$75,872	\$101,078	\$104,399	\$92,273	\$26,823	<b>\$415,992</b>
2026-2029	Contingency	\$0	\$0	\$48,566	\$49,997	\$51,551	\$53,106	<b>\$203,220</b>
2026-2029	Expenses	\$0	\$23,319	\$23,319	\$23,319	\$23,319	\$0	<b>\$93,277</b>
	<b>Total</b>	<b>\$62,609</b>	<b>\$571,878</b>	<b>\$1,016,846</b>	<b>\$1,020,080</b>	<b>\$913,892</b>	<b>\$479,095</b>	<b>\$4,064,400</b>

## **Appendix A. Detailed Program Evaluation Plans**

Guidehouse has developed program-specific plans to evaluate the entire portfolio of PGL and NSG energy efficiency programs. The following programs are covered in this plan:

- **Residential Programs**
  - **Single Family Program**
  - **Multi-Family Program**
- **Income Eligible Programs**
  - **Income Eligible Single Family Program**
  - **Income Eligible Multi-Family Program**
- **Business and Public Sector Programs**
  - **Small/Mid-Size Business**
  - **Commercial Food Service**
  - **C&I and Public Sector Programs**

### 3 Residential Programs

#### 3.1 SINGLE FAMILY PROGRAM

Residential Single Family is designed to help residential customers save energy and reduce their utility bills.

**Home Energy Rebates** is a gas-only offering provided in collaboration with local Trade Allies. The program offers rebates on energy-efficient heating, ventilation, air conditioning and water heating equipment, and qualifying weatherization projects for residential customers.

**Home Energy Assessment** offers energy-saving products installed in homes at no-cost to the customer. Homeowners can reduce their energy and water use with the installation of products available to owners of single family homes, two-flats, and individually metered condos and townhomes. Renters are also eligible with permission from their landlords.

**Advanced Thermostat** is a joint utility offering that provides residential customers discounted smart thermostats through ComEd's Retail and/or Marketplace programs.

**Epic Savers Kits** provides residential customers with high-energy usage a kit of energy efficiency measures to self-install.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
HVAC, Water Heating, Wx	Impact	Interim Impact Analysis	X	X	X	X
HVAC, Water Heating, Wx	Impact	Measure-Level Deemed Savings Review	X	X	X	X
Home Energy Rebate	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally			†	X
Joint Home Energy Assessment	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally			X	
Joint Advanced Thermostats	NTG	Online Free Ridership and Spillover Research			X	
Epic Savers Kits	Impact	Interim Impact Analysis	X	X	X	X
Epic Savers Kits	Impact	Measure-Level Deemed Savings Review	X	X	X	X
Epic Savers Kits	NTG	Online Free Ridership and Spillover Research		X		

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

Source: Guidehouse.

#### 3.2 MULTI-FAMILY PROGRAM

Residential Multi-Family targets customers who live in multi-family buildings and multi-family building owners/property managers. The path is designed as a one-stop-shop, meaning that the target audience will be able to access all offerings through one point of contact with assistance as needed and requested.

Peoples Gas and North Shore Gas intend to work with local organizations with expertise in the multi-family market.

**Prescriptive and Custom:** Prescriptive rebates are standard incentive amounts for common types of energy efficiency measures. Custom incentives are awarded for non-standard technologies or projects that do not include a one-for-one replacement. This is based on the review of several operating parameters that determine energy savings

**Multi-Family Energy Assessment** is a Joint program offering provided in partnership with Peoples Gas, North Shore Gas, and ComEd. The program offers free direct installation of energy-saving measures for multi-family building

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Interim Impact Analysis	X	X	X	X
All	Impact	Measure-Level Deemed Savings Review	X	X	X	X
All	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally		†	X	

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

Source: Guidehouse.

## 4 Income Eligible Programs

### 4.1 INCOME ELIGIBLE SINGLE FAMILY

Income Eligible Single Family is designed to help income eligible customers save energy and reduce their utility bills.

**Home Energy Savings Retrofits** offers direct install products, comprehensive measures, and no-cost weatherization services for Income Eligible Single Family home customers. It is delivered jointly with ComEd through approved agencies or partners.

**Home Energy Assessments** offers energy-saving products installed in homes at no cost to the customer. Homeowners can reduce their energy and water use with the installation of products available to owners of single family homes, two-flats, and individually metered condos and townhomes. Renters are also eligible with permission from their landlords. The Home Energy Assessment program is a joint program offering provided in partnership with Peoples Gas, North Shore Gas, and ComEd.

**Illinois Home Weatherization Assistance Program (IHWAP)** leverages state and federal funds to supplement incentives from utility programs. The program was designed to help low-income residents save energy and money while increasing the comfort of their homes, with a mission to insulate low-income customers, particularly the elderly, persons with disabilities, families with children, high residential energy users, and households with a high energy burden, to conserve needed energy and to aid those persons least

able to afford higher utility costs. Weatherization services are provided to low-income residents through local community action agencies or not-for-profit agencies.

**Community Kits** provides income-qualified customers with a kit of energy efficiency measures to self-install. The Income Eligible Gas Kits are distributed by ground mail to qualified customers vetted by the Low-Income Eligible Home Energy Assistance Program (LIHEAP).

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Interim Impact Analysis	X	X	X	X
All	Impact	Measure-Level Deemed Savings Review	X	X	X	X

Source: Guidehouse.

## 4.2 INCOME ELIGIBLE MULTI-FAMILY

Income Eligible Multi-Family is designed to offer a comprehensive, one-stop-shop to multi-family building owners whose buildings are targeted to income eligible residents. Participating multi-family building owners and managers will benefit directly from free energy assessments, financial guidance, enhanced rebates, installation support, project oversight, and continuing engagement.

**Multi-Family Energy Savings Retrofits** allows building owners to receive free technical assistance to identify energy efficiency opportunities and install measures. The program fully covers most expenses, including the energy assessment, direct installation of energy efficiency products in tenants' units (thermostats, aerators, showerheads, etc.), and most common area measures. More extensive or capital investment measures (furnace, water heater, boiler replacements, etc.) may require a building owner co-pay. This program is a joint utility program offering.

**Public Housing** offers prescriptive and custom rebates for gas measures in housing owned by Public Housing Authorities. This program is a joint program offering provided in partnership with Peoples Gas, North Shore Gas, and ComEd.

**IHWAP** leverages state and federal funds to supplement incentives from utility programs. The program was designed to help low-income residents save energy and money while increasing the comfort of their homes, with a mission to insulate low-income customers, particularly the elderly, persons with disabilities, families with children, high residential energy users, and households with a high energy burden, to conserve needed energy and to aid those persons least able to afford higher utility costs. Weatherization services are provided to low-income residents through local community action agencies or not-for-profit agencies.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Interim Impact Analysis	X	X	X	X
All	Impact	Measure-Level Deemed Savings Review	X	X	X	X

Source: Guidehouse.

## 5 BUSINESS AND PUBLIC SECTOR PROGRAMS

### 5.1 SMALL/MID-SIZE BUSINESS

Small business owners are often time-constrained, unaware of energy efficiency opportunities, and lack dedicated staff who concentrate on the facility’s energy use. As such, they are a hard-to-reach target audience. While some business owners are also the property owner, many lease their space and consequently have little motivation to make major improvements to their tenant’s premises.

**Prescriptive Rebates** are standard incentive amounts for common energy efficiency measures, typically, with deemed energy savings in the IL-TRM.

**Custom Rebates** (gas-only) are awarded for the non-standard applications of energy efficiency measures or for projects that do not follow a one-for-one replacement. The review of several operating parameters determines the energy savings. Gas Optimization studies (gas-only) identify custom and prescriptive opportunities to improve gas systems. RCx studies (coordinated with ComEd) provide insights to help facilities perform optimally.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
Prescriptive Rebates	Impact	Interim Impact Analysis	X	X	X	X
Prescriptive Rebates	Impact	Measure-Level Deemed Savings Review	X	X	X	X
Prescriptive Rebates	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally	†	X		
Custom Rebates	Impact	Custom Savings Review	X	X	X	X
Custom Rebates	Impact	Wave Impact Analysis	X	X	X	X
Custom Rebates	Impact	Survey, Phone, or Virtual Verification	X	X	X	X

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

## 5.2 COMMERCIAL FOOD SERVICE

The upstream commercial food service (CFS) program builds on the progress, analysis, and experience gained from a jointly funded pilot program that has been successfully running since 2018. The goal is to support and sustain a comprehensive list of measures for the food service industry to give operators a range of options for improving energy efficiency in their facilities.

The CFS program is offered jointly by the Illinois utilities and provides commercial customers a point-of-sale discount on commercial kitchen equipment through participating distributors.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Interim Impact Analysis	X	X	X	X
All	Impact	Measure-Level Deemed Savings Review	X	X	X	X
All	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally		†	X	

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

Source: Guidehouse.

## 5.3 C&I AND PUBLIC SECTOR PROGRAMS

The Commercial and Industrial (C&I) Program is designed as a one-stop-shop that allows all business customers to access all offerings based on their needs. The Public Sector program is designed as a one-stop-shop that allows all qualifying local government customers to access all offerings based on their needs.

### 5.3.1 PRESCRIPTIVE REBATES

Prescriptive rebates are standard incentive amounts for common energy efficiency measures, typically, with deemed energy savings in the IL-TRM.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Interim Impact Analysis	X	X	X	X
All	Impact	Measure-Level Deemed Savings Review	X	X	X	X
All	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally	†	X		

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

Source: Guidehouse.

### 5.3.2 CUSTOM REBATES

Custom rebates are awarded for the non-standard applications of energy efficiency measures or for projects that do not follow a one-for-one replacement. The review of several operating parameters determines the energy savings.

Engineering Studies focus on large, custom, capital-intensive energy saving projects.

New Construction rebates are provided towards new building projects or deep renovations, which are designed to exceed regional energy efficiency code requirements.

Public Sector Staffing Grants provide recipients with up to \$50,000 to support a full- or part-time employee to oversee the implementation of natural gas efficiency projects.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Custom Savings Review	X	X	X	X
All	Impact	Wave Impact Analysis	X	X	X	X
All	Impact	Survey, Phone, or Virtual Verification	X	X	X	X
All	Impact	Onsite Verification	X	X	X	X
All	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally			†	X

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

Source: Guidehouse.

The Custom Rebate NTG interviews in the C&I and Public sector will be conducted in 2028 and 2029 for reporting in 2029.

### 5.3.3 GAS OPTIMIZATION

Gas Optimization is a comprehensive facility review that focuses on gas systems and is like an ASHRAE Level 2 Audit. The study aims to identify custom and prescriptive opportunities. Customers may receive up to \$15,000 for onsite engineering assistance from a 3rd party engineering firm.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Custom Savings Review	X	X	X	X
All	Impact	Wave Impact Analysis	X	X	X	X
All	Impact	Survey, Phone, or Virtual Verification	X	X	X	X
All	Impact	Onsite Verification	X	X	X	X
All	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally			†	X

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

Source: Guidehouse.

### 5.3.4 COORDINATED RETRO-COMMISSIONING

Retro-Commissioning (RCx) is a comprehensive study that provides insights into the performance of a facility's existing energy-using systems to help facilities perform optimally. This is coordinated with ComEd, and an approved 3rd party engineering firm conducts the study.

The evaluation of this program will include the activities shown in Table 1.

**Table 1. Evaluation Activities**

Market Offering	Category	Tasks	CY2026	CY2027	CY2028	CY2029
All	General	PM/IC Interview	X		X	
All	Process	Research Optional, Discuss with Program				
All	Impact	Custom Savings Review	X	X	X	X
All	Impact	Wave Impact Analysis	X	X	X	X
All	Impact	Survey, Phone, or Virtual Verification	X	X	X	X
All	Impact	Onsite Verification	X	X	X	X
All	NTG	Online Free Ridership and Spillover Research, Customer and Trade Ally		†	X	

For NTG research “X” indicates reporting year; and “†” indicates the year research starts.

Source: Guidehouse.

Guidehouse will perform program tracking data review and project reviews quarterly in 2026. Our overarching goal is to research savings impacts sufficiently to report program-level savings at ±10% precision and 90% confidence. The default strata will be defined by project size and offering type.

The impact research sample will be drawn quarterly based on the projects labeled “Ready for Evaluation” in the Ops Report provided by the implementation contractor. After program ex ante results are final, the progressive quarterly sample will be compared to the year-end program participation and savings, and we will adjust the sample to comply with sampling goals.

In 2027, the evaluation team will conduct a NTG study to research free ridership and spillover. We will survey participants and interview active trade allies to research free ridership and spillover. We will triangulate their results to inform the final recommended NTG value in 2028 using methods defined in the Illinois TRM.