An aerial photograph of a city coastline, likely Chicago, showing a mix of urban buildings, a multi-lane highway, and a sandy beach along the water's edge. A large, semi-transparent blue shape is overlaid on the left side of the image, containing the main title and subtitle. The blue shape has a pointed bottom edge that points towards the large '22-25' text at the bottom of the page.

Energy Efficiency Plan 4

For the Period

January 1, 2022 — December 31, 2025

22-25

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1. Introduction

The Illinois Public Utilities Act's ("Act") Section 8-104 establishes energy efficiency goals, energy efficiency program filing requirements and cost recovery mechanisms, and energy efficiency program expenditures for Illinois gas utilities serving more than 100,000 gas utility customers.¹ Section 8-104 was amended in 2016 through Public Act 99-0906 ("PA 99-0906") that changed the period of energy efficiency plan² and required Illinois gas utilities to provide energy efficiency programs to low income and public sector customers³.

In addition to the mandated energy-efficiency reductions in natural gas deliveries, Section 19-140 of the Public Utilities Act (220 ILCS 5/19-140) requires each gas utility to create an On-Bill Financing program for energy efficiency upgrades completed by utility customers. Both electric and natural gas utilities offer On-Bill Financing programs to allow certain customers to pay for approved energy efficiency measures on their utility bills. Those energy efficiency measures are financed through a loan with a financial institution participating in the program.⁴

Section 8-104(f) provided the standards for approval. Plan 4 for Peoples Gas ("PG" or "PGL"), an energy efficiency plan, meets these standards as follows:

1. Demonstrate that the proposed energy efficiency measures will achieve the requirements that are identified in Section 8-104(c) as modified by Section 8-104(d) under Section 8-104(f)(1).

Peoples Gas meets the demonstration that it will meet the energy efficiency goals through its modified savings goals. See NS-PGL Ex. 1.0 pp.13-18, NS-PGL Ex.1.3, p.10.

2. Present specific proposals to implement new building and appliance standards that have been placed into effect under Section 8-104(f)(2).

Peoples Gas meets the demonstration that it has provided measures and programs for new building and appliance standards. See NS-PGL Ex. 1.0, p.30.

3. Present estimates of the total amount paid for gas service expressed on a per therm basis associated with the proposed portfolio of measures designed to meet the identified requirements under Section 8-104(f)(3).

Peoples Gas meets the demonstration that it has provided a cost per therm. See NS-PGL Ex. 1.0 p.31-32.

4. Demonstrate that the overall portfolio of energy efficiency measures, not including

¹ 220 ILCS 5/8-104

² 220 ILCS 5/8-104(f)

³ 220 ILCS 5/8-104 (e-5). Energy efficiency programs for low income and public sector customers had previously been provided by the Illinois Department of Commerce and Economic Opportunity ("DCEO").

⁴ The Commission approved the Companies' On-Bill Financing program in Order No. 10-0090 (Order, June 2, 2010). This On-billing financing program has since expanded to also allow small commercial customers' energy efficiency improvements to be eligible for an On-Bill Financing program.

programs targeting income eligible customers (also referred to herein as “income eligible customers”), is cost-effective using the Total Resource Cost (“TRC”) test and represents a diverse cross-section of opportunities for customers of all rate classes to participate under Section 8-104(f)(5).

Peoples Gas meets the demonstration of overall program cost-effectiveness using the TRC test and its programs provide a diverse cross-section of opportunities to all ratepayers. See NS-PGL Ex. 1.0, p. 32; Ex. 1.3, pp. 10, 26-59.

5. Include a proposed cost-recovery tariff mechanism to fund the proposed energy efficiency measures and to ensure the recovery of the prudently and reasonably incurred costs of the Illinois Commerce Commission (“Commission”) approved programs under Section 8-104(f)(7).

Peoples Gas meets the demonstration that it has a tariff in place to recover prudently and reasonably incurred energy efficiency costs. See NS-PGL Ex. 2.0, p. 8.

6. Provide for quarterly status reports tracking implementation of and expenditures for the utility’s portfolio of measures, an annual independent evaluation of the cost-effectiveness of the portfolio of measures as well as a full review of the 4-year results of the broader net program impacts and, to the extent practical, adjustment of the measures on a going-forward basis as a result of the evaluations under Section 8-104(f)(8). The resources dedicated to evaluation shall not exceed 3% of portfolio resources in any given year.

Peoples Gas will provide said updates and tracking. See NS-PGL Ex 1.0 pp. 33-35, Ex. 1.3 pp. 4-5.

Further, Peoples Gas will allocate no more than 3% of energy efficiency measures for demonstration of breakthrough equipment and devices.

Also, as required under Section 8-104(e-5), a minimum 10% of the entire portfolio of cost-effective energy efficiency measures is reserved for efficiency programs serving local government, municipal corporations, school districts and community college districts. Further, spending on energy efficiency measures for income eligible customers proportionate to the share of total annual utility revenues from households at or below 150% of the poverty level and whose programs are targeted to households with incomes at or below 80% of the area median income. See NS-PGL Exhibit 1.0, pp. 16-18.

The plan demonstrates that Peoples Gas proposed energy efficiency portfolio will, in a prudent and cost-effective way, use the limited budget allowed by Section 8-104(d) (the “Cap”) to provide energy efficiency measures to Peoples Gas retail customers. The proposed Fourth Energy Efficiency Plan for CY2022-2025 (the “Plan” or “Plan 4”) cannot, however, meet the cumulative natural gas delivery reductions identified in Section 8-104(c)(4)-(6) within the Cap under Section 8-104(d). This plan documents the development of the Plan including general

research and specific program plans while remaining consistent with the requirements and guidelines outlined in Section 8-104.

Further, Peoples Gas' execution of its Plan 4 will meet several requirements, many of which are highlighted below. For more detail please see NS-PGL Exhibit 1.8.

1. Cost Effectiveness

Peoples Gas will present joint Total Resource Cost ("TRC") and Program Administrator Cost Test ("PACT") results for each program and each portfolio as part of its 2022-2025 Plan filing and any ex-post cost effectiveness reporting. Results will be combined gas/electric results for programs saving both fuels. 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.

2. Adjustable Savings Goals

- a) Peoples Gas will file the completed gas adjustable savings goal spreadsheets with their 2022-2025 Plan filings.
- b) To enable efficient annual review by the evaluators of the adjustable savings goal spreadsheet in accordance with Section 6.3 of the Illinois Energy Efficiency Policy Manual Version 2.0 ("Policy Manual") and to ensure accuracy in the Illinois Statewide Technical Reference Manual for Energy Efficiency ("IL-TRM") calculations, Peoples Gas will have the evaluators verify the accuracy in the IL-TRM calculations used to derive the measure savings that form the initial savings goals in the initial adjustable savings goal spreadsheet in advance of filing the completed adjustable savings goal spreadsheet with their 2022-2025 Plan filings.
- c) In advance of filing their completed adjustable savings goal spreadsheet, Peoples Gas will consult with Ameren Illinois and Nicor Gas on a consistent statewide adjustable savings goal template to use, and will leverage to the greatest extent possible the transparent structure of the statewide adjustable savings goal template used for the last Plan.

3. Weighted Average Measure Life (WAML)

- a) Peoples Gas retains the flexibility, as documented in Section 6.1 of the Illinois Energy Efficiency Policy Manual Version 2.0 ("Policy Manual"), to shift resources between programs and measures. Peoples Gas agrees that they will not exercise this flexibility in a way that results in a portfolio weighted average measure life ("WAML") decrease greater than 1 year lower than the filed Plan.
- b) The WAML targets will be adjusted on an annual basis to align with changes to measure lifetimes as defined in the annual update to the IL-TRM and as approved by the Commission. This adjustment will rely on applying the new measure lives to the original Plan quantities of measures to produce the new WAML target that would have been set if all measure life changes had been known at the time of the 2022-2025 Plan development. This new adjusted WAML value will then set the baseline from which any deviations are measured. Specifically, Peoples Gas will be limited to no more than a 1 year drop from its new WAML baseline. PGL will file updated WAML targets within the updated adjustable savings goal spreadsheet that is filed with the Commission.
- c) WAML will be calculated as the sum of the net lifecycle savings for all measures

delivered in the portfolio divided by the sum of net first-year savings for all measures delivered in the portfolio.

4. Bill Impacts

- a) Peoples Gas will work with interested stakeholders through SAG to define the term Energy Burden and discuss energy efficiency-related ideas for assessing the bill impacts of said programs and reductions of income eligible Energy Burdens.

5. IQ North Advisory Committee

Peoples Gas will continue to participate in the IQ North Committee convened pursuant to Section 8-103B(c) of the Act. Peoples Gas and the other Parties agree to support and advocate with utilities and stakeholders to improve the income eligible energy efficiency advisory committees, including, but not limited to incorporating some successful learnings from the IQ South Committee into the IQ North Committee, as well as a discussion of best practices of IQ program implementation strategies.

6. Reporting

Peoples Gas will continue to provide quarterly and annual status reports as designated by the statewide reporting templates, as well as additional reporting metrics that focus on providing more information on income eligible multi-family projects, health and safety and the Market Development Initiative. Several are highlighted below, more detail on new reporting metrics are outlined in NS-PGL Exhibit 1.8. Peoples Gas will:

- a) Report data separately on single family and multi-family income eligible channels: IHWAP-braided, utility-only, and utility-only-CAA.
- b) Report IQ Measure Data/Comprehensiveness of treatment.
- c) Report on health and safety (“H&S”) related metrics including: the use of predominant materials being used for income eligible building retrofits related to insulation, sealants/caulks generally and sealants/caulks for HVAC duct work, number of assessed properties that had identified H&S issues, breakdown of type of identified H&S issues, and number of properties deferred.
- d) Provide additional detail on the separate gas-only, trade-ally-driven multifamily program.

7. Customer Care Coordination

- a) Peoples Gas commits to coordinate between the Company’s Energy Efficiency, Customer Service and Credit/Collections groups so that customer interactions include energy efficiency education and referral, when practicable. These efforts would continue our current process of training customer service representatives about energy efficiency resources for customers indicating hardships or otherwise entering into Deferred Payment Programs or potential disconnection, as well as additional training on how to connect interested customers and customers for whom participation in energy efficiency programs may prove beneficial to program offerings.
- b) Additionally, Peoples Gas will cross promote information on financial assistance programs for which energy efficiency program participants may be eligible. Peoples Gas will also discuss the potential for coordination of energy efficiency messaging with local administering agencies such as the Community and Economic Development Association of Cook County (CEDA) and other community action

agencies.

Further, the following values were used for avoided costs in the revised Plan 4 filing:

- a) Electricity Avoided Costs: updated with data received from ComEd 12/15/20
- b) Natural Gas Avoided Costs: Using PGL specific commodity and non commodity costs as the basis for the avoided natural gas supply. Avoided Natural Gas Supply Costs are calculated as the sum of the 2019 average commodity gas charge and the three-year average non-commodity gas charge, sourced from PGL historical data. Future natural gas supply costs are escalated based on NYMEX Natural Gas Futures and AEO price forecasts.
- c) Escalation rate: 1.91% based upon the IL TRM v9.0.
- d) Non-Energy Benefits or Non-Energy Impacts: The TRC includes a Societal NEI estimate that was developed by Guidehouse
- e) Carbon adder: As agreed-upon by all IL utilities, a methodology was developed to convert from \$/tonne of carbon equivalent to \$/therm of natural gas combusted from IWG SCC estimates.

This Plan is submitted in compliance with the Section 8-104.

2. Executive Summary

Peoples Gas, a wholly-owned subsidiary of WEC Energy Group, proposes to implement a portfolio of natural gas energy efficiency programs and On-Bill Financing as required by Section 8-104 and Section 19-140 of the Public Utilities Act. The overriding objectives of this Plan are to achieve the indicated energy efficiency goals cost-effectively and to provide access to energy-saving programs for Peoples Gas residential, income eligible and commercial/industrial (“C&I”) customers.

In concert with Section 8-104 and Section 19-140 of the Public Utilities Act for natural gas utilities, Peoples Gas has developed diverse programs that reach all customer classes, and have specifically met the following requirements as outlined in the legislation:

- Allocate ten percent (10%) of cost-effective energy efficiency measures to efficiency programs for local government, municipal corporations, school districts and community college districts.
- Develop program offerings that serve customers at 150% of Federal Poverty Guidelines. This is reflected in program delivery as customers who are at or below 80% of area median income (“AMI”).

In the Plan 4, Peoples Gas has designed flexible, scalable, best practice programs that allow for partnering with Commonwealth Edison Company (“ComEd”), the electric service provider in Peoples Gas service territory, to streamline administration and delivery while maximizing customer participation based on researched market potential. Peoples Gas also worked with the neighboring gas utilities Ameren Illinois and Nicor Gas to provide consistency in program design where possible.

The proposed budget and cap is based on forecasted revenues for Calendar Year (“CY”) 2022-2025 (January 1, 2022 to December 31, 2025) and are as follows:

Table 1: Statutory 2% Cap on Recoveries from Customers

	PEOPLES GAS
Total Retail Natural Gas Service	\$1,452,451,567
Total 2% Statutory Budget Cap	\$29,049,031

The proposed budget and savings estimates are illustrated below. The budget is consistent with the statutory cap. The savings estimates fall below the statutory targets.

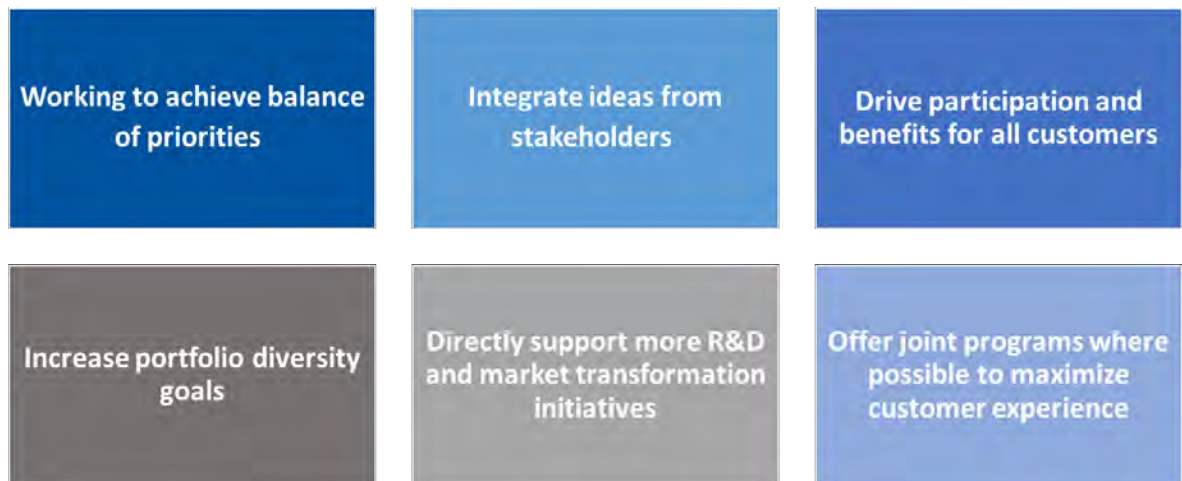
Table 2: Overall Goals and Budgets

Peoples Gas	2022	2023	2024	2025	Total
Throughput (Therms)	1,754,194,737	1,754,194,737	1,754,194,737	1,754,194,737	7,016,778,948
Statutory Savings Goal (Percent)	1.50%	1.50%	1.50%	1.50%	n/a
Statutory Savings Goal (Therms)	26,312,921	26,312,921	26,312,921	26,312,921	105,251,684
Utility Proposed Modified Savings Goal (Therms)	8,809,941	8,376,359	7,741,723	7,023,142	31,951,166
Utility Proposed Modified Savings Goal (Percent)	0.50%	0.48%	0.44%	0.40%	n/a
Portfolio Budget	2022	2023	2024	2025	Total
Budget Cap	\$29,049,031	\$29,049,031	\$29,049,031	\$29,049,031	\$116,196,124
Research & Development (Emerging Technologies)	\$290,490	\$290,490	\$290,490	\$290,490	\$1,161,960
EM&V Implementation	\$871,471	\$871,471	\$871,471	\$871,471	\$3,485,884
Portfolio Administration (Including Planning)	\$2,614,025	\$2,617,769	\$2,616,051	\$2,609,315	\$10,457,160
Portfolio Marketing & Education	\$319,539	\$319,539	\$319,539	\$319,539	\$1,278,157
Market Transformation	\$580,981	\$580,981	\$580,981	\$580,981	\$2,323,924
Total Portfolio Costs	\$4,676,506	\$4,680,250	\$4,678,533	\$4,671,796	\$18,707,086
Available Program Budget	\$24,372,525	\$24,368,781	\$24,370,498	\$24,377,235	\$97,489,038

Detailed program budgets provided in Tables 4A and 4B

The Plan has many offerings that incent customers to become more energy efficient. The offerings are integrated with energy efficiency awareness and education efforts designed to encourage customers to make more informed energy use decisions.

The following objectives guided the development of the portfolio of programs. The portfolio will:



Based on the goals outlined above, Peoples Gas developed a portfolio that incorporates direct stakeholder feedback and lessons learned from Plan 3 implementation and adapts to our changing customers' needs.

Below is a highlight of key changes from Plan 3 to Plan 4:

- Redirection of budget from residential behavioral to more comprehensive/deeper retrofits.
- Addition of virtual assessment options for residential and small/mid-sized business customers.
- Transition of joint utility Commercial Food Service pilot into full midstream program offering.
- Expansion of Small Business program to include mid-sized customers. Usage threshold was extended from an annual usage of approximately less than 150,000 up to 400,000 therms per year.
 - Addition of specialized business energy efficiency kits (grocery, worship, general)
- Substantial increase in funding for income eligible programs.
- Increase in incentives for public sector customers.
- Streamlining customer experience and working to reduce confusion for income eligible multi-family customers.
- Addition of Market Development Initiative (MDI) which aims to increase the number of local and diverse participants in the Peoples Gas energy efficiency contractor network, among other goals.

The following table summarizes the proposed portfolio. The program details are provided in Section 3.6.

Table 3: Energy Efficiency Portfolio Summary

Program	Market Offering	Offering Overview
Residential	Outreach and Education	The Elementary Education offering provides energy efficiency lesson plans, equipping teachers with activity guides and take-home kits for students and their families to learn how to save energy by installing no-cost energy-saving products in their homes.
	Home Energy Jumpstart	Offers energy-saving products installed in homes at no-cost to the customer. Option for virtual assessment.
	Home Energy Rebate	Provided in collaboration with local Trade Allies. Offers rebates on energy-efficient heating, ventilation, and air conditioning, water heating equipment and qualified weatherization projects for residential customers.
	Multi-Family	Offers a comprehensive program of assessments, direct installs, prescriptive and custom rebates, and partner Trade Ally projects. The Multi-Family program is a joint offering with ComEd.
Business	C&I	Robust offerings for C&I customers including rebates and incentives for prescriptive, custom, new construction, strategic energy management, retro-commissioning, gas optimization, engineering studies, and staffing grants.
	Public Sector	Robust offerings for public sector customers including enhanced rebates and incentives for prescriptive, custom, new construction, strategic energy management, retro-commissioning, gas optimization, engineering studies, and staffing grants.
	Small/Mid-Size Business (SMB)	Targeted offering for SMB customers that includes enhanced rebates for prescriptive, custom, and new construction paths, assessment/direct install (in person & virtual, kits and partner Trade Ally projects).
	Commercial Food Service Program	Expansive state-wide effort offering of midstream/upstream incentives for food service equipment. The program works closely with manufacturers, manufacturer representatives, and dealers in the program.
Income Eligible	Single Family	Comprehensive offering for income eligible Single Family customers that includes various ways to participate: utility only and government braided whole home retrofits, assessments and direct install measures, energy efficiency kits, and elementary energy education.
	Multi-Family	Comprehensive one-stop-shop offering for income eligible Multi-Family customers that includes various ways to participate: utility only and government braided whole building retrofits and new construction, and energy efficiency kits.
Portfolio	Market Development Initiative (MDI)	Initiative to increase the number of local and diverse participants in the energy efficiency contractor network, among other goals.

Table 4A provides a summary of the savings and budget by program and Table 4B provides a more detailed budget for each year.

Table 4C provides a summary of the Total Resource Cost (“TRC”) both with and without the Carbon Adder and Societal Non-Energy Impacts (“NEIs”). The total four year TRC benefit cost ratio is estimated at 2.17⁵ and without Income Eligible is 2.30.

Tables 4D and 4E provide the net present value cost effectiveness detail for the portfolio. TRC is a benefit cost test (described in Section 3.1.1).

Table 4A: Portfolio Summary for Budget and Savings

Peoples Gas	2022		2023		2024		2025	
Program	Therm Savings	Budget	Therm Savings	Budget	Therm Savings	Budget	Therm Savings	Budget
Income Eligible	1,518,356	\$10,241,867	1,642,928	\$11,179,693	1,786,354	\$12,417,831	1,936,597	\$13,783,527
Residential	3,059,935	\$5,806,157	2,790,556	\$5,350,106	2,555,388	\$4,929,986	2,078,511	\$4,143,676
Business	4,231,650	\$8,324,500	3,939,426	\$7,838,983	3,393,082	\$7,022,681	2,995,852	\$6,450,032
MDI	-	\$700,000	-	\$700,000	-	\$700,000	-	\$700,000
Portfolio Costs	-	\$4,676,506	3,450	\$4,680,250	6,899	\$4,678,533	12,182	\$4,671,796
TOTAL	8,809,941	\$29,049,031	8,376,359	\$29,049,031	7,741,723	\$29,049,031	7,023,142	\$29,049,031

Table 4B: Program Budget Detail

Peoples Gas	2022			2023			2024			2025		
Program	Impl	Incentive	Total	Impl	Incentive	Total	Impl	Incentive	Total	Impl	Incentive	Total
Income Eligible	\$2,401,541	\$7,840,326	\$10,241,867	\$2,665,219	\$8,514,474	\$11,179,693	\$2,962,582	\$9,455,249	\$12,417,831	\$3,259,406	\$10,524,121	\$13,783,527
Residential	\$1,745,657	\$3,360,500	\$5,106,157	\$1,621,622	\$3,028,484	\$4,650,106	\$1,498,209	\$2,731,777	\$4,229,986	\$1,268,277	\$2,175,399	\$3,443,676
Business	\$3,732,277	\$4,592,223	\$8,324,500	\$3,562,743	\$4,276,240	\$7,838,983	\$3,228,888	\$3,793,793	\$7,022,681	\$3,020,071	\$3,429,961	\$6,450,032
MDI	\$700,000		\$700,000	\$700,000		\$700,000	\$700,000		\$700,000	\$700,000		\$700,000
Total	\$8,579,475	\$15,793,050	\$24,372,525	\$8,549,584	\$15,819,197	\$24,368,781	\$8,389,679	\$15,980,819	\$24,370,498	\$8,247,754	\$16,129,481	\$24,377,235

Note: Implementation includes Program Administration and Marketing

Note: Evaluation is not included in individual program budgets but at the portfolio level

Table 4C: Portfolio Cost Effectiveness Results

Peoples Gas	2022			2023			2024			2025		
Program	TRC	TRC w/ Carbon w/o NEIs	PACT	TRC	TRC w/ Carbon w/o NEIs	PACT	TRC	TRC w/ Carbon w/o NEIs	PACT	TRC	TRC w/ Carbon w/o NEIs	PACT
Income Eligible	1.89	1.56	0.71	1.91	1.58	0.72	1.91	1.58	0.72	1.90	1.58	0.72
Residential	2.88	2.32	2.03	2.93	2.37	2.05	3.00	2.44	2.10	3.04	2.48	2.10
Business	2.63	2.04	1.50	2.70	2.11	1.53	2.74	2.16	1.53	2.79	2.21	1.52
MDI	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
TOTAL W/O IE	2.30	1.81	1.29	2.31	1.84	1.29	2.31	1.85	1.27	2.28	1.83	1.22
TOTAL	2.18	1.74	1.09	2.19	1.76	1.07	2.17	1.76	1.03	2.12	1.73	0.98

⁵ Including IE, Carbon Adder and Societal NEIs

Table 4D: Portfolio Cost Effectiveness Results – Net Present Values for TRC⁶

Peoples Gas	2022			2023			2024			2025		
Program	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits
Income Eligible	\$20,563,950	\$10,859,032	\$9,704,919	\$22,671,178	\$11,884,234	\$10,786,945	\$25,167,665	\$13,209,012	\$11,958,654	\$27,854,643	\$14,662,084	\$13,192,559
Residential	\$32,284,307	\$10,493,701	\$21,790,605	\$30,098,224	\$9,572,436	\$20,525,788	\$28,335,863	\$8,747,161	\$19,588,702	\$23,662,868	\$7,085,664	\$16,577,204
Business	\$32,386,846	\$12,295,935	\$20,090,911	\$30,964,449	\$11,478,667	\$19,485,783	\$27,673,587	\$10,091,491	\$17,582,096	\$25,336,763	\$9,082,952	\$16,253,811
MDI		\$700,000	(\$700,000)	\$0	\$700,000	(\$700,000)	\$0	\$700,000	(\$700,000)	\$0	\$700,000	(\$700,000)
Portfolio Costs		\$4,676,506	(\$4,676,506)	\$45,171	\$4,697,319	(\$4,652,147)	\$92,479	\$4,712,670	(\$4,620,191)	\$165,802	\$4,739,464	(\$4,573,662)
Total W/O IE	\$64,671,153	\$28,166,143	\$36,505,009	\$61,107,844	\$26,448,421	\$34,659,423	\$56,101,929	\$24,251,321	\$31,850,607	\$49,165,433	\$21,608,080	\$27,557,353
Total	\$85,235,103	\$39,025,175	\$46,209,928	\$83,779,023	\$38,332,655	\$45,446,368	\$81,269,594	\$37,460,333	\$43,809,261	\$77,020,075	\$36,270,163	\$40,749,912

Table 4E: Portfolio Cost Effectiveness Results – Net Present Values for TRC w/o NEIs⁷

Peoples Gas	2022			2023			2024			2025		
Program	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits
Income Eligible	\$16,959,940	\$10,859,032	\$6,100,909	\$18,760,538	\$11,884,234	\$6,876,304	\$20,899,948	\$13,209,012	\$7,690,936	\$23,206,344	\$14,662,084	\$8,544,260
Residential	\$25,985,264	\$10,493,701	\$15,491,563	\$24,335,528	\$9,572,436	\$14,763,092	\$23,007,673	\$8,747,161	\$14,260,512	\$19,286,785	\$7,085,664	\$12,201,121
Business	\$25,122,169	\$12,295,935	\$12,826,234	\$24,209,131	\$11,478,667	\$12,730,465	\$21,791,498	\$10,091,491	\$11,700,007	\$20,117,077	\$9,082,952	\$11,034,125
MDI		\$700,000	(\$700,000)		\$700,000	(\$700,000)		\$700,000	(\$700,000)		\$700,000	(\$700,000)
Portfolio Costs		\$4,676,506	(\$4,676,506)	\$35,381	\$4,697,319	(\$4,661,938)	\$72,851	\$4,712,670	(\$4,639,819)	\$131,276	\$4,739,464	(\$4,608,188)
Total W/O IE	\$51,107,434	\$28,166,143	\$22,941,290	\$48,580,040	\$26,448,421	\$22,131,619	\$44,872,022	\$24,251,321	\$20,620,700	\$39,535,138	\$21,608,080	\$17,927,058
Total	\$68,067,374	\$39,025,175	\$29,042,199	\$67,340,578	\$38,332,655	\$29,007,923	\$65,771,969	\$37,460,333	\$28,311,636	\$62,741,482	\$36,270,163	\$26,471,318

Table 4E: Portfolio Cost Effectiveness Results – Net Present Values for PACT

Peoples Gas	2022			2023			2024			2025		
Program	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits	Benefits	Costs	Net Benefits
Income Eligible	\$7,247,874	\$10,241,867	(\$2,993,993)	\$8,012,914	\$11,179,693	(\$3,166,779)	\$8,918,952	\$12,417,831	(\$3,498,879)	\$9,894,770	\$13,783,527	(\$3,888,756)
Residential	\$11,764,133	\$5,106,157	\$6,657,976	\$10,978,108	\$4,650,106	\$6,328,002	\$10,376,847	\$4,229,986	\$6,146,860	\$8,722,135	\$3,443,676	\$5,278,459
Business	\$12,508,278	\$8,324,500	\$4,183,778	\$11,975,148	\$7,838,983	\$4,136,165	\$10,710,077	\$7,022,681	\$3,687,396	\$9,810,992	\$6,450,032	\$3,360,960
MDI	\$0	\$700,000	(\$700,000)	\$0	\$700,000	(\$700,000)	\$0	\$700,000	(\$700,000)	\$0	\$700,000	(\$700,000)
Portfolio Costs	\$0	\$4,676,506	(\$4,676,506)	\$45,171	\$4,697,319	(\$4,652,147)	\$92,479	\$4,712,670	(\$4,620,191)	\$165,802	\$4,739,464	(\$4,573,662)
Total W/O IE	\$24,272,411	\$18,807,164	\$5,465,248	\$22,998,427	\$17,886,407	\$5,112,020	\$21,179,403	\$16,665,337	\$4,514,066	\$18,698,929	\$15,333,172	\$3,365,757
Total	\$31,520,286	\$29,049,031	\$2,471,255	\$31,011,341	\$29,066,100	\$1,945,241	\$30,098,355	\$29,083,168	\$1,015,187	\$28,593,699	\$29,116,699	(\$523,000)

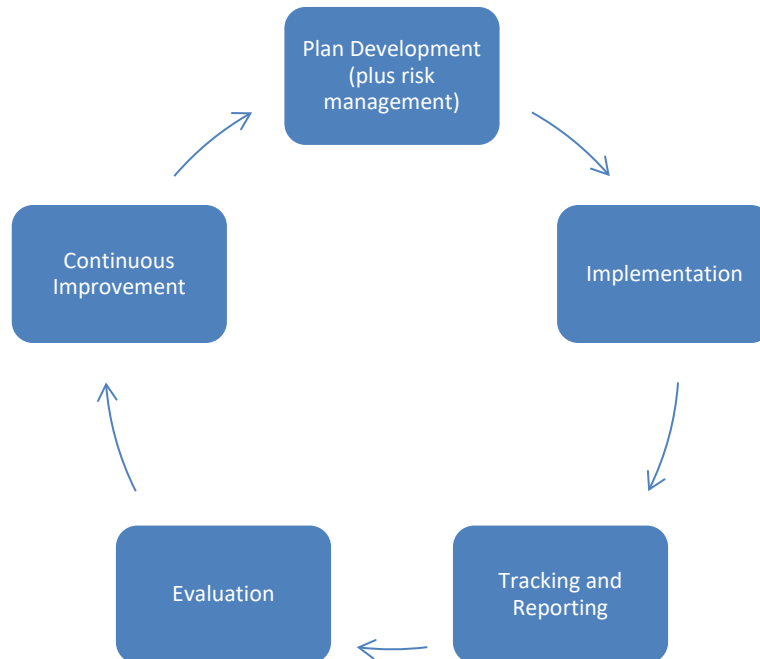
⁶ TRC results include the Carbon Adder and the Societal NEI described in Section 3.1.1

⁷ TRC results include the Carbon Adder and does not include the Societal NEI described in Section 3.1.1

3. The Components of the Plan

The creation of this Plan adheres to a rigorous planning process, beginning with market analysis and a potential study and culminating in program design. The diagram in Figure 1 provides an illustration of the energy efficiency planning process and coincides with the topics in the balance of this section.

Figure 1: Energy Efficiency Planning Process Overview



A market potential assessment (“Market Potential Study”) was performed by Applied Energy Group. The purpose of the study was to (1) identify the economic potential for natural gas savings in the People Gas service territory, (2) identify opportunities for program enhancements and new program offerings to realize this potential and (3) estimate the achievable potential gas savings and program costs for these opportunities. The Market Potential Study, along with the experience gained and lessons learned from the previous Plan period, is the basis for the development of this Plan 4.

Peoples Gas is committed to continuously improving the design and delivery processes for its programs. During the course of the Plan 4, as done during the prior Plan period, programs will be improved and refined on an ongoing basis, particularly as program evaluation and reporting activities identify opportunities for program enhancement.

3.1 Plan Development

Plan development incorporated a number of tasks that helped structure the portfolio design process and the steps that followed.

- Developed a database of energy saving measures, including estimated costs, energy savings and measure life. The energy savings measures were compared to baseline conditions – current practices, if available, or, alternatively, minimum standards. Measures were screened for cost-effectiveness based on Peoples Gas specific avoided cost and other data.
- Taken into consideration were experiences by other utilities, consultants and program implementation contractors and information on generally accepted best practices and put them into the context of the Peoples Gas market to ensure participants are available and the measures will meet their needs.
- Bundled measures into programs that are logical and facilitate participation from the customers' perspectives. Best practices and the experiences of other program administrators and implementers were taken into consideration when developing the program design. Program level budgets were prepared and the program was screened for cost-effectiveness. All programs were finally bundled into one portfolio and the total portfolio, including general costs that are not program specific, was screened for cost-effectiveness.
- Performed a risk analysis and identified risk mitigating measures.

3.1.1 Benefit Cost Analysis

There are many methods used to assess the cost-effectiveness of an energy efficiency measure. Section 8-104(f) requires using the total resource cost test ("TRC") as the primary method to determine cost-effectiveness of the portfolio.

TRC measures the net costs of an energy efficiency program as a resource option based on the total costs of the program, including both the participants' and the utility's costs. The TRC test represents the effects of a program on both participating customers and those not participating in a program. The benefits are the avoided supply cost – the reduction in transmission, distribution, commodity and capacity costs valued at marginal cost for the periods when there is a reduction in usage of natural gas. The costs in this test are the program costs paid by the utility and the participants plus the increase in supply costs for the periods in which demand is increased. Thus, all incremental equipment costs, operation and maintenance, cost of removal and administration costs, no matter who pays for them, are included in this test. The benefit cost ratio resulting from the application of the TRC test is the ratio of the discounted total benefits of the program to the discounted total costs over a specified time period. A benefit cost ratio above one (1) indicates that the program is beneficial to the utility and its customers on a TRC basis.

Even though the TRC test is prescribed by Section 8-104(f), there are three other cost-effectiveness tests that analyze the programs from different perspectives. The additional tests are the Participant Test, the Ratepayer Impact Measure (“RIM”) Test, and the Utility or Program Administrator Cost Test.

The Participant Test reflects the quantifiable benefits and costs to the customer due to participation in a program from the participant’s perspective. The benefits include a reduction in the participant’s bill, and incentives paid to them. The costs are out-of-pocket expenses incurred as a result of participation in the program plus any increases to utility bills.

The RIM Test measures what happens to customer’s bills or rates due to changes in utility revenues and operating costs caused by a program. The benefits are the savings from avoided supply costs. The costs are the program costs incurred by the utility and/or other entities for creating or administering the program, incentives paid to the participant, decreased revenues for any periods for which demand decreased, and increased supply costs for instances when demand increased.

The Utility or Program Administrator Cost Test measures the net costs of a program as a resource option based on the costs incurred by the program administrator, excluding any net costs incurred by the participant. The benefits are the avoided supply costs of energy and demand (similar to the TRC benefits). The costs are the program costs incurred by the administrator, the incentives paid to the customers, and the increased supply costs for the periods in which demand is increased.

To determine energy efficiency measures that should be considered opportunities for achievable energy savings, a comprehensive benefit cost analysis was conducted on a wide range of measures that affect natural gas consumption across all customer classes. The benefit cost tests were performed using data specific to Peoples Gas. When the TRC test results produce a value greater than one (1) for any given measure or bundle of measures, it is judged to be a cost-effective application, implying that it is more beneficial to implement the energy efficient technology. Measures are grouped into programs and budget amounts are allocated. Then the TRC test is run again on each program, or bundle of measures, to determine cost-effectiveness. Table 4A in Section 2 above included the TRC test results for each proposed program and the total portfolio.

For this Plan, the avoided costs also include a Societal and Participant NEI estimate developed by Guidehouse. These values are specific for Peoples Gas based on an analysis using 2019 portfolio savings. Additionally, an estimate for carbon reductions were included. The carbon adder was developed in conjunction with the other IL utilities to ensure the same original source value. For gas utilities, the original IWG SCC estimates were converted from \$/tonne of carbon equivalent to \$/therm of natural gas

combusted.⁸ The Illinois Technical Reference Manual (“TRM”)⁹ was utilized to calculate savings for measures that were specified in the TRM. Section 8-104(f) requires that Peoples Gas meet a TRC of 1.0 or higher at the portfolio level.

In addition to the results of the four tests mentioned above, this Plan also provides the cost per therm saved based on levelized (life cycle) savings. This measures the lifetime savings against the program costs, rather than just the first year savings.

3.1.2 Current and Future Coordination with Stakeholders

Peoples Gas recognizes the importance of obtaining agreement among stakeholders in all phases of the Plan life cycle from planning and program design, to implementation, evaluation, tracking and cost recovery. Peoples Gas participated in a collaborative process led by the Stakeholder Advisory Group (“SAG”) facilitator and made periodic presentations to the SAG on proposed plans, design changes, etc. Discussions were held with stakeholders that chose to participate and signed a non-disclosure. During these discussions Plan 4 budgets and program delivery plans were further defined and the Market Development Initiative (MDI) was established. Stakeholders were also provided information and an opportunity to provide input for this revised Plan 4.

Peoples Gas will continue to actively participate in the SAG, the Technical Advisory Committee of the SAG (“TAC”) and the Income Eligible North Advisory Committee. These forums allow all stakeholders to work together to ensure high quality, high performance energy efficiency programs in the State of Illinois. In addition, Peoples Gas will continue to have conversations with stakeholders to discuss what’s working, what’s not working and how to improve coordination where it makes sense and is mutually beneficial for customers, stakeholders and Peoples Gas.

3.2 Risk Management

The objective of risk management is to limit the liability to Peoples Gas and develop a proactive plan to identify and resolve the most critical and/or most likely potential risk events. It is particularly important in the planning and development stages to document risks and identify mitigation and contingency options that can be applied to risks.

Peoples Gas defines a risk as any factor (event) that may potentially interfere with success of the portfolio in reaching its objectives. A risk is not a problem; a risk is the possibility that a problem might occur. By recognizing potential problems, Peoples Gas can attempt to avoid a problem through proper actions, or risk responses. The best mitigation is to take action upfront to prevent a risk event from occurring. If a risk cannot

⁸The Illinois legislature, through FEJA, requires the use of the 2016 IWG SCC projections to be used in setting the value of Zero Emission Credits and for calculating the avoided costs of emissions. 8-103B(d-5)(1)(B)(i): Social Cost of Carbon: The Social Cost of Carbon is \$16.50 per megawatthour, which is based on the U.S. Interagency Working Group on Social Cost of Carbon's price in the August 2016 Technical Update using a 3% discount rate, adjusted for inflation for each year of the program.

⁹ Illinois Statewide Technical Reference Manual for Energy Efficiency Version 9.0 (9/25/20), developed by members of the Illinois Energy Efficiency Stakeholder Advisory Group.

be prevented, contingency planning involves the preparation of prescribed actions should a risk event be triggered.

Peoples Gas' assessment of the portfolio concluded that there are currently five main risks that require responses. These risks are:

- Performance risk: The risk that the programs do not deliver expected results.
- Market risk: The risk that the program participation will suffer as a result of poor economic conditions.
- Technology risk: The risk that certain technologies or measures fail to deliver expected savings.
- Evaluation risk: The risk that independent evaluation, measurement and verification ("EM&V") will conclude that either deemed savings, plan assumptions, or estimates fall short of what implementers have estimated.
- Regulatory risk: The risk that achievements are not recognized and cost recovery is affected.

Peoples Gas' risk responses to these identified risks are as follows. They do not necessarily correlate to the above risks on a one-on-one basis.

- Mitigate technology and market risks by designing a diversified portfolio that does not rely heavily on one single program or technology.
- Mitigate market risks by designing programs that help overcome many of the market challenges and barriers.
- Mitigate technology risk by incorporating technologies and measures based on market research and technologies with proven results in similar markets.
- Mitigate evaluation risk by using TRM algorithms if available and obtain SAG agreement on the net-to-gross ("NTG") ratios to be used in planning assumptions using EM&V results. The Policy Manual Version 2.0 allows for goals to be adjusted that are beyond the control of the utility. The annual energy savings goals will be adjusted to align with (1) changes to TRM values and (2) Evaluator's recommended NTG values for the entire Plan period prior to the start of the first Plan year (i.e., prior to CY 2022).
- Mitigate regulatory risk by clearly stating objectives, expectations and assumptions in the plan and obtaining approval of these expectations and assumptions. Continue to work closely with SAG members to develop processes and expectations that minimize negative retrospective applications that exacerbate regulatory risk.

Risk management is an on-going process; it is not performed once and then set aside. Risk identification, management, and resolution continue after the portfolio is launched. New risks will develop as the programs evolve and external and internal situations change.

3.3 Implementation

The majority of the programs outlined in Plan 4 are currently being implemented by Peoples Gas and ongoing adjustments are applied to improve program processes. Implementation planning involves a continual assessment of program and measure mix to assure that the portfolio is on track to meet goals. As a result, in subsequent years, Peoples Gas may add/subtract measures or modify the scope of a program based on market data, changes in technology, or other relevant information.

In addition to ensuring that Peoples Gas reaches savings and budget goals in a cost-effective way, some of the key goals identified in implementation planning are:

- Continue to implement new measures or remove less cost-effective measures in a seamless manner, working in close partnership with trade allies.
- Continue building on the trade ally network.
- Work more closely with local organizations and communities to increase awareness of and activity in the programs.
- Make all reasonable attempts to offer jointly delivered programs to customers in partnership with ComEd, and where not feasible, arrange a kWh savings selling and purchasing agreement to facilitate comprehensive (electric and gas) offerings.

Peoples Gas will continue working with local energy efficiency vendors for performing implementation services for income eligible offerings. Peoples Gas will continue to leverage program resources currently present with the Illinois Home Weatherization Assistance Program (“IHWAP”).

The Research & Development/ Market Transformation budget will focus on the following areas, in addition to other initiatives yet to be determined:

- Energy Efficiency Performance Standards – Peoples Gas will continue to assess the feasibility of promoting adoption of energy efficiency performance standards for existing buildings and may implement an initiative funded by the Market Transformation budget.
- Triple Glazed Windows – Peoples Gas will consider participation in a statewide market transformation initiative to promote tripe-glazed windows and to collaborate with stakeholders through the SAG MT Working Group. Peoples Gas may fund a triple glazed windows initiative through the Market Transformation budget.

3.3.1 Overall Management Strategy

Peoples Gas shall directly provide overall strategy, management and oversight of the energy efficiency portfolio in Plan 4. Peoples Gas’ internal energy efficiency team includes the following positions:

- Director Energy Efficiency and Business Customer Engagement
- Manager Energy Efficiency Programs Residential and Income Eligible
- Manager Energy Efficiency Programs Business
- Program Engagement Specialist
- Energy Efficiency Analyst
- Business Analyst

Additionally, Peoples Gas will conduct a competitive Request for Proposal (RFP) process prior to the beginning of Plan 4 for services including, but not limited to, the following administrative support, implementation, and program delivery functions:

- Program design, planning and implementation for residential, income eligible and business offerings
- Market Development Initiative (MDI) implementation services (this will specifically be a stand-alone Tier 1 contract)
- Administration support including regulatory, planning, internal evaluation and QA/QC
- Marketing, outreach and trade ally engagement
- Program data management, tracking and reporting

3.3.2 Communications/Marketing

Each program in the portfolio has a specific marketing and communication strategy to recruit customers in the target audience for the services being delivered. Some offerings may also have an individual marketing and communication strategy. However, at the portfolio level, a broad communication plan that addresses program branding, communication and collateral standards, messaging, and customer service standards for all implementation contractors will be reviewed and revised as needed.

Peoples Gas will develop a portfolio-level communication plan, as well as detailed plans for individual programs, and provide branding guidelines including trademarks, communication styles and color palettes. Market drivers are consistently reviewed for the Peoples Gas territory, allowing for adjustments to these marketing strategies, messaging, and specific unique program tactics. In general, the goals of the communication plan are to:

- Ensure awareness and drive participation to meet energy saving goals during the Plan 4 period, to the extent possible within the budget cap.
- Deliver a clear, consistent, compelling message about the benefits of energy efficiency and provide a call to action.
- Build a strong marketing channel through the trade allies.
- Manage expectations regarding program availability, offerings, and incentives.
- Coordinate closely with other utilities, energy efficiency program providers, such as Elevate Energy, the Illinois Home Weatherization Assistance Program, the

Historic Chicago Bungalow Association, as well as key industry and trade ally associations and organizations.

A multi-pronged marketing communication approach will be utilized to establish awareness of the portfolio. Primary channels for overall program awareness:

- Mass Communications Outlets – Bill messaging, newsletters, and website promotions are a few of the existing low-cost mass communication vehicles available to build program awareness.
- Program Field Staff – Peoples Gas and implementation teams conduct targeted outreach to relevant customer groups and industry associations as well as daily communications with customers.
- Account Managers – Peoples Gas will leverage the existing relationships utility account managers have with larger customers. Utility account managers will serve as a conduit to inform customers of the energy efficiency programs.
- Trade Allies – This channel reaches customers through existing relationships so that the program can influence a decision to participate in the energy efficiency programs. Peoples Gas provides marketing materials and training to ensure trade allies understand the various programs available, terms and conditions to which they must comply, and required procedures.
- Direct Delivery – Peoples Gas will develop marketing materials that are incorporated into program training sessions, mailed directly to customers, and distributed at events.
- Targeted Relationship Marketing – Strategies by sector, region, business type, or end-use to target specific audiences to increase the effectiveness of promotional activities.

Marketing effectiveness will be closely monitored so that marketing strategies and tactics can be altered based on program performance and marketplace opportunities. Increased marketing effectiveness will result in improved cost-effectiveness of the portfolio.

3.3.3 Customer Service/Contact Center

Contact center operations are critical operational components of the energy efficiency portfolio. Peoples Gas will contract with an energy efficiency implementation contractor who will be responsible for establishing, staffing, and reporting on contact center activities to support the Peoples Gas programs. The contact center goals are to:

- Support the portfolio of energy efficiency programs.
- Minimize impact on the utility contact center.
- Facilitate regular communication between contact centers to cultivate smooth relationship management.
- Respond to customer inquiries on the energy efficiency programs.
- Enable and encourage participation in the energy efficiency programs.
- Provide cross promotion on utility financial assistance programs as appropriate.

The contact center will handle inquiries about customer and measure eligibility, completing program applications, requests to participate in a program, scheduling, and supporting documentation requirements. Each person handling phone calls will be proficient in Peoples Gas offerings, customer qualification, program business rules, paperwork and procedures. Furthermore, contact center staff will have completed introductory training on all core technologies which comprise the majority of trade ally and customer inquiries. Ongoing and refresher training is performed as needed. Contact center staff has access to a wide variety of bilingual resources to communicate with customers as needed.

The contact center shall meet the expectations regarding Peoples Gas customer care protocol and call center standards. Furthermore, metrics are closely followed to provide the best customer experience. Call volumes, wait times and callback turnaround are closely monitored.

3.3.4 Joint Program Delivery

Peoples Gas has been jointly implementing programs with ComEd throughout Plan 1, Plan 2 and Plan 3 periods and has coordinated with ComEd during the development of Plan 4.

With respect to joint program delivery with ComEd in Plan 4, Peoples Gas will:

- Coordinate with ComEd on sharing public sector project leads to help ensure each Company meets its statutory spending goals.
- Make all reasonable attempts to reach agreement with ComEd on a jointly funded single rebate for the smart thermostat measure.
- Work with ComEd to comprehensively serve customers through income eligible programs, including but not limited to:
 - Whole building single family and multi-family retrofit programs
 - Single family and multi-family energy assessments
 - Elementary education
- Work with ComEd to identify opportunities to streamline customer experience and reduce potential customer confusion over available programs and incentives.
- Make all reasonable efforts to reach agreement with ComEd on joint processes, including joint enrollment forms, customer intake portals and program marketing materials. Additionally, Peoples Gas will work to reach agreement with ComEd on a common set of electric and gas measures offered and report to the SAG on measures included in jointly funded programs.
- Peoples Gas will also work with ComEd to identify and enact processes to

prevent individual multi-family business owners from being recruited by multiple vendors.

- For any non-IHWAP utility-only and contractor channel income-eligible single family and multi-family programs, and market rate residential single-family and multi-family weatherization programs where an agreement for joint delivery cannot be reasonably reached, Peoples Gas will work with ComEd to coordinate selling net lifecycle kWh savings at the average cost per net lifecycle kWh that ComEd is forecasted to incur each year through its own non-IHWAP utility-only and contractor channel income-eligible single family and multi-family programs, and market rate residential single-family and multi-family weatherization programs.
- For any non-IHWAP utility-only and contractor channel income-eligible single family and multi-family programs, and market rate residential single-family and multi-family weatherization programs where an agreement for joint delivery cannot be reasonably reached, Peoples Gas will work with ComEd to coordinate purchasing net lifecycle therm savings from ComEd at the average cost per net lifecycle therm forecasted to incur.
- For business programs, Peoples Gas will continue to work with ComEd to jointly offer programs and fund measures that provide a comprehensive service to customers in alignment with Peoples Gas' portfolio goals and available budgets.

3.4 Tracking and Reporting

Peoples Gas will take a comprehensive approach to tracking and reporting for the upcoming 2022-2025 portfolio. With the increased emphasis on tracking and reporting, ensuring that programs are accurately tracked will be an essential component of program delivery.

The portfolio tracking system will continue to provide real-time access and visibility into energy efficiency projects and applications at every stage, while providing consistent tracking of projected energy savings and other key program information such as marketing leads, outbound marketing campaign success rates, and trade ally activity. In addition to tracking completed projects, Peoples Gas will work closely with program implementers to monitor the pipeline of *i n c o m i n g* projects to estimate contributions from marketing and promotion campaigns and develop forecasts for program performance.

Program reporting serves two key objectives:

- Provide information to regulators needed to assess the programs and their achievements.
- Provide timely information to program implementers needed to manage the

programs including progress towards goals and expenses versus budgets.

Quarterly and annual reports will be prepared to meet these objectives. Program evaluation also requires that the information needed to properly evaluate a program is tracked and reported. Each of these items is discussed further below.

Accurate reporting is essential to the successful administration of a program. Program reporting reflects the progress or results of the programs, helps determine program changes that need to be made, and is a key tool used in the decision-making process. Program changes made as a result of reporting can have financial implications, which add to the importance of accurate reporting.

Accurate reporting is also important because it provides needed information to track whether mandated requirements are being met. Most energy efficiency programs have specific goals and benchmarks that must be achieved by certain dates. Accurate reporting provides the vehicle to evaluate whether these goals and benchmarks are being achieved cost-effectively in the allotted time frame and whether goals or programs need to be adjusted.

Providing information for the program evaluation is also an important aspect of reporting. Evaluation is a key aspect in gauging the success of the programs because it:

- Reports if the utilities have met their portfolio goals.
- Reports if a program has met its goals.
- Presents reasons why a program has succeeded or failed.
- May be used for compliance with regulations.

Evaluation relies heavily on data tracking and reporting to be comprehensive, reliable, and robust. Evaluation determines whether the portfolio results were cost-effective and feeds into the identification of potential adjustments to the Illinois TRM.

The most important data pieces to track are the total annual energy savings, the total yearly participation and accurately categorized costs. The first two data points are the benchmark for all goals and targets. The costs associated with the savings allows us to track where we are in terms of reaching the cap as well as reviewing cost effectiveness of the program at year end.

Peoples Gas will work closely with the EM&V Contractor to ensure the appropriate and needed data is being collected and that the EM&V Contractor has access to the tracking system to enable timely and direct downloading of data needed for evaluation purposes.

Peoples Gas will provide additional reporting metrics that focus on income eligible multi-family projects, health and safety and the Market Development Initiative per the stipulated agreement. Please see NS-PGL Exhibit 1.8 for more detail on new reporting metrics.

3.5 Evaluation

Evaluation is the process of determining and documenting the results, benefits, and lessons learned from an energy efficiency program. Energy efficiency evaluations are conducted to estimate actual energy savings compared to predicted estimates. An evaluation should be viewed as one part of an ongoing process to improve planning and implementation to maximize the effectiveness of the program.

There are limited evaluation resources. Therefore, all activity should 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, such as quantification of spillover.

Two types of evaluation generally undertaken for energy efficiency programs include process and impact evaluations. These are discussed in detail below. A third type of evaluation that is sometimes performed is a market transformation evaluation. Market transformation evaluations attempt to quantify the adoption of a measure in the market place. They analyze the availability and adoption of a product, along with changes in pricing if available and relevant.

Peoples Gas will cooperate with an independent third-party evaluation firm to evaluate the programs and measures. The third-party evaluator will perform evaluations consistent with generally accepted rules for evaluation and will address net-to-gross (“NTG”) matters consistent with the Policy Manual and IL TRM.

Many issues associated with evaluations and the application of evaluation results have been discussed during SAG meetings and in separate meetings focusing on evaluation. Peoples Gas has participated in these meetings. SAG meetings have also been a forum for development of the Illinois Energy Efficiency Policy Manual (“Policy Manual”), which details evaluation policies. Peoples Gas will continue to actively participate in these meetings and evaluation efforts.

In Plan 4, Peoples Gas shall also contract with a separate, independent, third-party entity to provide evaluations services for the Market Development Initiative (MDI) funded by the EM&V budget. For more details on this component, please see NS-PGL Exhibit 1.8 Stipulated Agreement.

3.5.1 Impact Evaluation

The primary objective of impact evaluation is to estimate gross and net energy savings for the programs. These results are used to validate program-claimed savings and to adjust estimates of savings to improve their accuracy.

Although the plan is to evaluate the most important measures offered in the programs, not all measures will be evaluated with the same level of rigor. An important part of the

planning will be to prioritize the programs and their measures and define the level of rigor that will be applied to the evaluation for each component. New measures and new processes will be given a higher priority than measures that have already been evaluated or are standard.

3.5.2 Process Evaluation

Timely process evaluations are critical for ensuring (1) that the appropriate information is being tracked and (2) that the program is being implemented effectively and efficiently. Process evaluations provide insights and recommendations to improve each program as well as to ensure the reliability of inputs to the impact evaluation.

Where relevant (particularly where a program is expected to go beyond energy savings to influence various aspects of a market), we will also conduct research to understand and document the relevant market. The primary objective of this effort will be to help Peoples Gas to achieve cost-effective savings and reduce barriers to participation while maintaining high levels of customer satisfaction.

The process evaluation for each program will include in-depth qualitative interviews with Peoples Gas' 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.

3.6 Proposed Program Details

This section provides details on the programs that Peoples Gas proposes to include in its gas energy efficiency portfolio.

Peoples Gas is committed to meeting the proposed energy savings targets within the budget allocations in the most cost-effective way. To this end, Peoples Gas requests the latitude to reallocate funding between programs, to add or delete cost-effective measures, and increase or decrease incentive amounts, at their discretion (consistent to the Illinois Policy Manual 2.0 and subject to the terms of NS-PGL Exhibit 1.8 Stipulated Agreement), to ensure performance criteria are met. Peoples Gas envisions the nature of the portfolio adjustments would relate to specific designs developed in response to customer/implementer feedback and/or rebalancing the portfolio based on individual program performance or emerging market/technology opportunities. Lastly, as Peoples Gas continues to learn from the market response to these and other utility programs, additional programs may be added to enhance the portfolio performance.

3.6.1 Market Development Initiative (MDI)

Peoples Gas will dedicate an annual average budget of \$700,000 per year to an MDI. The goal of the MDI is to increase contracting opportunities for diverse business enterprises and Community-Based Organizations (CBOs) and assist these groups in developing the necessary capabilities to participate in the delivery of the energy efficiency portfolio.

The MDI will feature the following components in Plan 4:

- Research – Research shall be performed by a contractor who will be selected through a competitive bidding process in 2021 and who has demonstrated experience in diverse market development efforts. Peoples Gas will consult with the SAG on further details of the MDI research effort.
- Market Development Action Plan (MDAP) - the MDAP will be informed by the research project and implementation of the MDAP will be competitively bid to an independent third-party implementation contractor with demonstrated experience in diverse market development efforts. The MDAP may include, but not be limited to, the following components:
 - Outreach and education to potential bidders on opportunities for energy efficiency implementation contracts.
 - Providing diverse business enterprises with financial and technical support, and expanded educational opportunities to assist in developing the capabilities to compete for implementation contracts.
 - Working with Peoples Gas to review and analyze utility requirements for energy efficiency goods and services and providing input to the utility in structuring energy efficiency procurement efforts to provide sufficient information on technical and performance requirements for non-traditional bidders to compete for contracts or form teams with other subcontractors.
- SAG Coordination – Peoples Gas will coordinate directly with the SAG on MDI efforts through a newly formed SAG subcommittee dedicated to the MDI efforts.
- Reporting – Peoples Gas will provide quarterly status updates on MDI efforts and use data-driven approaches to assess the effectiveness of the MDI initiative in achieving goals.
- Evaluation – Peoples Gas shall contract with a third-party vendor to evaluate the impacts and assess the effectiveness of the MDI by December 31, 2023.

3.6.2 Core Program Details

The proposed portfolio is a comprehensive set of proven programs that reach all customer classes. All of the programs in the proposed portfolio with the exception of Income Eligible and Public Sector programs screened as cost-effective for the 4-year plan period. Furthermore, all programs are scalable, meaning they can easily expand to incorporate additional measures in the future or remove measures that are no longer cost effective.

Savings estimates for individual measures or programs have been developed in various manners. This includes calculating impacts using algorithms in the TRM if the measure is listed in the TRM or generally accepted engineering algorithms based on a set of reasonable assumptions to input variables and building simulation modeling. Because of the diversity in equipment and energy consumption patterns across multiple building types and end-uses, there exists a variability in the savings estimates as they relate to program design and target markets. A collaborative effort throughout the planning process between the utilities allowed for comparison of the measures and has led to a consistency in approach, even if the saving values differed. The proposed rebate levels are based mostly on current incentives or on the levels of incentives we believe are needed to encourage customers to pursue efficiency during a time of lower gas costs and longer payback periods. We have also tried to balance the impact of higher incentives against the impact of reaching our budget cap.

Details on each program are provided in the following pages.

Table 5: Energy Efficiency Portfolio Summary

Program	Market Offering	Offering Overview
Residential	Outreach and Education	The Elementary Education offering provides energy efficiency lesson plans, equipping teachers with activity guides and take-home kits for students and their families to learn how to save energy by installing no-cost energy-saving products in their homes.
	Home Energy Jumpstart	Offers energy-saving products installed in homes at no-cost to the customer. Option for virtual assessment.
	Home Energy Rebate	Provided in collaboration with local Trade Allies. Offers rebates on energy-efficient heating, ventilation, and air conditioning, water heating equipment and qualified weatherization projects for residential customers.
	Multi-Family	Offers a comprehensive program of assessments, direct installs, prescriptive and custom rebates, and partner Trade Ally projects. The Multi-Family program is a joint offering with ComEd.
Business	C&I	Robust offerings for C&I customers including rebates and incentives for prescriptive, custom, new construction, strategic energy management, retro-commissioning, gas optimization, engineering studies, and staffing grants.
	Public Sector	Robust offerings for public sector customers including enhanced rebates and incentives for prescriptive, custom, new construction, strategic energy management, retro-commissioning, gas optimization, engineering studies, and staffing grants.
	Small/Mid-Size Business (SMB)	Targeted offering for SMB customers that includes enhanced rebates for prescriptive, custom, and new construction paths, assessment/direct install (in person & virtual, kits and partner Trade Ally projects).
	Commercial Food Service Program	Expansive state-wide effort offering of midstream/upstream incentives for food service equipment. The program works closely with manufacturers, manufacturer representatives, and dealers in the program.
Income Eligible	Single Family	Comprehensive offering for income eligible Single Family customers that include various ways to participate: utility only and government braided whole home retrofits, assessments and direct install measures, energy efficiency kits and elementary energy education.
	Multi-Family	Comprehensive one-stop-shop offering for income eligible Multi-Family customers that include various ways to participate: utility only and government braided whole building retrofits and new construction, and energy efficiency kits.
Portfolio	Market Development Initiative (MDI)	Initiative aimed at increasing the number of local and diverse participants in the energy efficiency contractor network, among other goals

3.6.3 Proposed Program Details – Income Eligible Program

Path	3.6.3.1 INCOME ELIGIBLE SINGLE FAMILY
Description	<p>Income Eligible Single Family is designed to help income eligible customers save energy and reduce their utility bills.</p> <p>Retrofit A comprehensive retrofit is an energy efficiency project that applies a whole building approach and touches multiple systems and components of a customer’s residence. Qualifying customers in existing homes will receive an energy assessment and a comprehensive retrofit that focuses on a whole building approach to improving energy efficiency in the customer’s home. Customers may receive free installation of insulation and air sealing based upon the results of the energy assessments, mechanicals and electric measures. As needed, customers will receive emergency replacement of heating and water heating systems or a heating system tune-up, and health and safety measures.¹⁰</p> <p>Elementary Energy Education Fifth-grade teachers are provided lesson plans and activities aligned with state curriculum standards that are designed to teach students about energy production and conservation. Each student will receive a take-home kit containing energy efficient products to install at home with their families. The program will target schools in neighborhoods that qualify as income eligible.</p> <p>Home Energy Assessments Offers energy-saving products installed in homes at no-cost to the customer. Option for virtual assessment. The goal of this pathway will be used as another touch point with income eligible customers and an opportunity to drive them toward the more comprehensive retrofit paths.</p> <p>Income Eligible 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).</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to jointly deliver with ComEd and cooperate with a variety of partners wherever possible.
Delivery Strategy	Delivery strategy will include the use of local experts wherever practicable. Costs and savings will be based upon an allocation agreement with ComEd, as appropriate. The allocation may be periodically reviewed to ensure the allocations are appropriate. The retrofits will not require any funding from the customer. Peoples Gas will provide enhanced rebates for developers of new construction homes targeted to income eligible residents within the service territory.
Target Market	<p>Retrofit Peoples Gas will target single family or duplex residences within the Peoples Gas service territory. Households deemed to be at or below 80% of the AMI. Both owner-occupied and rental premises are eligible.</p> <p>Elementary Energy Education Peoples Gas will target schools in residential neighborhoods with customers who have incomes at or below 80% of the AMI.</p> <p>Home Energy Assessments Peoples Gas will target single family or duplex residences within the Peoples Gas service territory. Households must be at or below 80% of the AMI. Both owner-occupied and rental premises are eligible.</p>
Marketing Strategy	Peoples Gas will work with a variety of partners to create awareness.

¹⁰ Emergency replacements include equipment that is non-repairable and/or unsafe due to the age and condition of the equipment.

Path	3.6.3.1 INCOME ELIGIBLE SINGLE FAMILY
Eligible Measures	<p>Eligible retrofit measures may include, but are not limited to:</p> <ul style="list-style-type: none"> • Air Sealing • Attic Insulation • Wall Insulation • Basement Sidewall Insulation • Rim Joist Insulation • Foundation Insulation • Boiler • Furnace • Water Heater • Weatherstripping & Door Sweeps • Heating System Clean and Tune-Up • Health and Safety <p>Eligible Direct Install Measures and School Kits may include, but are not limited to:</p> <ul style="list-style-type: none"> • Low Flow Bathroom & Kitchen Aerators • Low Flow Kitchen Aerator • Low Flow Showerhead • Pipe Insulation • Programmable Thermostat • Advanced Thermostat • Thermostat - Reprogram • Shower Timer • Weatherstripping • Door Sweep

Targets	Participation				
		2022	2023	2024	2025
	Single Family Retrofit	6,708	6,708	6,748	6,838
	Elementary Energy Education	19,200	19,200	19,200	19,200
	Home Energy Jumpstart	200	600	1,000	1,400
	Annual Savings				
		2022	2023	2024	2025
	Income Eligible Single Family	763,601	798,173	841,577	895,356
	Program Budget				
	Budget Category	2022	2023	2024	2025
Third Party Incentives	\$4,580,390	\$4,620,001	\$4,806,249	\$5,174,627	
Implementation	\$391,861	\$416,760	\$448,549	\$488,765	
Marketing	\$17,674	\$18,918	\$20,507	\$22,518	
TOTAL	\$4,989,925	\$5,055,679	\$5,275,305	\$5,685,910	
Cost-Effectiveness					
Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test		
0.34	0.75	2.24	1.00		
Levelized Cost per Therm Saved					
2022	2023	2024	2025		
\$0.54	\$0.53	\$0.55	\$0.53		

Path	3.6.3.2 INCOME ELIGIBLE MULTI-FAMILY
Description	<p>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 and enhanced rebates, installation support, project oversight and continuing engagement.</p> <p>Retrofit A comprehensive retrofit is an energy efficiency project that applies a whole building approach and touches multiple systems and components of a customer’s residence. A technician will conduct a comprehensive energy assessment to identify energy savings opportunities. This will include a site visit with a visual and diagnostic inspection as well as an analysis of utility bills. The assessment will report on opportunities for direct installation of low-cost measures both in-unit and common areas, plus comprehensive retrofit opportunities that focus on a whole building approach to improving energy efficiency. Building owners will receive a report detailing estimated costs and savings for the efficiency improvements. They will receive enhanced incentives and possibly financing for the purchase and installation of efficient equipment. The incentives help offset the incremental cost of high efficiency equipment and the cost of installation. As needed, buildings will receive health and safety measures as well as, direct installation of unit measures at no cost.</p> <p>New Construction Enhanced rebates will be offered to affordable housing developers for substantial rehab and new construction of income eligible multi-family buildings.</p> <p>Partner Trade Ally (PTA) A Peoples Gas-only offering, delivered by vetted Partner Trade Allies. Trade Allies are given higher rebate amounts to serve geographically income-eligible customers with retrofit measures.</p> <p>Income eligible 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).</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to jointly deliver with ComEd and cooperate with a variety of partners.
Delivery Strategy	<p>Peoples Gas will work the other IL utilities to develop a seamless one-stop-shop multifamily program design. The utilities will work to create a single-point of contact (including, but not limited to, use of a common online portal) for multifamily building owners to access the multifamily pathways.</p> <p>Delivery strategy will include use of local experts wherever practicable.</p> <p>Costs and savings will be based upon an allocation agreement with ComEd for measures that affect both electric and gas usage. The allocation may be periodically reviewed to ensure the allocations are appropriate. Peoples Gas will provide enhanced rebates for retrofits and new construction for buildings targeted to income eligible residents within the service territory.</p>
Target Market	The path will target owners and managers of income eligible multi-family buildings in Peoples Gas service territory. Rents must be affordable to households at or below 80% of the AMI.
Marketing Strategy	<p>Retrofit Peoples Gas will work with a variety of partners, to create awareness.</p> <p>New Construction Peoples Gas will coordinate with partners to increase awareness of enhanced rebates for developers of income eligible multi-family buildings.</p>

Path	3.6.3.2 INCOME ELIGIBLE MULTI-FAMILY																																																																											
Eligible Measures	<p>Partner Trade Ally The program will engage with trade allies to promote the program through Trade Ally specific webinars and distribute the Brief Trade Ally Update e-newsletter to provide the latest information on topics such as program updates, energy savings measures, training opportunities, safety information and more.</p> <p>Eligible measures may include, but not limited to:</p> <ul style="list-style-type: none"> • Air Sealing • Attic Insulation • Wall Insulation • Pipe Insulation • Boiler Tune-Up • Boiler Reset/Cutout • Boiler • Water Heater • Weatherstripping & Door Sweeps • Steam Boiler • Steam Boiler Averaging Controls • Steam Traps • On Demand DHW Circulation System • A/C Cover and Gap Sealer • Condensate Tank Insulation • DHW Storage Tank Insulation • Shut Off Flue Damper • Health and Safety 																																																																											
Targets	<p>Participation</p> <table border="1"> <thead> <tr> <th></th> <th>Participation Unit</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Multi-Family Retrofit</td> <td>Unit Assessments</td> <td>3,450</td> <td>4,050</td> <td>4,750</td> <td>5,400</td> </tr> <tr> <td>New Construction</td> <td>Projects</td> <td>1</td> <td>1</td> <td>1</td> <td>1</td> </tr> <tr> <td>PTA</td> <td>Measures</td> <td>347</td> <td>347</td> <td>347</td> <td>347</td> </tr> <tr> <td>IE Kits</td> <td>Kits</td> <td>4,100</td> <td>4,000</td> <td>4,000</td> <td>4,000</td> </tr> </tbody> </table> <p>Annual Savings</p> <table border="1"> <thead> <tr> <th></th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Income Eligible Multifamily</td> <td>754,755</td> <td>844,755</td> <td>944,777</td> <td>1,041,241</td> </tr> </tbody> </table> <p>Program Budget</p> <table border="1"> <thead> <tr> <th>Budget Category</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Incentives</td> <td>\$0</td> <td>\$0</td> <td>\$0</td> <td>\$0</td> </tr> <tr> <td>Third Party Incentives</td> <td>\$3,259,936</td> <td>\$3,894,473</td> <td>\$4,649,000</td> <td>\$5,349,494</td> </tr> <tr> <td>Implementation</td> <td>\$1,897,149</td> <td>\$2,123,372</td> <td>\$2,374,787</td> <td>\$2,617,260</td> </tr> <tr> <td>Marketing</td> <td>\$94,857</td> <td>\$106,169</td> <td>\$118,739</td> <td>\$130,863</td> </tr> <tr> <td>TOTAL</td> <td>\$5,251,942</td> <td>\$6,124,014</td> <td>\$7,142,526</td> <td>\$8,097,617</td> </tr> </tbody> </table>							Participation Unit	2022	2023	2024	2025	Multi-Family Retrofit	Unit Assessments	3,450	4,050	4,750	5,400	New Construction	Projects	1	1	1	1	PTA	Measures	347	347	347	347	IE Kits	Kits	4,100	4,000	4,000	4,000		2022	2023	2024	2025	Income Eligible Multifamily	754,755	844,755	944,777	1,041,241	Budget Category	2022	2023	2024	2025	Incentives	\$0	\$0	\$0	\$0	Third Party Incentives	\$3,259,936	\$3,894,473	\$4,649,000	\$5,349,494	Implementation	\$1,897,149	\$2,123,372	\$2,374,787	\$2,617,260	Marketing	\$94,857	\$106,169	\$118,739	\$130,863	TOTAL	\$5,251,942	\$6,124,014	\$7,142,526	\$8,097,617
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Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test																	
0.33	0.69	1.78	1.01																	
2022	2023	2024	2025																	
\$0.49	\$0.51	\$0.53	\$0.54																	

3.6.3 Proposed Program Details – Residential Program

Path	3.6.4.1 OUTREACH AND EDUCATION
Description	<p>Outreach and Education is designed to provide awareness and education that motivates customers to change behavior and implement small but meaningful efficiency measures through education and provision of low cost measures. It will also provide information on rebate programs and incentives available for long-term savings measures.</p> <p>Energy Efficiency Education. Fifth-grade teachers are provided lesson plans and activities aligned with state curriculum standards that are designed to teach students about energy production and conservation. Each student will receive a take-home kit containing energy efficient products to install at home with their families.</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to continue to jointly offer Energy Efficiency Education with ComEd.
Delivery Strategy	Energy Efficiency Education A vendor jointly selected by Peoples Gas and ComEd will solicit schools to participate, provide teacher lesson plans and deliver student kits. Fifth-grade teachers in participating schools will receive lesson plans and low cost energy efficiency measures to distribute to students for installation at home as a homework assignment. Students and parents will be required to complete a survey, reporting on installations completed. The vendor will maintain contact with educators and report on activity, counts of students versus kits, and other QC processes.
Target Market	Energy Efficiency Education is applicable to customers with a child in 5 th grade that attends a participating school.
Marketing Strategy	Energy Efficiency Education will be offered to schools located in the Peoples Gas service territory. If more educators sign up to participate than is budgeted for, they will be put on a waiting list.
Eligible Measures	Measures that will be included in kits for students to install at home will be finalized before Energy Efficiency Education is launched.

Path	3.6.4.1 OUTREACH AND EDUCATION				
Targets	Participation				
		2022	2023	2024	2025
	Elementary Energy Education	800	800	800	800
	Annual Savings				
		2022	2023	2024	2025
	Elementary Energy Education	13,254	13,254	13,254	13,254
	Program Budget				
	Budget Category	2022	2023	2024	2025
	Incentives	\$0	\$0	\$0	\$0
	Third Party Incentives	\$15,918	\$15,918	\$15,918	\$15,918
	Implementation	\$1,600	\$1,600	\$1,600	\$1,600
	Marketing	\$0	\$0	\$0	\$0
	TOTAL	\$17,518	\$17,518	\$17,518	\$17,518
	Cost-Effectiveness				
	Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test	
	1.13	2.45	6.16	1.08	
	Levelized Cost per Therm Saved				
		2022	2023	2024	2025
		\$0.14	\$0.14	\$0.14	\$0.14

Path	3.6.4.2 HOME ENERGY REBATE
Description	<p>The Home Energy Rebates path is designed to help customers save energy incentives for efficient equipment.</p> <p>Customers may receive incentives for the purchase and installation of higher efficiency furnaces, boilers, thermostats and insulation/air sealing. The incentives offset the incremental cost of high efficiency equipment and the cost of installation. Trade allies install measures and engage customers.</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to cooperate with ComEd to offer this path as there are some measures that could benefit both gas and electric energy use. In addition, the utilities will collaborate in educating customers and trade allies on the benefits of energy efficiency.
Delivery Strategy	<p>In general, incentives for high efficiency equipment are based on approximately 50% of incremental costs. Actual incentives are provided in the table of eligible measures. Peoples Gas requests authority to revise eligible measures and incentives as driven by current market conditions, changes to codes and standards, technology, EM&V results, and management knowledge.</p> <p>Peoples Gas will develop a network of weatherization trade allies based upon qualified contractors that apply to participate. Customers will be required to utilize a partner trade ally to receive weatherization incentives. An online and hardcopy application will be available to customers and trade allies.</p> <p>Quality control activities will include:</p> <ul style="list-style-type: none"> • Field inspections to confirm installation and eligibility for at least 2.5% of rebated equipment. • Transaction surveys to measure customer satisfaction and identify potential measure and process improvements. • Trade ally advisory groups and surveys to ensure the process is easy to work with and helpful to trade allies in selling high efficiency equipment.
Target Market	The path targets customers with individually metered residences that are either single family or duplexes and that have natural gas heating. Customers must be an active Peoples Gas residential customer. Both owner-occupied and rental premises are eligible provided the purpose of the premises is for a residential dwelling.
Marketing Strategy	<p>The marketing strategy will continue to be building awareness of the paths available for participation. Messaging will be aimed at two audiences: 1) property owners and 2) dealers, distributors, contractors and other trade allies.</p> <p>Campaigns directed at home owners will include bill inserts, newsletters, public relations, and other special events, all supported by the Peoples Gas website. Peoples Gas will also work with community and neighborhood organizations to promote.</p> <p>The tactics for trade ally involvement will be to provide marketing support and periodic trade ally incentives. Trade ally support and engagement is a key element to the success of energy efficiency programs. The Implementer will establish trade ally advisory groups to educate and ultimately champion the path.</p>

Path	3.6.4.2 HOME ENERGY REBATE				
Eligible Measures	Eligible measures and their incentives may include the following:				
	Measure		Per Unit Incentive		
	Boiler - DHW Two-in-One		\$500		
	Boiler ≥88% AFUE, <300MBh		\$350		
	Steam Boiler ≥82% AFUE, <300MBh		\$150		
	Furnace >95% AFUE		\$150		
	Furnace >97% AFUE		\$150		
	Advanced Thermostat		\$25		
	Air Sealing		\$0.40 per CFM		
	Attic Insulation		\$0.30 per sq.ft.		
	Duct Sealing		\$2.00 per CFM		
	Wall Insulation		\$0.50 per sq.ft.		
	Foundation Insulation		\$0.50 per sq.ft.		
	Water Heater Storage 0.67 EF		\$150		
	Thermostat - Reprogram		\$20		
	Programmable Thermostat		\$20		
	Indirect Water Heater		\$150		
	Tankless Water Heater		\$150		
Targets	Participation				
		2022	2023	2024	2025
	Home Energy Rebate (measures)	7,206	7,121	7,034	6,865
	Annual Savings				
		2022	2023	2024	2025
	Home Energy Rebate	724,598	715,139	705,496	686,531
	Program Budget				
	Budget Category	2022	2023	2024	2025
	Incentives	\$371,830	\$357,980	\$343,960	\$317,090
	Third Party Incentives	\$116,531	\$116,531	\$116,531	\$116,531
	Implementation	\$608,770	\$601,590	\$594,240	\$579,962
	Marketing	\$30,439	\$30,080	\$29,712	\$28,998
	TOTAL	\$1,127,570	\$1,106,181	\$1,084,443	\$1,042,581
	Cost-Effectiveness				
	Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test	
	0.80	2.95	2.85	0.88	
	Levelized Cost per Therm Saved				
		2022	2023	2024	2025
		\$0.12	\$0.12	\$0.12	\$0.12

Path	3.6.4.3 SINGLE FAMILY HOME ENERGY JUMPSTART
Description	<p>The Single Family Home Energy Jumpstart path is designed to help customers save energy via energy assessments with direct install of low cost measures and provide recommendations for incentives for efficient measures.</p> <p>Customers will receive an energy assessment and direct installation of low cost energy and water saving measures including low flow showerheads, kitchen and bathroom faucet aerators, programmable/smart thermostats and pipe insulation at no cost. Field technicians complete a high-level energy assessment to identify other energy saving opportunities and provide the customer with estimated costs and savings for these opportunities.</p> <p>The technician will educate residential customers on financial incentives available for eligible measures identified during the assessment and provide referrals for appropriate vendors.</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to cooperate with ComEd to offer this path as there are some measures that could benefit both gas and electric energy use. In addition, the utilities will collaborate in educating customers and trade allies on the benefits of energy efficiency.
Delivery Strategy	<p>A technician will perform a high-level assessment and install low cost energy and water savings measures. The assessment will identify energy savings opportunities as well as estimates of costs and savings so the resident can prioritize future actions based on payback if desired. Customers will be educated on available financial incentives offered by Peoples Gas.</p> <p>Quality control activities will include:</p> <ul style="list-style-type: none"> • Field inspections to confirm installation and eligibility for at least 2.5% of rebated equipment. • Transaction surveys to measure customer satisfaction and identify potential measure and process improvements. • Trade ally advisory groups and surveys to ensure the process is easy to work with and helpful to trade allies in selling high efficiency equipment.
Target Market	The path targets customers with individually metered residences that are either single family or duplexes and that have natural gas heating. Customers must be an active Peoples Gas residential customer. Both owner-occupied and rental premises are eligible provided the purpose of the premises is for a residential dwelling.
Marketing Strategy	<p>The marketing strategy will continue to be building awareness of the paths available for participation. Messaging will be aimed at two audiences: 1) property owners and 2) dealers, distributors, contractors and other trade allies.</p> <p>Campaigns directed at home owners will include bill inserts, newsletters, public relations, and other special events, all supported by the Peoples Gas website. Peoples Gas will also work with community and neighborhood organizations to promote</p> <p>The tactics for trade ally involvement will be to provide marketing support and periodic trade ally incentives. Trade ally support and engagement is a key element to the success of energy efficiency programs. The Implementer will establish trade ally advisory groups to educate and ultimately champion the path. Different trade ally groups will be established for equipment versus building envelope improvements versus new home construction.</p>

Path	3.6.4.3 SINGLE FAMILY HOME ENERGY JUMPSTART																																																																		
Eligible Measures	<p>Eligible measures and their incentives may include the following:</p> <ul style="list-style-type: none"> • Low Flow Bathroom Aerator • Low Flow Kitchen Aerator • Low Flow Showerhead • Pipe Insulation • Programmable Thermostat • Advanced Thermostat • Thermostat - Reprogram • Shower Timer • Weatherstripping • Door Sweep 																																																																		
Targets	<p>Participation</p> <table border="1"> <thead> <tr> <th></th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Home Energy Jumpstart</td> <td>3,800</td> <td>3,400</td> <td>3,000</td> <td>2,600</td> </tr> </tbody> </table> <p>Annual Savings</p> <table border="1"> <thead> <tr> <th></th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Home Energy Jumpstart</td> <td>284,205</td> <td>254,306</td> <td>224,310</td> <td>194,567</td> </tr> </tbody> </table> <p>Program Budget</p> <table border="1"> <thead> <tr> <th>Budget Category</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Incentives</td> <td>\$0</td> <td>\$0</td> <td>\$0</td> <td>\$0</td> </tr> <tr> <td>Third Party Incentives</td> <td>\$691,028</td> <td>\$618,322</td> <td>\$545,445</td> <td>\$472,930</td> </tr> <tr> <td>Implementation</td> <td>\$157,696</td> <td>\$141,097</td> <td>\$124,497</td> <td>\$107,897</td> </tr> <tr> <td>Marketing</td> <td>\$7,885</td> <td>\$7,055</td> <td>\$6,225</td> <td>\$5,395</td> </tr> <tr> <td>TOTAL</td> <td>\$856,609</td> <td>\$766,474</td> <td>\$676,167</td> <td>\$586,222</td> </tr> </tbody> </table> <p>Cost-Effectiveness</p> <table border="1"> <thead> <tr> <th>Ratepayer Impact Measure Test</th> <th>Utility Cost Test</th> <th>Total Resource Cost Test</th> <th>Participant Test</th> </tr> </thead> <tbody> <tr> <td>0.79</td> <td>1.54</td> <td>4.42</td> <td>1.03</td> </tr> </tbody> </table> <p>Levelized Cost per Therm Saved</p> <table border="1"> <thead> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>\$0.33</td> <td>\$0.33</td> <td>\$0.33</td> <td>\$0.33</td> </tr> </tbody> </table>		2022	2023	2024	2025	Home Energy Jumpstart	3,800	3,400	3,000	2,600		2022	2023	2024	2025	Home Energy Jumpstart	284,205	254,306	224,310	194,567	Budget Category	2022	2023	2024	2025	Incentives	\$0	\$0	\$0	\$0	Third Party Incentives	\$691,028	\$618,322	\$545,445	\$472,930	Implementation	\$157,696	\$141,097	\$124,497	\$107,897	Marketing	\$7,885	\$7,055	\$6,225	\$5,395	TOTAL	\$856,609	\$766,474	\$676,167	\$586,222	Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test	0.79	1.54	4.42	1.03	2022	2023	2024	2025	\$0.33	\$0.33	\$0.33	\$0.33
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Path	3.6.4.4 MULTI-FAMILY ASSESSMENTS & REBATES/GRANTS
Description	<p>Multi-Family Assessments and Rebates/Grants target 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 intends to work with local organizations with expertise in the multi-family market such as Elevate and Community Investment Corporation.</p> <p>Energy Assessment and Direct Install An energy advisor performs a comprehensive energy audit of the building and makes recommendations for direct install and rebate opportunities. A report is provided to building owners/managers on the energy and water saving opportunities present within their facility. Residents receive direct installation of low cost energy and water saving measures including low flow showerheads, kitchen and bathroom faucet aerators, programmable/smart thermostats and pipe insulation (at no cost).</p> <p>Rebates – Standard and Partner Trade Ally (PTA) Pre-qualified, standardized rebates are available for measures such as heating systems, steam traps, and pipe insulation. Incentives are based on the size and efficiency of the equipment installed. A network of selected trade allies, screened and registered, offers measures with higher incentives (20%-30% higher on average).</p> <p>Rebates – Custom Customers may receive incentives for non-standard measures, including new construction projects. Incentives are calculated on a \$/first year therm savings basis.</p> <p>Gas Optimization. An energy advisor/engineer performs an advanced gas usage study to identify operation and maintenance issues as well as energy conservation measures related to the building heat system. Qualifying buildings must be 75,000 square feet or more and use a minimum of 60,000 therms per year.</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to cooperate with ComEd to offer the path as there are some measures that could benefit both gas and electric energy use. In addition, the utilities will collaborate in educating customers and trade allies on the benefits of energy efficiency. Peoples Gas and ComEd will continue to offer Direct Install jointly.
Delivery Strategy	<p>Direct Install Technicians will perform the building energy assessment and install low cost energy and water savings measures in customer units. An energy advisor will perform a comprehensive energy audit of the entire complex and provide recommendations for direct install, trade ally partner, and standard installation opportunities. A report is provided to building owners/managers on the energy saving opportunities.</p> <p>Rebates Standard incentives will be offered to building owners along with an option for owners to use a group of registered partner trade allies partners who will offer upgrades at a higher incentive. The Company will develop a network of partner trade allies based upon qualified contractors that apply to participate.</p> <p><i>Standard/PTA</i> incentives for high efficiency equipment are based on approximately 30-70% of incremental costs. Actual incentives are provided in the table of eligible measures.</p> <p><i>Custom</i> incentives are based on the lesser of a buy down to a 1-year payback, 50% of the project cost, or a \$/therm saved during the first year.</p> <p>Peoples Gas requests authority to revise eligible measures and incentives as driven by current market conditions, changes to codes and standards, technology, EM&V results, and management knowledge. An online and hardcopy application will be available to customers and trade allies.</p>

Path	3.6.4.4 MULTI-FAMILY ASSESSMENTS & REBATES/GRANTS																																																												
	<p>Gas Optimization Services will be delivered by staff and independent engineering firms with expertise uncovering these types of opportunities.</p> <p>Quality control activities will include:</p> <ul style="list-style-type: none"> • Field inspections to confirm installation and eligibility for at least 2.5% of rebated equipment. • Transaction surveys to measure customer satisfaction and identify potential measure and process improvements. • Trade ally advisory groups and surveys to ensure the process is easy to work with and helpful to trade allies in selling high efficiency equipment. 																																																												
Target Market	<p>The path targets individually metered and central metered multi-family buildings not served by the Residential market offering. Customers must be an active Peoples Gas customer. Community Development housing projects not served by the DCEO and Federally-owned multi-family housing structures will be a target market sector. Assisted living and nursing homes may also be possible market targets.</p>																																																												
Marketing Strategy	<p>The path will be marketed primarily through partnerships with building owners, property managers and real estate professionals. Peoples Gas and partners will use strategic communication channels to inform building owners about the path and recruit new participants. The primary outreach strategies will involve working with key businesses, institutions, associations and organizations that are already connected with a broad range of local property owners. Case studies, testimonials, and presentations will feature successes of participation.</p> <p>Partner Trade Ally – The program will engage with trade allies to promote the program through Trade Ally specific webinars and distribute the Brief Trade Ally Update e-newsletter to provide the latest information on topics such as program updates, energy savings measures, training opportunities, safety information and more.</p>																																																												
Eligible Measures	<p>Eligible measures and their incentives may include the following:</p> <table border="1" data-bbox="396 1188 1146 1297"> <thead> <tr> <th>Measure</th> <th>Per Unit Incentive</th> </tr> </thead> <tbody> <tr> <td>Custom Rebate</td> <td>\$1.00 per therm</td> </tr> <tr> <td>Gas Optimization</td> <td>\$1.25 per therm</td> </tr> </tbody> </table> <table border="1" data-bbox="396 1373 1373 1877"> <thead> <tr> <th>Measure</th> <th>Unit</th> <th>Std Per Unit Incentive</th> <th>PTA Per Unit Incentive</th> </tr> </thead> <tbody> <tr> <td>Boiler</td> <td>Per MBH</td> <td>\$1.25</td> <td>\$1.50</td> </tr> <tr> <td>Boiler Reset Controls</td> <td>Per MBH</td> <td>\$0.50</td> <td>\$1</td> </tr> <tr> <td>Boiler Tune Up</td> <td>Per MBH</td> <td>\$0.30</td> <td>\$0.40</td> </tr> <tr> <td>Condensing Unit Heater</td> <td>Per MBH</td> <td>\$2</td> <td>\$3</td> </tr> <tr> <td>Direct Fired Heaters</td> <td>Per MBH</td> <td>\$1</td> <td>\$2</td> </tr> <tr> <td>Furnace</td> <td>Per Unit</td> <td>\$150</td> <td>\$270</td> </tr> <tr> <td>High Speed Washer</td> <td>Per Lbs</td> <td>\$2</td> <td>\$3</td> </tr> <tr> <td>Infrared Heater</td> <td>Per MBH</td> <td>\$2.50</td> <td>\$3</td> </tr> <tr> <td>Ozone Laundry</td> <td>Per Lbs</td> <td>\$25</td> <td>\$25</td> </tr> <tr> <td>Pipe Insulation, Hyd. Boiler Sm ≤1.25"</td> <td>Per Linear Ft.</td> <td>\$1</td> <td>\$3.25</td> </tr> <tr> <td>Pipe Insulation, Hyd. Boiler Sm 1.25-2"</td> <td>Per Linear Ft.</td> <td>\$1.25</td> <td>\$4.50</td> </tr> <tr> <td>Pipe Insulation, Hyd. Boiler Large ≥2"</td> <td>Per Linear Ft.</td> <td>\$1.50</td> <td>\$5.50</td> </tr> </tbody> </table>			Measure	Per Unit Incentive	Custom Rebate	\$1.00 per therm	Gas Optimization	\$1.25 per therm	Measure	Unit	Std Per Unit Incentive	PTA Per Unit Incentive	Boiler	Per MBH	\$1.25	\$1.50	Boiler Reset Controls	Per MBH	\$0.50	\$1	Boiler Tune Up	Per MBH	\$0.30	\$0.40	Condensing Unit Heater	Per MBH	\$2	\$3	Direct Fired Heaters	Per MBH	\$1	\$2	Furnace	Per Unit	\$150	\$270	High Speed Washer	Per Lbs	\$2	\$3	Infrared Heater	Per MBH	\$2.50	\$3	Ozone Laundry	Per Lbs	\$25	\$25	Pipe Insulation, Hyd. Boiler Sm ≤1.25"	Per Linear Ft.	\$1	\$3.25	Pipe Insulation, Hyd. Boiler Sm 1.25-2"	Per Linear Ft.	\$1.25	\$4.50	Pipe Insulation, Hyd. Boiler Large ≥2"	Per Linear Ft.	\$1.50	\$5.50
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Path	3.6.4.4 MULTI-FAMILY ASSESSMENTS & REBATES/GRANTS					
	Pipe Insulation, HW Small 1" to 2"	Per Linear Ft.	\$1	\$3.25		
	Pipe Insulation, HW Medium 2.1" to 4"	Per Linear Ft.	\$1.25	\$4.50		
	Pipe Insulation, HW Large >4"	Per Linear Ft.	\$1.50	\$5.50		
	Pipe Insulation, Steam - Small 1" to 2"	Per Linear Ft.	\$2.50	\$5		
	Pipe Insulation, Steam - Med 2.1" to 5"	Per Linear Ft.	\$4	\$7.50		
	Pipe Insulation, Steam - Large 5.1" to 8"	Per Linear Ft.	\$5.50	\$10		
	Pipe Insulation, Steam - X-Large >8"	Per Linear Ft.	\$10	\$18		
	Pipe Insulation, Steam Med Fitting	Per Unit	\$5	\$10		
	Pipe Insulation, Steam Large Fitting	Per Unit	\$7	\$18		
	Pipe Insulation, Steam X-Large Fitting	Per Unit	\$14	\$30		
	Pipe Insulation, Steam Med Valve	Per Unit	\$13	\$20		
	Pipe Insulation, Steam Large Valve	Per Unit	\$20	\$30		
	Pipe Insulation, Steam X-Large Valve	Per Unit	\$28	\$40		
	Steam Boiler	Per MBH	\$1	\$1.25		
	Steam Boiler Averaging Controls	Per Living Unit	\$100	\$150		
	Steam Traps, HVAC Repair/Rep - Audit	Per Unit	\$100	\$150		
	Steam Traps, HVAC Repair/Rep - No Audit	Per Unit	\$30	\$50		
	Steam Traps, Industrial/Process Audit	Per Unit	\$200	\$250		
	Steam Traps, Test	Per Unit	\$20	\$20		
	Condensate Tank Insulation	Per Sq. Ft.	\$8	\$9		
	DHW Storage Tank Insulation	Per Sq. Ft.	\$4.50	\$6.50		
	Linkageless Controls	Per MBH	\$0.40	\$0.50		
	On Demand DHW Circulation System	Per Living Unit	\$35	\$55		
	Demand Controlled Ventilation	Per Sq. Ft.	\$0.05	n/a		
	Modulating Commercial Gas Clothes Dryer	Per Unit	\$150	\$200		
	Water Heater, Central/Indirect MF ≥88% TE	Per Unit	\$750	\$750		
	Water Heater, Storage 0.67 EF	Per Unit	\$150	\$175		
	Dock Door Seals	Per Unit	\$200	\$250		
	DCV - Kitchen	Per HP	\$650	\$975		
	Air Sealing	Per CFM	\$0.40	n/a		
	Duct Sealing	Per CFM	\$2	n/a		
Targets	Participation					
		Participation Unit	2022	2023	2024	2025
	Assessments/Direct	Unit Visits	3,896	3,486	3,076	2,256
	Standard Rebate	Measures	1,848	1,653	1,462	1,075
	Partner Trade Ally	Measures	5,101	4,563	4,029	2,956
	Custom	Projects	4	3	3	2
	Gas Optimization	Projects	8	7	6	4

<i>Path</i>	3.6.4.4 MULTI-FAMILY ASSESSMENTS & REBATES/GRANTS				
	Annual Savings				
		2022	2023	2024	2025
	Multi-Family	2,037,878	1,807,858	1,612,329	1,184,160
	Program Budget				
	Budget Category	2022	2023	2024	2025
	Incentives	\$427,634	\$367,899	\$334,835	\$241,824
	Third Party Incentives	\$1,737,560	\$1,551,834	\$1,375,088	\$1,011,106
	Implementation	\$894,540	\$800,190	\$706,605	\$518,500
	Marketing	\$44,727	\$40,010	\$35,330	\$25,925
	TOTAL	\$3,104,461	\$2,759,933	\$2,451,859	\$1,797,355
Cost-Effectiveness					
Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test		
0.75	2.41	3.20	0.92		
Levelized Cost per Therm Saved					
2022	2023	2024	2025		
\$0.14	\$0.14	\$0.14	\$0.14		

3.6.4 Proposed Program Details - Business Programs

Path	3.6.5.1 SMALL/MID-SIZE BUSINESS ASSESSMENTS & REBATES
Description	<p>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.</p> <p>Direct Install Customers receive direct installation of low-cost energy and water saving measures including low flow showerheads, kitchen and bathroom faucet aerators, pipe insulation and, if applicable, pre-rinse sprayers (at no cost). A high-level, no-cost assessment of the facility will be completed while at the site to identify additional energy efficiency improvements the small business owner/tenant can pursue.</p> <p>Prescriptive Rebates Pre-qualified, standardized rebates are available for the most common efficiency upgrades, such as heating systems, steam traps, and pipe insulation. Incentives are based on the size and efficiency of the equipment installed.</p> <p>Partner Trade Ally (PTA) A network of trade allies promotes measures and assists in engaging customers to participate in site assessments to identify savings opportunities. To serve as a PTA, participation and customer satisfaction goals must be achieved. Customers using a PTA will be eligible for enhanced rebate levels.</p> <p>Custom Incentives Customers may receive incentives for non-standard measures, including new construction projects. Incentives are calculated on a \$/first year therm savings basis. Staff will work with customers to identify and quantify savings opportunities for complex projects.</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to cooperate with ComEd to offer this path. Measures that could benefit both gas and electric energy use may be offered jointly, where possible, and be made transparent to the customer. In addition, the utilities will collaborate in raising awareness of and educating customers on the benefits of energy efficiency.
Delivery Strategy	<p>The path utilizes a mix of staff and a list of qualified contractors to perform direct installation of low-cost measures, the high-level assessments, and deeper retrofits on a shared cost basis. The trade allies will continue to promote high efficiency equipment whenever possible.</p> <p>Direct Install Peoples Gas will engage staff and/or vendors to conduct a high-level assessment of the facility to identify energy improvement opportunities that the building owner or business can implement.</p> <p>Prescriptive/Partner Trade Ally (PTA) Rebates Enhanced prescriptive incentives will be offered along with an option to use a group of registered trade ally partners who will offer upgrades at a higher incentive. Peoples Gas will utilize and expand the value network of partner trade allies based upon qualified contractors that apply to participate.</p> <p>Custom Rebates are based on the lesser of a buy down to a 1-year payback, 50% project cost, or a \$/therm saved during the first year.</p> <p>Peoples Gas requests authority to revise eligible measures and incentives as driven by current market conditions, changes to codes and standards, technology, EM&V results, and management knowledge.</p>

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Target Market	<p>The path is targeted to small business customers with an annual usage of approximately less than 400,000 therms per year. Both owner-occupied and rental properties are eligible. Likely business types include strip malls, main street businesses, business district establishments, theaters, restaurants, convenience stores, houses of worship, non-profit establishments, office buildings, small manufacturers etc. Customers must be an active Peoples Gas C&I customer.</p>																																																																																													
Marketing Strategy	<p>The marketing strategy includes provisions for trade allies to drive activity by marketing services to small business customers as part of the trade allies' normal day-to-day business. Peoples Gas will also look at geographic-focused marketing (i.e., business districts within Peoples Gas territory) and industry targeting to increase awareness of the offering. This will involve working directly with established groups such as local chambers of commerce or business associations (e.g., restaurant association, dry cleaners association).</p>																																																																																													
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Path	3.6.5.1 SMALL/MID-SIZE BUSINESS ASSESSMENTS & REBATES					
	Modulating Commercial Gas Clothes Dryer (Hotels/Hospitals)	Per Unit	\$300	\$400		
	Modulating Commercial Gas Clothes Dryer (Laundromat & MF Dorms)	Per Unit	\$150	\$200		
	Ozone Laundry	Per Lbs	\$25	\$25		
	Pipe Insulation, Dry Cleaners	Per Linear Ft.	\$3	\$4		
	Pipe Insulation, HW Small 1" to 2"	Per Linear Ft.	\$1	\$3.25		
	Pipe Insulation, HW Medium 2.1" to 4"	Per Linear Ft.	\$1.25	\$4.50		
	Pipe Insulation, HW Large >4"	Per Linear Ft.	\$1.50	\$5.50		
	Pipe Insulation, Steam - Small 1" to 2"	Per Linear Ft.	\$2.50	\$5		
	Pipe Insulation, Steam - Med 2.1" to 5"	Per Linear Ft.	\$4	\$7.50		
	Pipe Insulation, Steam - Large 5.1" to 8"	Per Linear Ft.	\$5.50	\$10		
	Pipe Insulation, Steam - X-Large >8"	Per Linear Ft.	\$10	\$18		
	Pipe Insulation, Steam Med Fitting	Per Unit	\$5	\$10		
	Pipe Insulation, Steam Large Fitting	Per Unit	\$7	\$18		
	Pipe Insulation, Steam X-Large Fitting	Per Unit	\$14	\$30		
	Pipe Insulation, Steam Med Valve	Per Unit	\$13	\$20		
	Pipe Insulation, Steam Large Valve	Per Unit	\$20	\$30		
	Pipe Insulation, Steam X-Large Valve	Per Unit	\$28	\$40		
	Pre-Rinse Sprayer	Per Unit	\$28	\$75		
	Steam Boiler	Per MBH	\$1	\$1.25		
	Steam Traps, Dry Cleaner/Industrial - No Audit	Per Unit	\$30	\$50		
	Steam Traps, Dry Cleaner/Industrial - Audit	Per Unit	\$200	\$225		
	Steam Traps, HVAC Repair/Rep - Audit	Per Unit	\$100	\$150		
	Steam Traps, HVAC Repair/Rep - No Audit	Per Unit	\$30	\$50		
	Steam Traps, Test	Per Unit	\$20	\$20		
	Programmable Thermostat	Per Unit	\$50	\$65		
	Water Heater	Per Unit	\$150	\$175		
	Targets	Participation				
		Participation Unit	2022	2023	2024	2025
Assessments		Unit Visits	34	32	28	26
Kits		Kits	336	317	277	261
Gas Optimization		Projects	3	2	2	2
Standard Rebates		Measures	174	166	140	135
PTA Rebates		Measures	3,851	3,624	3,165	2,986
Custom		Projects	12	11	11	9
Annual Savings						
			2022	2023	2024	2025
Small/Mid-Size Business		1,521,829	1,424,632	1,226,240	1,158,017	

<i>Path</i>	3.6.5.1 SMALL/MID-SIZE BUSINESS ASSESSMENTS & REBATES																																						
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Path	3.6.5.2 C&I REBATES, GRANTS AND STUDIES
Description	<p>The C&I Rebates, Grants and Studies path is designed as a one-stop-shop that allows all business customers to access all offerings based on their needs.</p> <p>Rebates Rebates will be available for business customers of any size.</p> <p><i>Prescriptive Rebates</i> Pre-qualified, standardized rebates are available for the most common efficiency upgrades, such as heating systems, steam traps, and pipe insulation. The incentives are based on the size and efficiency of the equipment installed.</p> <p><i>Custom</i> Customers may receive incentives for non-standard measures, including new construction projects. Incentives are calculated on a \$/first year therm savings basis. Staff will work with customers to identify and quantify savings opportunities for complex projects. New construction incentives are designed to push building efficiency beyond what is required through compliance with building codes, through an integrated, comprehensive, whole-building analysis early in the design phase.</p> <p>Gas Optimization Studies Studies that focus on identifying low-cost or no-cost “actionable” measures for building heating, central steam plant and/or process heating energy optimization. The studies will incorporate limited monitoring and testing as necessary.</p> <p>Engineering Studies Incentives to offset the costs of energy audits or implementation studies. Based on the findings of such studies, customers can select improvements that qualify for prescriptive or custom rebates. Customers will be able to take advantage of cost sharing for implementation studies, investment-grade audits, and process evaluations needed for large custom, capital-intensive projects.</p> <p>Staffing Grants Assist customers to overcome internal operational hurdles to identify, plan, and implement on-site energy efficiency projects.</p> <p>Retro-Commissioning Studies that identify measures and actions to reduce energy usage.</p> <p>Strategic Energy Management engages customers in long-term continuous energy efficiency improvements at their facilities by involving site management, leveraging data, and promoting best practices at the site.</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to cooperate with ComEd to offer this path. Measures that could benefit both gas and electric energy use may be offered jointly, where possible, and be made transparent to the customer. In addition, the utilities will collaborate in raising awareness of and educating customers on the benefits of energy efficiency.
Delivery Strategy	<p>The path will be offered through a combination of The Implementer and vendors.</p> <p>Rebates</p> <p><i>Prescriptive Rebates</i> are based on approximately 50% of incremental costs. Actual incentives are provided in the table of eligible measures.</p> <p><i>Custom Rebates</i> are based on the lesser of a buy down to a 1 year payback, 50% of project costs, or a \$/therm saved during the first year.</p> <p>Peoples Gas requests authority to revise eligible measures and incentives as driven by current market conditions, changes to codes and standards, technology, EM&V results, and management knowledge.</p> <p>Gas Optimization Studies Peoples Gas will engage staff and/or vendors to conduct studies that focus on identifying low-cost or no-cost “actionable” measures for building heating, central steam plant and/or process heating energy optimization. The studies will incorporate limited monitoring and testing as necessary. Customers may receive a study value up to \$15,000 at no charge provided they agree to implement the lesser of</p>

Path	3.6.5.2 C&I REBATES, GRANTS AND STUDIES
	<p>\$10,000 or all quick-payback measures identified.</p> <p>Engineering Studies Incentives to offset the costs of energy audits or implementation studies. Based on the findings of such studies, customers can select improvements that qualify for prescriptive or custom rebates.</p> <p>Staffing Peoples Gas will engage staff and/or vendors to provide staffing support, including:</p> <p><i>Embedded Energy Advisor</i> A dedicated engineer/advisor will work on-site for a fixed number of hours per week and work closely with customer staff to help explore, plan, and implement energy-saving projects. Assistance will include quantifying savings, prioritizing projects, overseeing contractors, and project documentation for rebate applications.</p> <p><i>Strategic Energy Management</i> Large-account customers will be able to leverage building and energy modeling software to remotely analyze and manage energy use in innovative ways.</p> <p><i>Staffing Grants</i> Grants to assist in funding new full- or part-time employees, better leverage existing staff, or select a consultant to manage, engineer, or supervise the implementation of natural gas efficiency projects that otherwise would not be implemented due to limited staff time.</p> <p>Retro-Commissioning (RCx) Four options are available to serve C&I customers of all sizes.</p> <ul style="list-style-type: none"> • <i>Standard RCx</i> Facilities ≥400,000 sq. ft. receive a fully-funded study valued at up to \$100,000, with a commitment to spend a minimum amount on identified measures. • <i>RCxpress</i> Facilities 150,000 < 400,000 sq. ft. receive a fully-funded study valued at up to \$25,000, with a commitment to spend a minimum amount on identified measures. • <i>Monitoring-based Commissioning (MBCx)</i> Facilities ≥400,000 sq. ft. receive an incentive upon integration of MBCx software, along with an additional incentive based on verified energy savings. • <i>RCx Building Tune-Up</i> Small facilities receive a fully-funded study and implementation of selected improvements at no cost. <p>Quality Control</p> <p>Field inspections will be performed on a minimum of 2.5% of installations with incentives less than \$10,000 and on all projects with incentives greater than \$10,000.</p>
Target Market	The path is targeted to all C&I customers. Both owner-occupied and leased commercial and industrial buildings under this customer classification are eligible.
Marketing Strategy	<p>The path will market to both end use customers and trade allies. Trade ally support and engagement is a key element to the success of energy efficiency programs. The Implementer will establish and educate trade ally working groups who will ultimately champion the path. The path will rely on wholesale and retail trade allies to assist in marketing.</p> <p>The Implementer will evaluate the possible use of direct mail, email, case studies, technical fact sheets, brochures, training sessions, point of purchase materials, collateral materials, and various public relations activities to raise awareness. Peoples Gas will also pursue opportunities to cooperatively promote the path with ComEd, especially for new construction projects.</p>

Path	3.6.5.2 C&I REBATES, GRANTS AND STUDIES		
Eligible Measures	Eligible measures and their incentives may include the following:		
	Measure	Per Unit Incentive	
	Custom Rebate	\$1.00 per therm	
	Gas Optimization	\$1.25 per therm	
	Retro Commissioning	\$1.30 per therm	
	New Construction	\$1.30 per therm	
	Measure	Unit	Per Unit Incentive
	Staffing	Unit	\$50,000
	Boiler	MBH	\$1.25
	Boiler Reset Controls	MBH	\$0.50
	Boiler Tune Up	MBH	\$0.30
	Furnace	Unit	\$150
	Condensing Unit Heater	MBH	\$2
	DCV - Kitchen	HP	\$650
	Direct Fired Heaters	MBH	\$1
	High Speed Washer (Hotel/Motel/Hospital)	Lbs	\$4
	High Speed Washer (Laundromat)	Lbs	\$2.50
	Small Commercial Advanced Thermostat	Unit	\$50
	Demand Controlled Ventilation	Sq. ft.	\$0.05
	Linkageless Controls	MBH	\$0.40
	Condensate Tank Insulation	Sq. ft.	\$8
	DHW Storage Tank Insulation	Sq. ft.	\$4.50
	Dock Door Seals	Unit	\$200
	Water Heater, ≥75 MBH, ≥88% TE	MBH	\$1
	Water Heater, Storage 0.67 EF	Unit	\$150
	Infrared Heater	MBH	\$2.50
Modulating Commercial Gas Clothes Dryer (Hotels & Hospitals)	Unit	\$300	
Modulating Commercial Gas Clothes Dryer (Laundromat & MF Dorms)	Unit	\$150	
Ozone Laundry	Lbs	\$25	
Pipe Insulation, HW Small 1" to 2"	Linear ft.	\$1	
Pipe Insulation, HW Medium 2.1" to 4"	Linear ft.	\$1.25	
Pipe Insulation, HW Large >4"	Linear ft.	\$1.50	
Pipe Insulation, Steam - Small 1" to 2"	Linear ft.	\$2.50	
Pipe Insulation, Steam - Med 2.1" to 5"	Linear ft.	\$4	
Pipe Insulation, Steam - Large 5.1" to 8"	Linear ft.	\$5.50	
Pipe Insulation, Steam - X-Large >8"	Linear ft.	\$10	
Pipe Insulation, Steam Med Fitting	Unit	\$5	

Path	3.6.5.2 C&I REBATES, GRANTS AND STUDIES					
Targets	Measure					
			Unit	Per Unit Incentive		
	Pipe Insulation, Steam Large Fitting		Unit	\$7		
	Pipe Insulation, Steam X-Large Fitting		Unit	\$14		
	Pipe Insulation, Steam Med Valve		Unit	\$13		
	Pipe Insulation, Steam Large Valve		Unit	\$20		
	Pipe Insulation, Steam X-Large Valve		Unit	\$28		
	Pre-Rinse Sprayer		Unit	\$28		
	Steam Boiler		MBH	\$1		
	Steam Traps, Dry Cleaner/Industrial - No Audit		Unit	\$30		
	Steam Traps, Dry Cleaner/Industrial - Audit		Unit	\$200		
	Steam Traps, HVAC Repair/Rep - Audit		Unit	\$100		
	Steam Traps, HVAC Repair/Rep - No Audit		Unit	\$30		
	Steam Traps, Industrial/Process Audit		Unit	\$200		
	Steam Traps, Test		Unit	\$20		
	Programmable Thermostat		Unit	\$50		
	Water Heater, Storage 88% TE ≥75MBh		Unit	\$150		
	Water Heater, Central Lodging 88% TE		MBH	\$2.50		
Energy Recovery Ventilator		CFM	\$0.75			
Participation						
		Participation Unit	2022	2023	2024	2025
Gas Optimization		Projects	6	5	4	3
Retro Commissioning		Projects	13	12	10	8
Staffing Grant		Grant	1	1	1	1
Rebates		Measures	1,070	988	807	621
Strategic Energy Management		Participants	8	7	6	4
Custom		Projects	9	8	6	5
New Construction		Projects	6	5	4	3
Annual Savings						
		2022	2023	2024	2025	
Business Programs		2,127,167	1,911,710	1,539,381	1,190,556	
Program Budget						
Budget Category		2022	2023	2024	2025	
Incentives		\$2,234,171	\$1,972,235	\$1,572,845	\$1,243,646	
Third Party Incentives		\$0	\$0	\$0	\$0	
Implementation		\$988,045	\$887,967	\$715,025	\$552,999	
Marketing		\$49,402	\$44,398	\$35,751	\$27,650	
TOTAL		\$3,271,618	\$2,904,600	\$2,323,621	\$1,824,295	

Path	3.6.5.2 C&I REBATES, GRANTS AND STUDIES			
	Cost-Effectiveness			
	Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test
	0.75	2.13	2.97	0.46
	Levelized Cost per Therm Saved			
	2022	2023	2024	2025
	\$0.15	\$0.15	\$0.15	\$0.15

Path	3.6.5.3 PUBLIC SECTOR REBATES, GRANTS AND STUDIES
Description	<p>The Public Sector Rebates, Grants and Studies path is designed as a one-stop-shop that allows all qualifying local government customers to access all offerings based on their needs.</p> <p>Rebates Rebates will be available for public sector customers of any size.</p> <p><i>Prescriptive Rebates</i> Pre-qualified, standardized rebates are available for the most common efficiency upgrades, such as heating systems, steam traps, and pipe insulation. The incentives are based on the size and efficiency of the equipment installed.</p> <p><i>Custom</i> Customers may receive incentives for non-standard measures, including new construction projects. Incentives are calculated on a \$/first year therm savings basis. Staff will work with customers to identify and quantify savings opportunities for complex projects. New construction incentives are designed to push building efficiency beyond what is required through compliance with building codes, through an integrated, comprehensive, whole-building analysis early in the design phase.</p> <p>Gas Optimization Studies Studies that focus on identifying low-cost or no-cost “actionable” measures for building heating, central steam plant and/or process heating energy optimization. The studies will incorporate limited monitoring and testing as necessary.</p> <p>Engineering Studies Incentives to offset the costs of energy audits or implementation studies. Based on the findings of such studies, customers can select improvements that qualify for prescriptive or custom rebates. Customers will be able to take advantage of cost sharing for implementation studies, investment-grade audits, and process evaluations needed for large custom, capital-intensive projects.</p> <p>Staffing Grants Assist customers to overcome internal operational hurdles to identify, plan, and implement on-site energy efficiency projects.</p> <p>Retro-Commissioning Studies that identify measures and actions to reduce energy usage.</p> <p>Strategic Energy Management engages customers in long-term continuous energy efficiency improvements at their facilities by involving site management, leveraging data, and promoting best practices at the site.</p>
Duration	January 1, 2022 through December 31, 2025
Utility Collaboration	It is the intent of Peoples Gas to cooperate with ComEd to offer this path. Measures that could benefit both gas and electric energy use may be offered jointly, where possible, and be made transparent to the customer. In addition, the utilities will collaborate in raising awareness of and educating customers on the benefits of energy efficiency.
Delivery Strategy	<p>The path will be offered through a combination of the Implementer, local experts and vendors.</p> <p>Rebates</p> <p><i>Prescriptive Rebates</i> Incentives are provided in the table of eligible measures.</p> <p><i>Custom Rebates</i> are based on the lesser of a buy down to a 1 year payback, 50% of project costs, or a \$/therm saved during the first year.</p> <p>Peoples Gas requests authority to revise eligible measures and incentives as driven by current market conditions, changes to codes and standards, technology, EM&V results, and management knowledge.</p> <p>Gas Optimization Studies Peoples Gas will engage staff and/or vendors to conduct studies that focus on identifying low-cost or no-cost “actionable” measures for building heating, central steam plant and/or process heating energy optimization. The studies</p>

<p>Path</p>	<p>3.6.5.3 PUBLIC SECTOR REBATES, GRANTS AND STUDIES</p> <p>will incorporate limited monitoring and testing as necessary. Customers may receive a study value up to \$15,000 at no charge provided they agree to implement the lesser of \$10,000 or all quick-payback measures identified.</p> <p>Engineering Studies Incentives to offset the costs of energy audits or implementation studies. Based on the findings of such studies, customers can select improvements that qualify for prescriptive or custom rebates.</p> <p>Staffing Peoples Gas will engage staff and/or vendors to provide staffing support, including:</p> <p><i>Embedded Energy Advisor</i> A dedicated engineer/advisor will work on-site for a fixed number of hours per week and work closely with customer staff to help explore, plan, and implement energy-saving projects. Assistance will include quantifying savings, prioritizing projects, overseeing contractors, and project documentation for rebate applications.</p> <p><i>Strategic Energy Management</i> Large-account customers will be able to leverage building and energy modeling software to remotely analyze and manage energy use in innovative ways.</p> <p><i>Staffing Grants</i> Grants to assist in funding new full- or part-time employees, better leverage existing staff, or select a consultant to manage, engineer, or supervise the implementation of natural gas efficiency projects that otherwise would not be implemented due to limited staff time.</p> <p>Retro-Commissioning (RCx) Four options are available to serve customers of all sizes.</p> <ul style="list-style-type: none"> • <i>Standard RCx</i> Facilities ≥400,000 sq. ft. receive a fully-funded study valued at up to \$100,000, with a commitment to spend a minimum amount on identified measures. • <i>RCxpress</i> Facilities 150,000 < 400,000 sq. ft. receive a fully-funded study valued at up to \$25,000, with a commitment to spend a minimum amount on identified measures. • <i>Monitoring-based Commissioning (MBCx)</i> Facilities ≥400,000 sq. ft. receive an incentive upon integration of MBCx software, along with an additional incentive based on verified energy savings. • <i>RCx Building Tune-Up</i> Small facilities receive a fully-funded study and implementation of selected improvements at no cost. <p>Quality Control</p> <p>Field inspections will be performed on a minimum of 2.5% of installations with incentives less than \$10,000 and on all projects with incentives greater than \$10,000.</p>
<p>Target Market</p>	<p>The path is targeted to local government, municipal corporations, school districts and community college districts. Both owner-occupied and leased buildings are eligible.</p>
<p>Marketing Strategy</p>	<p>The path will market to both end use customers and trade allies. Trade ally support and engagement is a key element to the success of energy efficiency programs. The Implementer will establish and educate trade ally working groups who will ultimately champion the path. The path will rely on wholesale and retail trade allies to assist in marketing.</p> <p>The Implementer will evaluate the possible use of direct mail, email, case studies, technical fact sheets, brochures, training sessions, point of purchase materials, collateral materials, and various public relations activities to raise awareness. Peoples Gas will also pursue opportunities to cooperatively promote the path with ComEd, especially for new construction projects.</p>

Path	3.6.5.3 PUBLIC SECTOR REBATES, GRANTS AND STUDIES																																																																																																														
Eligible Measures	Eligible measures and their incentives may include the following:																																																																																																														
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Path	3.6.5.3 PUBLIC SECTOR REBATES, GRANTS AND STUDIES					
	Pre-Rinse Sprayer	Unit				\$115
	Steam Boiler	MBH				\$2
	Steam Traps, Dry Cleaner/Industrial - No Audit	Unit				\$90
	Steam Traps, Dry Cleaner/Industrial - Audit	Unit				\$600
	Steam Traps, HVAC Repair/Rep - Audit	Unit				\$300
	Steam Traps, HVAC Repair/Rep - No Audit	Unit				\$90
	Steam Traps, Industrial/Process Audit	Unit				\$600
	Steam Traps, Test	Unit				\$20
	Programmable Thermostat	Unit				\$75
	Water Heater, Storage 88% TE ≥75MBh	Unit				\$375
	Water Heater, Central Lodging 88% TE	MBH				\$3.75
	Energy Recovery Ventilator	CFM				\$0
	Targets	Participation				
		Participation Unit	2022	2023	2024	2025
Gas Optimization	Projects		2	2	2	2
Retro Commissioning	Projects		0	0	0	0
Staffing Grant	Grant		2	2	2	2
Rebates	Measures		892	892	892	892
Custom	Projects		3	3	3	3
New Construction	Projects		0	0	0	0
	Annual Savings					
		2022	2023	2024	2025	
Public Sector		518,773	518,773	518,773	518,773	
	Program Budget					
	Budget Category	2022	2023	2024	2025	
Incentives		\$1,195,827	\$1,195,827	\$1,195,827	\$1,195,827	
Third Party Incentives		\$0	\$0	\$0	\$0	
Implementation		\$1,115,362	\$1,115,362	\$1,115,362	\$1,115,362	
Marketing		\$111,536	\$111,536	\$111,536	\$111,536	
TOTAL		\$2,422,725	\$2,422,725	\$2,422,725	\$2,422,725	
	Cost-Effectiveness					
	Ratepayer Impact Measure Test	Utility Cost Test	Total Resource Cost Test	Participant Test		
	0.46	0.84	1.99	0.56		
	Levelized Cost per Therm Saved					
	2022	2023	2024	2025		
	\$0.39	\$0.39	\$0.39	\$0.39		

Path	3.6.5.4 COMMERCIAL FOOD SERVICE PROGRAM		
Description	The upstream commercial food service (CFS) rebate 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.		
Duration	January 1, 2022 through December 31, 2025		
Utility Collaboration	Statewide joint program that is jointly funded by Peoples Gas, North Shore Gas, ComEd, Nicor Gas, and Ameren and provides both electricity and natural gas savings opportunities to utility customers throughout Illinois.		
Delivery Strategy	The CFS rebate program will provide commercial end-users of participating utilities instant rebates of up to \$4,500 on ENERGY STAR® and other high-efficiency commercial kitchen equipment. The program is designed to increase access to affordable, highly efficient equipment for companies within the foodservice industry. This is achieved through two interventions. Commercial foodservice equipment suppliers receive sales incentives (SPIFs) when qualifying efficient products are sold, and the end-user (utility customer) receives an instant rebate at the time of purchase.		
Target Market	Food Service equipment manufacturers and distributors		
Marketing Strategy	The marketing materials generated for this program will be used to continue generating supplier awareness around the program and equip participating suppliers with marketing collateral to promote the program with their customers. Marketing elements include program brochure, email content, website content, website maintenance, quarterly updates to the Qualifying Products List, management of the P3 cloud-based tool for submitting point-of-sale rebate applications, and supplier engagement provided by an outreach team.		
Eligible Measures	Eligible measures and their incentives may include the following:		
	Measure	Unit	Per Unit Incentive
	ENERGY STAR Griddle	Unit	\$500
	Pre-Rinse Sprayer	Unit	\$25
	Pasta Cooker	Unit	\$200
	Combination Oven	Unit	\$2,000
	DCV - Kitchen	Unit	\$323
	Double Rack Oven	Unit	\$2,000
	ENERGY STAR Convection Oven	Unit	\$788
	ENERGY STAR Conveyer Oven	Unit	\$1,500
	ENERGY STAR Fryer	Unit	\$750
	ENERGY STAR Steamer	Unit	\$2,000
	ENERGY STAR Dishwasher, Single Tank Conveyor	MBH	\$1,321
	ENERGY STAR Dishwasher, Multi Tank Conveyor	MBH	\$1,403
	ENERGY STAR Dishwasher, Stationary Single Tank	Unit	\$593

<i>Path</i>	3.6.5.4 COMMERCIAL FOOD SERVICE PROGRAM																																	
	ENERGY STAR Dishwasher (MF/CI/SMB)	MBH		\$282																														
	Heat Recovery Grease Trap Filter	MBH		\$410																														
	Infrared Charbroiler	MBH		\$500																														
	Infrared Rotisserie Oven	HP		\$500																														
	Infrared Salamander Broiler	MBH		\$550																														
	Infrared Upright Broiler	Lbs		\$540																														
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