

**Proposed Policy for Version 3.0: Cumulative Persisting Annual Savings  
(CPAS) Goal Setting  
Submitted By: ComEd**

**Question 1: Proposed Policy and Rationale**

*Briefly describe the policy proposed to be included in Policy Manual Version 3.0, including rationale for why this policy is necessary in Illinois.*

Questions to consider:

1. *Why does this policy require inclusion in Policy Manual Version 3.0?*
2. *What unresolved policy issue(s) will be resolved by inclusion in the Policy Manual Version 3.0?*

*Please be as specific as you can. If you have specific policy language to propose at this time, please include in this template. It is not a requirement to draft policy language in the proposal template. If draft policy language is not included here, you may be assigned to draft proposed policy language for review by the Subcommittee at a future meeting.*

Section 8-103B of Public Act 102-0062 (PUA) directs the ICC to establish additional cumulative persisting annual savings (CPAS) goals beyond 2030, and specifically required the ICC to set 2031-2035 goals no later than December 31, 2021, with a default statutory goal of 0.9% per year.

This was discussed over the course of several SAG workshops and meetings with Staff and other stakeholders. Although parties appeared to generally be aligned that material downward adjustments to the default goals were potentially necessary, due to the statutory deadline of December 31, 2021, many parties also believed it was impossible at that time to develop the required evidentiary record upon which to base a decision to adjust the CPAS goals. Given this tight timeline, ComEd proposed to establish a policy to revisit the establishment of CPAS goals beyond 2030 in a later process, ahead of the 2030-2033 Plan filing, when more current and robust data and analysis is available, including the potential study, and adequate time is allowed to thoroughly discuss.<sup>1</sup>

ICC Staff filed a Staff Report<sup>2</sup> to the Commission on October 7, 2021, recommending that the Commission direct Staff to continue discussions with interested stakeholders and the utilities on a process by which the default statutory CPAS goals could be altered at a future date and include such a process in the Illinois Energy Efficiency Policy Manual Version 3.0, or such other forum, venue, proceeding, or process that the Staff deems appropriate. At the October 21, 2021 ICC Meeting, the Commission declined to institute a proceeding to establish CPAS goals for 2031-2035 (i.e., Plan 8), and as a result, the default statutory goals (0.9% per year) went into effect by operation of law, but directed Staff to continue discussions with the utilities to develop a process by which the default statutory CPAS goals could be altered at a future date (such as through an update to the Illinois Energy Efficiency Policy Manual).<sup>3</sup>

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<sup>1</sup> <https://www.ilsag.info/event/monday-september-27-sag-meeting/>

<sup>2</sup> <file:///C:/Users/e074107/AppData/Local/Temp/1/MicrosoftEdgeDownloads/64bd20e2-2a50-4bfb-80bf-d3ba9ee98d18/Staff%20Report-2031-2035-Savings-Goals-Final-2021-10-07.pdf>

<sup>3</sup> <file:///C:/Users/e074107/AppData/Local/Temp/1/MicrosoftEdgeDownloads/ea6ad696-1160-440a-83f0-212ad92c5bc1/10-21-2021%20ROM%20Minutes.pdf>

ComEd is thus reintroducing the topic and proposes again to establish a policy to revisit the establishment of CPAS goals beyond 2030 in a later process, ahead of the 2030-2033 Plan filing, when more current and robust data and analysis is available, including the potential study, and adequate time is allowed to thoroughly discuss. ComEd further suggest that this policy also potentially contemplate future goal-setting, beyond 2035.

### **Question 2: Utility Impact**

*Describe whether the proposed policy impacts Illinois gas utilities, electric utilities, or both.*

The proposed policy impacts electric utilities ComEd and Ameren.

### **Question 3: Background Research**

*Provide any background research completed in preparing this template, including source references and links, as applicable.*

*Questions to consider:*

- 1. Are you aware of other jurisdictions or utilities that address this policy issue?*
- 2. Have any national or regional energy efficiency organizations addressed this policy topic? If so, please provide reports and any other relevant sources.*

N/A

### **Optional Question 4: Commission Decision**

*Has the Illinois Commerce Commission previously addressed this policy or issue? If so, please provide language and specific citations, including the ICC docket number.*

See response to Question 1.

Additionally, Section 8-103B of the PUA directs that the Commission establish CPAS goals based in part on an energy efficiency potential study, so ComEd's Revised Plan 6 Stipulation, approved by the ICC in Docket 21-0155, requires the potential study be conducted and timed in a manner that would allow for the assessment of market potential for each service territory that could be used to support development of both the unmodified CPAS goals identified in Section 8-103B(b-5) and (b-15) for the years 2031-2040, as well as the CPAS goals by service territory applicable for the next energy efficiency plan for the years 2026-2030.

### **Optional Question 5: Statutory Consistency**

*Have you reviewed your proposed policy against applicable Illinois law? Are there any possible conflicts? If so, please explain and provide statutory citation(s).*

We have reviewed the proposed policy against applicable Illinois law and currently have not identified a conflict.

**Optional Question 6: Additional Information**

*Provide additional information, as needed, to assist with understanding the proposed policy issue and your request to include it in the Policy Manual Version 3.0. For example, have any memos been drafted to the SAG related to this policy proposal?*

N/A