

IL EE Stakeholder Advisory Group (SAG) Request for Comments on Market Transformation Working Group Process Proposal October 6, 2026

Comment Instructions

- Using this template, send written comments to the SAG Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com **by Wednesday, October 21, 2026.**
- Include “SAG MT Feedback” in the subject line of the email.
- Feedback will be posted on the [SAG Market Transformation Savings Working Group page](#) and circulated to the Working Group distribution list.

Comments Submitted By

Name: Kegan Daugherty

Company or Organization: Resource Innovations on behalf of Nicor Gas

Company or Organization Website (if applicable):

Email: kdaugherty@resource-innovations.com

Phone: 708.277.3251

Request for Feedback

During the [October 6, 2026](#) SAG Market Transformation Savings Working Group meeting, the SAG Facilitator presented a process proposal, described below.

- [SAG Facilitator Presentation: Process Proposal for SAG Market Transformation Savings Working Group](#)

Suggested approach for future MT Working Group meetings:

1. Annual meeting (Q1) for IL utilities to give a status update on each MT initiative
2. Opportunity for IL utilities (or evaluators) to give additional MT-initiative specific update(s) throughout the year, if needed, including any MT component that a utility is interested in feedback on
3. MT-initiative specific evaluation plan – a draft will be presented for each MT initiative, when ready, with an opportunity for discussion and written feedback

Are stakeholders interesting in previewing any of the components related to MT savings for a specific MT initiative, or are stakeholders comfortable waiting until the draft evaluation plan is ready?

- a. Logic Models
- b. Savings/Unit
- c. Total market unit data collection
- d. Natural market baseline data and projections
- e. Service territory accounting
- f. Market progress indicators
- g. The duration of any MT savings credit

Please describe any feedback or question(s) you have about the process proposal described above.

Response:

Nicor Gas is in line with the proposed changes to the approach laid out by the SAG Facilitator. Nicor Gas strongly supports sharing out and requesting feedback on the natural market baseline of any new MT initiative a utility is pursuing. Nicor Gas views agreement on the assumptions and methodology that go into the initiative's natural market baseline as critical to avoid future disagreement on measuring impact and savings from a utility's interventions in the market.