

Coordinated Utility Non-Residential New Construction Impact Evaluation Report

Energy Efficiency / Demand Response Plan: Electric Plan Year 9 (EPY9) / Gas Plan Year 6 (GPY6) (6/1/2016-12/31/2017)

Presented to Commonwealth Edison Company Nicor Gas Peoples Gas North Shore Gas

FINAL

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1. INTRODUCTION

This report presents the results of the impact evaluation of the Coordinated Utility Non-Residential New Construction Program (New Construction Program) implemented for ComEd, Nicor Gas and Peoples Gas and North Shore Gas Companies. The ComEd energy efficiency portfolio is in its ninth electric program year and sixth gas program year (EPY9/GPY6), while the New Construction Program did not begin until EPY2.

The report presents a summary of the energy and demand impacts for the overall program and broken out by utility. The appendix presents the impact analysis methodology and lists project-specific impact analysis findings and results. EPY9/GPY6 covers June 1, 2016 through December 31, 2017.¹

2. PROGRAM DESCRIPTION

The New Construction Program aims to capture immediate and long-term energy efficiency opportunities that are available during the design and construction of new buildings, additions and renovations in non-residential and multi-family buildings in ComEd's service area. Nicor, Peoples Gas and North Shore Gas each purchase therm savings in the program on a "dollars per therm" payment model on a project-by-project basis. Seventhwave implements the program by reaching out to design professionals and customers at the beginning of the design process. The New Construction Program coordinates with Nicor Gas, Peoples Gas, and North Shore gas where their service areas overlap with ComEd's service area. The implementation team provides technical assistance in building designs that reduces energy use beyond what is required by existing building codes and standards. The program served 99 projects in EPY9/GPY6 as shown in Table 2-1.²

Project Description	Count of Projects*
ComEd Only	57
ComEd and Nicor Gas	23
ComEd and Peoples Gas	16
ComEd and North Shore Gas	3
Total	99

Table 2-1. EPY9/GPY6 Volumetric Findings Detail

* The program tracking database contains 100 records for 99 EPY9/GPY6 projects. The program split one project into two records for incentive tracking purposes

Source: ComEd tracking data and Navigant team analysis.

3. PROGRAM SAVINGS

Table 3-1 summarizes the incremental electric energy and demand savings the I New Construction Program achieved in EPY9/GPY6 while Table 3-2 summarizes the incremental natural gas savings achieved in EPY9/GPY6.

¹ The program has historically run from June 1 to May 31 but was extended to include a bridge period as the utilities shifted from a fiscal to calendar year cycle.

² The program tracking database contains 100 records for 99 EPY9/GPY6 projects. The program split one project into two records for incentive tracking purposes.



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Table 3-1. EPY9 Total Annual Incremental Savings

Savings Category	Energy Savings (kWh)	Demand Savings (kW)	Peak Demand Savings (kW)
Ex Ante Gross Savings	81,347,380	18,754	18,754
Program Gross Realization Rate	79%	68%	59%
Verified Gross Savings	64,299,560	12,810	11,141
Program Net-to-Gross Ratio (NTGR)	0.77	0.77	0.77
Verified Net Savings	49,510,661	9,863	8,578

Source: ComEd tracking data and Navigant team analysis.

Table 3-2. GPY6 Total Annual Incremental Savings

Savings Category	Nicor Gas	Peoples Gas	North Shore Gas
Ex Ante Gross Savings - removing interactive effects (Therms)	377,225	430,105	33,041
Program Gross Realization Rate	95%	95%	95%
Verified Gross Savings - removing interactive effects (Therms)	357,085	407,141	31,277
Program Net-to-Gross Ratio (NTGR)	67%	67%	67%
Verified Net Savings - removing interactive effects (Therms)	239,247	272,785	20,956

Source: ComEd tracking data and Navigant team analysis.

4. PROGRAM SAVINGS BY MEASURE

The New Construction program does not track savings by measure. Program savings are estimated through participant-specific whole building energy analyses, discussed further in Section 5 below.

5. IMPACT ANALYSIS FINDINGS AND RECOMMENDATIONS

5.1 Impact Parameter Estimates

Participants completed 99 projects through the New Construction Program in EPY9/GPY6, of which 30 were selected though a stratified sampling approach to be included in the engineering desk review. In many cases, the desk review independently confirmed the estimation of ex ante savings and no ex post adjustments were required. However, for 14 sampled projects, we identified discrepancies in model inputs and ex ante savings calculations. The evaluation team calculated realization rates with and without interactive effects. The final realization rate was 79% for kWh with interactive effects and 78% for kWh without interactive effects. For kW, the final realization rate was 68% with interactive effects and 70% for without interactive effects. For projects with gas savings, final realization rates were 91% for therms with interactive effects.

The primary reason for the lower realization rate is the treatment of baseline window-to-wall ratios (WWR). For eight of the 30 sampled projects, the evaluation team adjusted window-to-wall ratio baseline conditions to match code compliance conditions (a WWR of 40%), where the program's ex ante model did not make this adjustment. For two of these projects, this resulted in the baseline model using less energy than the building modeled with all measures included, and therefore ex post savings for these projects was set to zero. Because these projects were large, the resulting penalty affected the program's



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overall realization rate notably. Overall, WWR baseline adjustments accounted for nearly all the difference between ex ante and ex post kWh savings in the sample of projects. The evaluation team understands that the program shifted away from this practice in early 2016 after discussions with the evaluation team. However, due to the long participation timeline of commercial new construction projects, many projects completed in EPY9/GPY6 had savings based on the old WWR modeling approach.

The impact evaluation is fuel-specific: the electric impact evaluation includes a sample of 30 EPY9/GPY6 projects with electric savings, while the gas impact evaluation includes a sample of 19 projects with gas savings. ComEd-only projects are those which do not fall within any gas utility's service territory, or do not claim gas savings.

The evaluation team calculated verified gross and net savings for energy, demand, and coincident peak demand³ resulting from the EPY9/GPY6 New Construction Program by using participant-specific wholebuilding energy models developed for baseline and projected design scenarios. For each participant, the design energy model estimates the annual whole building energy consumption of the proposed building based on architectural, building envelope, HVAC, lighting, and other parameters from the building design plans. The baseline energy model for a project estimates the counterfactual annual energy consumption the building would be expected to consume if it was built to meet the energy performance baseline standards. The estimated first year savings is the difference in annual electric and gas consumption between the two models. The energy performance baseline is the Illinois Energy Conservation Code for Commercial Buildings, which references and incorporates the applicable International Energy Conservation Code (IECC). This reference specifically allows for use of ASHRAE Standard 90.1 as an alternate compliance method. The program assumes the appropriate baseline based on the date that the project applied to the program. Projects that applied prior to January 1, 2013 used the IECC 2009 as the baseline, those that applied after January 1, 2013 but before May 31, 2016 used the IECC 2012, and those that applied after June 1, 2016 use IECC 2015.

Table 5-1 below presents the parameters that were used in the verified gross and net savings calculations and indicates which were calculated through evaluation activities and which were deemed.

Gross Savings Input Parameters	Data Source	Deemed or Evaluated?
Program Model Inputs	Program supplied building models and Savings calculation spreadsheet	Evaluated
Evaluated Model Inputs	Desk review of project documentation	Evaluated
Evaluated Model Inputs	Illinois TRM Version 4.0 ⁺	Deemed
Evaluation Model Results	eQuest/DOE2.2, TRACE700, OpenStudio	Evaluated
Realization Rate – All Projects	Program savings and evaluated savings	Evaluated
NTG – Electric and Gas	SAG agreement [‡]	Deemed

Table 5-1. Verified Savings Parameter Data Sources

* The program continues to use the System Track spreadsheet to calculate savings for simple project calculations, such as HVAC and lighting † State of Illinois Technical Reference Manual version 5.0 from http://www.ilsag.info/technical-reference-manual.html.

‡ EPY9/GPY6 deemed NTG ratios for ComEd, Nicor Gas, Peoples Gas and North Shore Gas are available on the IL SAG website here: http://ilsag.info/net-to-gross-framework.html.

The impact evaluation is fuel-specific: the electric impact evaluation includes a sample of 30 EPY9/GPY6 projects with electric savings, while the gas impact evaluation includes a sample of 19 projects with gas savings. Table 5-2 summarizes the incremental electric energy and demand savings the New Construction Program achieved for ComEd, as well as the therm savings achieved in this period for each gas utility. Note that the evaluation achieved the target 90/10 confidence and precision level for kWh and

³ The evaluation team estimated both summer and winter peak demand using PJM's peak periods.



therm savings but did not meet it for demand savings due to the large discrepancy in ex ante and ex post savings related to the WWR baseline and refrigeration measures.

Table 5-2. EPY9/GPY6 Total Annual Incremental Electric and Gas Savings, by Utility

Utility	Metric	Ex Ante Gross Savings	Gross Realization Rate	Relative Precision (90% confidence)	Evaluation- Adjusted Gross Savings	NTGR	Verified Net Savings
	kWh	81,347,380	79%	8.91%	64,299,560	0.77	49,510,661
	kWh removing interactive effects	82,457,129	78%	8.74%	64,616,125	0.77	49,754,416
ComEd	Total kW	18,754	68%	12.19%	12,810	0.77	9,863
ComEd	Total kW removing interactive effects	18,754	70%	12.37%	13,136	0.77	10,115
	Summer Peak kW	18,754	59%	12.74%	11,141	0.77	8,578
	Winter Peak kW	18,754	63%	13.43%	11,839	0.77	9,116
	Therms	256,579	91%	4.61%	234,251	0.67	156,948
Nicor Gas	Therms removing interactive effects	377,225	95%	4.07%	357,085	0.67	239,247
Deenlee	Therms	310,487	91%	4.61%	283,468	0.67	189,923
Peoples Gas	Therms removing interactive effects	430,105	95%	4.07%	407,141	0.67	272,785
North	Therms	19,621	91%	4.61%	17,914	0.67	12,002
Shore Gas	Therms removing interactive effects	33,041	95%	4.07%	31,277	0.67	20,956

5.2 Other Impact Findings and Recommendations

The evaluation team reviewed the New Construction Program tracking data for projects completed in EPY9/GPY6. Table 2-1 above presents the 99 completed projects, by savings type and utility. The New Construction Program completed more projects in EPY9/GPY6 than in EPY8/GPY5, when the program completed 76 projects. The number of projects completed with claimed gas savings increased from 27 projects in EPY8/GPY5 to 42 projects in EPY9/GPY6. Of these 42 projects, 23 were inside Nicor Gas's service territory, 16 were completed inside Peoples Gas's service territory, and 3 were completed inside North Shore Gas's service territory.

In addition, 74% of completed projects involved organizations or representatives who worked on projects in previous program years, compared to 53% in EPY8/GPY5. As anticipated, repeat participation has increased as the program reaches out to more design professionals representing a growing share of the building design market in the greater Chicago area. It seems likely that repeat participants, familiar with the program's offerings, are also more likely to encourage project teams to sign up and work with the implementation team earlier in the design process, allowing for greater savings opportunities.

The program succeeded in its goal to serve larger projects, as both the total square footage of completed projects and the average square footage of completed projects increased as compared to EPY8/GPY5, by 58% and 21%, respectively. Projects completed in EPY9/GPY6 averaged 649,490 kWh savings per project, a 14% increase as compared to those completed in EPY8/GPY5, while also experiencing a 27% increase in the average electric incentive per project. In terms of gas savings, the total claimed ex ante



therms in EPY9/GPY6 decreased by roughly 45% as compared to EPY8/GPY5, yet this still represents a roughly 70% increase over EPY7/GPY4.

Based on our evaluation of program impacts, we provide the following key program findings and recommendations.

- **Finding 1.** For eight of the sampled projects, the evaluation team adjusted window-to-wall ratio (WWR) baseline conditions to match code compliance conditions, where the program's ex ante model was claiming savings based on expected conditions. In these cases, the baseline was adjusted to have a WWR of 40% as per code. For two of these projects, this resulted in the baseline model using less energy than the building modeled with all measures included. The ex post savings for these projects was set to zero. Because these projects were large, the resulting penalty affected the program's overall realization rate notably.
- **Recommendation 1.** The evaluation team recommends that the program ensures that projects consistently follow the approaches in ASHRE 90.1 or IECC when measuring ex ante program savings. For WWR, this includes accounting for the energy penalty for the excess window area. The evaluation team understands that the program shifted away from this practice in early 2016 after discussions with the evaluation team, but that these issues carried over from legacy projects started before the change in practice.
- **Finding 2.** In several projects the evaluation team removed the savings associated with electronically commutated (EC) motors and LED lighting installed in refrigerated case and walk-in coolers. Specifically, EC motors for walk-in coolers are required per federal standard and LED lighting is required for these cases to meet the kW/day threshold set forth in the federal standard.
- **Recommendation 2.** The evaluation team recommends the program ensures federal standards are appropriately incorporated into ex ante savings estimates.
- **Finding 3**. Other than the issues described above relating to WWR and refrigeration, the evaluation team found very few differences between ex ante and ex post savings estimates. When these differences did occur, they were often minor and the result of slight adjustments to baseline efficiencies or lighting power densities. The program continues to demonstrate that it is implemented well and models new construction projects using industry best practices.

The program should continue to apply industry best practices to its modeling approach and to work with the evaluation team to discuss potential changes to the program and problematic or complicated projects as needed. Having these discussions will help identify and mitigate potential issues to achieve realization rates of as close to 100% as possible.

6. APPENDIX 1. IMPACT ANALYSIS METHODOLOGY

6.1 Engineering Methodology

The engineering analysis used building energy models listed in Table 5-1. The analysis included:

- 1) Adjusting the model inputs in the executable files to match the as-built conditions identified in our review of the New Construction Program's project files and then rerunning the model.
- 2) Quantifying impacts by comparing two simulations representing the projected design scenario and the baseline scenario.



The baseline scenario in the model is dictated by the appropriate Illinois Energy Conservation Code for Commercial Buildings (this is to be distinguished from the IECC, the International Energy Conservation Code). A project's ex ante savings model is based on a baseline scenario which incorporates the building codes that were in effect at the time of the project's application. Although the applicable energy codes may change by the time a project obtains a building permit, the evaluation team believes that this is rare and the program's approach of using the application date to determine the applicable building code is reasonable and justified.

The evaluation team also calculated interactive effects, where applicable, for each fuel type. Interactive effects are the resulting changes to savings that occur when the installation of one measure has a positive or negative effect on the savings for the other fuel type. Interactive effects are calculated in the model. Peak kWs are only shown with interactive effects because it is required for PJM reporting. For utilities' goals tracking, we provide the savings without the penalties from interactive effects. The implementation team calculated savings for joint projects including interactive effects; however, the evaluation team also calculated savings both with and without interactive effects for reporting purposes. *Unless noted, the results in this report include interactive effects.*

Verified net energy and demand savings were calculated by multiplying the verified gross savings estimates by a net-to-gross ratio (NTGR). In EPY9/GPY6, the NTGR values used to calculate the net verified savings were based on past evaluation research and approved by the Stakeholder Advisory Group (SAG)⁴.

6.2 Sampling Approach

As we did in prior years, the evaluation team selected a stratified random sample for the New Construction program to support the engineering desk reviews. The approach focused on both electric and gas savings. The evaluation team designed the sample to provide 90/10 precision for both evaluated kWh and therm savings estimates. This approach was also designed to provide 90/10 precision at the program MBtu and kW level.

The sample frame is composed of all projects with electric or gas savings. These projects may or may not have gas savings and may or may not be receive gas utility incentives. A total of 99 PY9 projects comprised the population for this sampling approach. We divided the sample frame of all projects into three strata based on their overall project MBtu savings and randomly selected 30 projects across these strata to compose our sample. We then developed case weights to extrapolate the results to similar projects, ensuring that the engineering results are representative of the population of PY9 participants. Table 6-1 and Table 6-2 show the sampling approach and weights for electric and gas savings.

Stratum	Boundaries (MWh)	Projects in Population	Projects in Sample	Stratum Weight
1	>0 - 600	55	10	5.50
2	601 - 1,500	28	9	3.11
3	>1,500	16	11	1.45
Total		99	30	

Table 6-1. Sampling Approach for Projects with Electric Savings

⁴ EPY9/GPY6 deemed NTG ratios for ComEd, Nicor Gas, Peoples Gas and North Shore Gas are available on the IL SAG website here: http://ilsag.info/net-to-gross-framework.html.



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Stratum	Boundaries (Therms)	Projects in Population	Projects in Sample	Stratum Weight
1	>0 – 10,000	33	3	11.00
2	10,001 - 85,000	28	8	3.50
3	>85,000	9	8	1.13
Total		70	19	

Table 6-2. Sampling Approach for Projects with Gas Savings

As shown earlier in Table 5-2, the evaluation achieved the target 90/10 confidence and precision level for kWh and therm savings but did not meet it for demand savings due to the large discrepancy in ex ante and ex post savings related to the WWR baseline and refrigeration measures

7. APPENDIX 2. IMPACT ANALYSIS DETAIL

Table 7-1 below shows the results of the engineering desk review. Ex ante and ex post electric and gas savings and the resulting realization rate are presented for each of the 30 projects included in the sample. In addition, where applicable, the table includes a narrative describing the reasons for any discrepancies between ex ante and ex post savings. Realization rates below 100% indicate that energy savings were adjusted downwards while realization rates above 100% indicate energy savings were adjusted upwards. All energy savings include interactive effects.



Realization Rate Ex Ante Ex Post Gas Utility Project Claiming Electric Gas Description Electric ID Gas Electric Gas Savings (kWh) (therm) Savings Savings Savings Savings Savings Savings (kWh/yr) (therms/yr) (kWh/yr) (therms/yr) RR RR 249 2,438,340 100% 100% No changes Peoples 51,626 2,438,340 51,626 The savings for this project were changed due to adjustments to the refrigerated case and walk-in cooler measures. Specifically, the ECM motors for walk-in coolers are required per federal standard. Additionally, the installed refrigerated cases require LED lighting and ECM motors to 267 218,029 0 127,105 0 58% meet federal standard and cannot be purchased without N/A this equipment. Additionally, the anti-sweat heater controls were adjusted based on TRM savings algorithms and the watts per door based on the provided specifications. Similarly, the temperature based-door heater controls were modified based on refrigerated-case specifications. The boiler savings were reduced since the baseline boiler 98% 355 Nicor 573,523 41,503 573,523 40,540 100% was input at 77% rather than 80%. The savings for this project were marginally changed. The original analysis did not include a penalty for the insulation 357 3,408,450 98% 100% 140.838 3,337,948 140,838 levels being less than code. The electric penalty for the energy recovery unit was 399 604,935 84,671 580,609 87,456 96% 103% included. 405 799.729 30,449 799,729 30,449 100% 100% No changes. The savings for this project were significantly reduced. The 429 3,351,306 0 0 0 0% ex ante model WWR does not meet code. WWR adjusted N/A to 40%. The baseline spandrel insulation U value was 0.290

Table 7-1. Researched Gross Savings for Sampled Projects

	Gas Utility	Ex Ante		Ex F	Post	Realizatio	on Rate	
Project ID	Claiming Savings	Electric Savings (kWh/yr)	Gas Savings (therms/yr)	Electric Savings (kWh/yr)	Gas Savings (therms/yr)	Electric (kWh) Savings RR	Gas (therm) Savings RR	Description
								and the proposed U value was 0.12. Code requires a U- value of 0.064. The U-value of the baseline building as adjusted in the ex post model. The savings for this project are set to zero.
475		3,220,498	0	0	0	0%	N/A	Note that this building includes both projects 475 and 877 in the tracking database. The savings have been set to zero for this project. The latest MIA sheet in the project folder was used for the savings associated with this building. The exterior of the as-built building is almost completely made of windows with U-values between 0.45 and 0.41. The baseline for this building was changed to have a WWR of 40%. The baseline building uses less energy than the building modeled with all the ECMs included. The savings for this project are set to zero.
525		1,477,944	69,758	1,095,616	31,978	74%	46%	Ex ante model WWR does not meet code and was reduced to 40%.
551	Nicor	2,561,969	0	1,295,541	0	51%	N/A	The savings for this project were significantly reduced. The ex ante model WWR does not meet code. WWR adjusted to 40%.
552	Nicor	1,947,843	29,565	1,947,843	29,565	100%	100%	No changes.
571		1,394,469	27,185	1,116,077	23,126	80%	85%	The ex ante model WWR does not meet code. The ex post model was modified so that the WWR was 40%.
579	Nicor	79,348	128	79,348	128	100%	100%	No changes.
625		333,648	0	334,281	-363	100%	N/A	No changes.
632		65,613	1,984	65,613	1,984	100%	100%	No changes.
633		453,747	51,107	453,747	51,107	100%	100%	No changes.

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	Gas Utility	Ex Ante		Ex f	Post	Realization Rate		
Project ID	Claiming Savings	Electric Savings (kWh/yr)	Gas Savings (therms/yr)	Electric Savings (kWh/yr)	Gas Savings (therms/yr)	Electric (kWh) Savings RR	Gas (therm) Savings RR	Description
643		855,507	42,364	855,507	42,364	100%	100%	No changes.
652		872,422	33,811	822,069	31,136	94%	92%	The savings for this project were reduced by adjusting the baseline to account for the window-to-wall ratio of the baseline building exceeding 40%.
658		2,626,132	0	2,583,647	0	98%	N/A	The savings for this project were reduced due to the original analysis inadvertently double-counting savings for reducing the condensing pressure for three compressors. However, due to a cell reference error, two of the three compressors were not included in the claimed savings total.
674		2,004,456	22,612	2,004,456	22,612	100%	100%	No changes.
691		2,843,052	0	2,843,052	0	100%	N/A	No changes.
722	Nicor	1,062,999	14,230	914,902	14,231	86%	100%	The savings for several refrigeration measures were reduced. Specifically, the savings for ECM motors for walk- in cases was removed, since these are required by federal standard and the savings for LED lighting for refrigerated cases was set to zero since the installed cases are not available with T8 lighting since the LED lighting is required for them to meet the kW/day set forth in the federal standard.
743		413,385	0	290,656	0	70%	N/A	The savings for several refrigeration measures were reduced. Specifically, the savings for ECM motors for walk- in cases was removed, since these are required by federal standard. In addition, the savings for LED lighting for refrigerated cases was set to zero since the installed cases are not available with T8 lighting since the LED lighting is required for them to meet the kW/day set forth in the federal standard. The defrost controls were adjusted to be consistent with the defrost times listed in the manufacturer literature. Finally, the savings for the anti-sweat heater

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	Gas Utility	Ex A	Ex Ante		Post	Realizatio	on Rate	
Project ID	Claiming Savings	Electric Savings (kWh/yr)	Gas Savings (therms/yr)	Electric Savings (kWh/yr)	Gas Savings (therms/yr)	Electric (kWh) Savings RR	Gas (therm) Savings RR	Description
								controls was adjusted based on the actual heater wattage size.
791	Nicor	2,247,732	0	2,247,732	0	100%	N/A	No changes.
829		96,399	0	96,399	0	100%	N/A	No changes.
549		2,830,937	0	2,836,845	0	100%	N/A	The savings for this project were slightly increased. The original model used an R-value for the refrigerated space that exceeded code.
572		1,419,907	78,874	655,618	65,372	46%	83%	The ex ante model WWR does not meet code. It was greater than 60% in the ex ante model and this was reduced to 40% in the ex post model.
700	Peoples	1,210,354	22,989	1,098,602	11,270	91%	49%	The ex ante model WWR does not meet code. It was greater than 70% in the ex ante model and this was reduced to 40% in the ex post model.
716	Nicor	208,005	18,351	208,005	18,351	100%	100%	No changes.
747	Nicor	68,114	2,434	68,114	2,433	100%	100%	No changes.



8. APPENDIX 3. TRC DETAIL

Table 8-1 below shows the total resource cost savings summary for the New Construction Program. Note that all energy savings include interactive effects.

Projects	Units	Quantity	Effective Useful Life	Ex Ante Gross kWh Savings	Ex Ante Gross Peak kW Savings	Ex Ante Gross Therms Savings	Verified Gross kWh Savings	Verified Gross Peak kW Savings	Verified Gross Therms Savings
ComEd	Project	99	17	81,347,380	18,754	NA	64,299,560	11,141	NA
Nicor Gas	Project	23	20	NA	NA	256,579	NA	NA	234,251
Peoples Gas	Project	16	20	NA	NA	310,487	NA	NA	283,468
North Shore Gas	Project	3	20	NA	NA	19,621	NA	NA	17,914
All	Project	99		81,347,380	18,754	586,687	64,299,560	11,141	535,632

Table 8-1. Total Resource Cost Savings Summary

The Total Resource Cost (TRC) variable table only includes cost-effectiveness analysis inputs available at the time of finalizing this PY9 impact evaluation report. Additional required cost data (e.g., measure costs, program level incentive and non-incentive costs) are not included in this table and will be provided to evaluation at a later date. Further, detail in this table (e.g., EULs) other than final PY9 savings and program data are subject to change and are not final.