## MEMORANDUM

TO:	ILLINOIS STAKEHOLDER ADVISORY GROUP - TECHNICAL ADVISORY COMMITTEE
FROM:	SHAWN ENTERLINE, VEIC PROJECT MANAGER
SUBJECT:	TRM CHANGES & DOCUMENTS RESULTING FROM THE SEPT $11^{\rm TH}$ SAG MEETING
DATE:	9/14/12
CC:	ERIN CARROLL, SAM DENT, ANNETTE BEITEL

I have completed revisions to both the Technical and the Policy TRM documents, and the sources, titles and summary of the changes are outlined below. The changes to the documents are meant to be captured by the redlined versions. However, when accepting and cleaning up the documents for the 'clean' versions, I frequently have to use my best judgment to accept some changes and not others in order to arrive at the final, clean version. In instances where I reject a comment or edit, I have made an effort to create a bullet in this memo summarizing my thinking.

In general, my approach continues to be to generalize the language and bring individual issues up to a level where there is a consensus. Said differently, I have tried to avoid being too specific throughout the revision process. This has allowed me to consolidate disputed issues into a single section. I then try to avoid specific references to any disputed issues in other sections of the document.

This revision to the Policy TRM leaves three issues unresolved; how to file the TRM in Section 3.1, reporting dual savings in Section 3.6.2 and TRM Administrator Independence. The basis for the revision was the working document from our Sept 11<sup>th</sup> meeting, which was Staff's redline. As a result, the majority of the changes that Staff made in that document have been accepted and appear in the clean version of the Policy TRM.

## TRM Changes Resulting from the Sept 14th SAG Meeting

## Technical TRM

- 1. <u>New Document Title:</u>
  - Illinois\_Statewide\_TRM\_Effective\_060112\_Final\_Technical\_Version\_091212\_Redline.docx'
  - Illinois\_Statewide\_TRM\_Effective\_060112\_Final\_Technical\_Version\_091212\_Clean.docx'
- 2. Starting Document:
  - Illinois\_Statewide\_TRM\_Effective\_060112\_Final\_Technical\_Version\_082012\_Clean.docx'
- 3. <u>Content:</u> All technical content. Only technical content.
- 4. <u>Technical TRM Edits</u>: The following errata items have been fixed.
  - The word "policy" has been struck from the first sentence in the second paragraph of the introductory page and has been replaced with the word "technical."
  - The words "for approval" have been struck from the first sentence in the second paragraph of the introductory page to generalize the sentence. The phrase "for approval" is too general and although there is consensus that approval will be sought in the first filing, it is not a consensus that approval will be sought annually. Hence the deletion.
  - All of the bullets following the aforementioned sentence have been deleted and pasted over with the edits from the following document, which embodies ICC Staff's comments.

- 'Illinois\_Statewide\_TRM\_Policy\_Document\_082212 ICC Staff 9-10-12\_Mtg\_Edits.docx'
- 6.3.4 Tankless Water Heater: In footnote related to incremental costs has been corrected to refer to DEER. The values remain the same pending future TAC discussion.
- 6.4.16 VSD for HVAC: The error in using 'CF' as the notation has been corrected to 'DSF'
- The numbering in the headers has been updated to match the numbering in the headings.
- All of the tables in the front matter have been renumbered to match the subsection heading out to Heading 3.
- Several Table references in the Glossary have been changed to match up to the revised numbering as described in the previous bullet.

## Policy TRM

- 1. <u>New Document Title</u>:
  - 'Illinois\_Statewide\_TRM\_Policy\_Document\_091412\_Redline.docx'
  - Illinois\_Statewide\_TRM\_Policy\_Document\_091412\_Clean.docx'
- 2. <u>Starting Document:</u>
  - Illinois\_Statewide\_TRM\_Policy\_Document\_082212 ICC Staff 9-10-12\_Mtg\_Edits.docx'
- 3. <u>Content</u>:
  - The starting document for this revision that is listed above is the working document from the 9/11/12 SAG/TAC meeting.
- 4. Front Matter TRM Edits:
  - All of the content labeled [Original] has been removed and all of the content labeled [ICC Staff Position] has been retained. This content forms the basis for further redlined revisions.
    - Several exceptions were found where the ICC Staff indicated that they supported the original content as written.
  - Section 3.3.1: TRM Values and Reconciliation Proceedings has been deleted in its entirety. I believe the TAC agreed that it is not necessary to specify this in the TRM Policy document. As a result, this formerly disputed item has been removed from the disputed items list.
  - In Section 2, the phrase "The applicability of the TRM," has been deleted as a result of Ted Weaver's comment / suggestion. The phrase "Any other matters relating to the TRM." works as a catch-all, and captures any instances where the deleted phrase may have applied.
  - In Section 2.1, the 'approved work paper format' has been added to the 9/25 TAC agenda for discussion and clarification.
  - Table 2.4 A footnote was added stating, "The TRM is not applicable to Ameren and ComEd in EPY4."
  - The SAG has been added to the glossary using the extensive footnote from Section 2.1. That footnote is now deleted in favor of the Glossary insertion.
  - The first sentence in the second paragraph of Section 1 now reads, "The TRM is a technical document that is filed with the Illinois Commerce Commission (Commission or ICC) and is intended to fulfill a series of objectives, including:"
    - This general statement is a consensus in my view. Everyone agrees that it will be filed. This statement leaves the dispute of the annual approval of the TRM to a later section.
  - Section 2.1 needs more clarity around the use of the terms Portfolio Administrator, Program Implementer and Program Administrator. The distinction in the comment is not

clear to me, and I have accepted the language as it was redlines, which I believe was from Nicor.

- Section 2.1,TRM Administrator: The sentence "The TRM Administrator makes any necessary revisions to the TRM to reflect the Commission Order from the annual TRM Update proceeding." has been deleted. The nature of the annual filing and approval is in dispute and in the event that a Commission Order does result, the TRM Administrator's role is already clearly enough defined to make the deleted sentence unnecessary.
- Table 2.4: The last column indicates if the TRM is used in the 3-year plan filings, and for the 6/1/14 – 5/31/17 period, the answer is yes as indicated by the statement, "TRM is used in the Plan filing." The additional detail in StafPs edit concerning ICC approval is in dispute, and this generalized language is a consensus of the TAC in my view. Everyone agrees that the TRM will be used as a basis for the plan filings.
- Section 2.3: The line edits in the first paragraph were rejected because the Commission's approval of the TRM is in dispute. The original language was intended to be general enough to embody the consensus that March 1<sup>st</sup> is the deadline by with the TRM needs to be final, and is purposely silent on the Commission's approval of the TRM.
- 5. <u>Review Process</u>: Circulate to SAG by Friday, Sept 14<sup>th</sup>. Review with TAC on Tuesday Sept 18<sup>th</sup>. Finalize with SAG on Tuesday, September 25.