

**EE SAG Process and Plans:
2014 and Beyond (EPY7-9; GPY 4-6)
Ver. 1.0
*Updated 5/13/2014***

I. Overview

This memorandum describes the Illinois Energy Efficiency Stakeholder Advisory Group (“EE SAG” or “SAG”) Process and Plans for 2014 and beyond, covering the Electric Program Years 7-9, and the Gas Program Years 4-6 Plans. The intent of the process guidelines and schedule is to achieve the following:

- **Compliance with Illinois Commerce Commission (ICC) Directives:** The ICC established the EE SAG in Final Orders approving the ComEd and Ameren IL first three year energy efficiency plans (ComEd Final Order, [07-0540 at 32](#); Ameren Final Order, [07-0539 at 24](#)). Subsequently, the ICC directives have identified additional roles and responsibilities for the SAG, which evolve as the EE portfolios evolve. This memo captures ICC directives so that compliance with the directives related to the SAG can be tracked and documented.
- **Clarity:** Clarity for participants, so they know what to expect and can plan accordingly.
- **Collaboration and Inclusiveness:** SAG and TAC meetings are open to all. Participants are welcome to engage consistently or selectively, depending on their interest.
- **Respectful Communications:** Participants are expected to treat others with respect, as evidenced by the tone and substance of their comments.
- **Efficiency:** To make efficient use of time, the required pre-work, purpose and outcome of each topic discussed at the SAG will be identified at the beginning of the SAG meeting, and then documented in the meeting notes. Templates, process maps and timelines will be used to address recurring topics.
- **Consensus Decision-Making:** The SAG does not make use of formal voting. Instead, where a specific decision or action is sought, consensus decision-making will be used to reach agreement. If, after a reasonable period of time, as determined by the facilitator, consensus is not reached, the facilitator will produce a Comparison Exhibit that identifies the issue, different opinions, and the basis for those opinions. Where practicable, the parties supporting each position will be identified.
- **Flexibility:** The SAG schedule and plan is designed to be flexible, and can be modified to address issues and needs as they arise.
- **Build Trust:** SAG meetings are intended to build trust and collaborative working relationships. Parties are encouraged to raise issues and voice concerns when they don't support specific initiatives discussed at the SAG, and also offer constructive approaches and solutions where possible.
- **Advisory:** The SAG is an advisory body, not a decision-making body. It is a forum that allows parties to express different opinions, better understand the opinions of others, and foster collaboration and consensus, where possible and appropriate.
- **Identify and Celebrate IL EE Successes:** The EE SAG website (www.ilsag.info) and meetings will be used to identify and celebrate successes with the EE portfolios and programs.

This memorandum covers the following topics:

- **II. SAG Process Guidelines**
- **III. Summary of Relevant ICC Directives to SAG**
 - Recurring Topics
 - Additional Topics
 - Gas Issues Still in Litigation
 - SAG Directive Priorities – High, Medium, and Low
- **Appendix: Relevant ICC Directives to SAG**

II. SAG Process Guidelines

A. EE SAG has two standing groups

- The EE SAG (“SAG”), and
 - General Meetings will cover Program Administrator quarterly reports, portfolio planning, program planning, fund-shifts, EE Policy Manual, and topics of general interest, as directed by the ICC or requested by SAG members.
- The EE SAG Technical Advisory Committee (“TAC”)
 - These meetings will address the Technical Reference Manual (TRM), EM&V Issues, and other issues of a more technical nature. General SAG attendees will be briefed on topics covered in the Technical Advisory Committee.

B. EE SAG Subcommittees (Issue Specific)

- Subcommittees will be established for necessary issue-specific topics based on ICC directives or SAG requests, and will be open to all SAG participants interested in joining. Subcommittees may be established for the following topics; others will be considered as need arises:
 - Combined Heat and Power (“CHP”)
 - Large C&I Pilot Program
 - EE Policy Manual
 - Ground Source Heat
 - Smart Devices?
 - Wasted Energy?
- **Facilitation:** Annette or Celia will serve as central point of organization regarding timelines, issues, action items, updates to SAG, etc.
- **Timing:** Majority of meetings will be scheduled on Tuesdays if possible.
- **Subcommittee process (Flowchart):**
 - Flow chart describes general process; will be modified for specific issues as needed.

C. EE SAG Participants

- *SAG Participant:* Attendance and participation open to all interested organizations / companies.
- *TAC Participant:* Attendance and participation open to all interested organizations / companies.

D. Determination of whether Consensus has been reached by the EE SAG:

- **Consensus Determinations:** For the purposes of the EE SAG, consensus may be determined through one of three ways:
 1. **In-Person or Teleconference:** Consensus may be determined if no objections voiced in a meeting to an issue. The meeting may be in person or one the phone. Determining consensus through lack of objection at a meeting will be used sparingly as it is preferable for parties to see written proposals and have ample time to consider the proposal.
 2. **Review of Written Proposal:** Generally, consensus should be determined through review of a written proposal so parties know what they are agreeing to.

“Consensus” will be determined on a particular written proposal based on receiving no objections from any party on that written proposal by a date specified reasonably in advance by the SAG facilitator, but should allow at least one week for review/comment.

3. Review of Written Proposal, with Affirmative Written Consent: For items that are filed at the ICC, written affirmative consent of a written proposal will generally be sought so that it is clear which parties are indicating consent.
- Use of “Comparison Exhibits” in the consensus decision-making process– At times, consensus may not be reached on all issues after a reasonable period of time, as determined by the facilitator. In such cases, the facilitator will prepare a “Comparison Exhibit” delineating the non-consensus items, the different positions and reasons for the different positions, and the parties who support each position.

E. EE SAG Meeting Dates and Times

- SAG: The regularly scheduled EE SAG meetings will generally be held on the 4th Tuesday of the month. In general, the three exceptions are the months of March, August, November, and December. There is no meeting scheduled for August. Additional SAG Meetings may be scheduled on Tuesdays as needed. Meeting times will generally be as follows:
 - Afternoon-Only: 1:00-4:30pm
 - All-Day: 10:30am-4:30pm
- TAC: Identification of high or medium priority measures for IL-TRM Updates will be established by July 1st. Work papers for updates to existing IL-TRM measures will be completed by August 1st. Work papers for new IL-TRM measures will be completed by October 1st. TAC meetings will be scheduled weekly from October through March from 10:00 – 12:00, the period during which the TRM is updated and the SAG is reviewing/commenting on NTG values. At other times, TAC meetings may be scheduled on an as-needed basis on Tuesdays from 10:00 – 12:00.

F. Meeting Locations

- SAG: Meetings will be held at the Midwest Energy Efficiency Alliance (MEEA) unless otherwise noted. MEEA is located at 20 North Wacker Drive, Suite 1301 (Lyric Opera Building), Chicago. Three meetings will be held in Springfield, dates TBA.
- TAC: Meetings will be via teleconference.

G. Meeting Agendas and Meeting Materials:

- SAG: Agendas will be circulated five business days in advance of the meeting. Meeting materials will be circulated three business days in advance of the meeting. If materials are not circulated in advance, SAG participants will not be asked to make any decisions or seek consensus on the topic, but may ask questions and state concerns about any issues.
 - For items that require SAG discussion and feedback, the topic will be discussed a minimum of two times at the SAG. The first meeting will be educational and will give participants the opportunity to ask clarifying questions. The second meeting will provide an opportunity to identify consensus or non-consensus

issues. If consensus cannot be reached, it will be memorialized in a Comparison Exhibit, which will contain: brief description of issue, summary of positions, rationale for positions, parties supporting each position.

- **Program proposals:** For proposed new programs to be presented to the SAG, presenters must fill out a program template before a meeting date/time is scheduled on the agenda. The program template will be provided to SAG participants and available for download on the SAG website (<http://www.ilsag.info/templates/html>.) Pre-work must be completed in advance of the meeting and distributed to SAG participants. Presentations also must be submitted in advance of the meeting.
- **Policy/issue proposals:** For proposed policy/issue discussions to be presented to the SAG, presenters must fill out a policy/issue request template before a meeting date/time is scheduled on the agenda. The policy/issue template will be provided to SAG participants and available for download on the SAG website (<http://www.ilsag.info/templates/html>). Policy/issue proposals must be circulated at least five business days in advance of a SAG meeting.
- **TAC:** Agendas must be circulated 1.5 Business Days in advance due to more detailed review and comment that will be required for meaningful review of these materials. Handouts will be sent out before the meeting. If agenda items are submitted to the TRM administrator after the TRM circulates the agenda, the TRM administrator has the discretion about whether to add the agenda item to the upcoming meeting or wait until the next meeting.

H. Meeting Follow-Up

- **SAG:** For each meeting, a list of meeting attendees (in phone and in person) plus meeting action items from the meeting will be posted on the EE SAG website (<http://www.ilsag.info/templates/html>). In addition, notes will include topics and issues discussed with enough specificity to afford SAG members the ability to track issues and next steps. Meeting notes will generally note identify positions of individual parties.
- **TAC:** For each TAC meeting, a list of meeting attendees (in phone and in person) plus meeting action items from the meeting will be posted on the EE SAG website (www.ilsag.info). Detailed meeting notes will be kept.

I. EE SAG Website

- The EE SAG website (www.ilsag.info) will be maintained to include the following items:
 - EE SAG agendas, materials, list of meeting attendees and affiliations, action items.
 - TAC meeting agenda, attendees and affiliations, action items, meeting notes, IL-TRM versions, reference materials.
 - Quarterly reports and annual reports, as made available by utilities/DCEO.
 - Final EM&V Reports.
 - Final NTG values/by year, provided by the evaluators.
 - Open dockets related to EE.

- Other materials as requested by SAG or TAC participants and approved by the SAG Facilitator.

J. Meeting Topics

- EE participants may contact EE SAG Facilitator Annette Beitel or Senior Policy Analyst Celia Johnson if they would like topics or speakers added to the agenda.
 - For proposed topics to be presented to the SAG, presenters must fill out a program template before a meeting date/time is scheduled on the agenda. The template will be provided to SAG participants and available for download on the SAG website. (<http://www.ilsag.info/templates/html>). Please allow one full meeting cycle to add a new topic/speaker to the agenda.
- Contact information:
 - Annette.Beitel@FutEE.biz or 847-920-0367
 - Celia.Johnson@FutEE.biz or 312-374-0932

K. Process for Review of EM&V Draft Reports

- Previously, PDF versions of draft EM&V reports for each IL EE program were circulated to all SAG participants either by email (for ComEd programs) or by posting on the SAG website, with 10 business days for review (<http://www.ilsag.info/evaluation-documents.html>).
- Evaluators Navigant and Opinion Dynamics reported in February 2014 they have never received comments on draft reports from SAG participants outside of Staff and the utilities. Therefore, for efficiency, circulating draft reports to the SAG will be discontinued, effective March 2014.
 - For SAG participants who want to continue receiving draft reports, reports will be sent directly to utilities, Staff, and interested participants by the evaluators.

L. Recurring Topics

- There are a number of topics that require recurring discussion in the SAG. Going forward, the plan will be to have recurring SAG activities calendared, with pre-established templates/standing information requests, timelines and due dates, clear roles and responsibilities (who is responsible for what), and an understanding of how many times a particular issue can come before the SAG. Recurring activities include:
 1. TRM update process (Starts in early June, ends by March 1. By July, high and medium priority measures must be discussed. Scheduled weekly TAC Tuesday am calls from June through February. Calendared, but can be canceled.)
 - TRM Process improvement discussion (June likely good time – coordinate with Erin Carroll – contract renewal process also).
 2. NTG discussions (Process improvement – June; likely January/February)
 - Determine what evaluators need to provide.
 - Two meetings per year to discuss updated values with evaluators/SAG participants.
 3. Quarterly reports – Oct; (Q1); Jan (Q2); April (Q3); July (Q4)

- Utilities/DCEO to provide brief highlights, including successes and issues, on a quarterly basis. Also: What is being done with that information prospectively? What are utilities / DCEO planning on doing with it?
 - Present: Numbers – successes; lessons learned, looking in to future; how adapting, what see coming up.
 - Time: ½ hour per utility / DCEO; 20 minute presentation; 10 minute SAG feedback.
 - Material: Quarterly report plus presentation.
4. EM&V Planning Process
- **Presentation on 3-year plans** (EY 7-9; GY 4-6) – plans, resource allocations (per Chris Neme)
 - Timing/opportunity for SAG input
 - **Annual plan on EM&V consistency** – how can EM&V work together on an annual basis to ensure consistency, where appropriate? When could EM&V report to SAG and get input? (This topic has come up multiple times and we need to address)
 - **Annual timing of draft and final EM&V reports**
 - When can SAG expect to get draft and final EM&V reports each year (understand may have evaluations that are exceptions to general rule given more extensive data collection or analysis required)
 - Draft EM&V (October – December)
 - Final EM&V reports (December – February)

M. Additional Topics for Consideration in 2014 and Beyond

- Ameren On-Bill Financing Program
 - Why so successful?
 - What are plans now that money has run out?
- On-Bill Financing independent evaluation – the first evaluation of measures / programs is coming up soon, anticipated this fall. OBF legislation requires an independent evaluation after 3 years of program operation, and the legislation requires the evaluator to solicit feedback from participants and interested stakeholders. (After programs run for three years; one year for evaluation).
 - Policy memos (June TAC)
 - Memo on interactive effects (discussed in TRM TAC)
 - Memo on updating measure inputs (discussed in TRM TAC)
- Follow-up on NTG “Comparison of Approaches” discussion
- Multifamily Programs – long-term plan; mass-implementation
- Process efficiency
- Streamlining regulatory process, consistent Final Orders
- Reporting requirements / adjustment of goals / compliance issues
 - Fund-shifting requests
- Program shifting to IPA: implications
- CHP related to TRM – how will TRM treat CHP?
- Publicizing IL EE accomplishments
- Ameren’s Moderate Income Program

- Electronic TRM
- Templates, Process charts to standardize information requests and process
- Process Improvement – Annual Review of NTG values
- Energy performance contracting – DCEO SEDAC – overview of programs – DCEO
 - History
 - How the Program has operated
- Codes Collaborative/CANDI Update
- Smart Grid Advisory Council (*added on 3/20/14*)
 - Mandated by Smart Grid legislation
 - Subject to Open meeting act requirements (agendas public; anyone can participate)
 - Key Purpose is for utilities to present their deployment plans to the group for feedback. Up until now they have not focused on the Smart Devices, but really just on infrastructure update plans and meter deployment.
 - Will coordinate with Gayle Fuiten on mid-summer meeting; meeting not scheduled at this time. Utilities will need to be co-presenters.

III. Summary of Relevant ICC Directives to SAG*

**Since Final Orders in the Nicor Gas and Peoples Gas-North Shore Gas EE Plan dockets will not be final until late spring, the charts and language referenced below only includes electric issues and will be updated with gas utility-specific issues once the final orders are available.*

Gas Issues Still in Litigation

- **Nicor Gas** – There are a number of items that Nicor Gas believes should not be discussed in SAG while the Company’s docket is still open. Several of the items are in dispute among the parties in the Nicor Gas docket and will need to be resolved by the Commission. Other items relate to joint programs with ComEd that may have an impact on Nicor Gas’ plan, which is still pending approval by the Commission.
 - Topics include:
 - NTG
 - Breakthrough technologies definition
 - EE Policy Manual
 - Timing of NTG and TRM
 - Combined Heat and Power
 - Technical Method to Calculate Savings for CHP
 - Spillover Survey
 - Program flexibility
 - Quarterly Reports
 - Core and Targeted Programs – DCEO
 - Inconsistent NTG – DCEO
 - Subcommittees
- **Peoples Gas – North Shore Gas** – There are a number of items that Peoples Gas – North Shore Gas believes should not be discussed in SAG while the Company’s docket is still open.
 - Topics include:

- “Consensus” for EE SAG issues
- NTG
- Breakthrough technologies definition
- Large C&I Program
- EE Policy Manual
- Timing of NTG and TRM
- Economically Efficient Potential
- Capture of waste energy

SAG Directive Priorities

- The following charts show SAG directives organized by priority, including high priority where the Commission has specifically ordered or directed an action that needs to be discussed in 2014; medium priority where the Commission has specifically directed an action that can commence after the first six months of 2014; and low priority where the Commission has encouraged an action, but it is not required.

Directive Category	Ameren Final Order	ComEd Final Order	DCEO Final Order	Priority	References
Annual NTG Value Updates (January/Feb Recurring)	x	x		High	Ameren FO (p121-123); ComEd FO (118-119)
Consistent Statewide NTG Methodologies (June)	x	?	x	High	Ameren FO (p. 167-168, p171) (DCEO FO (p. 18-19)
Breakthrough Technologies (June)	x	x	x	High	Ameren FO (p33); ComEd (p136); DCEO (p45-47)
Ameren Large C&I Program (May – Report-Out)	x			High	Ameren FO (p74)
Smart Devices Program (March)	x	x		High	Ameren FO (p78-79); ComEd FO (p80-81)
Timing of NTG and TRM TRM – Starts in June, ends by March 1 (January and February)	x	x		High	Ameren FO (p130-131); ComEd (p80-81)
ComEd Electric Self Direct Pilot, Large C&I (March, May)		x		High	ComEd FO (p74-75)

Directive Category	Ameren Final Order	ComEd Final Order	DCEO Final Order	Priority	References
DCEO Natural Gas Self-Direct (May)			x	High	DCEO FO (p43)
CHP – pilot Programs, and technical method to calculate savings (April and June)		x	x	High	ComEd FO (p91-92); DCEO (p33-34)

Directive Category	Ameren Final Order	ComEd Final Order	DCEO Final Order	Priority	References
EE Policy Manual (May, July, September)	x	x	x	Medium	Ameren FO (p129); ComEd (p130); DCEO FO (p23)
Capture of Waste Energy (June)		x		Medium	ComEd FO (p83)
DCEO Programs (Low Income, Data Center (July), Market Transformation) (September)			x	Medium	DCEO FO (p34, p37, p40-41)

Directive Category	Ameren Final Order	ComEd Final Order	DCEO Final Order	Priority	References
Street Lighting Program (July)	x	x		Low	Ameren FO (p174-175); ComEd FO (p82)
Demand Response (Not Scheduled)		x		Low	ComEd FO (p77)
Portfolio-wide (or sector-wide) Non-Participant Spillover Survey (May)		x		Low	ComEd FO (p91-92)
Economically Efficient Potential (next Spring / early Summer)	x	x	x	Low	ComEd FO (p137); DCEO FO (p47); IPA (p147)
Franchise			x	Low	DCEO FO (p9-10)

Directive Category	Ameren Final Order	ComEd Final Order	DCEO Final Order	Priority	References
Agreements (July)					
Inconsistent NTG Applications (June)			x	Low	DCEO FO (19-20)

Appendix: Relevant ICC Directives to SAG

Meeting tracking notes are in green highlight.

Ameren Final Order (ICC Docket No. 13-0498)

- **Breakthrough Technologies (p33):**
 - [T]he Commission directs AIC and Staff to conduct a workshop with other SAG participants on a clear definition of breakthrough equipment and devices that could be applied during Plan 3.
 - **SAG ACT:** Staff – AIC/ComEd/DCEO Workshop. EE SAG participants must be invited.
- **Large C&I Program Proposal (p74):**
 - As a result, the Commission directs AIC to report to the SAG its progress, if any, in developing a large C&I program that attempts to meet the needs of this customer group.
 - **SAG Pre-work:** Ameren will discuss with large customers and will report back to SAG on any progress.
 - **SAG Work Product:** Final Program Template with Comparison Exhibit of any non-consensus items
 - **Agenda item scheduled for 5/29 SAG meeting.**
- **Smart Devices Program (p78-79):**
 - The Commission is reluctant to order AIC to spend the entire emerging technologies budget on this initiative, thereby replacing the codes and standards initiative of which AIC is a partner with others. Therefore, the Commission adopts CUB's proposal to spend the remaining emerging technologies budget on the proposed smart devices program. At a minimum, AIC must develop a comprehensive plan for smart devices including potential programs that deploy home devices in conjunction with smart meters. In addition, AIC must discuss its plan with the SAG and report back to the Commission within 6 months.
 - **SAG Pre-Work:** Discuss following with Ameren – How much funding is left in Ameren's emerging technologies budget? When would Ameren like to discuss its plan with SAG? Plans need to be reported back to the Commission by end of July 2014, therefore need to bring this up for discussion early in year if possible. Program template must be filled out prior to scheduling SAG discussion.
 - Two SAG discussions
 - **SAG Work Product:** Final Program Template with Comparison Exhibit of any non-consensus items.
 - **SAG Action at 3/18/14 Meeting:** Educational presentation by Ameren (Keith Goerss).
 - **Agenda item scheduled for 6/24 SAG meeting.**
- **On Bill Financing (p85-86):**
 - Ameren argues it has already exhausted Commission-approved funding for its OBF program and that OBF is provided for in statutes that are separate from the energy efficiency and demand response statutes, and thus it would be inappropriate to address OBF in this proceeding. AIC also believes Intervenors'

recommendations are vague and do not provide sufficient information as to how Ameren's Plan should be modified and any discussion of Ameren's OBF program should occur after the evaluation report has been filed and the legislation has approved continuing the program per the Act.

- The Commission agrees with the AG that Ameren should evaluate including an OBF program or similar cost-reducing mechanism in its plan. The OBF program has proven highly successful as evidenced by AIC's already having exhausted the minimum funding requirement of \$5 million such that Ameren has discontinued offering OBF. It is clear to the Commission that this program is in high demand and could be an excellent program to achieve further energy efficiency savings. If the OBF program is not included in Ameren's Plan 3, the Company should evaluate including an OBF program or similar cost-reducing mechanism in its Section 16-111.5B plan.
- Last, to the extent ELPC is suggesting workshops related to OBF, it is not clear what benefit such workshops would provide at this time. The proposal to pursue workshops related to OBF should be rejected at this time.
- **SAG:** Discussion of on-bill financing, Ameren's program success.
- **SAG Action at 4/29/14 Meeting:** Presentation by Ameren IL (Keith Goerss) on success of OBF program and next steps. Ameren IL plans to petition the Commission for funding to continue offering OBF to customers.
- **NTG Framework (p121-123):**
 - Adopts the NTG Framework from Plan 2, with minor modification: "... for purposes of Ameren's Plan 3 the Commission declines to modify the NTG Framework and concludes that the NTG Framework adopted from Plan 2 should be utilized with minor modification. The Commission would encourage the parties to continue discussions regarding a modified framework, taking into account the comments made in this case, that would address the critical challenges resulting from the continued use of the current NTG Framework, while avoiding making the process excessively complicated or burdensome. In order to provide additional certainty, which all parties advocate, prior to March 1 of each year, the independent evaluator will present its proposed NTG values for each program to the SAG. The purpose of this meeting will be for the independent evaluator to present its rationale for each value and provide the SAG, in their advisory role, with an opportunity to question, challenge and suggest modifications to the independent evaluator's values. The independent evaluator will then review this feedback and make the final determination of values to be used for the upcoming year. In all other respects, the NTG Framework adopted in Plan 2 should be utilized."
 - **SAG Pre-Work:** Evaluators provide proposed NTG values with spill-over identified, and rationale for value.
 - **SAG:** Two meetings annually, one for education, the other for SAG feedback and identification of non-consensus items. SAG participants are encouraged to submit feedback to the Evaluators in between SAG meetings in order to promote a more thoughtful discussion of issues at the second SAG meeting.

- **Work Product:** Evaluators to produce final NTG values by March 1st, after receiving input from SAG participants.
- **EE Policy Manual (p129):**
 - The Commission believes that the AG's clarified proposal is specific, addresses an inconsistency between utilities in Illinois that may warrant attention, and is reasonable. As a result, to the extent possible, the Commission directs the SAG to complete an Illinois Energy Efficiency Policy Manual to ensure that programs across the state and as delivered by various program administrators can be meaningfully and consistently evaluated.
 - **Pre-Work:** List of proposed topics to include, any existing ICC directives, proposed process and timing for SAG input (prepared by SAG Facilitator).
 - **SAG:** Discuss topics, process, timing, does end product get filed at ICC?
 - **Work Product:** Policy Manual ver. 1.0 with Comparison Exhibit of non-consensus items. Complete by December.
 - Agenda item scheduled for 6/24 SAG meeting.
- **Consistent Statewide NTG Methodologies (p124-128,160-171):**
 - AIC indicates that it wishes to have the option to renew its contract with the EM&V contractor, and not have to rebid the contract if it so chooses. Staff notes that if the Commission adopts Staff's recommendation to require the Evaluators to use consistent NTG methods that will ultimately be adopted by the Commission as an attachment to the updated IL-TRM, then Staff has no objection to AIC's request to renew the contract. The Commission finds this request to be reasonable and will therefore approve of AIC's request as conditioned by Staff. (p167-168)
 - The Commission also directs Ameren to include Staff in the evaluation plan development, as well as to direct AIC to require its Evaluators to collaborate with the other utilities' Evaluators to reach consensus on the best approaches to assessing NTG in particular markets for both residential and non-residential EE programs. The Commission believes that the conditions requested by Staff are reasonable and will aid in future evaluation of the energy efficiency programs. (p171)
 - **Pre-Work:** 1. Evaluators work together to develop proposal to resolve inconsistencies between non-residential NTG methodologies as suggested at Nov. 19, 2013 SAG meeting 2. Evaluators identify similar residential programs and work together to develop proposals for consistent NTG methodologies. (may need a presentation to the SAG comparing existing methods first similar to non-residential process)
 - **SAG:** Evaluators present differences between existing residential NTG ratio methodologies.
 - **Work Product:** Statewide Net Savings Methodologies compiled as Attachment to the Updated IL-TRM
- **Timing of NTG and TRM (p130-131):**
 - To free up limited SAG resources for addressing unresolved matters that actually require SAG's attention, Staff recommends the Commission adopt the Evaluators' suggested EM&V schedules for TRM and NTG updates as shown below:
 - TRM Updates

- July 1st: the TRM Technical Committee informs the evaluators and others which measures are high or medium priority measures, for which work papers need to be prepared.
 - August 1st: updates to existing measure work papers to clarify terms or approaches will be completed.
 - October 1st: completely new work papers for new measures will be completed.
 - NTG Updates
 - November 1st: draft residential NTG estimates will be completed for the program year that ended May 31st.
 - December 1st: draft commercial/industrial NTG estimates will be completed for the program year that ended May 31st.
 - Of the three proposals in the record, the Commission finds Staff's proposal least objectionable and it is hereby adopted for purposes of Ameren's Plan 3.
- **SAG Pre-Work:** Utilities can be on same scheduled for TRM, not necessarily for NTG.
- **Work Product:** Updated TRM and any Comparison Exhibit for filing.
- **Street Lighting (p174-175):**
 - The Commission agrees with Ameren that there is insufficient evidence in the record to direct Ameren to implement a tariff in the next year to include LED street lighting. That being said, the Commission does believe that this issue presents intriguing possibilities, and is an issue that should be explored further by Ameren and the SAG.
 - **SAG Pre-Work:** Program Template
 - Two SAG Discussions
 - **Work Product:** Final Program Template with Comparison Exhibit of any non-consensus items.

ComEd Final Order (ICC Docket No. 13-0495)

- **Program Flexibility (p56):**
 - The Commission agrees that ComEd requires flexibility to effectively manage its portfolio. The Commission urges ComEd to bring any proposed modification to the SAG for discussion, but requires that any modifications that require a 20% budget shift be brought to SAG as well as reported to the Commission.
 - **SAG Pre-Work:** IOUs develop proposed process and template for fund-shifting request.
 - **SAG:** Discuss process/template with SAG participants.
 - **Work Product:** Proposal for fund-shifting; SAG comments, including areas of non-consensus; ComEd response.
- **Programs – Commission Authority (p65-66):**
 - The Commission finds ComEd's argument to be incorrect. There is nothing within the statute or the cooperative SAG framework that prohibits the Commission from ordering changes to ComEd's plan even if further refinement is necessary. Indeed, mid-plan corrections are encouraged and ideas that will improve ComEd's performance, whether proposed by ComEd or an intervenor,

should be brought to SAG. The Commission finds that programs that are eligible for inclusion in ComEd's energy efficiency program - even if not specifically enumerated in the Plan - may be initiated so long as the plan remains diverse and cost-effective. Indeed, this is consistent with the Company's request for flexibility.

- **SAG:** Figure this out on an as-needed basis.
- **Electric Self Direct Pilot Large C&I (p74-75):**
 - The Commission notes that a broad consensus has now developed in support of a modified Large C&I Pilot Program. The same can be said for the proposal to iron out the implementation details in a collaborative process -- this proposal has broad consensus support, and there is no objection from any party to that approach. Accordingly, the Commission conditionally approves the modified version of ComEd's Large C&I Pilot Program, the framework of which is reflected in ComEd/REACT Joint Ex. 1, and directs SAG to engage in its collaborative process to formulate the implementation details of the program.
 - The Commission agrees with the general idea and hopes that it will increase net energy efficiency investment for Large C&I customers. An emphasis on this goal is important and should be SAG's focus when working on the specifics of the pilot. The Commission's goal, which is consistent with the statutory goal, is distinct from REACT's goal of ensuring that its clients' Rider EDA funds are available to them. Indeed, the testimony made clear that these customers are already highly motivated and raises the concern that the pilot be designed to limit free riders. The requirement that 33% of project costs be funded by the customer is a good starting point to limit free-riders, subject to certain exceptions for operational optimization projects and combined gas and electric incentives, as set forth in the pilot framework (ComEd/REACT Joint Ex. 1).
 - Because there is a possibility that the final pilot will be different after collaboration at SAG, the Commission orders that the pilot specifics be filed in this docket. After collaboration at SAG, if the final pilot design complies with the following specifications, the pilot can be filed and no further action will be required. The Commission finds that any Large C&I Pilot must: 1) be cost-effective and any measure must pass the TRC, 2) be subject to EM&V, 3) require that customers pay all Rider EDA charges, with 40% supporting the EE plan in general and the remaining available to be refunded back to the participating customer, 4) 33% of project costs must be funded by the customer, 5) projects must be completed within the three year planning period, and 6) unused funds will be returned to the general pool of funds.
 - **SAG Pre-Work:** This probably needs to be scheduled early in process. Identify what implementation details need to be worked out, and how long this should take. Program template must be filled out prior to scheduling SAG discussion.
 - The Commission agrees with the general idea and hopes that it will increase net energy efficiency investment for Large C&I customers. An emphasis on this goal is important and should be SAG's focus when working on the specifics of the pilot.
 - Two SAG discussions

- **Work Product:** Implementation details and final Program design outlined in Large C&I Pilot Program Operations Manual with Comparison Exhibit of non-consensus items.
- **SAG Action at 3/18/14 Meeting:** Presentation by ComEd, discussion of draft Program template – kick-off to Large C&I Subcommittee (Mike Brandt; Roger Baker, ComEd).
- **SAG Subcommittee Action:** Four Large C&I Subcommittee meetings were held, on March 25th, April 8th, April 15th, and April 22nd. Result was updated pilot Program template, comparison exhibit, Q&A document.
- **SAG Action at 4/29/14 Meeting:** Presentation by ComEd (Steve Baab), including pilot program plans.
- **Demand Response (p77):**
 - The Commission declines to require that ComEd include a specific demand response program in this Plan. This finding, however, does not preclude discussion at the SAG. Nor does it preclude inclusion of a demand response program mid-plan if a cost effective program is developed.
 - **SAG:** Do participants want to include discussion of a ComEd demand response program this year? Can this be scheduled later in the year? Two SAG discussions.
- **Smart Devices (p80-81):**
 - Based on ELPC’s testimony, the Commission orders ComEd to develop and implement a comprehensive plan, involving manufacturers, retailers, and other third parties, to enable smart devices to interact with ComEd’s smart meters and to make it easy for customers to identify and purchase these smart devices. The Company should use funds from the R&D/Emerging Technologies budget to pay for this program. Some funding may also be allocated from Education/Outreach. The Company must seek input from the SAG to further develop this program and report back to the Commission within 6 months from the date of this order. Although the Commission believes this program is best funded with dollars from ComEd’s AMI investments in accordance with EIMA, we are cognizant that the next AMI Plan will be filed April 1, which leaves little time for collaboration and program development. Thus, if this program is deemed successful and could benefit from further funding in future years, ComEd is encouraged to include it in its next AMI Plan filing or in its suite of proposed programs for funding by the IPA.
 - **SAG Pre-Work:** How much funding is available in the R&D/Emerging Technologies Budget / Education/Outreach budget for this plan? Plans need to be reported back to the Commission by end of July 2014, therefore need to bring this up for discussion early in year if possible. Coordinate discussion with similar discussion that ICC directed that Ameren have. Program template must be filled out prior to scheduling SAG discussion.
 - ComEd working with ELPC, will discuss with SAG.
 - Two SAG discussions
 - **Work Product:** New Program Template with Comparison Exhibit of Non-Consensus items.
 - **SAG Action at 3/18/14 Meeting:** Educational presentation by ComEd (Jim Eber).

- Agenda item scheduled for 6/24 SAG meeting.
- **Capture of Waste Energy (p83):**
 - The Commission is confused by ComEd's completion and inclusion of this study but refusal to consider capturing any of the identified opportunities to limit energy consumption. It is clear, however, that this idea is in its infancy and should be addressed through the SAG. The Commission's grant of flexibility allows new programs to be added and budgets shifted, so although the Commission declines to require that this be included now, there is nothing stopping this program from being implemented within the next three years if it complies with the statutory requirements and has worked through the SAG process.
 - **SAG Pre-Work:** ComEd will clarify with ELPC.
 - **SAG:** Presentation by ComEd on how the Company is capturing waste energy.
- **CHP (p91-92):**
 - The Commission agrees with MCA that a standalone CHP program should be evaluated within the stakeholder advisory group process and that such a stand-alone program might appropriately be incorporated in ComEd's Plan 3 program offerings following that evaluation. Thus, the Commission directs ComEd to initiate a discussion at SAG to evaluate a stand-alone CHP Pilot Program. This does not require a new plan to be filed, but rather is consistent with the Commission's grant of flexibility.
 - The Commission would encourage the Company to undertake this discussion as soon as possible in order to allow sufficient time to implement a CHP Pilot Program in this plan, should SAG find that it would be a beneficial addition to ComEd's energy efficiency offerings. If it requires a budget shift over 20%, then ComEd will need to report that to the Commission.
 - **SAG Pre-Work:** Program template must be filled out prior to scheduling SAG discussion. ComEd will put together a technical team.
 - **SAG:** CHP must be addressed by SAG. Schedule early in year.
 - **Work Product: New Program Template/Comparison Exhibit of Non-Consensus Items.**
- **Spillover (p101):**
 - Staff's proposal to consider a program-wide spillover survey is worthwhile and can be taken to SAG for further development. The survey has the potential to provide a cost-efficient and more accurate measurement for accounting for spillover. The Commission notes that it would benefit all parties to determine the feasibility of such a survey in a timely fashion if the intent is, as Staff suggests, to conduct the first analysis over the course of this Plan 3.
 - **SAG Pre-Work:** ComEd Evaluators produce memo to SAG summarizing feasibility of such a study and if feasible, a draft survey for SAG review.
 - **SAG:** Schedule discussion well before start of new evaluation cycle.
 - **Document Describing Approach for including spillover, Comparison Exhibit for any non-consensus items.**
 - Agenda item scheduled for 6/10 SAG TAC teleconference meeting.
- **NTG Framework (p118-119):**
 - The Commission finds that the current NTG framework works well with some minor adjustments. Intervenors' points are well taken that SAG should have a role

in determining NTG values. Thus, if consensus can be reached then SAG's decision should be adopted - even if it is different than the evaluator's original proposal. If consensus is not reached, the Commission agrees with ComEd that then the evaluator's NTG should be used.

- In other words, for the most part, ComEd's proposal is adopted because it is not markedly different from the Plan 2 NTG framework and is an improvement because of the addition of dates. The difference that the Commission is ordering from ComEd's NTG framework is that SAG will review the evaluator's proposed NTG values and if consensus is reached, the SAG value will be used **prospectively beginning June 1**. Otherwise the evaluator's NTG value **as of March 1 will be used going forward beginning June 1**. This approach is consistent with SAG's consensus building role, but eliminates the steps in Staff's process that add complexity and might even result in Commission rocket docket. For PY7 SAG should begin immediately to attempt to reach consensus for NTG values.
- The Commission review at the end of Plan 3 to determine compliance with the energy efficiency goals is separate and apart from the independent evaluation required by Section 103(f)(7) of the statute. The Commission hopes that allowing for SAG consensus will result in significantly less litigation.
 - **SAG:** Same as for Ameren. Schedule two teleconferences to discuss annually.
- **Policy Manual (p130):**
 - As a result, to the extent possible, the Commission directs the SAG to complete an Illinois Energy Efficiency Policy Manual to ensure that programs across the state and as delivered by various program administrators can be meaningfully and consistently evaluated.
 - **SAG:** Same as for Ameren.
 - **Agenda item scheduled for 6/24 SAG meeting.**
- **Definition of "breakthrough equipment and devices" (p136):**
 - The Commission does not see that a definition can be adopted at this time. Staff has proposed a definition, ComEd has proposed an alternate definition and, in Docket 13-0498, Ameren has proposed further discussion concerning Staff's definition through a workshop process before adoption. The Commission believes a consistent definition should be adopted across the state. A statewide definition for "breakthrough equipment and devices" should be addressed at the SAG and it can be presented to the Commission for approval. The Commission directs Staff to conduct a workshop with other SAG participants on a clear definition of breakthrough equipment and devices that could be applied during Plan 3.
 - **SAG:** Workshop hosted by ICC – ComEd/Ameren/DCEO. SAG participants invited to participate.
- **Economically Efficient Potential (p137):**
 - ComEd has indicated it is willing to discuss this with SAG, but does not believe the Commission should order it to perform such an analysis at this time. The Commission agrees with ComEd and its suggestion is adopted. It is not clear that

Staff's proposal is required by the statute. The Commission shares ComEd's concern regarding the additional cost such a study might require.

- **SAG:** Schedule time to discuss in SAG, schedule later in year.

DCEO Final Order (ICC Docket No. 13-0499)

- **Franchise Agreements (p9-10):**
 - In addition, the Commission agrees that SAG should discuss how this particular barrier to energy efficiency should be addressed.
 - **SAG Pre-Work:** Document describing barriers and proposed ways to address. (Who prepares?)
 - Two SAG Discussions.
 - **Work Product:** SAG Comments documented with DCEO responses.
- **NTG/Realization Rates (p19-20):**
 - Inconsistent NTG applications are a problem the Commission recognizes. Specifically for DCEO, consistency throughout the state would be helpful. This is an issue that should be addressed by SAG. As addressed below, the SAG is ideal for resolution of issues like this. Indeed, NRDC has proposed a good methodology for beginning the resolution of this issue: (1) have all the different evaluators in the state work together to reach consensus on the best approaches to assessing NTG in particular markets and (2) examine the evaluation results from multiple years and multiple sources – potentially even including out-of-state studies – to develop deemed NTG assumptions for certain markets.
 - **SAG:** Discuss EM&V Planning timing and process. Discuss how the planning process can lead to consistency in NTG.
 - **Work Product:** Develop schedule/process for annual EM&V planning across all administrators.
 - **Question** for EM&V: When will draft work plans for next evaluation year be ready.
- **EE Policy Manual and SAG/DCEO Quarterly Reports Required (p23):**
 - Consistent with the advisory role of SAG, the Commission recognizes the difficulties that utilities and DCEO may face in the evaluation process. A consistent set of guidelines in terms of monitoring savings achieved and evaluating programs would be useful and, indeed, the AG says that the primary goal of its proposed policy manual would be to ensure consistency in terms of monitoring savings achieved and evaluating programs. This is particularly evident with the current situation where the utilities and DCEO Program Administrators and their individually selected evaluators play by different evaluation rules. Thus, to the extent possible, the Commission directs the SAG to complete an Illinois Energy Efficiency Policy Manual to ensure that programs across the state and as delivered by various program administrators can be meaningfully and consistently evaluated.
 - DCEO has agreed to Staff's proposal to provide quarterly reports. The Commission agrees that providing quarterly reports to the Commission is reasonable and is consistent with Section 8-104(f)(8) of the Act. Thus, Staff's proposal is adopted. DCEO should file quarterly reports via the Commission's e-docket system in this docket.

- **SAG:** Same as Ameren/ComEd
 - **Agenda item scheduled for 6/24 SAG meeting.**
- **Program Flexibility (p25-26):**
 - Although DCEO would undoubtedly make large budgetary changes only when necessary and appropriate, requiring Commission approval for shifts over 20% is consistent with the statutory framework that EE plans be approved by the Commission. Further, it appears from the record that although DCEO would prefer complete flexibility, the Department was receptive to this recommendation. Thus, the Commission accepts as reasonable the proposed resolution that Commission approval must be requested for budget changes that exceed 20% of a program budget, with the caveat that consultation with the SAG should occur prior to DCEO making significant program changes. The Commission believes that DCEO would benefit from the input of the SAG on such changes as it has a smaller budget and fewer resources than the utilities. The AG's proposal that savings goals be adjusted with large budgetary shifts is not part of the proposed compromise resolution and is not adopted.
 - **SAG:** DCEO required to request Commission approval, however, ComEd does not – ComEd only has to report to Commission.
- **Data Center Program (p34):**
 - ELPC recommends that the Commission direct DCEO to initiate a data center program. The Commission notes, however, that data center projects are typically customized projects that would already qualify under DCEO's Public Sector Custom Program, so an investigation is necessary to determine whether a dedicated Data Center Program is warranted. DCEO agreed to update its Energy Efficiency Potential Study within the next six months to include the savings potential for public sector data center projects in Illinois and to present the results to the Stakeholder Advisory Group. At that point, DCEO would determine if a data center program is justified. Staff recommended that the investigation should be utilized to assess what the existing baseline and standard practices are for data centers operating in the public sector in Illinois and address whether it would be cost-effective to implement a dedicated Data Center Program. This approach is reasonable and adopted by the Commission.
 - **SAG Pre-Work:** Program template must be filled out prior to scheduling SAG discussion.
 - **SAG:** Data center program and additional economic potential resulting from data centers to be presented to SAG. Two SAG discussions.
 - **Work Product: New Program Template/Comparison Exhibit for any Non-Consensus Items**
- **Core and Targeted Programs - Public Sector – WWT – CHP – HINGE (p33-34):**
 - DCEO needs some flexibility to move funds, and, as addressed above, any shift above 20% will be brought to the Commission.
 - The Commission agrees that CHP applications should be prioritized by cost effectiveness - highest overall efficiency at least cost. This will maximize the benefits to ratepayers. In response to NRDC, DCEO has agreed to include an evaluation criterion in the competitive solicitation that requires the applicant to explain what they have done within their facility to improve overall energy

efficiency. The Commission finds this reasonable. The Commission further agrees that for topping cycle CHP systems, DCEO should only be allowed to claim savings for the portion of the useful thermal output that is actually used.

- Also, the Commission agrees with DCEO that requiring CHP systems to be designed to a minimum efficiency of 75%, as proposed by NRDC, will run the risk of eliminating substantial cost effective savings from potential CHP sites. The Commission finds the compromise proposed by DCEO to be reasonable, i.e., systems that measure system efficiencies equal to or above 75% will qualify for the production incentive of \$0.08/kWh produced, and those that measure system efficiencies below 75% but above the minimum 60% will receive \$0.06/kWh.
- The Commission declines to adopt the AG's recommendation regarding how to calculate the savings from a CHP system. DCEO's method correctly accounts for the fuel that would have been utilized to generate the electricity from the grid being supplied by the CHP system, accounts for the fuel that would have been used to generate the thermal energy recovered from the CHP system, and accounts for the increase in gas utilized at the site by the CHP system.
- As pointed out in Staff's brief on exceptions, the method for evaluating savings from CHP systems should be addressed in the Illinois Statewide Technical Resource Manual ("IL-TRM"). The Commission directs DCEO and its evaluator to work with the other utilities and the SAG to reach agreement on the most appropriate technical method to calculate savings from CHP systems in Illinois and include such methodology in the updated IL-TRM that gets submitted to the Commission for approval. DCEO's methodology is adopted until the IL-TRM process is completed.
 - **SAG:** Request that DCEO share a draft of the solicitation, including prioritization/selection criteria, before it goes out. Discuss the method of calculating savings with TAC/SAG/DCEO/evaluator for TRM, Version 4.0. The current draft TRM (version 3.0) will be finalized before March 1. Two SAG discussions.
 - **Work Product:** List of SAG comments/DCEO responses; CHP Measures in IL TRM Version 4.0.
- Agenda item for CHP scheduled for 5/29 SAG meeting.
- **Market Transformation Programs (p37):**
 - The Commission accepts DCEO's proposed Market Transformation programs. The Commission approves spending up to 10 percent of its budget on these programs and additional funds from the three percent set aside for breakthrough equipment and programs, if necessary, to implement programs in conjunction with the utilities under the Illinois Codes Collaborative. Finally, the Commission approves DCEO claiming savings from its Market Transformation programs, provided that the evaluations are conducted to preclude double counting of savings.
 - Also, the Commission agrees with DCEO and rejects the AG's recommendation to incorporate the SEDAC and Energy Performance Contracting programs into its Custom program. The Commission notes with approval the track record of the SEDAC and EPC programs as evidence that they are legitimately standalone programs.

- Finally, the Commission agrees with the AG that DCEO should work with SAG to improve these programs and resolve any issues that remain.
 - **SAG Pre-Work:** Document describing possible program improvements (Q: Who prepares?)
 - Two SAG Discussions
 - **Work Product:** SAG suggestions for improving programs/DCEO responses.
 - **Questions:** When would DCEO like to discuss these programs? Who else should be involved in this discussion?
- **Low Income Programs (p40-41):**
 - In addition, the Commission, while not ordering any changes, directs DCEO to work with SAG and explore whether more customers can be served under the low income program. The Commission finds that although the TRC test need not be met for low income programs, Staff raises a valid argument that ratepayer funds could be utilized more effectively. Specifically the Commission recommends that DCEO evaluate Staff and CUB's suggestion to install less than top-of-the-line energy efficient furnaces when the corresponding energy savings do not warrant doing so. Actions such as this will decrease the cost per customer of DCEO's programs and allow it to reach more low-income households. It is important to the Commission that DCEO have the flexibility to implement efficiency programs in communities where they are much needed, but that those programs are continually improved upon to be as effective as possible at allowing as many members of those communities to benefit from the programs as is achievable.
 - **SAG Pre-Work:** Review low-income programs and whether improvements could be made – consider other jurisdictions for suggestions.
 - **SAG Discussions**
 - **Work Product:** SAG recommendations on low-income programs; DCEO responses.
- **DCEO Natural Gas Self Direct Program (p43):**
 - The Commission sees that, pursuant to the Act, the Department has the right to audit the information provided in the customer's application and annual reports to ensure continued compliance with the requirements of this subsection. 220 ILCS 5/8-104(m)(3). The annual report contains, among other things, the account balances, the energy efficiency measures undertaken and an estimate of the energy saved by the measure. 220 ILCS 5/8-104(m)(1)(E). There is no question that DCEO should be auditing whether the measures were installed and the energy saved. There is nothing in the statute that would prohibit the use of energy efficiency funds to perform the required audit. In order to eliminate any uncertainty, the Commission orders DCEO to more effectively audit and verify savings from natural gas self-direct customers and the Department is authorized to use EEPS funds for that purpose. The Commission further orders DCEO to report the verified savings to the Commission and the Stakeholder Advisory Group on an annual basis. In its BOE, DCEO reiterates its request to count the savings from the natural gas self-direct program towards its goal. The Commission declines however to grant this request because the statutory language is clear that

these customers are to be excluded for purposes of calculating savings and spending goals. The purpose of the audit is to determine if these customers should be removed from the self-direct program and their funds put back into the general energy efficiency pool.

- **SAG Pre-work:** DCEO proposed audit of gas self-direct programs.
- **SAG Discussions:** SAG input on DCEO-proposed audit.
- **Work Product:** Final DCEO audit plans, with Comparison Exhibit of any non-consensus items.
- **Follow-Up:** Annually, Schedule time for DCEO to report annually.

o Agenda item scheduled for 5/29 SAG meeting.

- **Definition of “breakthrough equipment and devices” (p46-47):**
 - o Although DCEO accepts Staff’s definition and has agreed to make a compliance filing to show which technologies meet Staff’s definition, ComEd has proposed an alternate definition in Docket 13-0495 and, in Docket 13-0498, Ameren has proposed further discussion concerning Staff’s definition through a workshop process before adoption. The Commission believes a consistent definition should be adopted across the state and because the utilities are not represented in this proceeding, the Commission declines to adopt Staff’s definition at this time. A statewide definition for “breakthrough equipment and devices” should be addressed at the SAG and it can be presented to the Commission for approval. The Commission directs DCEO and Staff to conduct a workshop with other SAG participants on a clear definition of breakthrough equipment and devices that could be applied during Plan 3.
 - **SAG:** ICC Staff – DCEO, AIC, ComEd organize workshops. SAG Participants invited.
- **Economically Efficient Potential (p47):**
 - o DCEO has agreed to consider including an analysis of economically efficient potential in its next Potential Study, filed pursuant to Section 8-103A. DCEO has indicated it is willing to discuss this with SAG, but does not believe the Commission should order it to perform such an analysis at this time. The Commission agrees with DCEO and its suggestion is adopted.
 - **SAG:** This issue will be discussed in workshops; SAG participants will be invited.

IPA Final Order (ICC Docket No. 13-0546)

- **Economically Efficient Potential (p147):**
 - o Given that specific proposals related to potential studies were raised in CUB's Response to Objections and that additional specific recommendations were raised in Staff's Reply to Responses, the Commission is concerned that the record on these issues is not as complete as it should be, particularly in a proceeding with an expedited schedule. As a result, the Commission believes it would be best if such matters were addressed in workshops before a Commission order on such issues is entered. Therefore, the Commission directs Staff to work with CUB, the AG, and any other interested parties to conduct workshops, as needed, to determine what improvements, if any, can be incorporated into the potential studies, the timing of any filings related thereto, as well as improvements to the RFP process.

- **SAG:** This issue will be discussed in workshops; SAG participants will be invited.