

Illinois Statewide Technical Reference Manual for Energy Efficiency
Version 4.0 – Draft Circulated on December 19, 2014
Comments of the Illinois Industrial Energy Consumers (IIEC)
Authors: Ali Al-Jabir and Eric Robertson
Proposed Modifications to IIEC Language: Jennifer Morris (ICC Staff)
January 9²⁶, 2015

Section 2.34.1 C&I Custom Value Use in Measure Implementation

This section defines the requirements for capturing Custom variables that can be used in place of defaults for select assumptions within the prescriptive measures defined in this statewide TRM. This approach is to be used when a variable in a measure formula can be replaced by a verifiable and documented value that is not presented in the TRM. This approach assumes that the algorithms presented in the measure are used as stated and only allows changes to certain variable values and is not a replacement algorithm for the measure. A custom variable is when customer input is provided to define the number or the value is measured at the site. Custom data values can also be supplied from product data of the measure installed. In certain cases the custom data can be provided from a documented study or report that is applicable to the measure. Custom variables and potential sources are clearly defined in the specific measures where “Actual” or “Custom” is noted.

Comment [AZA1]: “Data” and “values” appear to be nearly synonymous as they are used in this sentence.

~~It is recognized that the design and configuration of certain energy efficiency projects may be complex, and as such, the calculation of energy savings may not be reducible to the equations within this TRM. In such cases, a more comprehensive engineering and financial analysis may be developed that more accurately incorporates the attributes of complex energy efficiency projects. For such projects, values in TRM energy efficiency measures that are determined through an external engineering analysis may be substituted by agreement between the participant, the program administrator and independent evaluator. In cases where the participant, program administrator, and independent evaluator all agree that the TRM algorithm for a particular energy efficiency measure does not accurately characterize the energy efficiency measure within a project due to the complexity in the design and configuration of the particular energy efficiency project, a more comprehensive custom engineering and financial analysis may be used that more accurately incorporates the attributes of the measure in the complex energy efficiency project. In such cases and consistent with Commission policy adopted in ICC Docket No. 13-0077, Program Administrators are subject to retrospective evaluation risk (retroactive adjustments to savings based on ex post evaluation findings) for such projects utilizing customized savings calculations. As part of the independent evaluator’s review of such TRM deviation requests, the evaluator should consider whether deviation from the TRM is being requested due to higher expected savings that might occur (i.e., potential gaming) or whether the TRM algorithm really does not accurately characterize the measure due to the complexity in the design and configuration of the particular energy efficiency project. The evaluator should reject cases where it believes the complexity of the energy efficiency project is not any greater~~

Comment [HMJ2]: Delete IIEC Proposed Language from 1/9/2015 and replace with redline language below. This proposed language would modify the language set forth on page 25 of the IL-TRM Version 4.0 draft dated January 23, 2015. http://www.icc.illinois.gov/downloads/public/Illinois_Statewide_TRM_Effective_060115_Version_4.0_012315_Clean.pdf

than the complexity of other energy efficiency projects where the TRM is used or if the evaluator believes the request might be due to higher expected savings (i.e., potential gaming). The evaluators should provide a summary of the number of cases where TRM divergence occurred within the evaluation reports.

ICC Staff Comments (1-26-2015)

To the extent parties believe that language pertaining to this issue must be included in the IL-TRM Version 4.0, Staff would not oppose including the revised language set forth above. It is Staff's understanding that the IIEC client group accepts Staff's revisions to their proposed language set forth above. That being said, Staff believes TRM applicability issues that are not already set forth in the [IL-TRM Policy Document](#) might more appropriately be handled through the ongoing development of the IL EE Policy Manual.

IIEC Comments (1-9-2015)

IIEC has modified its proposed edits to Section 2.4.1 of the TRM to closely track the edits drafted by Roger Baker of ComEd and accepted by the stakeholders for inclusion in the "Deemed Measure Cost" section of the proposed Combined Heat and Power (CHP) energy efficiency measure. However, the proposed Section 2.4.1 language would apply globally to all energy efficiency measures in the TRM.

As IIEC noted in its prior comments on this subject, large customers are sophisticated energy users whose production processes and energy efficiency projects may not neatly fit into the measure specifications set forth in the TRM. Moreover, such customers often conduct their own engineering and cost-benefit studies to evaluate proposed energy efficiency projects at their sites. In such cases, it would be appropriate to grant customers the flexibility to use their own engineering and financial analyses to support TRM energy efficiency projects, similar to the flexibility that was granted in the context of CHP projects. IIEC's proposed language would recognize that such flexibility may be needed for certain energy efficiency projects other than CHP.

It should be noted that this flexibility would not be limited to large customers above a specific size threshold under IIEC's modified language, but would be available to all customers regardless of size. Although IIEC would expect these custom provisions to be useful only to larger, more sophisticated energy users, IIEC would not object to a size limitation if parties felt that such a limitation would be appropriate or helpful. Moreover, the use of a customer's own engineering and financial analyses to support an energy efficiency project would be subject to the consent of the program administrator and independent evaluator, as is the case with the CHP measure flexibility language that was approved by the stakeholders.