

**Illinois Energy Efficiency Stakeholder Advisory Group:
Portfolio Planning Process Report
DRAFT – 9/22/16**

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Illinois Energy Efficiency Stakeholder Advisory Group: Portfolio Planning Process Report (DRAFT – 9/22/16)

I. Executive Summary

The Illinois Energy Efficiency Stakeholder Advisory Group (“SAG”) Portfolio Planning Process (“Planning Process”) was a year-long process that involved input and participation from a broad range of stakeholders from the beginning of the three-year Energy Efficiency Plan (“EE Plan”) development process, and achieved consensus stipulation agreements between four of five individual Program Administrators and non-financially interested stakeholders prior to the EE Plan filing: Nicor Gas, ComEd, Peoples Gas – North Shore Gas, and the Illinois Department of Commerce and Economic Opportunity. Negotiations are still ongoing between non-financially interested stakeholders and the fifth Program Administrator (Ameren IL), and may yet result in settlement.

Besides early settlement and avoiding costly, protracted and resource-intensive litigation, the SAG Portfolio Planning Process yielded multiple benefits:

- **Diverse Stakeholder Input:** Input from a broad and diverse group of stakeholders.
- **Transparency:** Clear and transparent planning process.
- **Clear and Coordinated Planning Process:** Coordinated planning statewide, and between gas and electric companies with overlapping service territories.
- **Timely Issue Resolution:** Resolution of key planning, portfolio and program issues long before the June 1, 2017 new EE Plan launch dates.
- **Trust Building:** Extensive education, collaborative and trust-building discussions between stakeholders, Program Administrators and ICC Staff.
- **Portfolios That Reflects Multiple Stakeholder Interests and Requests:** A portfolio that meets both statutory goals, while also addressing key concerns and incorporating key requests from a broad range of stakeholders.
- **Consistent and Clear Policy and Programmatic Outcomes:** The consensus stipulations are broadly consistent though do reflect some tailoring specific to individual utilities.

This report describes the SAG Portfolio Planning Process and provides recommendations about what worked and what could be improved in future SAG planning process endeavors from the perspective of the SAG Facilitation Team and SAG Portfolio Planning Process key participants. The SAG Facilitation Team intends to memorialize key elements of the Planning Process in a “Guidelines” document so that future Illinois energy efficiency planning processes can build upon what has already worked.

While the SAG Portfolio Planning Process required significant time and effort, as documented herein, it yielded substantive benefits that did not result from prior EE Plan litigations. In addition, the resulting consensus is unprecedented nationwide. Based on inquiry and best practices research, no other state’s planning processes have yielded full settlement with four Program Administrators prior to EE Plan filing between key non-financially interested parties and Program Administrators. The scope of collaboration and resulting broad stipulations is a

testament to effective processes, working relationships and results that have been achieved over the past eight years in the IL EE SAG, despite operating in a political climate that is increasingly hostile, fractious, partisan and deadlocked.

II. Background

The Program Administrator EE Plans filed in fall 2016 represent the fourth 3-year energy efficiency portfolio filings for electric Program Administrators (Ameren IL, ComEd, and the Department) and the third 3-year energy efficiency portfolio filings for gas Program Administrators (Nicor Gas, Peoples Gas-North Shore Gas, and the Department), as required by Section 8-103 and 8-104 of the Public Utilities Act.¹ No prior EE Plan has been filed with the support of key non-financially interested stakeholders. All but one EE Plan (which resulted in settlement post-filing) was litigated. Litigation included multiple disagreements among stakeholders, the Program Administrators, and ICC Staff relating to statutory interpretation, policy, portfolio and program design, and even individual measures. Litigation involved extensive and costly discovery; testimony from multiple parties arguing for different and conflicting approaches to energy efficiency planning, portfolio design and program implementation; and two rounds of briefs (opening and reply) from multiple parties both before and after the Proposed Order was issued. For some of the EE Plan final decisions, parties challenged the elements of the final decisions; further delaying certainty and an orderly plan launch process. In the case of the electric EE Plans, by statute, the ICC needed to render judgment on complex and technical issues in a short time-period (5 months). In the case of the last gas EE Plan filings, with no statutory deadline, the ICC issued final decisions on EE Plans only weeks before programs needed to be implemented, a far-from-ideal circumstance, as the absence of a final decision leaves unresolved key details important to implementation.

The litigation of energy efficiency plans has several deficiencies from a procedural and substantive standpoint. From a procedural standpoint, EE Plan litigations have been costly, rushed (for the electric companies) and delayed (from the perspective of the gas companies). Due to the cost and time associated with EE Plan litigation, only a limited number of intervenors have engaged in litigation to contribute to the energy efficiency portfolio designs and program implementation details. The litigation process is not designed to educate and build awareness among stakeholders, or to find common ground that often exists. Instead, litigation breeds distrust and anger among parties, a sense that there will be “winners” and “losers,” as well as a hardening of positions, and a desire not to consider or incorporate ideas or requests from stakeholders. In addition, litigation has yielded inconsistent regulatory directives. Because of the structure of the litigation process, each Program Administrator files their EE Plan in a separate docket and is assigned a different Administrative Law Judge, which has resulted in final orders with different policy and regulatory directives, even in the same cycle, which could have been the same across all Program Administrators. Several decisions in prior final orders have been unpopular, unclear or viewed as unfair or not reasonable by one or more parties, which is not a surprising outcome given the breadth and complexity of issues that are addressed in the EE Plan filings and the short time that the ICC has to understand and resolve the complex issues prior to when new programs must be implemented. Three-year EE Plans begin on June 1, as EE Plans are filed the on or before the prior September 1 (electric companies) and October 1 (gas companies).

¹ See 220 ILCS 8/103 and 8/104.

Over the years, a number of SAG participants expressed interest in minimizing litigation in EE Plan dockets. The SAG Facilitation Team created the Planning Process to address this concern and provide a consensus-seeking avenue for stakeholders and Program Administrators to discuss energy efficiency program and measure ideas, consider new initiatives, and work with Program Administrators to develop portfolio EE Plans in advance of the next required filings. The Planning Process concept was developed in the Policy Manual Subcommittee and added as a high level policy to Illinois Energy Efficiency Policy Manual Version 1.0 (“Policy Manual”), approved by the Commission in December 2015.²

The SAG Facilitation Team³ appreciates the good faith participation by interested SAG participants in the Planning Process, which included an extensive discussion of energy efficiency program and planning issues and exchange of ideas and information. This SAG Portfolio Planning Process Report memorializes key Planning Process activities for SAG participants and the Commission to have a complete record of the objectives, activities, issues discussed, results, and recommendations for the future.

III. Planning Process Overview

A. Objective

The primary objective of the Planning Process was to reach as much consensus as possible on issues related to EE Plans before Program Administrator filings with the Commission for approval in fall 2016. The goal was to reach consensus on a variety of issues in order to minimize litigation during the EE Plan dockets.

Consensus was prioritized on the following EE Plan components:

1. Allocation of portfolio budget across residential and commercial and industrial sectors;
2. Portfolio savings;
3. Programs to be funded (existing and new);
4. Residential and non-residential split;
5. Low and moderate income offerings; and
6. Coordination between gas and electric utilities.

B. Broad Participation

The Planning Process included participation from a wide range of stakeholders, some of whom participated actively throughout the process and others who engaged only on select issues of interest to them. More than two hundred companies and organizations are represented on the SAG distribution list, which increases in size on a regular basis.⁴ Large group SAG meetings during the Planning Process were regularly attended by over sixty participants, both in-person and by teleconference.

² See Policy Manual Version 1.0, Section 3.7, Draft Portfolio Outlines.

³ Annette Beitel and Celia Johnson, Future Energy Enterprises, LLC

⁴ See SAG website, Meeting Participants page: <http://www.ilsag.info/meeting-participants.html>.

The Planning Process included the following meeting categories:

- **Large Group SAG meetings:** Large group SAG meetings were held on a monthly basis during the Planning Process, from September 2015 to June 2016. Large group meetings were open to all interested SAG participants.
- **Small Group SAG meetings:** Small group SAG meetings on specific proposal topics were scheduled during the Planning Process, as follow-up to the November and December 2015 SAG meetings. Small group meetings were open to all interested SAG participants.
- **Follow-up SAG meetings:** Follow-up meetings on specific topics were scheduled during the Planning Process, as needed.⁵ Follow-up meetings were open to all interested SAG participants.
- **Confidential Negotiation Meetings:** Non-financially interested stakeholders that intervene in EE Plan dockets and expressed an interest in reaching settlement participated in confidential negotiation meetings with individual Program Administrators on issues related to preliminary portfolio EE Plans. The goal of negotiation meetings was to reach consensus on open issues and develop stipulation agreements. Several Program Administrators requested that parties execute confidentiality agreements prior to participating in confidential negotiations.

Stakeholders who were actively engaged throughout the Planning Process included:

- **Illinois Program Administrators:** Ameren Illinois Company d/b/a Ameren Illinois (“Ameren Illinois”), Commonwealth Edison Company (“ComEd”), Northern Illinois Gas Company d/b/a/ Nicor Gas (“Nicor Gas”), Peoples Gas Light & Coke Company and North Shore Gas Company (“Peoples Gas – North Shore Gas”), and the Illinois Department of Commerce and Economic Opportunity (“Department”).
- **Government Representatives:** Illinois Attorney General’s Office (“IL AG”) and Commission Staff (“ICC Staff”). Several stakeholders expressed appreciation for the strong participation of ICC Staff in the Planning Process, including ensuring that commitments were in place to follow the policies in approved Policy Manual Version 1.0 and engage in future Version 2.0 discussions, and providing in-depth analysis of draft EE Plans.
- **Ratepayer Advocates:** Citizens Utility Board (“CUB”).
- **Environmental Organizations:** Environmental Law and Policy Center (“ELPC”) and Natural Resources Defense Council (“NRDC”).
- **Municipal:** The City of Chicago participated in confidential negotiation meetings with specific Program Administrators.

Others participated in large group SAG meetings, small group SAG meetings, and follow-up meetings that were open to all participants.⁶ For example, many different stakeholders presented program, measure, and program change ideas to SAG during the Planning Process, including: Grundfos Pump Corp.; IL AG; Embertec; FirstFuel; Midwest Cogeneration Association; NRDC;

⁵ Small group follow-up meetings were held following the November and December 2015 presentations on proposed program ideas, for proposals that required further discussion. See http://www.ilsag.info/small_group_planning_calls.html. Three calls were held in April and May 2016 to discuss follow-up on cost-effectiveness issues.

⁶ See SAG Meeting Participants: <http://www.ilsag.info/meeting-participants.html>

Open Energy Efficiency; Metropolitan Mayors Caucus; Elevate Energy; ELPC; Delta Institute; TrickleStar; EnergySavvy; Community Investment Corp.; and CUB. In addition, several Program Administrators presented new proposal ideas to SAG, including ComEd, Nicor Gas, and Ameren IL. Other participating stakeholders included Elevate Energy, public housing representatives, and the Illinois Industrial Energy Consumers (“IIEC”).

C. Planning Process Guidelines

SAG is a forum that allows parties to provide early and ongoing input on energy efficiency program and policy issues, express different opinions, better understand the opinions of others, and foster collaboration and consensus, where possible and appropriate. SAG Facilitation requested that SAG participants follow specific “Guiding Principles” and “Process Guidelines” in the Planning Process, to foster communication and productive discussion and engage in consensus decision-making. Guiding Principles and Process Guidelines were included in the project plan shared with SAG at the October 2015 large group meeting, as excerpted below.

Guiding Principles

1. **Collaboration.** 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. Discussions should focus on the merits of an issue, rather than assertions of prior litigation positions or future speculation of litigation positions.
2. **Prioritizing Issues.** The SAG Facilitation Team will prioritize the issues to be addressed through the Portfolio Planning Process, with input from SAG participants.
3. **Productive Discussion.** Participants in the SAG Portfolio Planning Process should avoid providing feedback to Program Administrators that is based on:
 - a. Assuming “evil” intent or inevitable opportunistic behavior.
 - b. Attempting to address extreme or worse-case scenarios.
 - c. Creating opportunities to micro-manage Portfolio Administrators.
 - d. Seeking information for purposes of seeking future cost disallowances.

Process Guidelines

1. **Proposal Support.** SAG participants that propose to discuss a policy change, program design, or other topic relevant to the SAG Portfolio Planning Process shall demonstrate fact-based support of their recommendation(s) prior to discussion at SAG. Support includes, but is not limited to, background, research, and data analysis, and information about other jurisdictions who have implemented the proposed policy change or program design change. The Proposed New Program Idea Template and/or Policy / Issue Template must be submitted to the SAG Facilitation Team in advance of scheduled discussion. The SAG Facilitation Team reserves the right to request additional information prior to scheduling discussion at SAG.
2. **Discussions in the Nature of Settlement Discussions.** The SAG Facilitation Team will seek to build group consensus on issues that are addressed through the Portfolio Planning Process. Consensus decision-making is in the nature of settlement discussions. As a

matter of general agreement, positions or statements made during SAG meetings shall not be used by any party to contradict or impeach another party's position, or prove a party's position, in a Commission proceeding. If, after a reasonable period of time as determined by the SAG Facilitation Team, consensus is not reached, the SAG Facilitation Team will prepare a "Comparison Exhibit" that tracks areas of non-consensus, including positions and rationale. Parties who agree to a consensus position who later change their positions in litigation will be viewed as negotiating in bad faith.

3. ***Conflict of Interest Policy.*** Various SAG participants have raised concerns about stakeholder participation on sensitive issues that may arise during the Planning Process. A conflict of interest is present when a SAG participant, in the judgment of the SAG Facilitation Team, has a financial stake in a SAG discussion topic and participation of the financially interested party could have adverse consequences, such as hindering complete and frank discussions. SAG participants that have a conflict of interest in specific meetings topics must recuse themselves from participating in those meetings. Topics that may include conflicts of interest and the associated SAG participants include, but are not limited to, the following: 1) Discussion of proprietary and/or confidential information (e.g. current and prospective program implementers, contractors, and product representatives); 2) current and past program performance (e.g. current program implementers and contractors); 3) Future bids (e.g. current and prospective program implementers, potential bidders, and contractors); and 4) Evaluation performance and proposed changes (e.g. current and prospective independent evaluation contractors).

D. Participant Roles and Responsibilities

The roles and responsibilities of key participants in the Planning Process, established at the beginning of the process, are summarized below, including SAG Facilitation, Program Administrators, and stakeholders.

SAG Facilitation: Planning Process large group SAG meetings and follow-up discussions were facilitated by the SAG Facilitation Team. SAG Facilitation Team duties included:

- **Broad Stakeholder Outreach:** Prior to the start of the process, the SAG Facilitation Team contacted all parties who had intervened in any of the prior EE Plan filings to explain the Planning Process, find out how and whether the party would like to engage or be informed by the process, and to solicit issues and ideas that the parties would like considered in the Planning Process. SAG Facilitation also offered to meet with any other stakeholder who was interested in learning about or possibly contributing to the Planning Process.
- **Meeting Facilitation:** Preside over meetings; develop agendas; complete background research, as needed and resources permitting; maintain the schedule; review draft meeting materials; circulate final meeting materials; and update the SAG website. Large group and small group SAG agendas and meeting materials were made available for download on the SAG website, unless documents contained confidential or proprietary

information.⁷ The SAG Facilitation Team adhered to a clear timeline and process for the conclusion of work.

- Tracking Issues: Action items, questions and open issues were tracked by the SAG Facilitation Team during each large group SAG meeting, small group SAG meeting, and large group follow-up meeting. An updated action items tracking document was circulated to SAG participants following each meeting, and was made available for download on the SAG website on individual meeting material pages.
- Proposal Research: During the proposed program and policy suggestion period in fall 2015, SAG Facilitation provided research support to stakeholders that were interested in proposing specific ideas to SAG but did not necessarily have the resources or background knowledge to complete the required policy or program templates. Research support was provided upon request by stakeholders. SAG Facilitation also assisted stakeholders in completing proposal templates, as needed. In this role, SAG Facilitation was “leveling the playing field” to allow all interested parties an equal opportunity to contribute their ideas to the Planning Process, even if they had limited resources or capacity.
- Tracking Responses to Stakeholder Suggestions and Recommendations: Throughout the Planning Process, stakeholders made specific suggestions and recommendations to Program Administrators. SAG Facilitation tracked the suggestions and recommendations as well as responses from Program Administrators, including the rationale for rejecting stakeholder suggestions and/or recommendations.
- Tracking Consensus: SAG Facilitation tracked consensus and non-consensus issues throughout the Planning Process, in order to minimize the number of non-consensus items remaining for negotiations.
- Developed Planning Templates: SAG Facilitation developed planning templates for proposed policy, program and program change ideas submitted by interested stakeholders and Program Administrators. In addition, SAG Facilitation worked with Program Administrators and stakeholders to develop additional planning templates to ensure that consistent information was provided on EE Plans, including a Preliminary Portfolio Budget Template and High-Level Portfolio Template.
- Information Support: Upon request, SAG Facilitation provided support to stakeholders reviewing preliminary EE Plans, including summarizing data and helping stakeholders track data and follow-up information on open issues. SAG Facilitation also received questions from parties who do not regularly participate in the SAG about how to find information, and provided answers to any questions they might have about the process.
- Rendering Decisions on Project Process/Scope: SAG Facilitation rendered final decisions on process matters, including the project scope and what issues could reasonably be addressed in the Planning Process, to maintain a manageable and efficient process.
- Negotiation Meetings: SAG Facilitation scheduled and participated in negotiation meetings between individual Program Administrators and non-financially interested stakeholders as needed, to track open issues and next steps.
- “Parking Lot” Issues: SAG Facilitation maintained a list of issues and topics that were raised during the Planning Process, but needed to be addressed at a later time. This includes issues that are beyond the scope of Planning Process, belong in another process

⁷ See SAG website, Meeting Materials page (<http://www.ilsag.info/meeting-materials.html>) and Small Group Follow-Up Meetings page: http://www.ilsag.info/small_group_planning_calls.html.

(such as Policy Manual Version 2.0), are not ripe for decision and should be considered during the next three-year SAG, are not of general interest, etc. “Parking lot” issues will be discussed at future SAG meetings following EE Plan filings with the Commission. See SAG Planning Memo – Fall 2016 and Spring 2017, Attachment B: SAG “Parking Lot” Issues.⁸

Program Administrators: Program Administrators offering programs pursuant to Sections 8-103, 8-104 and Section 16-111.5B of the Public Utilities Act participated in the SAG Portfolio Planning Process (e.g. Ameren IL, ComEd, the Department, Nicor Gas, and Peoples Gas – North Shore Gas) as described in Policy Manual Version 1.0, Section 3.7(iii), Draft Portfolio Outlines:

Program Administrators shall work in a cooperative and iterative manner with SAG participants to develop the next three-year Plan. Such cooperation includes discussion of foundational issues to Plan development; including budgets, Portfolio objectives, Program ideas, and Program design. Program Administrators and SAG shall seek to develop and communicate such foundational assumptions in a manner that supports efficient and timely modeling of proposals for a comprehensive Plan. A primary purpose of these cooperative and iterative discussions is to reduce the number of non-consensus issues and litigation associated with the applicable Plan dockets.

Additional Program Administrator duties that were identified in the project plan include:

- Providing identified deliverables to allow interested stakeholders to provide meaningful input;
- Responding to requests for stakeholder information, consistent with preserving confidentiality of customer and other confidential information, and assuming information is readily available and does not require significant processing or analysis to respond to stakeholder requests; and
- Responding to stakeholder suggestions and recommendations and providing rationale for stakeholder suggestions and/or recommendations that were not accepted.

Stakeholders: Attendance and participation in SAG meetings is open to all interested stakeholders. Stakeholders were strongly encouraged to participate in the Planning Process by identifying high priority issues early, submitting proposed new program, measure, and program change ideas for presentation at SAG, and providing feedback to Program Administrators developing EE Plans. The following stakeholder participation guideline was included in the Planning Process project plan:

Stakeholder Participation/Participation Restrictions for Financially-Interested Parties: Attendance and participation in the Planning Process was open to all interested stakeholders. However, there may be agenda items during this process that require open discussion between Program Administrators and non-financially interested stakeholders, involving confidential and/or proprietary information. Confidential and/or proprietary topics will be identified by the SAG Facilitation Team in advance. Participants with a financial interest (e.g. current and prospective program implementers, contractors, and

⁸ A SAG website link will be added once the SAG Planning Memo is finalized.

product representatives) must recuse themselves from attending confidential and/or proprietary meetings.

During the Planning Process, large group SAG meetings and small group follow-up meetings were open to all SAG participants. Confidential negotiation meetings were held between individual Program Administrators and non-financially interested stakeholders that intervene in EE Plan dockets, with the goal of reaching consensus agreement on EE Plans. The negotiation process included the development of stipulation agreements that will be filed with EE Plans in fall 2016.

IV. Planning Process Activities

At the beginning of the Planning Process, SAG Facilitation developed, with stakeholder input, a six step Planning Process for all Program Administrators to follow to help ensure the planning was clear, logical and coordinated. The Planning Process included a number of key steps, including developing a project plan and soliciting input from interested parties; conducting outreach to a wide range of stakeholders; completing a six step planning process; and holding Illinois Power Agency workshops to address Commission directives to SAG and planning issues for Section 8-103 and Section 16-111.5B programs. A summary of Planning Process activities is described below, as well as an overview of the topics discussed at large group and small group SAG meetings from September 2015 to September 2016.

1. Developed Planning Process Project Plan; Solicited Input on Issues/Topics to Consider

SAG Facilitation presented a draft project plan for the Planning Process at the July 28, 2015 large group SAG meeting, including an overview of the proposed scope, issues to be addressed, schedule, deliverables and responsibilities. Following the July SAG meeting, Program Administrators were asked to review the proposed schedule and process and provide feedback if there were any timing concerns to be addressed. SAG typically holds monthly large group meetings on the last Tuesday of each month. For the Planning Process, SAG Facilitation scheduled an extra day for large group meetings when needed, totaling two days per month beginning in September 2015. Additional follow-up meetings were scheduled by teleconference, as needed.

2. SAG Facilitation Outreach to Wide Range of Stakeholders

Early in the Planning Process, SAG Facilitation reached out to regular SAG participants based on prior participation in EE Plan dockets, as well as non-participants that may be interested in the Planning Process, to request feedback and determine high priority energy efficiency and planning issues. In September 2015, SAG Facilitation researched intervenors in prior EE Plan dockets and reached out by email to companies and organizations that do not regularly engaged in SAG. In September and October 2015, SAG Facilitation met individually with interested stakeholders to provide an overview of the Planning Process, request feedback, and discuss key issues. SAG Facilitation held meetings with Midwest Energy Efficiency Alliance; Illinois Attorney General's Office; Environmental Entrepreneurs; ICC Staff; Union of Concerned Scientists; Elevate Energy; Metropolitan Mayors Caucus; Historic Chicago Bungalow

Association; Natural Resources Defense Council; Midwest Cogeneration Association; Environmental Law & Policy Center; Giordano & Associates; and Citizens Utility Board. As a follow-up to the September large group SAG meeting, all stakeholders were encouraged to contact SAG Facilitation to discuss the Planning Process and identify priority issues.

3. Six Step Planning Process

SAG Facilitation planned a six step process for Program Administrators to develop draft EE Plans with stakeholder review and feedback. Each step of this process is summarized below, including key SAG activities. A complete overview of Planning Process activities for individual SAG meetings is available in subsection 5 below.

Step 1: Program Administrators Summarized Current Portfolios

Program Administrators presented a summary to SAG in September 2015 of current electric and gas energy efficiency programs for Electric Program Year 7 and Gas Program Year 4, to educate SAG and address stakeholder questions. As follow-up in October 2015, SAG participants had an opportunity to provide input on current portfolios and discuss proposals that may benefit from further development in step 2. SAG also discussed resolution of portfolio threshold issues.

Step 2: Stakeholders and Program Administrators Proposed New Ideas for Consideration

All SAG participants had an opportunity to propose program, measure, and program change ideas to SAG in November and December 2015 for consideration by Program Administrators. Several Program Administrators also proposed new ideas for stakeholder consideration. Additionally, SAG participants had an opportunity to propose the resolution of policy issues for consideration by the Policy Manual Subcommittee in Policy Manual Version 2.0.⁹ Proposed program, measure, program change, and policy ideas required submittal of a completed template prior to presenting to SAG.

Step 3: Program Administrators Presented Preliminary Budget Templates and Responses to Program Ideas

Program Administrators presented preliminary budget templates and high level responses to stakeholder proposals to SAG in January 2016.

Step 4: Program Administrators Presented Potential Study Results¹⁰

Program Administrators that completed Potential Studies prior to developing EE Plans presented preliminary results to SAG. Potential Study presentation timing varied by Program Administrator; presentations were held in December 2015, February and March 2016.

Step 5: Program Administrators Presented Preliminary EE Plan Portfolios to SAG

Program Administrators presented a preliminary EE Plan portfolio of programs to SAG, taking into account stakeholder feedback and proposal ideas. Presentation timing varied by Program Administrator; preliminary EE Plan presentations were held in March and April 2016. SAG held large group follow-up “Q&A” meetings with individual Program Administrators and

⁹ Policy Manual Version 2.0 discussions were put on hold during the Planning Process. Discussions are expected to resume in 2017, following Commission approval of Program Administrator EE Plan dockets.

¹⁰ As applicable: Not all Program Administrators completed Potential Studies in 2016.

stakeholders following preliminary EE Plan presentations, to discuss open issues and stakeholder questions.

Step 6: Program Administrators Presented Updated EE Plan Portfolios to SAG

Program Administrators presented an updated EE Plan portfolio to SAG. Updated EE Plans incorporated stakeholder feedback and prior SAG discussion of portfolio issues, where applicable. Presentation timing varied by Program Administrator; updated EE Plan presentations were held in May and June 2016.

Following the six step process outlined above, confidential negotiation meetings were held between non-financially interested stakeholders that intervene in EE Plan dockets and expressed an interest in settlement and individual Program Administrators. The goal was to reach consensus agreement on EE Plans prior to the Section 8-103/8-104 filing deadlines in fall 2016.¹¹

4. Illinois Power Agency (“IPA”) Workshops

In addition to the six-step process outlined above, SAG Facilitation convened a Section 16-111.5B Workshop Subcommittee in January 2016, also referred to as the 2016 IPA Workshop Subcommittee, with Ameren IL, ComEd, non-financially interested stakeholders and the IPA in response to Commission directives to SAG in the 2016 IPA Procurement Plan docket.¹² The IPA Workshop Subcommittee also addressed relevant planning issues for Section 8-103 EE Plan programs. The key planning issue addressed by the Subcommittee was how the Section 16-111.5B energy efficiency program bids would be conducted by Ameren IL and ComEd when the Section 8-103 programs for the next three-year EE Plan have not yet been approved. The Subcommittee discussed a number of related planning and contract issues, including whether there are contractual mechanisms to address uncertainty around expanded Section 8-103 programs and whether conditional approval of expanded programs could be a pathway for inclusion. Subcommittee participants reached consensus on slightly different approaches to the Section 16-111.5B program bid process for Ameren IL and ComEd. The Subcommittee concluded that both approaches achieve the objectives of Section 16-111.5B despite structural differences between the two.¹³

V. Description of SAG Activities: September 2015 to September 2016

Large group SAG meetings and small group SAG follow-up meetings held during each month of the Planning Process are summarized below. Agendas and meeting materials are available for download on the SAG website.¹⁴

¹¹ Section 8-103 EE Plan filing deadline: September 1, 2016. Section 8-104 EE Plan filing deadline: October 1, 2016. See 220 ILCS 5/8-103(f) and 220 ILCS 5/8-104(f).

¹² See 2016 Section 16-111.5B Workshop Subcommittee Report (July 28, 2016). Available at: http://ilsagfiles.org/SAG_files/Illinois_Power_Agency/2016_IPA_Workshop_Subcommittee/SAG_2016_IPA_Workshop_Subcommittee_Report_Final_7-28-16.pdf.

¹³ Id. at 6-7.

¹⁴ See SAG website, Meeting Materials page: <http://www.ilsag.info/meeting-materials.html>; and Small Group Follow-Up Meetings: http://www.ilsag.info/small_group_planning_calls.html.

2015 Large Group SAG Portfolio Planning Activities:

- September 28-29: SAG Facilitation presented a kick-off to the Planning Process, including an overview of the final draft project plan, stakeholder outreach, next steps and upcoming deliverables. Program Administrators presented to SAG on current energy efficiency portfolios, for Electric Program Year 7 (“EPY7”) and Gas Program Year 4 (“GPY4”), utilizing completed Portfolio Templates. The purpose of reporting out on EPY7 and GPY4 was to educate SAG and address initial questions on current programs.
- October 26-27: SAG Facilitation presented a follow-up to the September Planning Process discussion, including an overview of updated project plan documents. In addition, a draft stipulation and a proposed acknowledgement/agreement document were presented for feedback. Utility Program Administrators presented high level objectives for the next EE Plans, to identify areas of overlap/differences and request stakeholder feedback. NRDC presented an overview of stakeholder feedback on current programs, to educate SAG and discuss which proposals should be further developed and presented to SAG in late fall. Various SAG participants presented a discussion of portfolio threshold issues for stakeholder consideration (see Attachment C).
- November 16-17: SAG participants that submitted Proposed New Program Idea / Program Change Templates presented proposed ideas to SAG. SAG participants were required to submit a completed template prior to presenting to SAG. The November meetings focused on business program ideas. Residential and cross-cutting ideas were scheduled for December. Planning Process follow-up included a discussion of common high-level objectives and an update on open legal issues.
- December 14-16: SAG participants that submitted Proposed New Program Idea / Program Change Templates presented proposed ideas to SAG. The December meetings focused on residential program and cross-cutting ideas. Ameren Illinois’ consultant presented preliminary Potential Study results, focusing on the residential Potential Study.

2015-2016 Small Group SAG Portfolio Planning Activities¹⁵:

- December 2015: SAG held four small group follow-up teleconference meetings following the November 2015 stakeholder presentations to SAG on proposed program, program change, and measure ideas. Follow-up meetings were held for proposals that required further discussion. All SAG participants were invited to participate in small group meetings. The stakeholder that proposed each idea was invited to present additional information and/or responses to open questions. Time was also provided for open discussion. Individual teleconference meetings were held on the following stakeholder proposals: Laminar aerator measure; LED Street Lighting; Data/building analytics; upstream programs; and the Grundfos Pump Corp. measure.
- January – April: SAG held nine additional small group follow-up teleconference meetings following the December 2015 presentations on proposed program, program change, and measure ideas, for proposals that required further discussion. All SAG participants were invited to participate in small group meetings. The stakeholder that proposed each idea was invited to present additional information and/or responses to

¹⁵ Additional information on small group follow-up meetings is available on the SAG website: http://www.ilsag.info/small_group_planning_calls.html.

open questions. Time was also provided for open discussion. Individual teleconference meetings were held on the following stakeholder proposals: Statewide marketing; Combined Heat and Power; EnergySavvy program idea; Open Energy Efficiency program idea; upstream programs follow-up and best practices for program design; multi-family improvement proposals; and low-moderate income program proposals.

2016 Large Group SAG Portfolio Planning Activities:

- January 25-26: SAG Facilitation presented a process overview and 2016 schedule for the Planning Process. Program Administrators presented high level responses to program ideas presented in November and December 2015. Nicor Gas presented a preliminary “Portfolio Tool” for question/comment by other Program Administrators and stakeholders. Program Administrators presented high level portfolio budgets. The Department presented an overview of programs and an update to SAG.
- February 22-23: Peoples Gas – North Shore Gas and ComEd presented preliminary Potential Study results.
- March 28-29: ComEd, Nicor Gas, Ameren IL, and Peoples Gas – North Shore Gas presented a preliminary portfolio of programs for the next three-year EE Plans, for stakeholder review and comment. The Department presented preliminary Potential Study results.
- April 26: Market transformation experts presented on the future of market transformation programs in Illinois, including benchmarking and recommendations for the Department’s market transformation programs. The Department presented a preliminary portfolio of programs for the next three-year EE Plan for stakeholder review and comment. Peoples Gas – North Shore Gas presented an update on low income programs.
- May 16-17: Nicor Gas and ComEd presented an updated EE Plan portfolio of programs. Ameren IL presented a high level preliminary portfolio of EE Plan programs.¹⁶
- June 28: Peoples Gas – North Shore Gas and the Department presented an updated EE Plan portfolio of programs.
- August 30: Program Administrators with final stipulation agreements presented a report-out to SAG on key Portfolio changes.
- September 27: SAG Facilitation report-out on the Planning Process; overview of draft Planning Process Report; discuss stakeholder questions/feedback

VI. SAG Facilitation Recommended Changes for the Future

SAG Facilitation will request feedback on the Planning Process in September 2016 from SAG participants, including Program Administrators and non-financially interested stakeholders that participated in negotiations. SAG Facilitation will hold a de-brief discussion on the Planning Process with SAG during the September 2016 large group SAG meeting. This report will be updated with key stakeholder feedback and recommendations and provided for 10 Business Day review and comment.

¹⁶ Ameren IL took a different approach to providing updated EE Plan information to stakeholders. Following the preliminary high level overview of the EE Plan presented at the May SAG meeting, additional information on the portfolio was presented only to non-financially interested stakeholders that executed a confidentiality agreement with Ameren IL. Ameren IL also discussed Section 16-111.5B energy efficiency program bids with stakeholders that executed a confidentiality agreement.

SAG Facilitation shares the following initial Planning Process recommended changes with SAG participants:

1. **Advance EE Plan Presentations to Earlier in the Process:** As described above in Section E, SAG Facilitation planned six steps for the Planning Process, prior to confidential negotiation meetings. Two key steps included an initial presentation by Program Administrators to SAG on preliminary EE Plans with a request for questions and feedback, and an updated presentation to SAG on preliminary EE Plans approximately two months later, incorporating initial stakeholder feedback. Initial EE Plan presentations were held in March/April with updated presentations in May/June. In the future, it would be beneficial to move up the initial EE Plan presentations by at least one month and require all Program Administrators to follow the same process and timeline for presenting EE Plans to SAG. These two changes will result in process clarity for stakeholders and earlier consensus stipulation agreements.
2. **Establish Common Due Dates for Templates and EE Plan Batch Files:** Program Administrators prepared common planning templates and EE Plan “batch files” as support for preliminary and updated EE Plan presentations to SAG. However, Program Administrators provided this information at different times due to individual planning timelines. In the future, it would be beneficial to require Program Administrators to provide templates and EE Plan batch files on the same date. This change will streamline stakeholder review of EE Plan portfolios across the state and allow for meaningful comparison, where applicable.
3. **Establish Confidentiality Requirements Up-Front; Establish a Form Confidentiality Agreement:** Program Administrators should determine at the beginning of a future Planning Process whether Non-Disclosure Agreements (“NDAs”) will be required for negotiation meetings with non-financially interested stakeholders and the form of such confidentiality agreements. There were meeting delays for negotiations in late spring 2016 due to the time needed for non-financially interested stakeholders to review and sign agreements. Three Program Administrators requested the execution of confidentiality agreements prior to holding negotiation meetings: Nicor Gas, People Gas – North Shore Gas, and Ameren IL. It would also be beneficial for Program Administrators to utilize a similar confidentiality agreement, for ease of review and execution by non-financially interested stakeholders.
4. **Provide Additional Time for Follow-Up Discussion of Stakeholder Proposals:** During step 2 of the Planning Process, stakeholders had an opportunity to present proposals to SAG for Program Administrator consideration, including new program and measure ideas, program changes, and policy proposals. Program and measure ideas were presented to SAG during the November and December 2015 meetings. Thirteen follow-up small group teleconferences were held to discuss additional questions on proposal ideas. During the January 2016 SAG meeting, Program Administrators were asked to respond to each proposal idea, including whether they would or would not incorporate each idea into the EE Plan portfolio, and if not, a rationale as to why not. Due to time constraints, Program

Administrators only presented high level responses to SAG on stakeholder proposals. In the future, it would be beneficial to allow additional time for explanation and follow-up discussion on ideas that were rejected by Program Administrators, including the rationale.

5. **Clarify the Confidential Negotiation Process:** As described above in Section D, confidential negotiation meetings were held from May – September 2016 between individual Program Administrators and non-financially interested stakeholders that intervene in EE Plan dockets, with the goal of reaching consensus agreement on EE Plans prior to the Section 8-103/8-104 filing deadline in fall 2016. The negotiation process included the development of stipulation agreements. SAG Facilitation participated in negotiation meetings at the request of participating stakeholders, to track open issues and next steps. The following changes are recommended for a future confidential negotiation process:
 - a. Establish common due dates for templates and batch files, as described above in recommendation 2;
 - b. Schedule two rounds of “Q&A” meetings with Program Administrators following preliminary EE Plan presentations to SAG to identify and resolve open issues;
 - c. Create a master stipulation template prior to negotiation meetings; and
 - d. Schedule confidential group negotiations between non-financially interested stakeholders and Program Administrators, for joint program discussions and resolution of cross-cutting issues.

6. **Schedule an Earlier Report-Out to SAG:** The final report-out SAG teleconference on the Planning Process was held on August 30, 2016, prior to the statutory September 1, 2016 electric EE Plan filing deadline with the Commission. Due to ongoing negotiations in August 2016, SAG Facilitation was unable to schedule this report-out at an earlier date. In the future, a final report-out to SAG should be anticipated at the beginning of the Planning Process to ensure process transparency to SAG participants and the Commission. Clear expectations should be established early in planning for the final report-out, including who will present and key issues to be addressed. Recommendation 1 above will also impact a future report-out teleconference; reaching consensus agreement earlier in the process will provide additional time for Program Administrators to develop final report-out presentations to SAG.

7. **Establish a Process Guideline for Future EE Plans:** Policy Manual Version 1.0, approved by the Commission in December 2015, included a policy for Program Administrators to participate in a cooperative process with SAG participants to develop the next three-year EE Plans.¹⁷ This policy represents the first structured SAG process to develop EE Plans in advance of filings with the Commission for approval. The “Draft

¹⁷ See Illinois Energy Efficiency Policy Manual Version 1.0, Section 3.7(iii) Draft Portfolio Outlines: *Program Administrators shall work in a cooperative and iterative manner with SAG participants to develop the next three-year Plan. Such cooperation includes discussion of foundational issues to Plan development; including budgets, Portfolio objectives, Program ideas, and Program design. Program Administrators and SAG shall seek to develop and communicate such foundational assumptions in a manner that supports efficient and timely modeling of proposals for a comprehensive Plan. A primary purpose of these cooperative and iterative discussions is to reduce the number of non-consensus issues and litigation associated with the applicable Plan dockets.*

Portfolio Outlines” policy should be updated in Policy Manual Version 2.0 discussions in 2017, taking into account lessons learned from the 2015/2016 Planning Process. The updated policy should include a high level process description, timing objectives, and participation, at a minimum. A detailed “Guideline” will be developed by SAG Facilitation in fall 2016 to capture what worked in the Planning Process and describe recommended improvements.

VII. SAG Facilitation Recommended Planning Process Elements to Retain for the Future

SAG Facilitation shares the following Planning Process elements that should be retained for a potential future EE Plan Planning Process:

1. **Starting One Year in Advance of Filing Deadlines:** The current Planning Process began in September 2015, one year prior to the statutory electric EE Plan filing deadline with the Commission (September 1, 2016). This allowed Program Administrators and stakeholders the time needed to determine high priority program and planning issues; discuss initial feedback on programs and portfolios; research and present new program, measure, and program change ideas; review preliminary Potential Study results; and provide initial feedback on EE Plans prior to confidential negotiations with non-financially interested parties.
2. **Seeking Input from a Wide Range of Interested Parties:** At the beginning of the Planning Process, SAG Facilitation conducted a wide range of outreach to both regular SAG participants and non-participants. SAG Facilitation also met individually with interested companies and organizations to discuss high priority energy efficiency issues and questions on the Planning Process project plan. This resulted in a comprehensive list of potential energy efficiency issues for discussion and additional clarity on which issues were important to resolve during the Planning Process.
3. **Establishing a Six Step Planning Process:** A six step process was established at the beginning of the Planning Process, which resulted in a clear timeline, goals and process for Program Administrators and stakeholders to follow prior to confidential negotiation meetings on EE Plans. The six Planning Process steps included:
 - a. Program Administrators summarizing current portfolios;
 - b. Stakeholders and Program Administrators proposing new program, measure, and program change ideas for consideration;
 - c. Program Administrators presenting preliminary budget templates and responses to program ideas;
 - d. Program Administrators presenting preliminary Potential Study results;
 - e. Program Administrators presenting preliminary EE Plan portfolios to SAG; and
 - f. Program Administrators presenting updated EE Plan portfolios to SAG.
4. **Using Common Templates:** SAG Facilitation developed common templates for proposed program, policy, measure, and program change ideas discussed during the Planning Process. SAG Facilitation also worked with Program Administrators and interested stakeholders to develop additional common templates for the Planning Process. Using common templates

allowed stakeholders to more easily review EE Plan data and program information and provided an opportunity for meaningful comparison of portfolios across Program Administrators. Common templates used during the Planning Process included:

- a. Existing Program Performance Template;
- b. Proposed New Program Idea / Program Change Template;
- c. Proposed Policy Template;
- d. Preliminary Portfolio Budget Template; and
- e. High-Level Portfolio Template.

5. **Limiting Confidential Negotiations to Non-Financially Interested Parties:** Following updated EE Plan presentations by Program Administrators to SAG in May and June 2016, confidential negotiation meetings began with individual Program Administrators. Negotiation meetings were held between Program Administrators and non-financially interested parties that intervene in EE Plan dockets and expressed an interest in settlement. Several Program Administrators also requested non-financially interested parties to sign confidentiality agreements prior to participating in negotiations. Limiting confidential negotiations to non-financially interested parties is a process element that should be retained in the future, as it keeps discussion to those with a mutual interest in compromise and reaching final settlement.

VIII. Stakeholder Recommended Changes for the Future

(To be added after feedback discussion with SAG participants)

IX. Conclusion

The Planning Process required considerable and sustained effort for a year, and yielded considerable and lasting benefits compared to litigation. The Planning Process included active and extensive discussion of energy efficiency program and planning issues, resulting in consensus EE Plans that reflect key concerns and requests from a broad range of stakeholders who follow and engage in Illinois' energy efficiency programs. This outcome would not have been possible without an up-front willingness by Program Administrators and key stakeholders to devote time and resources to the effort with a common goal of achieving consensus. The success of this effort will provide for continued solid group collaboration and cooperation during program implementation.

X. Attachments

Attachments A, B and C to this report provide additional information on Planning Process meetings and key issues:

- Attachment A, SAG Portfolio Planning Process Meetings, summarizes the Planning Process meetings held in 2015 and 2016. Meeting dates, meeting types and Planning

Process agenda topics can be found in Tables 1 and 2. Table 3 includes a list of confidential negotiation meetings for individual Program Administrators.¹⁸

- Attachment B, Key Issues for the SAG Portfolio Planning Process, summarizes key planning issues compiled by SAG Facilitation in early fall 2015. This issue list was a result of stakeholder discussion at the July 28, 2015 and September 28-29, 2015 monthly SAG meetings, as well as individual stakeholder meetings held by SAG Facilitation. SAG participants agreed that key planning issues would be addressed by SAG in the Planning Process and policy issues would be addressed separately by the Policy Manual Subcommittee.¹⁹
- Attachment C, Threshold Issues for the SAG Portfolio Planning Process, summarizes a list of threshold issues identified by stakeholders in discussions with SAG Facilitation and refined during the September 29, 2015 large group SAG meeting.

XI. Templates

Five common templates were utilized by Program Administrators and stakeholders during the Planning Process:

- Template 1: Existing Program Performance Template (Program Administrators presented in Sept. 2015)
- Template 2: Proposed New Program Idea / Program Change Template (Due in Nov. 2015; Stakeholders and Program Administrators presented in Nov.-Dec. 2015)
- Template 3: Proposed Policy Template (Due in Dec. 2015; discussed during initial Policy Manual Subcommittee meetings from February to April 2016)
- Template 4: Preliminary Portfolio Budget Template (Program Administrators presented in Jan. 2016)
- Template 5: High-Level Portfolio Template (Program Administrators presented preliminary templates in March/April 2016 and updated templates in and May/June 2016)

Templates are available for download on the SAG website.²⁰

¹⁸ Negotiation meetings were held between non-financially interested stakeholders that intervene in EE Plan dockets and individual Program Administrators following final presentations to SAG on preliminary EE Plans. Specific information on negotiation meetings is confidential and may be subject to a confidentiality agreement (NDA) with Program Administrator(s).

¹⁹ Policy Manual Subcommittee Version 2.0 meetings were put on hold in April 2016 to focus on completing the Planning Process. SAG Facilitation anticipates Version 2.0 discussions to begin in early 2017, following Program Administrator EE Plan approvals by the Commission.

²⁰ See Templates page: <http://www.ilsag.info/templates.html> (Note: Blank templates will be available soon.)

Attachment A: SAG Portfolio Planning Process Meetings

This attachment includes a list of SAG Portfolio Planning Process meetings held in 2015 and 2016. Meeting dates, meeting types, and Planning Process agenda topics are described in Tables 1 and 2 below. The “Agenda Topics” described in this attachment only include Planning Process discussions held during large group SAG meetings. Full agendas and meeting materials are available on the SAG website.²¹

Table 3 includes a list of negotiation meetings for each Program Administrator. As described in Section E above, negotiation meetings were held between non-financially interested stakeholders that intervene in EE Plan dockets and individual Program Administrators following final presentations to SAG on preliminary EE Plans. Specific information on negotiation meetings is confidential, and may be subject to a confidentiality agreement (NDA) with Program Administrator(s).

Table 1, below, also identifies the considerable time that was devoted to the Planning Process. The summary of hours for each meeting type is as follows:

Meetings Open to All SAG Participants:

Large group SAG meetings: 108.5 hours

Small group SAG follow-up meetings: 18.5 hours

Other SAG follow-up meetings: 14.5 hours

Subtotal= 141.5 hours

Meetings Open to Non-Financially Interested Parties:

49.5 hours

Grand total= 191 hours

Table 1: 2015 Planning Process Meetings		
Date	Meeting Type	Agenda Topics
Mon.-Tues., Sept. 28-29 10:30 am - 4:30 pm 10:30 am - 4:30 pm	Large Group SAG	<ul style="list-style-type: none"> • Planning Process kick-off • Program Administrator presentations on current EE Portfolios (Electric PY7 and Gas PY4)
Mon.-Tues., Oct. 26-27 10:30 am - 4:30 pm 10:30 am - 4:30 pm	Large Group SAG	<ul style="list-style-type: none"> • Planning Process follow-up: updated Project Plan documents • Utility Program Administrator presentations on EE Plan objectives • Initial stakeholder feedback on current EE programs
Mon.-Tues., Nov. 16-17 10:30 am - 4:00 pm 10:30 am - 3:40 pm	Large Group SAG	<ul style="list-style-type: none"> • Planning Process follow-up: Common high-level objectives; update on open legal issues • Proposed New Program / Program Change / Measure Ideas: Business

²¹ See Meeting Materials page: <http://www.ilsag.info/meeting-materials.html>

Table 1: 2015 Planning Process Meetings		
Date	Meeting Type	Agenda Topics
		Programs
Tues., December 1 4:00 - 5:00 pm	Small Group Follow-Up Call	• Questions/follow-up on Laminar Aerator Measure proposal
Thurs., December 3 10:00 - 11:00 am	Small Group Follow-Up Call	• Questions/follow-up on LED Street Lighting proposal
Thurs., December 3 1:00 - 2:00 pm	Small Group Follow-Up Call	• Questions/follow-up on Data/Building Analytics proposal
Fri., December 11 10:00 am - 12:00 pm	Small Group Follow-Up Call	• Questions/follow-up on Upstream Proposal and Grundfos Pump Measure proposal
Mon.-Wed., December 14-16 10:30 am – 5:00 pm 10:30 am – 5:00 pm 10:30 am - 4:30 pm	Large Group SAG	• Proposed New Program/Measure Ideas: Residential Programs; cross-cutting proposals • Ameren IL Preliminary Potential Study Results

Table 2: 2016 Planning Process Meetings		
Date	Meeting Type	Agenda Topics
Mon., January 11 10:30 - 11:30 am	Small Group Follow-Up Call	• Questions/follow-up on Statewide Marketing proposal
Mon., January 11 1:00 - 3:30 pm	Small Group Follow-Up Call	• Questions/follow-up on Low/Moderate Income open issues (meeting #1)
Wed., January 13 10:00 - 11:00 am	Small Group Follow-Up Call	• Questions/follow-up on Combined Heat and Power proposal
Wed., January 13 11:00 am - 12:00 pm	Small Group Follow-Up Call	• Questions/follow-up on EnergySavvy proposal
Wed., January 13 2:00 - 3:00 pm	Small Group Follow-Up Call	• Questions/follow-up on Open Energy Efficiency proposal
Thurs., January 21 2:00 - 4:00 pm	Small Group Follow-Up Call	• Upstream proposal follow-up: Best practices for upstream program design
Mon.-Tues., January 25-26 10:30 am - 4:30 pm 10:30 am - 4:30 pm	Large Group SAG	• Planning Process follow-up: Process overview and 2016 schedule • Follow-up: Ameren IL Voltage Optimization proposal • High Level Program Administrator Responses to Program Ideas • Preliminary Nicor Gas Portfolio Tool • High Level Portfolio Budgets: Gas and Electric • IL Department of Commerce Programs Overview and Update to SAG
Mon., February 8 2:00 - 3:00 pm	Small Group Follow-Up Call	• Questions/follow-up on Multifamily Improvements proposal

Table 2: 2016 Planning Process Meetings		
Date	Meeting Type	Agenda Topics
Mon.-Tues., February 22-23 10:30 am - 3:00 pm 1:00 - 4:20 pm	Large Group SAG	<ul style="list-style-type: none"> • Peoples Gas - North Shore Gas Potential Study results • ComEd Potential Study results
Wed., March 9 1:00 - 3:00 pm	Small Group Follow-Up Call	<ul style="list-style-type: none"> • Questions/follow-up on Low/Moderate Income open issues (meeting #2)
Mon.-Tues., March 28-29 10:30 am - 4:00 pm 10:30 am - 4:30 pm	Large Group SAG	<ul style="list-style-type: none"> • ComEd Preliminary Portfolio of Programs • Nicor Gas Preliminary Portfolio of Programs • IL Department of Commerce Potential Study results • Ameren IL Preliminary Portfolio of Programs • Peoples Gas - North Shore Gas Preliminary Portfolio of Programs
Thurs., April 7 9:30 - 10:30 am	Large Group SAG Follow-Up Call	<ul style="list-style-type: none"> • ComEd Preliminary Portfolio follow-up: Discuss Q&A from March SAG meetings
Thurs., April 7 11:00 am - 1:00 pm	Large Group SAG Follow-Up Call	<ul style="list-style-type: none"> • Peoples Gas - North Shore Gas Preliminary Portfolio follow-up: Discuss Q&A from March SAG meetings
Fri., April 8 10:00 - 11:00 am	Large Group SAG Follow-Up Call	<ul style="list-style-type: none"> • Nicor Gas Preliminary Portfolio follow-up: Discuss Q&A from March SAG meetings
Thurs., April 14 1:00 - 3:00 pm	Large Group SAG: Cost-Effectiveness Follow-Up Call #1	<ul style="list-style-type: none"> • Large group SAG teleconference to discuss the cost-effectiveness questions raised during the March SAG meetings, including classifying costs when performing TRC test analysis.
Tues., April 19 1:00 - 3:00 pm	Large Group SAG: Cost-Effectiveness Follow-Up Call #2	<ul style="list-style-type: none"> • Large group SAG teleconference to discuss additional cost-effectiveness issues: 1) Excessive incentives and 2) Interactive effects.
Wed., April 20 1:00 - 3:00 pm	Small Group Follow-Up Call	<ul style="list-style-type: none"> • Questions/follow-up on Low/Moderate Income open issues (meeting #3)
Tues., April 26 10:30 am - 4:30 pm	Large Group SAG	<ul style="list-style-type: none"> • Market transformation benchmarking results • IL Department of Commerce Preliminary Portfolio presentation • Peoples Gas - North Shore Gas update on low income programs
Tues., May 10 10:00 am - 12:00 pm	Large Group SAG: Cost-Effectiveness Follow-Up Call #3	<ul style="list-style-type: none"> • Large group SAG teleconference to discuss remaining cost-effectiveness issues.
Wed., May 11 10:00 am - 12:00 pm	Large Group SAG Follow-Up Call	<ul style="list-style-type: none"> • IL Department of Commerce Preliminary Portfolio follow-up: Discuss Q&A from March SAG meetings

Table 2: 2016 Planning Process Meetings		
Date	Meeting Type	Agenda Topics
Mon.-Tues., May 16-17 1:00 - 3:00 pm 10:30 am - 4:10 pm	Large Group SAG	<ul style="list-style-type: none"> Nicor Gas Updated Portfolio of Programs ComEd Updated Portfolio of Programs Ameren IL Update: High Level Preliminary Portfolio of Programs
Tues., June 7 10:00 - 11:00 am	Large Group SAG Follow-Up Call	<ul style="list-style-type: none"> Discuss U.S. Energy Information Administration (EIA) Early Release of the 2016 Annual Energy Outlook
Tues, June 28 10:30 am - 4:00 pm	Large Group SAG	<ul style="list-style-type: none"> Peoples Gas-North Shore Gas Updated Portfolio of Programs IL Department of Commerce Updated Portfolio of Programs
Tues, July 19 10:00 - 11:30 am	Large Group SAG Follow-Up Call	<ul style="list-style-type: none"> Discuss final U.S. Energy Information Administration (EIA) 2016 Annual Energy Outlook + Carbon adders
Tues., August 30 12:30 - 2:30 pm	Large Group SAG	<ul style="list-style-type: none"> Program Administrators with final stipulation agreements present a report-out to SAG on key Portfolio changes
Tues., September 27 10:30 am - 12:00 pm ²²	Large Group SAG	<ul style="list-style-type: none"> SAG Facilitation report-out and de-brief on the Planning Process; overview of draft Planning Process Report; discuss stakeholder questions/feedback

Table 3: 2016 Planning Process Negotiation Meetings	
Nicor Gas²³	
Date	Meeting Type
Wed., June 15 10:00 am - 12:00 pm	Negotiation Meeting #1
Thurs., June 23 3:00 - 5:00 pm	Negotiation Meeting #2
Thurs., July 21 9:00 - 11:00 am 3:00 - 5:00 pm	Negotiation Meeting #3
Mon., July 25 10:00 am - 12:00 pm	Negotiation Meeting #4
Wed., August 3 9:00 - 10:00 am	Negotiation Meeting #5
ComEd	
Date	Meeting Type
Wed., June 15 1:00 - 3:00 pm	Negotiation Meeting #1

²² The remainder of the September 2016 SAG meeting will be dedicated to other SAG topics.

²³ The Nicor Gas meetings listed in Table 3 were confidential and only open to non-financially interested stakeholders that executed a Non-Disclosure Agreement with Nicor Gas.

Table 3: 2016 Planning Process Negotiation Meetings	
Mon., June 27 1:00 - 3:00 pm	Negotiation Meeting #2
Wed., July 27 3:00 - 4:30 pm	Negotiation Meeting #3
Ameren Illinois²⁴	
Date	Meeting Type
Tues., May 24 1:00 – 4:00 pm	Ameren IL Preliminary Review of IPA Bid Analysis and Preliminary Portfolio of Programs
Wed., June 1 9:30 am – 12:00 pm	Ameren IL Modeling Follow-Up Call
Thurs., June 2 10:00 am – 12:00 pm	Ameren IL Preliminary Portfolio Follow-Up Call #1
Wed., June 8 11:30 am – 12:30 pm	Ameren IL Preliminary Portfolio Follow-Up Call #2
Tues., June 14 1:00 – 4:30 pm	Ameren IL Updated IPA Bid Analysis and Preliminary Portfolio of Programs
Fri., June 17 9:00 – 10:00 am	BenCost Modeling Input Call
Thurs., June 23 12:30 – 2:30 pm	Ameren IL Updated Preliminary Portfolio Presentation (8-103/8-104)
Thurs., July 14 2:30 - 5:00 pm	Negotiation Meeting #1
Mon., July 25 3:30 - 5:00 pm	Negotiation Meeting #2
Fri., July 29 8:00 - 9:00 am	Negotiation Meeting #3
Thurs., July 18 3:00 - 4:30 pm	Negotiation Meeting #4
Peoples Gas - North Shore Gas²⁵	
Date	Meeting Type
Mon., July 25 1:00 - 3:00 pm	Negotiation Meeting #1
Thurs., August 11 1:00 - 3:00 pm	Negotiation Meeting #2
Tues., August 30 3:00 - 5:00 pm	Negotiation Meeting #3

²⁴ The Ameren IL meetings listed in Table 3 were confidential and only open to non-financially interested stakeholders that executed a Non-Disclosure Agreement with Ameren IL.

²⁵ The Peoples Gas – North Shore Gas meetings listed in Table 3 were confidential and only open to non-financially interested stakeholders that executed a Non-Disclosure Agreement with Peoples Gas – North Shore Gas.

Table 3: 2016 Planning Process Negotiation Meetings	
Wed., September 7 2:00 – 3:30 pm	Negotiation Meeting #4
IL Department of Commerce and Economic Opportunity	
Date	Meeting Type
Wed., July 20 12:30 - 2:30 pm	Negotiation Meeting #1
Fri., August 5 9:00 - 11:00 am	Negotiation Meeting #2

Attachment B: Key Issues for SAG Portfolio Planning Process

The issues listed in this attachment are a result of stakeholder discussion at the July and September 2015 large group SAG meetings, as well as individual stakeholder meetings held by the SAG Facilitation Team. This issue list is included in the Planning Process Report to memorialize the topics and issues that stakeholders identified as important to cover during the Planning Process. SAG Facilitation notes that all but five topics were addressed during the Planning Process.²⁶ Topics that were not addressed will be deferred to another SAG process, which may include future large group SAG meetings or a SAG Subcommittee.²⁷

This list also demonstrates the comprehensiveness of the Planning Process – the process did not merely address statutory issues, such as budgets and savings from energy efficiency programs, but also covered a much broader range of topics that are important to optimizing EE Plan portfolios considering multiple perspectives.

Threshold Issues

- All parties must commit that positions taken during this process, including presentations and comments made during discussion meetings, will not be used in litigation – “rules of the road.”
- What is the scope, sequencing and timing of issues?
- Commission approval of Plans²⁸:
 - High level topics to be included:
 - Statutory topics for Commission approval:
 - Portfolio Savings, budgets
 - Program Budgets (within 20%)
 - Program content (an opportunity for Customers of all rate classes to participate)
 - Independent evaluation – timing for issuance of evaluator RFPs to ensure a contract is in place at the start of the programs
 - Additional topics for Commission approval:
 - Policy rules
 - Anything else?
 - For electric utilities, what belongs in IPA Portfolio?
 - What do the plans really need to settle?
 - What is within Administrator discretion?
 - With accountability comes responsibility.
 - Process issue: Syncing the specific dates in the tariffs for certain utility filings.
- What would planners/stakeholders like to know up-front?
- What is goal of discussion?
 - Stipulated agreements at end?
 - Who should participate? Review past Plan dockets to determine intervenors.

²⁶ Topics not addressed during the Planning Process include: 1) Multi-year savings goals; 2) Allocation of EM&V resources; 3) Leveraging deployment of smart meters; 4) Role of Codes and Standards and claiming savings; and 5) Program strategies to capture wasted energy.

²⁷ See SAG website, Subcommittees page: <http://www.ilsag.info/subcommittees.html>.

²⁸ See Section 8-103(f) and 8-104(f) for a list of filing requirements for Plans.

- What won't settle?
- What is current performance of Portfolios?
- Figure out what issues merit time
 - For proposals to be included in the Plan, the interested stakeholder should include impacts to the Plan, including costs and savings. Utilities should also do this as part of their planning process. This information should be allowed to be used in the docket.²⁹
- Annual vs. lifetime savings
- Program gaps and overall Plan design goals
 - What are we trying to accomplish?
 - Continued enhancement of gas and electric coordination
- Department of Commerce and Economic Opportunity budget
 - Can EE help former LIHEAP customers that have been cut off, to reduce usage?³⁰
- What information do we need to know to have informed discussions?
 - Data on current (2014) budget across programs
 - Data on cost/unit energy across programs
 - Non-program costs – where is money going?
 - Marketing – 3-4%
 - Research and development (“R&D”) – 3%
 - Evaluation, measurement and verification (“EM&V”) – 3%
 - Administrative costs – generally less than 5% in IL
 - Can the utilities clarify in the Plan whether the non-Program costs used in the Plan represent any non-Rider costs?

Up Front Issues for Discussion

- Department of Commerce and Economic Opportunity Funding (October SAG meetings – Molly Lunn, the Department)
 - Areas they would cover – can the other Program Administrators cover low or low/moderate income customers?
 - Amount – is it 25% of the total 8-103/8-104 funding? (The statute states 25% of the measures).
 - Independent evaluation contract – should the Department have its own evaluation contractor?
 - Should DCEO have its own proceeding and EE Plan?
 - What are realistic goals for the Department?
 - i. Should the Department have to get 20% of the utility goals?
 - ii. Can the Department get the same (\$/therm, kWh), higher or lower than their performance?
 - iii. Is it fair for the Department to assign 20% of the goals if that doesn't reflect their assigned customer base?
 - What is the load of customers that the Department actually serves, as a % of entire load? (ballpark for low-income / public sector)

²⁹ See 10-0568 Final Order at 26-27 (December 21, 2010).

³⁰ This issue was not specifically addressed in the Planning Process because broader low and moderate income issues were discussed by SAG.

- How can we integrate the IPA bidding process with the Section 8-104/8-104 planning process? (Karen Lusson, IL AG) – separate discussion
 - SAG participants need to understand what is in the current IPA Portfolio.
 - i. What programs should go into the IPA?
- Allocation across Programs (October 2015 meetings – Keith Goerss, Ameren IL; coordinate with other Program Administrators to include a matrix for each)
 - Residential / Commercial and Industrial (“C&I”) / Market Transformation
 - Maximize savings?
 - Funds allocated according to class contribution or more generally
 - “Balanced” Portfolio of options for customers
 - Roles that Potential Studies play in determining the allocation
- Annual vs. Lifetime Savings (October 2015 meetings – Chris Neme, Energy Futures Group, on behalf of NRDC)
 - To what extent should Program Administrators focus on annual vs. lifetime savings?
 - What happens if you define the EE Plans based on lifetime goals?
- Costs – cents/First year (and lifetime) kWh and dollars/First year (and lifetime) therm – deferred
 - Gas and electric costs – what is current price per kWh/therm savings of the residential and C&I Portfolios?
 - i. Res
 - ii. C&I
 - iii. Low Income
 - iv. By program?
 - What is reasonably aggressive goal (price/kWh; price/therm) for residential and C&I Portfolios?
- Changes to Current Program Design (starting point – current Portfolios) (October SAG meetings – Chris Neme, Energy Futures Group, on behalf of NRDC; in coordination with other stakeholders)
 - Are any changes needed? Is there evidence to support that change?
 - Custom Programs – how do Program Administrators come up with savings?
- Stipulation (SAG Facilitation) – October 2015
 - What are we trying to agree to at the end of this process?
- Policy Manual (Karen Lusson, IL AG) – October 2015
 - Confirm that the Policy Manual is a threshold document for the next 3-year Plan.
- Goals – on the electric side, will there be 3-year goals and budgets? (Keith Goerss, Ameren IL; in coordination with ComEd) – October 2015
 - This is a statutory interpretation/legal issue. Utilities need to comply with the statutory requirements.
 - Issues:
 - i. On the savings side, is it a 3-year goal? If it’s a multi-year goal, how is the goal calculated?³¹
 - ii. On the budget side, is it a plan-budget or a multi-year budget? Do those budgets change with either forecasts or actual sales data?

³¹ Multi-year savings is currently an issue in an Ameren IL energy efficiency docket.

- iii. Policy issue – if budgets adjust, goals should adjust accordingly.
- Clean Power Plan – how does input from SAG get articulated to IL EPA? What is the relationship between these two processes? – deferred
 - SAG Facilitation to prepare and present Technical Position Paper on possible SAG Portfolio Planning Process Impacts in October 2015 meetings.

Additional Issues for Discussion

1. Funding allocated to low income/moderate income – January 2016
 - Defining “low income” and “moderate income” customers
 - i. Expansion of the low income customer definition.
 - ii. What does “moderate income mean”? What is the purpose of offering programs to this particular subset of customers?
 - Should there be effort to identify how much these populations contribute? Yes.
 - Policy Issue: How much to allocate to these customers?
 - i. At a minimum, proportionate share to customer population.
 - ii. Is this concern the share of low/moderate income population, or the share of the total population?
 - It is possible to offer less efficient equipment for low-income programs and achieve greater savings. (For ex: A 95% AFUE furnace saves apx. 3% more gas than a 92% AFUE furnace, however the cost is apx. 20-25% more). Can the low-income programs serve more customers with their budget if this approach is utilized?
2. Cost-Effectiveness Issues (specific issues are being discussed in different venues)
 - Cost-Effectiveness Screening Issues
 - i. NEBs
 - ii. Common inputs
 1. Transparency in the sources (not always common)
 2. Transparency in incremental cost assumptions
 - iii. Sensitivity analysis
 1. Societal vs. cost of capital discount rate
 - iv. Providing joint program TRC results in Plan filings (not an issue since filing dates differ for gas/electric).
3. Large C&I Customers
 - Customers are currently being served; this sector will not be separately addressed as part of the planning process.
4. Are we allocating EM&V resources in an ideal way? If not, are there any fundamental changes that need to be considered? – April 2016³²
 - How much money impact vs. process?
 - Forward looking vs. bean counting?
 - Do we need simple discussion annually about forward-looking EM&V?
5. Program Design
 - What specific programs could be improved? – October 2015
 - Maximizing savings vs. comprehensiveness. – Move to threshold issues (a subset of the objectives issue); utilities
 - New program ideas/new technologies/new services? – templates due by Nov. 4

³² SAG Facilitation is planning to address EM&V issues in a SAG EM&V Subcommittee.

- Are upstream incentives being utilized to their full potential? – October 2015
- Gas vs. electric spending (Section 8-104 limits)
- Smart Grid – are we fully leveraging deployment of smart meters through EE? (This question needs to be addressed within the context of where each utility will be in terms of service territory installation rates.) – April 2016 for evaluation³³
- Role of Codes and Standards – can we claim savings? (Codes Collaborative – will this continue?) (Molly Lunn, the Department; Hammad Chaudhry, Nicor Gas)
 - i. Due to the delay, do we want to continue R&D?
 - ii. Key issue is evaluation.
 - iii. Complete the program template.
 - iv. This will be included in the draft IL-NTG Methodologies document circulated for discussion October 2nd.
 - v. Codes are important in the context of the TRM.
- Role of Market Transformation
 - i. What are markets we want to prioritize for transformation?
 - ii. How broadly should market transformation be defined?
- 6. If we aim for lifetime savings, what changes would be needed in program design? – deferred
- 7. Wasted Energy – do we have effective program strategies to capture?
 - Any SAG participant interested in submitting a program, measure or significant change needs to complete the required template (due by COB on Nov. 9, 2015).
- 8. Portfolio Gaps?
 - Programs
 - Technologies
- 9. Potential Studies – February 2016
 - Role of potential studies. How will they be used?
 - i. Gas – Are there areas we are not currently getting?
 - ii. IPA – Could we use to identify other decisions that could go into Plan?
 - iii. Are there areas we have not been pursuing?
 - What are the bounds of potential studies?
 - i. Is there information gathered that could be leveraged to update the TRM?
 - ii. Is there information gathered that could inform estimates for non-participant spillover?
- 10. Gas-Electric Coordination
 - What programs should be coordinated, ideally?
 - To what extent does lower gas budget preclude full coordination?
 - Providing joint TRC results for programs.
 - Timing to facilitate ComEd having gas final numbers when their Plan is filed.
- 11. Adjustable Goals
 - Reach agreement on the NTG ratios used in the Plan filing.
 - Transparency in calculations and key inputs to facilitate any adjustments. Use the TRM measure code and articulate any assumptions made in calculating.
 - Adjustable Goals template will be discussed in a small group in Policy Manual Subcommittee Version 2.0 process.

³³ SAG Facilitation is planning to address EM&V issues, including the possibility of utilizing AMI meter data, in a SAG EM&V Subcommittee.

12. Statewide Program Marketing

- Can we move to statewide trademark and marketing, similar to MASSaves?³⁴
- Pros/Cons of this approach.
- Any SAG participant interested in submitting a program needs to complete the required template (due by COB on Nov. 9, 2015).

13. Policy Changes – through Policy Manual Subcommittee process

- Are any needed? Policy changes will be developed through Policy Manual Subcommittee Version 2.0 process. Completed Proposed Policy Template due by COB on December 4, 2015.

14. Demand Response

- Inclusion in the next Plan. Is it appropriate to continue these programs once the statutory requirement ends? What about customers that have already signed up?
- Any SAG participant interested in submitting a program needs to complete the required template (due by COB on Nov. 9, 2015).

15. Voltage Optimization

- What is the feasibility to offer this? Is this a measure and should it be funded through the Portfolios?
- Any SAG participant interested in submitting a program needs to complete the required template (due by COB on Nov. 9, 2015).

³⁴ See <http://www.masssave.com/en/about-mass-save>.

Attachment C: Threshold Issues for SAG Portfolio Planning Process³⁵

During individual SAG Facilitation meetings with stakeholders, several issues were identified as “threshold issues” that ideally should be discussed early in the Planning Process as they may influence portfolio objectives and structure. The threshold issues list is set forth below. The issue list was refined in the September 29, 2015 large group SAG meeting. Various SAG participants, who are listed by each issue, offered to develop a “strawman” proposal for consideration by the stakeholder group in the October 2015 large group SAG meeting.

This threshold issue list is included in the Planning Process Report to document topics that stakeholders considered important. All issues listed below were addressed during portfolio planning, with one exception.³⁶

Threshold / Up Front Issues for Discussion

Issue 1: Stipulation Goals (SAG Facilitation)

- What are we trying to agree to at the end of this process?

Issue 2: Policy Manual (Karen Lusson, IL AG)

- Confirm that the Policy Manual is a threshold document for the next 3-year Plan.

Issue 3: Goals – on the electric side, will there be 3-year goals and budgets? (Keith Goerss, Ameren IL; in coordination with ComEd)

- This is a statutory interpretation/legal issue. Utilities need to comply with the statutory requirements.
- Issues:
 - a. On the savings side, is it a 3-year goal? If it’s a multi-year goal, how is the goal calculated?
 - b. On the budget side, is it a plan-budget or a multi-year budget? Do those budgets change with either forecasts or actual sales data?
 - c. Policy issue – if budgets adjust, goals should adjust accordingly.

Issue 4: Annual vs. Lifetime savings (Chris Neme, Energy Futures Group, on behalf of NRDC)

- To what extent should Program Administrators focus on annual vs. lifetime savings?
- What happens if you define the EE Plans based on lifetime goals?

Issue 5: Department of Commerce and Economic Opportunity Funding (Molly Lunn, the Department)

³⁵ October 11, 2015.

³⁶ Initial Clean Power Plan issues were discussed at SAG during the September 2015 meeting (an overview of the Final Order presented by MEEA and an overview of a compliance tool presented by NRDC). In addition, SAG Facilitation presented a memo on the Clean Power Plan and potential portfolio planning impacts at the October SAG meeting. However, the Clean Power Plan was not fully addressed during the Planning Process due to the stay issued by the U.S. Supreme Court in February 2016, which halted implementation of the Clean Power Plan pending a decision by the U.S. Court of Appeals for the District of Columbia Circuit.

- Areas they would cover – can the other Program Administrators cover low or low/moderate income customers?
- Amount – is it 25% of the total 8-103/8-104 funding? (The statute states 25% of the measures).
- Independent evaluation contract – should the Department have its own evaluation contractor?
- Should DCEO have its own proceeding and EE Plan?
- What are realistic goals for the Department?
 - a. Should the Department have to get 20% of the utility goals?
 - b. Can the Department get the same (\$/therm, kWh), higher or lower than their performance?
 - c. Is it fair for the Department to assign 20% of the goals if that doesn't reflect their assigned customer base?
- What is the load of customers that the Department actually serves, as a % of entire load? (ballpark for low-income / public sector)

Issue 6: Allocation across Programs (Keith Goerss, Ameren IL; coordinate with other Program Administrators to include a matrix for each)

- Residential / Commercial and Industrial (“C&I”) / Market Transformation
- Maximize savings?
- Funds allocated according to class contribution or more generally
- “Balanced” Portfolio of options for customers
- Roles that Potential Studies play in determining the allocation

Issue 7: Clean Power Plan – How does input from SAG get articulated to IL EPA? What is the relationship between these two processes? (Deferred)

Additional Planning Topics

Clean Power Plan – SAG Facilitation to present a Technical Position Paper on possible SAG Portfolio Planning Process impacts

Program Feedback: Changes to Current Program Design (starting point – current Portfolios) (Chris Neme, Energy Futures Group, on behalf of NRDC)

- Are any changes needed? Is there evidence to support that change?
- Custom Programs – how do Program Administrators come up with savings?