**EE SAG: Draft Q&A Responses for Large C&I Self-Direct Subcommittee**

This draft document includes responses to Q&A’s and issues discussed at the meeting on March 25th, noting associated open issues, action items, and non-consensus items, color-coded by the following:

* Open issue
* Action Item
* Non-consensus issue

**Best Practices:**

1. What programs/best practices have been considered in developing the program design?
   1. NRDC (Chris Neme) to provide.

**Customers:**

1. What issues would large customers like solved that are not being addressed by current programs?
   1. Access to funds that large customers have contributed.
   2. Achieving a streamlined pilot program process with a low cost.
2. Will there be a per customer cap or per project cap for funds?
   1. A per customer cap is based on how much the customer contributes, minus 40%. There is no project cap, only a customer cap.
3. How will customers be targeted and recruited?
   1. Customers will be informed of offer through Webinar and assigned Account Representatives. Customers will have limited time (1 week) to identify intent to participate.
      1. Non-Consensus: If over-subscription, how will customers be selected? First come, first serve, or random.
      2. Open Issues: Once customers have indicated intent to participate, may they “opt out” in the first year? .
4. *Issue:* Ensure outreach effort to potential participants is fair.
   1. Outreach will occur through Webinar and assigned Account Representatives.

**Eligibility, Recruiting, and Targeting:**

1. Are DCEO customers going to be excluded from the new self-direct program?  If so, why, and could they be included?
   1. Yes, DCEO customers will be excluded from this program. This was an issue in the DCEO EE Plan docket.
   2. REACT will discuss with DCEO and report back.
2. Will the pilot program accept only new projects, or can a project be included that started in a different program?
   1. Additional question: would a project that has already started be a free rider? What if a project is already under construction?
   2. ComEd (Roger B): we will need to see what is out there; it is possible that qualifying customers do not have any pending projects.
   3. Needs response (ComEd- Roger Baker- to draft response).
3. Will O&M measures be allowed that save energy (e.g. Retro-commissioning-type projects)?
   1. Yes, O&M measures will be included.
4. Can money be used for labor costs or just equipment?
   1. ComEd: Money can be used for labor (such as engineering studies). There is a cap of 20% for engineering studies. Labor for installing equipment also may be paid for by funds.
5. What is the time period for opt-out, if there is one? Rule proposed that once a customer has signed up, they have to stay in program for 1 year.
   1. Open issue
6. Eligibility: is a customer eligible for projects limited to a meter, a specific site, or the whole company?
   1. Owning one account using over 10 MWs means you qualify for the program. Non-contiguous sites don’t qualify.
7. How does the group of customer applicants get selected? Either first-come first-serve, or random selection?
   1. Non-consensus issue

**Budget:**

1. Any unspent funds must be reverted back to pool of energy efficiency budget (per Commission order). Is it clear whether unspent funds can be rolled over into next 3-year Plan? In this situation, would unspent budget go back to ratepayers?
   1. Discussed during meeting – see pages 5-6 of meeting notes. This is an open issue.

**Incentives:**

1. *Issue:* Incentives should only pay for energy efficiency projects.
   1. ComEd (Roger Baker) to draft response.
2. Co-funding minimum, incentives should not exceed incremental cost. What happens if gas utilities co-fund project?
   1. Must co-fund at 33% (only for capital projects).
   2. There is no co-funding requirement if it’s O&M project.

**Deadlines and Progress Updates:**

1. Progress monitoring for projects – how will this be accomplished?
   1. Agreed-upon approach is to abide by project-specific milestones and payments. A customer should propose a timeline/process for their project that achieves the goal. ComEd can vet it, and see that it gets achieved.
2. Timelines
   1. How much time does ComEd need to repurpose funds?
      1. Sliding rule – depending on amount of $
      2. Burn rate of other programs also involved
   2. Should there be a time period by which a customer commits to a project, or else the funds get taken away from them?
      1. Timelines should be decided right now (NRDC)
      2. Timelines should be decided after the first year of pilot (ComEd, REACT)

**EM&V and Cost-Effectiveness:**

1. Is TRC test appropriate? If not, is there another test that should be used instead?
   1. Discussed during meeting – see page 6-7 of meeting notes. This is an open issue.
2. What if a project saves a lot of gas but only a small amount of electricity? Could use BTUs, or the Utility Cost Test (assuming the project passes TRC).
   1. Suggestion to use a cost per kWh (first year); ComEd to provide detail on past three years.
3. Should a measure-level TRC or project-level TRC be used?
   1. Non-consensus issue
      1. ComEd does project-level TRC for custom program.
      2. Tom K thinks it should be measure-level in certain situations, for this pilot program.

**Reporting Requirements:**

1. ComEd reporting to the SAG
   1. Will include details in quarterly summary report to SAG
2. ComEd reporting to customers
   1. Either monthly or quarterly reports to each customer, showing what they have used/what they paid into program. ComEd to discuss with accountants.

**Combined Heat and Power:**

1. How can savings from CHP be included in a large C&I program? How is the large C&I program going to dovetail with the upcoming CHP program?
2. What kind of CHP projects can be part of this pilot?
3. Are there parameters in the way the program is set up that would result in difficulty including CHP projects? Or, is there a way to create parameters that will fit in nicely with CHP?
4. To what extent does putting off the CHP program due to gas utility dockets not being completed effect including CHP in a large C&I pilot program?
   1. Pat S to work with REACT and ComEd, draft responses. The main question is how is this pilot program going to dovetail with a CHP program?