

Program Name	Large C&I Pilot
Program Description	<p>The Pilot is intended to stimulate the implementation of large scale energy efficiency measures by ComEd's Largest (i.e., over 10 MW) customers, with a specific emphasis on increased and improved coordination between ComEd and program participants, increased flexibility to accommodate the complexity of large scale energy efficiency projects, expedited approval mechanisms, and increased certainty in funding availability. ComEd continues to collect Rider EDA charges from pilot participants, but tracks the amount of EDA charges paid by the participant during Plan Years 7 through 9. Subject to the Commission-ordered restrictions described below, the participant will be permitted to apply the amount of EDA charges it has paid as a credit to the cost of implementing energy efficiency measures. Specifically, participants are able to use a pre-specified percentage of their contributions to fully fund energy efficiency improvements on their site, subject to the following:</p>

Non-consensus issue: TRC at project level, measure level, or both.

- ICC Staff position: must meet both project and measure level TRC per the 13-0495 Order. "The Commission finds that any Large C&I Pilot must: 1) be cost-effective and any measure must pass the TRC" "As long as the incentive results in cost-effective TRC compliant energy efficiency measures, the Commission can approve it."
- Other Subcommittee participants' position: must meet project level TRC.

- **Projects must be cost-effective on TRC basis.** ComEd will review the project application and, working with the pilot participant, will determine the project's cost-effectiveness. ComEd and the pilot participant will integrate the independent evaluator in the review process and will defer to them for final acceptance of savings methodology, savings estimates, and evaluation procedures. The parties will develop an agreed upon project review process and will make best efforts to abide by this timeline.
- Customer participation in the pilot consists of two phases, enrollment and project acceptance. Enrollment means the customer has indicated they want to participate in the pilot. Project acceptance means ComEd has approved the customer's specific project.
- Identified potential participants may submit notice of intent to participate in this pilot within the first three months of the plan cycle or thereafter. Once enrolled, tracking of participants' Rider EDA fund contributions will commence, and participant will no longer be eligible to participate in any other Smart Ideas programs funded under Rider EDA. For participants enrolled in the first three months, Rider EDA funds will be tracked retroactive to the beginning of the plan cycle. For other customers, funds will be tracked from the date of enrollment. A participant may withdraw from the pilot at any time as long as the money given to the customer does not exceed the customer contributions to the pilot. If customer contributions to the pilot are less than the money given to the

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customer, customers may not leave until the funds given to the customer are not greater than the customer contributions to the pilot. Customer contributions to the pilot are calculated to be 60% of the customer's payments under Rider EDA. Once a customer has withdrawn from the pilot, the participant's funds will revert to the applicable EDA pool and the participant will regain eligibility to participate in other Smart Ideas program. Reapplying for the pilot will not be allowed.

Non-consensus issue:

Customer eligibility.

- Caterpillar/IIEC position: does not agree with ComEd's approach. Prefers a 1 MW floor as a minimum for participation, for large 10 MW+ customers with multiple sites.
- Other Subcommittee participants' position: agrees with ComEd's approach.
- Staff position: If program is under-subscribed (If participant enrollment of ">10 MW" customers does not allocate the entire Large C&I Pilot budget), ComEd will consider expanding participation enrollment opportunities in the Large C&I Pilot program in a fair, equitable, and nondiscriminatory basis to all ComEd EEPS customers of ">8 MW" or some other size that is deemed appropriate based on the intent of the pilot and the Commission directive that the pilot be designed to limit free riders.

- Participants further acknowledge that 40% of their Rider EDA contribution shall be used to fund portfolio costs, including DCEO programs (25%), M&V (3%) and program administration (12%). A key component of this pilot will be to monitor and track program administration costs so that the cost allocation can be recalculated based on actual results for future implementation of this program.
- The program will be open to all customers over 10 MW. However, the \$5 million dollar/per annum budget cap will be adhered to if the pilot extends to sites below 10 MW, as described further below.
- ComEd will offer participation in the Large C&I Pilot program to all ComEd EEPS customers in the ">10 MW" customer class; ComEd has identified 62 customers in this class.
 - For each customer application, ComEd will ask applicants to identify any potential additional ComEd accounts that are affiliates to their organization and that they would like to consider for participation in the pilot. These potential additional participants would be placed in two categories – "5MW-10MW" and "1MW-5MW"; under 1MW accounts will not be considered for the pilot.
 - If participant enrollment of ">10 MW" customers does not allocate the entire Large C&I Pilot budget, ComEd will review the "5MW-10MW" affiliate group for inclusion in the pilot.
 - If budget allows, ComEd will offer the entire "5MW-10MW" affiliate group the opportunity to participate in the Pilot.
 - If the budget is limited, ComEd will select the highest peak kW customers from the "5MW-10MW" affiliate group until the budget is completely allocated or the applicant pool is

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	<p>exhausted.</p> <ul style="list-style-type: none"> ○ If budget remains unallocated, ComEd will repeat this process with the “1MW-5MW” affiliate group. • Participants may submit a project at any time within the 3 year planning period, provided that the project will be completed within the 3-year planning period. Upon submission of a project application, ComEd and its independent evaluator shall review the application to ensure it satisfies regulatory and statutory requirements. Best efforts shall be used to complete the review within 30 business days, subject to complete and sufficient data being provided by the participant on a timely basis. Funds associated with the proposed project shall be reserved upon the approval of a project application by ComEd. • Participants must co-fund projects at minimum of 33% of total cost. However, operational optimization projects may not require any co-funding by the participant, which is consistent with current Smart Ideas programs. This determination will be up to the discretion of ComEd. • Project funding comes from the tracked amount of EDA charges paid by the participant to date. Additionally, advanced funding may occur under the "grant" approach outlined in ComEd's Rebuttal Testimony (ComEd Ex. 3.0 at 51:1171-1180). • Progress payments will be allowed with sufficient support documentation. • Project savings are subject to ComEd's normal EM&V process that is led by the independent evaluation. • Incentive payments will be capped at a maximum of 40 cents per kWh saved. ComEd may allow exceptions to the \$0.40/kWh cap for projects that provide unique additional value beyond energy savings. • Any changes to the scope of a project shall be brought to ComEd's attention immediately. Participants acknowledge that any scope change that would render a project as non-qualifying under the original scope approval criteria may result in a forfeiture of any incentives and repayment to ComEd of any progress payments already issued. • Approved projects must be completed by May 31, 2017.

Non-consensus issue: Cap of 40 cents/kWh for incentives.

- ICC Staff position: does not agree with alternate language to allow exceptions to cap.
- Other Subcommittee participants' position: agrees with cap + alternate language (REACT subject to check).

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	<p>Unused funds at end of three-year pilot are returned to the general pool of energy efficiency funds.</p> <p>Every 6 months, ComEd will review money that has been requested and status of projects. If at some point it is determined that there is a significant possibility that not all budgeted funds will be spent, ComEd will work with the SAG to develop a deadline for customers to commit to the spending of allocated funds. The deadline would balance the desire to provide as much flexibility as possible to customers with the need for ComEd to have enough lead time to effectively re-purpose any unspent funds.</p>
Program Duration	<p>June 2014 through May 2017. ComEd recognizes that large C&I energy efficiency projects often have extended planning and implementation periods. ComEd will make best efforts to accommodate those longer implementation periods within the three-year Plan period.</p>
Collaboration	<p>Because this program offers primarily electric-only energy savings, it is not being offered as a coordinated program. However, measures that are incentivized by both ComEd and one or more of the gas companies are flagged as such in our application documents (e.g., “Your gas company may offer an additional prescriptive or custom rebate for this measure”). We also will continue to leverage opportunities from consumer education on this program and other joint gas program customer outreach and engagement activities.</p> <p>Every 6 months, ComEd will review money that is being tracked and reserved, then report to the SAG in ComEd’s quarterly reports. ComEd will do short report-outs to the SAG about status of the C&I pilot.</p>
Delivery Strategy	<p>As a pilot program, this is still under development.</p> <ul style="list-style-type: none"> • The objective of this program is to obtain greater participation from ComEd’s largest customers, with corresponding increases in electric energy savings. • Customer eligibility and selection – non-consensus issue. • Time period for opt-in, opt-out – No time period, no requirement for customers to opt-in to program for a certain period. • Progress monitoring – participating customers will be asked to propose a timeline/process for their project that achieves the goal; ComEd will vet it and approve the timeline.

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Target Market	This program is designed for a limited number of the largest electric C&I customers in the ComEd service territory. The eligible customer group consists of all ComEd sites taking service under the Extra Large and High Voltage >10MW delivery classes. If the program is under-subscribed, ComEd may expand the eligibility criteria to include smaller sites that are affiliated with the initial qualified sites.
Marketing Strategy	<p>Since this a pilot program targeted at a very small subset of ComEd's business customers, there will be no mass marketing. Outreach will be personal, and limited to the eligible customer base.</p> <p>ComEd proposes to launch the program through a webinar to the 62 customers that qualify for the pilot. The webinar would be promoted through ComEd account management team and email contacts, and would explain the program and process.</p>
Eligible Measures	Any standard or custom projects that save electricity and otherwise comply with statutory requirements vis-à-vis cost-effectiveness and evaluated savings determinations.
Program Targets	Energy savings from this pilot will be included in the Incentives Program for tracking and reporting purposes. Program costs for this pilot will be included in the Incentives Program costs. The costs and savings from the pilot will be separately tracked and reported.