ComEd Large C&I Pilot Comparison Exhibit of Non-Consensus Items DRAFT 4/28/14

Issue	Position #1	Rationale	Position No. 2	Rationale
TRC: Calculated at	Program, Project AND	-Plain reading of ICC	Project level	-Consistent with original
measure or project	Measure-level	order. See Final Order		and filed ComEd
level		13-0495, p. 61 "any		proposal.
	Supporters: ICC Staff	measure must pass the	Supporters: REACT,	-Nobody contested
		TRC." [emphasis added]	ComEd, NRDC	project-level cost-
		See T. Kennedy e-mail		effectiveness.
		[link]		-Project-level cost-
		-A contested issue in the		effectiveness is
		docket related to the		consistent with how
		application of the TRC		Custom projects
		test at the project level		evaluated
		being insufficient by		-Commission rejected
		itself to protect		measure-level cost-
		ratepayers and these		effectiveness for other
		Large C&I Pilot funds		ComEd programs.
		from inappropriate use.		See REACT write-up
		See Final Order 13-0495,		[link]
		p. 72 "Eligible measures		-Less administratively
		are defined as any		burdensome
		project that saves		-Allows pursuit of
		electricity and passes		measures that are inter-
		the TRC cost-		related (i.e. one helps
		effectiveness test. While		enable the other), while
		this is not an		still ensuring that the

unreasonable starting	combination is cost-
point, it is not sufficient	effective
by itself to protect	-offers flexibility to
ratepayers and these	better meet customers'
funds from	needs (e.g. it might be
inappropriate use."	important to include a
	measure that doesn't
	pass TRC to enable
	development of
	relationship with
	customer that will pay
	off down the road with
	additional cost-effective
	savings); this is
	important especially in a
	pilot designed to
	address concerns about
	programs inadequately
	addressing some large
	customers' needs
	-most measures that fail
	the TRC but that the
	customer wants are
	actually cost-effective,
	but fail only because of
	inadequate valuation of
	non-energy benefits
	(otherwise the
	customers wouldn't
	actually want them!)
	- adoption of both

Customer Eligibility	Only sites with over 10 MW load. ComEd will ask applicants to identify potential additional ComEd accounts that are affiliates, using above 1 MW. If program is under-prescribed, ComEd will consider additional participation. <u>Supporters</u> : ComEd, ICC Staff, REACT	a. ICC intent: for 10 MW customers to allow greater participation. b. Cost: Cost to serve 10 MW customer up to 40 cents/kWH. Average cost to serve smaller customers 15 cents/kWh. Allowing sites with lower load will increase cost of savings compared to the current cost, and may prevent ComEd from achieving its ICC-mandated savings targets. c. Administrative Burden/Feasibility: ComEd is not able to identify all affiliates sites	Allow sites over 10 MW load and "affiliate" sites with over 1 MW load <u>Supporters</u> : IIEC <u>IIEC position</u> : As a pilot there should be an assumption of proving the efficacy of the program for its intended purpose of stimulating the implementation of energy efficiency measures by the largest customers. Providing increased flexibility to these large customers in recognition of their process and	project-level TRC requirements and cap on incentives per kWh saved (see issue below) will ensure electric rate- payers are getting adequate value per dollar spent a. Intent: Purpose of program is to grant large customers greater flexibility and lower administrative burdens. The key objectives of the program also apply to the smaller sites (under 10 MW, over 1 MW) owned by these customers. b. 10 MW is artificial cut-off: No real difference between site with 10 MW load and site with 8 – 9 MW load. Load can vary year-to- year such that an 8 or 9 MW load one year can be a 10 MW load the
		identify all affiliates sites of the 62 customers	process and organizational	be a 10 MW load the next.
		below 10 MW. Also, ComEd would not be	complexities is a fundamental premise of	c. Compromises Corporate Energy

		able to separately	the pilot and one that	Management Planning:
		calculate how much the	should be evaluated	Large customers will
		affiliate sites	over its course. It is	have more difficulty
		contributed to funds,	IIEC's contention that	implementing a
		how many savings they	large multi-site	corporate energy
		generated, and cost of	industrial entities are an	management plan if
		savings.	important class of	they have to deal with
		d. Unfairness to	energy consumer whose	different rules and
		other customers: Why	unique organizational	program requirements
		should 1 MW	complexity should not	depending on the load
		"affiliated" site be	be overlooked in this	at the site.
		allowed to participate if	pilot.	
		an 8 MW "unaffiliated"		
		site were not able to		
		participate.		
		e. Would Need to		
		Re-Introduce Screen: If		
		eligible sites expand,		
		ComEd would need to		
		introduce screen to deal		
		with possibility of over-		
		subscription.		
40 cents/kWh cap on	Incentives payments will	Cost/unit energy from	Incentives payments will	 Cost/unit energy from
incentives	not exceed 40	past large customer EE	not exceed 40	past large customer EE
	cents/kWh, with	projects average 40	cents/kWh. Alternate	projects average 40
	exception in unique	cents/kWh compared to	language including an	cents/kWh compared to
	circumstances	average 15 cents/kWh	exception to 40	average 15 cents/kWh
		for other C&I customers.	cents/kWh cap should	for other C&I customers.
	Supporters: ComEd,	-If ComEd does not have	not be accepted.	-If ComEd does not have
	NRDC. REACT subject to	cap, could result in		cap, could result in
	check.	ComEd funds being used	Supporters: ICC Staff	ComEd funds being used

		for gas EE or water		for gas EE or water
		savings projects or very		savings projects or very
		high-cost kWh projects		high-cost kWh projects
		for which spending		for which spending
		exceeds the value of		exceeds the value of
		electric benefits.		electric benefits.
		-If cap not imposed,		-If cap not imposed,
		ComEd runs risk of not		ComEd runs risk of not
		achieving ICC-adopted		achieving ICC-adopted
		savings targets and		savings targets and
		prudency review.		prudency review.
		-ICC did not adopt any		
		cap.		
		-Cap not required by		
		statute.		
DCEO customer	DCEO customers may	-ComEd and DCEO have	DCEO customers should	Statute does not
participation in ComEd	not participate in the	long-standing	be allowed to	preclude DCEO
pilot	ComEd large C&I Pilot	agreement about which	participate in ComEd	customers from
		customers participate in	pilot	participating in ComEd's
	Supporters: ComEd,	DCEO vs. ComEd		pilot.
	DCEO	programs. DCEO	Supporters: REACT.	
		customers cannot	However, REACT ok with	
		participate in ComEd	DCEO's decision to	
		programs and vice-	consider a similar pilot	
		versa.	once ComEd pilot details	
		-DCEO will consider a	are finalized.	
		similar pilot once the		
		details of ComEd's pilot		
		are finalized.		