

IL EE Stakeholder Advisory Group

Sub-Committee Meeting: ComEd C&I Self-Direct

Tuesday, April 22, 2014

10:00 – 12:00

Midwest Energy Efficiency Alliance

20 North Wacker Drive, Suite 1301

Call-In Number: 888-450-5996

Passcode: 734098#

Meeting Attendees

Annette Beitel, EE SAG Facilitator
Celia Johnson, EE SAG Senior Policy Analyst
Mike Brandt, ComEd
Steve Baab, ComEd
Samantha Williams, NRDC
Adam Margolin, Quarles & Brady; REACT
Rick Flowers, FutureMark; REACT
Chris Skey, Quarles & Brady; REACT
Roger Baker, ComEd
Tom Kennedy, ICC Staff
Jennifer Hinman, ICC Staff
Andrew Cottrell, AEG
Agnes Mrozowski, Ameren IL
Cheryl Miller, Ameren IL
Chris Neme, Energy Futures Group, representing NRDC
Byron Lloyd, DCEO
Stefano Galiasso, UIC
Nate Altfeather, Leidos
Keith Goerss, Ameren IL
Neal Latham, ComEd
Mark Kelly, Caterpillar; IIEC
Jonathon Jackson; Ameren IL

Non-consensus

Intro, Annette Beitel

- Overview of three non-consensus items, open issue of DCEO program
- Options going forward – it is likely there will be at least one non-consensus item
- Two procedural options

Non-consensus issue: Measure vs. project-level TRC

- ComEd attorneys took the lead; there will be a draft out today for review. Will be sent first to NRDC and REACT. Then it will go to other groups (ELPC, AG); and full SAG.
- Staff's position is that TRC should be at both measure and project-level.

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

- Steve B, ComEd: REACT requested language for flexibility to go above cap
 - Chris S, Quarles/REACT: ComEd provided REACT additional information about this proposal. This has been a sticking point for REACT. This is subject to check with REACT, to take off non-consensus list.
 - ComEd proposed language in the updated template.
 - Tom K, Staff: Why does there need to be an exception to spend more?
 - Chris Neme: The point is to make sure there are enough electricity benefits coming back; that there is enough value to support project. Will not be able to anticipate every opportunity that may require an exception.
 - Chris S, Quarles/REACT: Does not view this as a subsidy.
 - Staff does not agree with alternate language.

Non-consensus issue: Customer Eligibility

- ComEd is proposing to open this to 62 10 MW+ customers. If program is under-prescribed, will look to affiliated small sites.
- Mark Kelly, Caterpillar/IIEC: Caterpillar is a 100 MW+ customer. Company considers themselves as one even though there are a number of sites with different utility accounts. No data has been offered to show 10 MW as the magic number.
 - Caterpillar/IIEC does not agree with ComEd's proposal on customer eligibility.
- Mike B, ComEd: ComEd doesn't know how many customers this definition could be impacting, if the program were to be open to 62 + affiliates.
- Tom K, Staff: The proposal to include under 10MW sites lacks merit. Should consider dropping eligibility to 8 MW.
- Steve B, ComEd: Reviewed original proposal (only 10 MW+ customers qualify for pilot). Refined proposal is to collect information about under 10 MW sites in two categories 5-10 MW; and 1-5 MW.
- Chris Neme: What is IIEC's position if resulting demand from proposal resulted in an over-subscription beyond available budget?
 - Mark Kelly: Caterpillar/IIEC did not provide proposal regarding over-subscription. Preference to have a 1 MW floor as a minimum for participation.
 - ComEd does not know the customers that would be in the 1 MW to 10 MW categories. Issue is ComEd does not have a way to identify affiliate or corporate ownership to 10 MW customers.
- Chris S, Quarles/REACT: REACT had not considered alternatives to this since it was previously considered consensus.
- Jennifer H, Staff: If company has two 10 MW sites, would they be able to group them together and aggregate?
 - ComEd would allow aggregating.

DCEO Open Issue – whether DCEO customers should be eligible for ComEd C&I pilot

- DCEO and ComEd do not think DCEO customers should be eligible for this pilot.
- Chris S, Quarles/REACT: Does not oppose pilot program going forward because of this issue. Thinks it makes sense for DCEO customers to participate; but understand DCEO expresses interest in monitoring this.

- Annette: David Baker agrees to participate in a subcommittee meeting to discuss how this pilot could be adapted to DCEO, once the ComEd pilot details are worked out.

Pilot Program Template

- Discussed edits proposed by NRDC, ComEd
- Will note on template where there are specific parties disagreeing
- ComEd: There is no commitment period for participants
 - Steve, ComEd: customer wouldn't be able to leave if they have been given \$; will need to stay in until ComEd recovers that \$.
 - ComEd prefers not to ask customers to repay \$. Customer can leave program once ComEd is 'made whole.'
- Tom K, Staff: What happens to \$ if a customer leaves the pilot?
 - ComEd: Money will go back to pilot fund, or general Smart Ideas fund. ComEd will revisit this issue every 6 months.
- Tom K, Staff: Concerned about customers submitting projects at any time if there is no deadline.
- Steve B, ComEd: Enrollment means customer has decided to be part of pilot.
- Steve B, ComEd: Customers are eligible to receive 60% of funds paid in.
- Tom K, Staff: Specific projects vs. enrollment.
- Question: how/when does ComEd determine when \$ will need to go back in general fund, if it is not spent by a customer?
 - ComEd will need to make this decision at some point.
 - Chris S, REACT: Will double-check on this.
- Roger B, ComEd: Removed requirement that no more than 20% of funds will be spent
- ComEd will report on a quarterly basis to the SAG on the progress in this pilot.
- NRDC and REACT discussed a list of items that ComEd should report on to the SAG on a quarterly basis. Will circulate to ComEd.
- Costs/savings from pilot will be separately tracked and reported.

Next steps

- Will circulate red line and clean version; note non-consensus items; note one possible insert in document.
- Commission process – there is not full consensus on all items. ComEd can start with smaller program on June 1st and file a companion document at the Commission to determine decision on non-consensus issues.
 - Mark Kelly- needs to take process back to group.
 - Rick F- concerned about amount of money available to customers.
 - Chris T, REACT- subject to check, preference is to move forward with pilot.
 - Jennifer H, Staff- pilot can move forward without consensus per ComEd Final Order.
 - Roger B, ComEd- issues will be worked out as the program goes along.
- SAG process – discussion during monthly SAG meeting on 4/29 will be a report-out.