

August 16, 2022

Summary of Review Comments on Attachment C

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Review of Goals for Attachment C Revisions

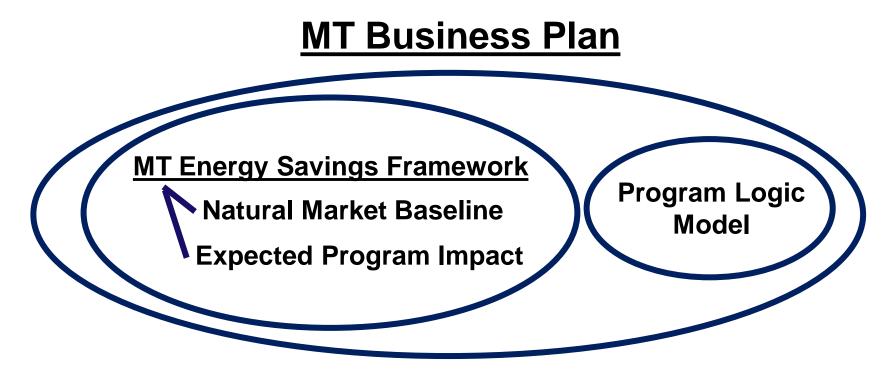
- 1. Provide guidance to allow Program Administrators to accurately assess the expected savings from MT Program Designs & Program Investments
- 2. Eliminate, to the extent possible, unnecessary distinctions between program types (RA & MT)

Summary of Review Comments on Attachment C Enhancements – Review Comments

- 1. Ameren
- 2. MEEA
- 3. NRDC
- 4. NiCor

Definitions (MEEA, NiCor)

• The *Energy Savings Framework* (ESF) is the quantitative service territory-level characterization of the market history and projections of the energy efficient product or service, including 1) the expected impact of the MT Program and 2) the Natural Market Baseline (NMB).



Terms that need further definition

- 1. Reviewers (MEEA) note that some Attachment C terms would benefit from a more detailed definition:
 - 1. "Preponderance of evidence"
 - 2. "Threshold level of confidence"
 - These terms apply to evaluating the impact of the Logic Model as measured by MPI's
 - The SAG/TRM needs to provide more clarity and work towards a consensus on what these terms mean and how they will be applied.

Recommendation: SAG Working Group

Concept that needs further definition

- 1. Reviewers (Ameren, NRDC) are good with a market-based Energy Savings Framework "reopener". In other words, a measurable deviation between the market projection and market reality must be found before revisiting and reworking the Energy Savings Framework.
- 2. However, the concept needs much more detail in:
 - 1. Defining the specific reopening criteria
 - 2. Defining what happens to MT savings (retrospectively & prospectively) when the ESF is revised.

Recommendation: SAG Working Group