



# ILLINOIS EVALUATION AND COVID-19

What to do when COVID-19 will affect the energy efficiency savings we measure?

FOLLOW-UP DISCUSSION 2020-08-24

# **History**

- 1. SAG Meeting June 11th to present the challenges and ask for SAG position
- 2. Questions from the Illinois Attorney General's Office
- 3. Memo August 10 Answering Questions
- 4. Discuss those answers today
- 5. Receive guidance





### Introduction

# The evaluation has three choices for addressing the impact of COVID-19 on program savings

- 1. Normalize savings for all years of EUL (recommended by the evaluation team)
- 2. Do not normalize savings in CY2020; normalize other years of EUL
- 3. Do not normalize savings in any year of EUL

In favor of option 1: ComEd, Ameren, NRDC, Nicor Gas, Peoples Gas and North Shore Gas (ComEd favors NOT normalizing for HER)

In favor of option 2: The Illinois Attorney General's office

The AG's office asked several questions, discussed in subsequent slides.





# AG Question #1-2

#1 How much savings would be impacted? Is this a rounding error, or is this potentially a large impact?

#2 Is there a way to quantify what type of savings impact this would have, in option 1 vs option 2?

Percent of 2020 net energy savings to be evaluated using custom methods where normalization might be an issue:

| Electric | Ameren 11%<br>ComEd 22.5% without HER (29.8% with)                               |
|----------|--|
| Gas      | Ameren 31%<br>Nicor Gas 27.2-35.5%<br>Peoples Gas and North Shore Gas 13.3-20.2% |





# AG Question #1-2

#1-2 How much savings would be impacted? Is this a rounding error, or is this potentially a large impact?

### **Electric – Projected Share of 2020 AAIG Achieved**

|                         | AIC    | ComEd no HER | ComEd<br>w/ HER |
|-------------------------|--------|--------------|-----------------|
| -100%                   | 70.9%  | 65.9%        | 53.6%           |
| -50%                    | 82.6%  | 84.9%        | 78.7%           |
| -20%                    | 89.6%  | 96.3%        | 93.8%           |
| -10%                    | 91.9%  | 100.1%       | 98.9%           |
| <b>No Normalization</b> | 94.2%  | 103.9%       | 103.9%          |
| +10%                    | 96.6%  | 107.7%       | 108.9%          |
| +20%                    | 98.9%  | 111.5%       | 114.0%          |
| +50%                    | 105.9% | 122.9%       | 129.1%          |
| +100%                   | 117.6% | 141.9%       | 154.2%          |





# AG Question #1-2

#1-2 How much savings would be impacted? Is this a rounding error, or is this potentially a large impact?

### **Gas – Projected Share of 2020 First-Year Savings**

|                  | AIC    | Nicor Gas<br>no HER | Nicor Gas<br>w/ HER | PG/NSG<br>no HER | PG/NSG<br>w/ HER |
|------------------|--------|---------------------|---------------------|------------------|------------------|
| -100%            | 68.7%  | 72.8%               | 64.5%               | 79.8%            | 66.5%            |
| -50%             | 84.4%  | 86.4%               | 82.3%               | 89.9%            | 83.3%            |
| -20%             | 93.7%  | 94.6%               | 92.9%               | 96.0%            | 93.3%            |
| -10%             | 96.9%  | 97.3%               | 96.5%               | 98.0%            | 96.7%            |
| No Normalization | 100.0% | 100.0%              | 100.0%              | 100.0%           | 100.0%           |
| +10%             | 103.1% | 102.7%              | 103.5%              | 102.0%           | 103.3%           |
| +20%             | 106.3% | 105.4%              | 107.1%              | 104.0%           | 106.7%           |
| +50%             | 115.6% | 113.6%              | 117.7%              | 110.1%           | 116.7%           |
| +100%            | 131.3% | 127.2%              | 135.5%              | 120.2%           | 133.5%           |





# **AG Question #3**

#3 What is the true evaluation cost impact of option 2? If the outer bound of the cost is 1.5 times what is initially estimated, what does that mean?

Answer: Assuming an increase of 1.5x for the affected analysis:

| Utility                         | Added Cost  | % of Budget |
|---------------------------------|-------------|-------------|
| Ameren                          | \$160,000   | 5%          |
| ComEd                           | \$850,000   | 9%          |
| Nicor                           | \$120,000   | 13%         |
| Peoples Gas and North Shore Gas | \$110,000   | 14%         |
| Total                           | \$1,240,000 |             |





# **AG Question #4**

# #4 Why would option 2 essentially require two evaluations?

#### Answer:

- For individual projects or programs, Option 2 would ask us to estimate savings both in their actual state for 2020, as well as a hypothetical state for future years.
- We will need to **both** gather 2020-specific data as to occupancy, production, energy usage, etc., as well as develop expected occupancy, production, energy usage, etc. in future years.
- We typically do some normalization. Some, but not all of that would continue even under Option 2 (e.g., weather). The line between not normalizing for COVID-19 and normalization that should continue may not be clear, leading to more internal and external debate.



# **AG Question #5**

#5 What do we do next year if COVID continues? Will we be revisiting this decision in future years?

#### Answer:

- This has not been discussed with SAG to date and should be discussed in the future.
- The decision about CY2020 should not be binding on the future.
- It will likely be reasonable in 2021 to view the conversation to date as basic precedent from which further decision-making can stem, as some of the issues we have thought through and discussed would be applicable in future years as well.





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