**SAG Fuel Conversion Working Group: Tracking Follow-Up Items**

**For Discussion During June 21, 2021 Meeting**

**April 26th Working Group Meeting**

1. Did ComEd have any custom projects that involved fuel switching (per the utility tables discussed)?

**Response from Guidehouse:** No.

1. Do the gas utilities capture or track the original / pre-existing fuel in CHP projects? Nicor Gas, Peoples Gas & North Shore Gas to check.

**Response from Nicor Gas and Peoples Gas & North Shore Gas:** Yes. For CHP projects, Nicor Gas and its implementation contractors keep track of the energy systems used prior to the CHP installation, and how those change after installation.

1. SAG Facilitator to follow-up with Chris Neme on fuel switching definition.

**Fuel Switching Definition (proposed by NRDC and NCLC):**

A fuel switching measure is:

1. The replacement of an existing piece of equipment, or the replacement or substantial supplementation of an existing end-use system (e.g., heating, water heating, cooking, etc.), that substitutes the existing use of a primary input fuel with equipment or a system that uses a different primary fuel input; or the installation of combined heat and power which substitutes purchased power with self-generation using an alternate primary fuel.

AND

1. The program design for which the customer is participating in is specifically designed to promote fuel switching and there is a reasonable expectation that the program offerings are a primary factor in the customer’s decision to fuel switch.

Note that measures adopted through most midstream and upstream programs are not likely to qualify as these programs generally capture customers who were already planning to purchase new equipment, and generally are designed to only improve the efficiency of the new equipment. Also, new construction measures or projects do not qualify as fuel switching.

1. Questions that may require Working Group discussion:
   * Considering whether the EE program is driving the fuel switch and/or early retirement
   * How do total BTU savings work?

**May 10th Working Group Meeting**

1. ComEd to follow-up with legal on whether there is an exemption to the 10% cap.
   * ComEd is discussing internally; will follow-up
2. IL Attorney General’s office to share position on fuel conversion questions.
   * IL AG’s Office will follow-up
3. Nicor Gas suggested a full compromise will also need to address 1) the 10% factor and 2) whether there are actual customer savings.
   * Follow-up discussion on 10% factor and customer savings scheduled during June 21 meeting

**Provided for Reference – Positions Table**

*Updated following May 10, 2021 Working Group meeting*

|  |  |  |
| --- | --- | --- |
|  | **Eligibility / Screening Calculation** | **Savings Claim Calculation (for Fuel Switch Measures)** |
| Ameren Illinois | Source, if there is an agreed method for screening | Site |
| ComEd | Source | Site |
| Nicor Gas | Source | Source |
| Peoples Gas & North Shore Gas | Source | Source |
| NCLC | Source | Site |
| NRDC | Site | Site |
| ICC Staff | Either site or source (law does not specify); total BTUs need to be reduced | Law does not specify; ICC has flexibility |