





similarities in the programs that indicate the utilities should pursue a state-wide stakeholder and education process, and it ignores some glaring holes regarding public education.

**1. THE COMMISSION SHOULD ORDER THE UTILITIES TO HOLD ONE STATEWIDE STAKEHOLDER PROCESS**

The Proposed Order states, “The Commission agrees with ComEd that it should establish a stakeholder process to review ComEd’s progress towards achieving the required energy efficiency and demand response goals. All parties involved, with the possible exception of Staff, maintain that a Stakeholder Advisory Committee is essential to the success of the Plan.” ICC Docket No. 07-0540 Proposed Order at 32. Additionally, the Proposed Order addresses the need for program design workshops addressing issues such as “accounting of funds collected, appropriate measuring savings values, Net to Gross ratios, financial compliance, program information tracking and reporting, and related issues.” Proposed Order at 45.

ELPC strongly agrees with the need for a stakeholder process and the need to address the accounting and financial issues in the program design workshops. However, for the reasons set forth below, there should be one statewide process that combines the program design workshops and stakeholder processes that the Proposed Order addresses separately.

**a. ComEd and Ameren Propose Virtually the Same Programs**

ComEd and Ameren propose virtually the same programs, and same implementation strategies. For example, on the residential lighting program, ComEd states, “This program will initially focus on buying down the cost of compact fluorescent light bulbs (“CFL”) at the retail level. The program will function very much like the seasonal CFL promotions that ComEd has successfully run in 2006 and 2007 as part of the U.S. Environmental Protection Agency’s

Change-a-Light campaign.” ComEd Energy Efficiency Plan at 6. Ameren states, “The initial focus will be on buying down the cost of compact fluorescent light (“CFL”) bulbs at the retail level. The program will function very much like the U.S. Environmental Protection Agency’s Change-a-Light Campaign.” Ameren Energy Efficiency Plan at 8.

Essentially, the lighting programs constitute approximately 70% of the first year residential programs for both utilities. Both programs will also focus on buying down costs of the bulbs at the retail level and will pattern the programs on EPA’s Change-a-Light Program. Additionally, both companies will implement HVAC diagnostic & tune-up programs, new HVAC programs, appliance recycling programs<sup>1</sup>, and residential multi-family programs. While there are some minor differences in the programs, the similarities far outweigh the differences.

On the commercial side, the vast majority of savings and expenditures for both utilities is the Prescriptive C&I program. ComEd Ex.1.0 at 5; Ameren Table 1 at 3. Both utilities place heavy emphasis on trade ally recruitment and training. Both companies’ strategies for trade ally training and recruitment are very similar. *See*, ComEd Plan at 77; Ameren Plan at 77. Most importantly, the more coordination in the programs, the easier it is for trade allies who want to operate in both service territories to participate. Holding separate stakeholder processes discourages the development of any such synergies. While ComEd plans more direct outreach to commercial customers than Ameren, this minor difference should not preclude them from coordinating on the trade and ally part of the program.

As the two utilities move forward with these ground-breaking residential and commercial programs, the ratepayers of Illinois will benefit from the type of information sharing that can only occur with one statewide stakeholder process.

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<sup>1</sup> For the residential appliance recycling program Ameren recycles only refrigerators. Ameren Plan at 66. ComEd will recycle refrigerators, but also freezers and room air conditioners. ComEd at 47.

**b. Both ComEd and Ameren Created their Programs Relying on the Same Consulting Firm**

Not only do both utilities propose virtually the same programs, the primary basis for the programs is work done by ICF and witness Val Jensen. His testimony in both dockets is virtually identical. *See*, Direct Testimony of Val R. Jensen Docket No. 07-0540 and the Direct testimony of Val R. Jensen Docket No. 07-0539. Mr. Jensen and ICF played the same roles for both ComEd and Ameren, helping them select energy efficiency measures, develop programs, design a portfolio, use the same deemed values for the same variables and comply in the same way with spending screens.

For example, in both ComEd and Ameren's testimony Mr. Jensen is asked, "Are you recommending that any values used in your analysis be deemed?" The answers for ComEd and Ameren are exactly the same. In fact, all of the answers to the questions in this section are virtually identical. *See*, ComEd Ex. 6.0 at 36-44; Ameren Ex. 4.0 at 34-43.

**c. ComEd and Ameren Participated in Each Other's Pre-Plan Stakeholder Meetings**

In addition to the similarities in the programs and analysis of the ComEd and Ameren Plans, the Commission should consider the participation by ComEd and Ameren in each other's initial planning process. Both Proposed Orders note that ComEd and Ameren held stakeholder meetings in the development of their Plans. 07-0540 Proposed Order at 7; 07-0539 Proposed Order at 7. The fact is that several ComEd employees, including Mr. Brandt, attended and participated in the Ameren meetings, and several Ameren employees, including Mr. Voytas, attended and participated in the ComEd meetings. Mr. Jensen attended both utilities' meetings,

and took virtually the same positions on behalf of the utilities. The duplications in the pre-filing meetings demonstrate the inefficiency of having separate processes.

**d. Service Territory Differences Not Supported by the Record**

The ComEd Proposed Order states, “This Commission does not believe that a statewide committee for both Utilities would be prudent. The differences in the service territories, such as labor costs, housing structure, population density and topography, may prove to make such coordination ill advised. The Utilities should coordinate their efforts as much as possible, but this Commission will not require it.” 07-0540 Proposed Order at 33. The Proposed Order does not cite to the record for support of this statement, and ComEd does not base its desire for separate processes on service territory differences in either its Brief or Testimony.

Logically speaking, the record on this entire proceeding does not support the premise that the differences in service territories prevent us from having one stakeholder process. The two utilities submit nearly identical plans based on the same testimony by the same witness. If the differences in the two service territories are that significant, the records in the two cases would not be so similar.

The basis for the Proposed Order finding appears to be the common sense notion that Chicago is a much bigger population center than any city in Ameren’s service territory. However, common sense also tells us that most of the population in Ameren’s service territory is in medium sized areas such as Peoria, Decatur, Bloomington, Champaign, and St. Louis Metro East, that may not be so different from Chicago in terms of demographics. Additionally, there are differences within ComEd’s own service territory between the Chicago area and outlying parts of the regions such as Rockford.

**e. Program Design Issues Should be Addressed in the Stakeholder Process**

The Proposed Order addresses the “stakeholder process” at p.30-33 of the Proposed Order, and states its purpose is “to review ComEd’s progress towards achieving the desired efficiency and demand response goals.” Proposed Order at 32. Then, much later in the Proposed Order the Commission discusses Program Design Issues separately, stating:

It appears likely to be useful to the Commission Staff, the utilities, and the general public, to develop standards regarding the accounting of the funds collected, the appropriate measure savings values, Net to Gross ratios, financial compliance, program information tracking and reporting, and related issues. We note that the statutory requisites regarding energy efficiency and demand response are new to Illinois and involve many complex issues. Additionally, new technology will emerge regarding energy efficiency and demand response, requiring a flexible approach regarding technology. Staff is directed to conduct workshops on these issues and any related issues. The outcome of these workshops shall be in the form of a Staff report, setting forth Staff’s recommendations regarding what rules, if any, need to be developed.

Proposed Order at 45.

While ELPC strongly supports addressing the financial and evaluation issues discussed in the “Program Design” section, we believe that the proper forum for this is as a sub-part of, or working group within, the stakeholder process.

Just as with the general program aspects of the stakeholder process, ELPC urges the Commission to order ComEd and Ameren to participate in one statewide process to address these issues. It simply does not make sense for the state to move down this path with ComEd and Ameren taking different approaches for measuring savings and tracking results.

**f. A Statewide Process Would be More Efficient (pardon the pun)**

ELPC plans to not only participate in the planning process, but also to work hard to promote energy efficiency programs throughout the state. That work however, takes resources. For the consumer and environmental groups that commit to the stakeholder process, participating

in two processes uses twice the resources and expenses for their staff and experts. Moreover, if the Commission does not order a combined process for the ComEd and Ameren service territories, AND it orders program design working groups separate and apart from the stakeholder process, we will now have four separate processes: ComEd Stakeholder Process; ComEd Program Design Working Group; Ameren Stakeholder Process; Ameren Program Design Working Group.

**g. The Benefits to Consumers Outweigh the Distinctions Between the Plans**

In the final analysis, it makes sense to start with one stakeholder process. While minor differences do exist between the Plans, for example ComEd's appliance recycling program includes refrigerators, freezers and room air-conditioners, and Ameren's is limited to refrigerators, the differences are very minor compared to the similarities. If the process becomes unwieldy or unproductive we can always separate them, but it would be much more difficult to go from two processes down to one. Also, as set forth above, one stakeholder process does not mean both utilities have to do everything the same way. There would be ample opportunity in a joint process to address the differences between the two Plans.

**Replacement Language:**

This Commission ~~does not~~ believes that a statewide committee for both Utilities would be prudent. *The similarities in the ComEd and Ameren programs, and the need to have standard evaluation policies for both utilities outweigh any minor* The differences in the service territories, ~~such as labor costs, housing structure, population density and topography, may prove to make such coordination ill advised.~~ The Utilities should coordinate their efforts as much as possible, but ~~this Commission will not require it.~~ *the coordination in the stakeholder process leaves room for the utilities to run different programs.*

*In addition to addressing general programmatic and rollout issues, the Commission directs the stakeholders to address the following evaluation issues: accounting of the funds collected, the appropriate measure savings values, Net to Gross ratios, financial compliance, program information tracking and reporting, and related issues. Staff is*

*directed to draft a report, setting forth Staff's recommendations regarding what rules, if any, need to be developed.*  
(p.24)

Additionally at p. 45 delete the following:

**I. ~~Program Design Issues~~**

**A. ~~Workshops~~**

~~—The NRDC recommends that the Commission should require its Staff to conduct a rulemaking, which would entail workshops, on various topics, such as the appropriate measure savings values, net to gross ratios, accounting rules for energy efficiency funds, financial compliance, and program information tracking and reporting. (NRDC posttrial brief at 15-16).~~

~~Staff took no position on this issue.~~

**~~Analysis and Conclusions~~**

~~It appears likely to be useful to the Commission Staff, the utilities, and the general public, to develop standards regarding the accounting of the funds collected, the appropriate measure savings values, Net to Gross ratios, financial compliance, program information tracking and reporting, and related issues. We note that the statutory requisites regarding energy efficiency and demand response are new to Illinois and involve many complex issues. Additionally, new technology will emerge regarding energy efficiency and demand response, requiring a flexible approach regarding technology. Staff is directed to conduct workshops on these issues and any related issues. The outcome of these workshops shall be in the form of a Staff report, setting forth Staff's recommendations regarding what rules, if any, need to be developed.~~

**2. THE PROPOSED ORDER FAILS TO ADDRESS THE GAP IN COMED'S PLAN REGARDING INCREASED CUSTOMER USAGE**

In its Initial Brief ELPC argued that under ComEd's Plan customers could participate in a number of effective programs designed to reduce their electricity consumption, and still end up with increases in electricity usage. ELPC raised two main issues. First, ComEd should educate customers on thermostat usage; both setting their thermostats at the proper temperature to maximize savings and comfort and use of a programmable thermostat. Second, ComEd should educate customers regarding the consumption levels of appliances such as plasma televisions (six times as much as a traditional television or as much as a refrigerator), and phantom load (the electricity consumed by appliances when not in use). Proposed Order at 54.

The Proposed Order states:

ComEd is encouraged to include any information in its marketing, or, on its web site, that would enable a consumer to reduce consumption. However, at this point in time, we decline to “micromanage” ComEd to the point, at which, we determine what information should be in a utility’s customer education program, or, on its web site.

Proposed Order at 55. While ELPC understands the Commission’s desire not to “micromanage” ComEd regarding its customer education program, ELPC does not believe that directing it to educate customers on usage constitutes micro-management. This issue goes beyond mere education per se, but directly to the heart of the energy efficiency plans.

Everyone acknowledges the need to do comprehensive energy efficiency planning in order to make Illinois more energy efficient. In order to achieve our goals we need to create a foundation where consumers understand basic opportunities to save energy and reduce peak demand. The Commission needs to ensure that this foundation is in place by ordering ComEd to include these basics in their public education campaign. If the Commission fails to address this issue we risk creating the scenario where consumers participate in the programs ComEd proposes while their personal consumption, as well as overall demand, still increases.

**Replacement Language:**

**Analysis and Conclusions**

ComEd is ~~encouraged~~ *ordered to include any promote* information in its marketing material and, ~~or, on its web site, that would enable a consumer to reduce consumption.~~ that provides information on reducing electricity consumption, including *measures such as* proper thermostat settings, programmable thermostats, appliance consumption, and reducing phantom load. ~~However, at this point in time, we decline to “micromanage” ComEd to the point, at which, we determine what information should be in a utility’s customer education program, or, on its web site.~~ *Such education is a critical element in a comprehensive approach to energy efficiency.*

### 3. THE COMMISSION SHOULD REQUIRE A STATEWIDE BRANDING PROGRAM AND WEBSITE

Consistent with arguments above related to the similarities between the ComEd and Ameren programs, the Commission should require a statewide branding program as part of the public education process. The Proposed Order rejects ELPC's proposal at this time, based on the difficulty of getting such a program operating within a short time frame. Proposed Order at 53. However, the start of the program is exactly the time to get such a statewide branding/education program started. Moreover, while ELPC recognizes the difficulty of getting programs started expressed in the Proposed Order, in the grand scheme of things this would require only marginally greater effort.

ELPC witness Crandall, who participated in a number of energy efficiency initiatives, including the Wisconsin statewide effort testified:

Branding is an important part of the long-term success of this program. Programs such as Wisconsin's *Focus on Energy* or California's *Flex Your Power* campaign enhance consumer awareness of both specific program offerings and the opportunities for energy efficiency in general. Although there are three separate entities running programs in the state (ComEd, Ameren and DCEO), I believe that the programs would be enhanced by a unified brand and marketing campaign supported by all three.

ELPC Ex. 1.0 at 6, line 172. Additionally, Crandall supported the creation of a statewide Web site connected with the branding, where consumers can go for all of their energy efficiency information. He proposed a site similar to the California and Wisconsin sites ([www.fypower.org](http://www.fypower.org) and [www.focusonenergy.org](http://www.focusonenergy.org)). *Id.*, line 178. NRDC similarly supported such a Web site. NRDC EX. 1.0 at 4. The statewide campaign and Web site cut across utility jurisdictions and send the important message that this is a statewide initiative that includes every customer working together across the region. ELPC notes that this does not prevent Ameren and ComEd from

supplementing the statewide effort with their own messages tailored to unique characteristics of their programs.

**Replacement Language:**

~~At some point in time, a uniform energy efficient brand, such as the federal “Energy Star” label, could create easy customer identification of energy efficient items. However, the programs are nascent. We note that the statute has provided the utilities with very little time to devise programs and get them “up and running.” At this point in time, creation of a state wide brand would only divert attention, time and money, from the creation of, and administration of, well run energy efficiency programs. Therefore, we decline to adopt this proposal at this time.~~

*The Commission believes that the utility programs will be enhanced by a statewide public education program that emphasizes the need for all Illinoisans to work together to conserve electricity. Branding is an important part of the long-term success of this program, as is a statewide website. Programs such as Wisconsin’s Focus on Energy or California’s Flex Your Power campaign enhance consumer awareness of both specific program offerings and the opportunities for energy efficiency in general. Although there are three separate entities running programs in the state (ComEd, Ameren and DCEO), the Commission believes that the programs would be enhanced by a unified brand and marketing campaign supported by all three. This effort should be supported by a statewide Web site.*

*The Commission’s ruling does not prevent the utilities or DCEO from their own individual efforts when unique characteristics of programs dictate . Merely, this requires joint coordination where it makes sense to do so.*

**4. THE COMMISSION SHOULD REVIEW THE FIRST YEAR OF COMED’S PLAN IN 2009**

The Proposed Order does not require Commission review of ComEd’s Plan until September 1, 2010. Proposed Order at 27. ELPC believes that such review should take place sooner than the Proposed Order envisions. The Plan goes into effect June 1, 2008. A review that begins on September 1, 2010 would not conclude until well in to 2011, which would be nearly three years after the start of the Plan. Moreover, it is questionable whether this review would even be completed before ComEd develops its next three year plan.

Given that we are embarking on a new and important initiative, it is important for the Commission to ensure that we are heading in the right direction. Moreover, the Commission needs to clarify that such review is not simply a general review of the Plan, but also a specific review of whether ComEd is meeting the statutory performance requirements. Thus, review of the first Plan should commence on September 1, 2009.

**Replacement Language:**

The dates are as follows for commencement of Commission dockets reviewing ComEd's plan to determine whether ~~it~~ *the plan complied with* ~~meets~~ the statutory energy efficiency and demand response goals- *September 1, 2009*, September 1, 2010, and September 1, 2011. The Commission believes that initiating proceedings on these dates is appropriate to ensure compliance with the goals set for in the Act. On or before each of these dates, Staff is directed to provide with the Commission with draft orders that will initiate docketed proceedings to review the energy efficiency and demand response goals set forth in the statute.

However, Staff's concerns are duly noted. The Commission reviews of ComEd's plan to determine compliance with the energy efficiency goals is separate and apart from the independent evaluation required by Section 103(f)(7) of the statute.

**CONCLUSION**

ELPC respectfully requests that the Commission amend the Proposed Order as set forth above. These changes will improve both utilities' planning processes. Additionally, the changes will provide consumers with better information that will increase energy savings and benefits from the programs for all Illinois consumers.

Respectfully Submitted,



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DATED: February 1, 2008

**CERTIFICATE OF SERVICE**

I, Robert Kelter, hereby certify that I served on February 1, 2008 the attached ENVIRONMENTAL LAW AND POLICY CENTER'S BRIEF ON EXCEPTIONS upon all active parties of record identified on the included service list electronically via e-mail.

A handwritten signature in black ink that reads "Robert A. Kelter". The signature is written in a cursive style with a large initial "R" and "K".

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