

13-0495 NRDC Group Cross Ex. 1

NRDC 1.02 (attachment 1)

NRDC 1.04 (attachment 1)

NRDC 2.02 (attachment 1)

NRDC 2.08

NRDC 2.18 (attachment 1)

NRDC 4.01

NRDC 4.04 (attachment 1)

NRDC 5.05

REACT 1.11

JLH 1.02 Attachment 6 (“PY7-9 V3 Lighting Draft – Units and incentives –  
(4.10.2013).xlsx”)

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 1.01 – 1.04**

**Date Received: September 18, 2013**

**Date Served: October 3, 2013**

**REQUEST NO. NRDC 1.02:**

Provide the following, in Excel format, for PY4 and PY5 actual results, as well as for forecast values for PY7-PY9, by program, by year:

- a. Program costs
  - i. Total costs
  - ii. Salary costs
  - iii. Contractor labor and expense costs
  - iv. Incentive costs
  - v. Marketing costs
  - vi. Planning costs
  - vii. Other
- b. Program annual savings
  - i. Net
  - ii. Gross
- c. Program lifetime savings
  - i. Net
  - ii. Gross
- d. number of participants
- e. For all measures:
  - i. number of each measure
  - ii. Savings per measure
    - 1. Annual
    - 2. Lifetime
  - iii. Total savings per measure category or end use
    - 1. Annual
    - 2. Lifetime
  - iv. Savings source (TRM, Custom)
  - v. Incentive per measure, by type
  - vi. NTG assumption

**RESPONSE:**

ComEd objects to this request on the grounds that it is overly broad, unduly burdensome, vague and ambiguous. ComEd also objects to this request to the extent it would require ComEd to categorize costs in a different manner than the existing costs categories ComEd has maintained and continues to maintain for tracking and reporting purposes. ComEd also objects to this request on the grounds Plan Year 4 and Plan Year 5 are outside the scope of ComEd's 2014-2016 Energy Efficiency and Demand Response Plan ("Plan 3") at issue in this proceeding, and

the information requested for these Plan Years is neither relevant nor likely to lead to the discovery of admissible evidence in this docket. Without waiving these objections or any of its General Objections, ComEd states as follows.

Please see the attachment labeled as NRDC 1.02\_Attach 1.

- a. The attachment labeled as NRDC 1.02\_Attach 1 presents the program costs in the same four categories ComEd uses in its annual reconciliation reports and in its 2014-2016 Energy Efficiency and Demand Response Plan. These categories include the following – (1) Administration, (2) Implementation, (3) Incentives and (4) Marketing & Others.
- b. The attachment labeled as NRDC 1.02\_Attach 1 provides the program annual savings at the net and gross level for each year.
- c. The attachment labeled as NRDC 1.02\_Attach 1 presents the program lifetime savings individually for PY4 and PY5 and cumulatively for the entire Plan 3 period of PY7 through PY9.
- d. Because “number of participants” does not provide a meaningful unit of measurement for all programs, the attachment labeled as NRDC 1.02\_Attach 1 provides the actual number of units associated with each program. For example, for residential lighting, the number of bulbs/fixtures is provided.
- e. Consistent with the telephone conversation held by representatives of ComEd and NRDC, ComEd directs NRDC to ComEd’s Response to Staff Data Request JLH 1.02, which includes the majority of the measure data requested.

Data Request subpart	Ex Post	Ex Ante	3rd Plan		
	PY4	PY5*	PY7	PY8	PY9
<b>RESIDENTIAL PROGRAMS</b>					
<b>Residential Lighting</b>					
<b>a. Program Costs</b>					
Administration	\$ 140,000	\$ 140,000	\$ 174,761	\$ 180,004	\$ 185,404
Implementation	\$ 2,493,725	\$ 2,380,114	\$ 2,631,322	\$ 2,628,554	\$ 2,579,954
Incentives	\$ 15,768,896	\$ 13,348,900	\$ 14,560,000	\$ 16,395,000	\$ 14,709,500
Marketing & Others	\$ 477,430	\$ 487,993	\$ 205,000	\$ 205,000	\$ 205,000
<b>Total Costs</b>	<b>\$ 18,880,051</b>	<b>\$ 16,357,007</b>	<b>\$ 17,571,083</b>	<b>\$ 19,408,558</b>	<b>\$ 17,679,858</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	319,243	305,449	127,471	118,868	85,576
Gross Savings (MWh)	533,162	515,816	236,471	233,093	175,618
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	2,873,187	2,749,041			1,425,370
Gross Savings (MWh)	4,798,458	4,642,344			2,915,992
<b>d. No. of bulbs/fixtures</b>	<b>12,600,000</b>	<b>10,370,000</b>	<b>8,303,000</b>	<b>8,180,000</b>	<b>6,020,000</b>
<b>Appliance Recycling</b>					
<b>a. Program Costs</b>					
Administration	\$ 103,709	\$ -	\$ 152,916	\$ 157,504	\$ 162,229
Implementation	\$ 4,312,487	\$ 4,137,436	\$ 2,478,825	\$ 2,478,825	\$ 2,478,825
Incentives	\$ 2,038,500	\$ 1,784,248	\$ 3,545,600	\$ 3,545,600	\$ 3,545,600
Marketing & Others	\$ 1,854,250	\$ 1,330,869	\$ 1,500,000	\$ 1,500,000	\$ 1,500,000
<b>Total Costs</b>	<b>\$ 8,308,946</b>	<b>\$ 7,252,553</b>	<b>\$ 7,677,341</b>	<b>\$ 7,681,929</b>	<b>\$ 7,686,654</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	72,302	31,869	26,178	26,178	26,178
Gross Savings (MWh)	97,039	46,623	34,043	34,043	34,043
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	578,416	254,952			626,973
Gross Savings (MWh)	776,312	372,984			814,800
<b>d. No. of units</b>	<b>53,200</b>	<b>49,000</b>	<b>40,000</b>	<b>40,000</b>	<b>40,000</b>
<b>Complete System Replacement</b>					
<b>a. Program Costs</b>					
Administration	\$ 115,285	\$ 56,000	\$ 87,381	\$ 90,002	\$ 92,702
Implementation	\$ 125,292	\$ 189,161	\$ 292,374	\$ 301,145	\$ 310,180
Incentives	\$ 832,492	\$ 1,591,900	\$ 1,342,400	\$ 1,350,400	\$ 1,363,400
Marketing & Others	\$ 37,550	\$ 105,076	\$ 70,000	\$ 72,100	\$ 74,263
<b>Total Costs</b>	<b>\$ 1,110,619</b>	<b>\$ 1,942,137</b>	<b>\$ 1,792,155</b>	<b>\$ 1,813,647</b>	<b>\$ 1,840,545</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	377	1,546	1,339	1,347	1,361
Gross Savings (MWh)	638	2,454	2,270	2,283	2,307
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	6,786	27,828			72,851
Gross Savings (MWh)	11,488	44,172			123,477
<b>d. No. of AC Systems</b>	<b>2,054</b>	<b>4,625</b>	<b>3,356</b>	<b>3,376</b>	<b>3,410</b>
<b>Multi-family Comprehensive EE</b>					
<b>a. Program Costs</b>					
Administration	\$ 87,500	\$ 122,500	\$ 152,916	\$ 157,504	\$ 162,229
Implementation	\$ 209,114	\$ 502,127	\$ 1,625,603	\$ 1,610,824	\$ 1,601,762
Incentives	\$ 1,266,119	\$ 1,394,469	\$ 2,573,014	\$ 2,310,287	\$ 1,899,227
Marketing & Others	\$ 36,444	\$ 37,084	\$ 180,000	\$ 180,000	\$ 180,000
<b>Total Costs</b>	<b>\$ 1,599,177</b>	<b>\$ 2,056,180</b>	<b>\$ 4,531,533</b>	<b>\$ 4,258,615</b>	<b>\$ 3,843,218</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	9,456	15,131	9,512	9,014	8,838
Gross Savings (MWh)	11,446	19,221	10,971	10,351	10,172
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	85,104	136,179			165,006
Gross Savings (MWh)	103,014	172,989			202,664
<b>d. No. of site visits</b>	<b>47,488</b>	<b>40,634</b>	<b>33,689</b>	<b>32,594</b>	<b>31,591</b>
<b>Energy Education Kits Program</b>					
<b>a. Program Costs</b>					
Administration	\$ 28,000	\$ 17,500	\$ 21,845	\$ 22,501	\$ 23,176
Implementation	\$ 75,700	\$ 233,380	\$ -	\$ -	\$ -
Incentives	\$ 22,240	\$ 65,068	\$ 432,820	\$ 396,640	\$ 360,460

Marketing & Others	\$ 1,115	\$ 6,171	\$ -	\$ -	\$ -
<b>Total Costs</b>	<b>\$ 127,055</b>	<b>\$ 322,119</b>	<b>\$ 454,665</b>	<b>\$ 419,141</b>	<b>\$ 383,636</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	479	1760	681	624	567
Gross Savings (MWh)	634	2500	896	821	746
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	3,952	14,520			9,562
Gross Savings (MWh)	5,232	20,625			12,124
<b>d. No. of kits</b>	<b>454</b>	<b>13,998</b>	<b>12,920</b>	<b>11,840</b>	<b>10,760</b>
<b>Single Family Home Performance</b>					
<b>a. Program Costs</b>					
Administration	\$ 87,500	\$ 119,000	\$ 87,381	\$ 90,002	\$ 92,702
Implementation	\$ 190,447	\$ 175,127	\$ 522,839	\$ 525,659	\$ 488,999
Incentives	\$ 123,318	\$ 301,771	\$ 672,577	\$ 616,229	\$ 465,640
Marketing & Others	\$ 63,530	\$ 96,354	\$ 169,333	\$ 170,764	\$ 152,153
<b>Total Costs</b>	<b>\$ 464,795</b>	<b>\$ 692,252</b>	<b>\$ 1,452,130</b>	<b>\$ 1,402,654</b>	<b>\$ 1,199,494</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	468	934	2,139	2,157	1,954
Gross Savings (MWh)	574	1,105	2,604	2,625	2,382
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	4,212	8,406			52,439
Gross Savings (MWh)	5,166	9,945			62,620
<b>d. No. of assessments</b>	<b>1,080</b>	<b>2,760</b>	<b>7,325</b>	<b>7,369</b>	<b>6,891</b>
<b>New Construction</b>					
<b>a. Program Costs</b>					
Administration	\$ 31,285	\$ -	\$ 21,846	\$ 22,501	\$ 23,176
Implementation	\$ 52,828	\$ 25,523	\$ 8,720	\$ 10,049	\$ 8,463
Incentives	\$ -	\$ 37,274	\$ -		
Marketing & Others	\$ 8,794	\$ 3,948	\$ -		
<b>Total Costs</b>	<b>\$ 92,907</b>	<b>\$ 66,745</b>	<b>\$ 30,566</b>	<b>\$ 32,550</b>	<b>\$ 31,639</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	0	30	16	19	15
Gross Savings (MWh)	0	40	19	23	19
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	0	600			977
Gross Savings (MWh)	0	900			1,221
<b>d. No. of units</b>	<b>0</b>	<b>490</b>	<b>374</b>	<b>431</b>	<b>363</b>
<b>C&amp;I PROGRAMS</b>					
<b>Incentives</b>					
<b>a. Program Costs</b>					
Administration	\$ 1,353,004	\$ 603,750	\$ 436,903	\$ 450,010	\$ 463,510
Implementation	\$ 7,496,995	\$ 6,944,694	\$ 12,712,487	\$ 11,641,171	\$ 11,820,724
Incentives	\$ 27,053,759	\$ 22,740,567	\$ 25,917,843	\$ 25,109,207	\$ 26,486,174
Marketing & Others	\$ 4,833,172	\$ 1,716,570	\$ 1,003,907	\$ 864,143	\$ 832,734
<b>Total Costs</b>	<b>\$ 40,736,930</b>	<b>\$ 32,005,581</b>	<b>\$ 40,071,140</b>	<b>\$ 38,064,531</b>	<b>\$ 39,603,142</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	259,852	233,146	181,277	162,742	161,831
Gross Savings (MWh)	352,139	319,958	273,324	247,835	247,245
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	3,656,119	2,677,752			5,952,101
Gross Savings (MWh)	5,817,255	3,839,496			9,085,747
<b>d. No. of projects</b>	<b>3,380</b>	<b>3,700</b>	<b>2,731</b>	<b>2,545</b>	<b>2,448</b>
<b>Optimization</b>					
<b>a. Program Costs</b>					
Administration	\$ 175,000	\$ 306,250	\$ 349,522	\$ 360,008	\$ 370,808
Implementation	\$ 2,311,572	\$ 2,601,921	\$ 3,673,018	\$ 3,833,421	\$ 3,900,737
Incentives	\$ 3,356,070	\$ 4,067,233	\$ 7,518,100	\$ 7,813,100	\$ 7,910,000
Marketing & Others	\$ 272,028	\$ 126,745	\$ 206,325	\$ 178,517	\$ 178,517
<b>Total Costs</b>	<b>\$ 6,114,670</b>	<b>\$ 7,102,149</b>	<b>\$ 11,746,965</b>	<b>\$ 12,185,046</b>	<b>\$ 12,360,062</b>
<b>b. Program annual savings</b>					
Net Savings (MWh)	28,018	26,968	92,547	95,781	97,831
Gross Savings (MWh)	31,788	40,069	96,810	100,807	103,216
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	120,018	186,240			1,197,707
Gross Savings (MWh)	149,034	277,419			1,466,971

For PY4 & PY5, includes the Prescriptive, Custom, Data Centers and Commercial Real Estate program elements

For PY4 & PY5, includes the Retrocommissioning and Compressed Air program elements

d. No. of projects	59	62	475	491	502
<b>Midstream</b>					
<b>a. Program Costs</b>					
Administration	\$ 87,500	\$ 87,500	\$ 174,761	\$ 180,004	\$ 185,404
Implementation	\$ 546,443	\$ 861,731	\$ 895,522	\$ 899,829	\$ 905,209
Incentives	\$ 2,126,152	\$ 3,696,526	\$ 5,425,727	\$ 5,795,753	\$ 6,240,497
Marketing & Others	\$ 97,880	\$ 265,221	\$ 100,000	\$ 100,000	\$ 100,000
Total Costs	\$ 2,857,975	\$ 4,910,978	\$ 6,596,010	\$ 6,975,586	\$ 7,431,110
<b>b. Program annual savings</b>					
Net Savings (MWh)	63,358	62,883	110,033	116,269	123,170
Gross Savings (MWh)	101,230	121,395	175,771	185,733	196,757
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	190,074	188,649			1,845,927
Gross Savings (MWh)	303,690	364,185			2,948,766
<b>d. No. of lamps</b>	413,687	1,315,800	1,843,290	1,947,757	2,063,363
<b>New Construction</b>					
<b>a. Program Costs</b>					
Administration	\$ 87,500	\$ 131,250	\$ 174,761	\$ 180,004	\$ 185,404
Implementation	\$ 705,736	\$ 1,509,245	\$ 2,280,000	\$ 2,394,000	\$ 2,660,000
Incentives	\$ 1,702,050	\$ 2,422,858	\$ 3,295,127	\$ 3,462,487	\$ 3,629,848
Marketing & Others	\$ 78,474	\$ 76,414	\$ 420,000	\$ 441,000	\$ 490,000
Total Costs	\$ 2,573,760	\$ 4,139,767	\$ 6,169,888	\$ 6,477,491	\$ 6,965,252
<b>b. Program annual savings</b>					
Net Savings (MWh)	10,400	20,433	14,795	15,665	16,535
Gross Savings (MWh)	18,200	34,929	28,451	30,125	31,798
<b>c. Program lifetime savings</b>					
Net Savings (MWh)	124,800	245,196			939,896
Gross Savings (MWh)	218,400	419,148			1,807,492
<b>d. No. of square footage</b>	6,200,000	13,990,000	17,000,000	18,000,000	19,000,000

\* - Program costs for PY5 are still preliminary, but are being provided for general comparison

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 1.01 – 1.04**

**Date Received: September 18, 2013**

**Date Served: October 8, 2013**

**REQUEST NO. NRDC 1.04:**

For your plan filing, identify all measures for which NTG values have changed.

- a. Show what the changes are.
- b. Explain why the changes were made.

**RESPONSE:**

ComEd objects to this request on the grounds it is overbroad, unduly burdensome, and vague and ambiguous. Without waiving these foregoing objections or any of ComEd's General Objections, ComEd states as follows. Please see the attachment labeled as NRDC 1.04\_Attach 1, which shows the NTG values from PY4 through PY9. Changes to the NTG values over time are due to the findings of the independent evaluator, and are consistent with the NTG framework approved by the Commission in its final Order in ICC Docket No. 10-0570.

NTG Ratio	PY4 - Used for PY4 M&V Results	PY4 -- Calculated by PY4 M&V Results	PY5 - Deemed Values	PY6 - Deemed Values	PY7 - Plan Values	PY8 - Plan Values	PY9 - Plan Values
<b>Lighting Discounts</b>	<b>0.60</b>						
Std CFLs	0.58	0.55	0.72	0.55	0.55	0.50	0.45
Specialty CFLs	0.80	0.44	0.80	0.80	0.44	0.44	0.44
<b>Fridge Freezer Recycle Rewards</b>	<b>0.75</b>						
Refrigerators	0.73	0.77	0.67	0.73	0.77	0.77	0.77
Freezers	0.77	0.77	0.75	0.82	0.77	0.77	0.77
AC Units	0.58	0.58	0.7	0.72	0.58	0.58	0.58
<b>Multi-Family Home Performance</b>	<b>0.83</b>						
CFLs	0.81	0.98	0.81	0.98	0.98	0.98	0.98
Water Measures	0.93	0.94	0.93	0.92	NA	NA	NA
Showerheads		0.92	0.93	0.92	0.92	0.92	0.92
Kitchen aerators		1.00	0.93	0.92	1.00	1.00	1.00
Bath aerators		0.94	0.93	0.92	0.94	0.94	0.94
<b>Single Family Home Performance</b>	<b>0.82</b>						
CFLs	0.80	0.80	0.89	0.79	0.80	0.80	0.80
Showerheads	0.93	0.92	0.94	0.75	0.92	0.92	0.92
Aerators	0.99	1.00	0.94	0.75	1.00	1.00	1.00
Water Pipe Insulation	0.93	0.90	0.94	0.75	0.90	0.90	0.90
Air Sealing	0.86	0.86	Retrospective	0.80	0.86	0.86	0.86
Attic Insulation	0.81	0.82	Retrospective	0.80	0.82	0.82	0.82
<b>Joint Elem Education</b>	<b>0.76</b>		<b>0.76</b>	<b>0.76</b>			
CFLs	0.73	0.73	0.76	0.76	0.73	0.73	0.73
Showerheads	0.92	0.92	0.76	0.76	0.92	0.92	0.92
Kitchen aerators	0.92	0.92	0.76	0.76	0.92	0.92	0.92
Bath aerators	0.79	0.79	0.76	0.76	0.79	0.79	0.79
<b>Complete System Replacement</b>	<b>0.59</b>	<b>0.59</b>	<b>Retrospective</b>	<b>0.59</b>	<b>0.59</b>	<b>0.59</b>	<b>0.59</b>
<b>Res New Construction</b>			<b>Retrospective</b>	<b>0.8</b>	<b>0.80</b>	<b>0.80</b>	<b>0.80</b>
<b>Prescriptive</b>	<b>0.74</b>						
Lighting		0.70	0.74	0.70	0.70	0.70	0.70
Non-Lighting		0.63	0.62	0.63	0.63	0.63	0.63
<b>Custom</b>	<b>0.76</b>	<b>0.61</b>	<b>0.56</b>	<b>0.61</b>	<b>0.61</b>	<b>0.61</b>	<b>0.61</b>
<b>Midstream</b>	<b>0.63</b>	<b>0.63</b>	<b>0.74</b>	<b>0.63</b>	<b>0.63</b>	<b>0.63</b>	<b>0.63</b>
<b>Retro-Commissioning</b>	<b>0.92</b>	<b>1.04</b>	<b>0.71</b>	<b>1.04</b>	<b>1.04</b>	<b>1.04</b>	<b>1.04</b>
<b>New Construction</b>	<b>0.57</b>	<b>0.59</b>	<b>0.65</b>	<b>0.52</b>	<b>0.52</b>	<b>0.52</b>	<b>0.52</b>
<b>Industrial Systems</b>			<b>0.67</b>	<b>Retrospective</b>	<b>0.67</b>	<b>0.67</b>	<b>0.67</b>

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 2.01 – 2.20**

**Date Received: September 20, 2013**

**Date Served: October 3, 2013**

**REQUEST NO. NRDC 2.02:**

Regarding banking of savings, for each of the past and current Program Years (PY1 through PY6):

- a. What was the savings goal?
- b. How much verified savings was achieved (for PY5 and any other year for which verification has not been completed, just provide the best current estimate; for PY6 provide the best forecast)?
- c. What has been the volume of banked savings carried forward to count toward compliance with the next year's savings target?
- d. If banked savings were lower than the amount by which the goals in a given year were exceeded, please explain why.

**RESPONSE:**

ComEd objects to this request on the grounds that the phrases "savings goal", "goals" and "carried forward to count toward compliance" are vague and ambiguous. ComEd also objects to this request on the grounds that Plan Year 1 through Plan Year 6 are outside the scope of ComEd's 2014-2016 Energy Efficiency and Demand Response Plan ("Plan 3") at issue in this proceeding, and the information requested for these Plan Years is neither relevant nor likely to lead to the discovery of admissible evidence in this docket. ComEd further objects to this request to the extent it calls for speculation and mischaracterizes the Commission's orders regarding the banking of energy savings. Without waiving these foregoing objections or any of ComEd's General Objections, ComEd states as follows.

For purposes of this Request, ComEd interprets the phrase "savings goal" to mean ComEd's portion of the applicable annual energy savings goal as approved by the Commission in either ICC Docket No. 07-0540 or ICC Docket No. 10-0570.

- a. Please see the attachment labeled as NRDC 2.02\_Attach 1.
- b. Please see ComEd's response to subpart (a) of this request. Because Plan Year 2 is the most recent Plan year for which the Commission has concluded its goal compliance investigation and issued a final order, energy savings and banked savings for Plan Year 3 through Plan Year 6 reflect estimates or projections. *See Commonwealth Edison Co., Final Order, ICC Docket No. 10-0520.*

- c. Please see ComEd's response to subpart (a) of this request, which, based on actual and estimated banked savings, shows the total amount of banked savings through Plan Year 6 that may be applied to future Plan years.
- d. During PY1-PY3, the amount of energy savings that could be banked in a given year was limited to 10% of the total combined energy savings goal for that year.

**Commonwealth Edison Banking Calculations PY1 - PY6 (Net MWh)**

Plan Year	Net results (MWh)	Statutory Goal (MWh)	Allowed Banking (MWh)	Cumulative Banked (MWh)
PY1	181,094	188,739	0	0
PY2	506,208	393,691	39,369	39,369
PY3	659,549	584,077	58,408	97,777
PY4	1,046,802	727,985	318,817	416,594
PY5	1,000,000	942,209	57,791	474,385
PY6 <sup>(3)</sup>	920,000	902,690	17,310	491,695
<b>Total</b>	<b>4,313,653</b>	<b>3,739,391</b>	<b>491,695</b>	<b>491,695</b>

Notes

PY5 and PY6 results and calculated banking are preliminary estimates (highlighted in yellow) .

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 2.01 – 2.20**

**Date Received: September 20, 2013**

**Date Served: October 3, 2013**

**REQUEST NO. NRDC 2.08:**

Regarding the Company's Midstream Products program:

- a. Please indicate how much of the forecast savings are expected to come from each of the measures identified as eligible measures on p. 80 of the plan.
- b. On p. 50, lines 1081 to 1083 of his testimony, Mr. Brandt states that the Company is "currently investigating potential future offerings through (its Midstream Incentives) program, including HVAC and motor technologies. The idea of expanding this program approach to other markets has been discussed for several years through the SAG. Why has the Company not already expanded the approach to other markets and/or committed to such an expansion for Plan 3?"

**RESPONSE:**

- a. Please see the attachment labeled as NRDC 2.08\_Attach 1.
- b. ComEd objects to this request to the extent it misquotes Mr. Brandt's testimony, assumes facts not in evidence, and seeks to impose obligations not otherwise imposed by applicable law or Commission orders. Without waiving these foregoing objections or any of ComEd's General Objections, ComEd states as follows.

As an initial matter, the quote of Mr. Brandt's testimony in the first sentence of subpart (b) of this request should conclude at the end of the first sentence (i.e., technologies.").

With respect to the issue of expansion, ComEd originally launched the Midstream Product Program during the last quarter of PY3. Since the launch of the program, the program offerings have increased over time from a single product (i.e., compact fluorescent lamps ("CFLs")) to include reduced wattage linear fluorescents, reduced wattage ceramic metal halide ("CMH"), screw-in LEDs, and most recently high efficiency ballasts. As these additional products were added to the program, ComEd has adjusted its Incentives Program (formerly the "Prescriptive" Program) accordingly, and believes that it has just begun to settle upon the most effective program design for the midstream offering. To date, the program has only gone through one year of evaluation results with a single product. As more evaluation feedback is received, ComEd will be better able to assess, for example, the feasibility of moving HVAC measures to a midstream delivery channel. Because HVAC measures are roughly 2.5 times more expensive to promote than lighting measures, ComEd will need to determine if the portfolio can afford this type of midstream offering within the constrained portfolio budgets. Additionally, low avoided capacity and supply costs and higher minimum efficiency standards have prevented the majority of HVAC and motor technologies from passing cost-effectiveness screening.

Variable: Sheet: Cell:	Mid Stream Program 1 D1	Lifetime Net kWh Savings Per Measure 5 I62
	2W S/4 MED 120V CL 2700K 25000H 2W S/4 MED 120V CL 2700K 25000H	216.21
	3W COLD CATHODE A LAMP FROSTED 3W COLD CATHODE A LAMP FROSTED	324.32
	4W A-15 SOFT WHITE 8W COLD CATHODE A LAMP FROSTED	534.97
	11W BR30 MED 120V FF 2250K 18,000H 8W R20 MED 120V FF 2850K 18000H	682.15
	15W CFL COLD CATHODE 15W CFL COLD CATHODE	972.95
	GRAINGER 40TWIST/41 (2CUU4) 40 GRAINGER 55TWIST/27 (2CUU5) 55W	327.02
	28942H277 35K 42W MOGUL TCP 42W SPRINGLAMP - 28942	1464.27
	CF65EL/TWIST/841 - 29508 CF65EL/TWIST/841 - 29508	1824.29
	68 WATT SPRINGLAMP 35K 2896835K TCP 68W SPIRAL MOGUL BASE - 28968H	3068.19
	2W TORPEDO CNDL BASE - 10702C 2W G10 GLOBE CAND 27K 51K - 1G1002C	108.11
	15W PAR CFL TCP 4W TORPEDO CAND BASE - 10704C	244.36
	11R20/41 TCP PF2414/31K PAR24 - PF2414	366.02
	13 WATT FULL SPRINGLAMP Can- 48913C TCP 33113SP 13W 2700K GU24 SP	603.29
	23 WATT SPRINGLAMP TRU DIM 35K TCP 27W T-6 CIRCLINE 4PIN	620.62
	19W A-LAMP - TCP 23W R40 SPRINGLIGHT - 804023	708.86
	CF40EL3WAY827RP - 27714 CF40EL3WAY827RP - 27714	1756.72
	13W GREEN FLE13HT3/2/GREEN 13W GREEN FLE13HT3/2/GREEN	27.03
	5 WATT FULL SPRINGLAMP SHATTER TCP 5W FULL SPRINGLAMP - 48905	326.35
	10W CFL FLE10HT3/2/827 TCP 9W SPRINGLIGHT 41K - 80100941	408.68
	13 WATT FULL SPRINGLAMP 30K TCP 14W SPRINGLIGHT 50K - 80101450	624.53
	13W T2 2700K 120V CFL TCP 32W SPRINGLIGHT - 801032	641.62
	18 WATT FULL SPRINGLAMP 41K TCP 19W SPRINGLIGHT 3PK - 8010193	747.90
	PL-C18W/841/XEW/4P/ALTO-14W 220418 PL-C18W/841/XEW/4P/ALTO-14W 220418	64.86
	PL-C26W/835/XEW/4P/ALTO-21W 220475 PL-C26W/835/XEW/4P/ALTO-21W 220475	81.08
	PL-T32W/835/XEW/4P/ALTO-27W 220228 PL-T32W/841/XEW/4P/ALTO-27W 220244	94.59
	PL-L40W/830/XEW/4P/IS-25W 209130 PL-L40W/841/XEW/4P/IS-25W 209155	405.40
	CDM145/C/U/O/4K/ED28 ALLSTART CDM145/U/O/4K/ED28 ALLSTART	648.64
	CDM205/C/U/O/4K ALLSTART 236927 CDM205/U/O/4K ALLSTART 232561	972.95
	CDM330/C/U/O/4K ALLSTART 236935 CDM330/V/O/4K/LL/ALLSTART	1891.86
	CDM830/V/O/4K EA 6PK ALLSTART CDM860/V/O/4K-ALLSTART	3121.56
	TCP 2W LED RED EXIT RETROFIT TCP 2W LED WHITE EXIT RETROFIT	170.54
	2B10/5/END/CL-2700 PHILIPS 2BA9/END/CL-2700 20W	200.63
	2.3W LED GLOBE NON DIMMABLE	343.95
	3.5B12/END/2700-E26-DIM MR16 6W	655.77
	10MR16/END/F24/2700 DIM 420166 MR16-GU10 5W	934.98
	10MR16/END/F24/3000 420174 MR16 NARROW FLOOD	1362.56
	7PAR20/F25/3000 418582 PAR20 8W	536.73
	LED 17W P20/50K/39 DEG LED6R20/DIM/827	841.12
	10W PAR30 120V FL DIM TCP LED 9W PAR20 FLD40	926.40
	10W PAR30 120V SP DIM PAR30 12W	1561.04
	10-16W LED DIMMABLE POWERBAND TECH PHILIPS 13PAR30S 12.28W	1817.57
	15W 120/277 VOLT WF 5000K TCP 19W LED NARROW FLD	2862.28
	19PAR38/END/F25/3000 421222 PAR38 LED	3672.05
	LED 5.8W A19/35K COVERED GLOBE LED 5.8W A19/50K COVERED GLOBE	564.85
	A19 8W LED 8WATT A19 SNOW CONE	1240.52
	7W LED A19 BULB MULTI DIRECTIONAL NON DIMMABLE 8.5W	861.65
	10A19/LPRIZE/2700 LED13.5A/O/F/827/HVP	1291.18
	17A21/END/2700 LED14A19/DIM/O/827	1645.92
	A19 MEDIUM BASE 2700K A19 MEDIUM BASE 2700K	2162.12
	28W T5 800 SERIES 3500K T5-21W-120-2/6500K IL 21	161.50
	4' 49W HO FP54/50W/850/HO/SS/ECO 21072	173.74
	15W 2' T8 F17T8/XL/SPX30/WM/ECO FO17/15W/835/XP/SS/ECO 22406	64.86

22W 3' T8 F25T8/XL/SPX35/WM/ECO GE 22W T8 - F25T8XLSPX50WMEC	74.32
25W 4FT UNIVERSAL START WEST FB28T8/835/6/ECO	213.65
F96T8/ADV835/XEW/ALTO-51W FO96/54W/850/XP/SS/ECO3 22347	74.87
Standard CFL 60W	313.51
Standard CFL 75W	356.75
Standard CFL > 100W	508.10
Specialty CFL 40W	194.59
Specialty CFL 60W	313.51
Specialty CFL 75W	356.75
Specialty CFL > 100W	0.00
Standard LED 40W	378.37
Standard LED 60W	539.18
Standard LED 75W	624.31
Standard LED > 100W	579.72
Reflector LED 45W	837.82
Reflector LED 65W	1520.24
Reflector LED 75W	1229.71
Reflector LED 90W	1486.46
Reflector LED > 120W	1916.18
Candelabra LED Globe < 40W	378.37
Candelabra LED Globe 40W	378.37
Candelabra LED Globe 60W	539.18
LED Fixture 65W	2958.42
Reduced Wattage T-8 32W	318.60

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 2.01 – 2.20**

**Date Received: September 20, 2013**

**Date Served: October 3, 2013**

**REQUEST NO. NRDC 2.18:**

In Table 7 of the Company's DSM plan (p. 27) the Company provides a breakdown of the different components of its forecast "portfolio-level costs".

- a. Please provide both budgeted values and actuals for each of the same categories (as well as another other categories not included in the proposed Plan 3) for PY1 through PY6.
- b. The non-program specific labor costs proposed for Plan 3 are roughly double those approved for Plan 2. What is the rationale for such a large increase?

**RESPONSE:**

ComEd objects to this request on the grounds that Plan Year 1 through Plan Year 6 are outside the scope of ComEd's 2014-2016 Energy Efficiency and Demand Response Plan ("Plan 3") at issue in this proceeding, and the information requested for these Plan Years is neither relevant nor likely to lead to the discovery of admissible evidence in this docket. ComEd further objects to this request to the extent it seeks to impose obligations not otherwise imposed by applicable law or Commission orders. ComEd also objects to this request because the phrase "as well as another other categories not included in the proposed Plan 3" is overbroad, vague and ambiguous. Without waiving these foregoing objections or any of ComEd's General Objections, ComEd states as follows.

- a. Please see the attachment labeled as NRDC 2.18\_Attach 1.
- b. The primary drivers for the increase in the non-program specific labor costs in Plan 3 versus Plan 2 are as follows: (1) headcount increased during Plan 2 and (2) Plan 3 corrects an omission in Plan 2 to ensure that payroll costs are fully reflected.

	Plan Year 1		Plan Year 2		Plan Year 3		Plan Year 4		Plan Year 5		Plan Year 6	
	Budget (1)	Actual	Budget (1)	Actual								
<b>EDUCATION / MARKET TRANSFORMATION COSTS</b>												
Education / Outreach	\$ 2,500,000	\$ 1,193,884	\$ 2,200,000	\$ 1,031,041	\$ 1,805,000	\$ 2,682,570	\$ 3,070,441	\$ 3,970,888	\$ 2,000,000	\$ 4,023,165	\$ 2,196,773	
Municipal Outreach							\$ 1,300,000	\$ 67,308	\$ 700,000	\$ -	\$ 280,000	
Market Transform. EIO / EDS	\$ 500,000	\$ 491,423	\$ 600,000	\$ 618,377	\$ 400,000	\$ 275,427	\$ 400,000	\$ 460,749	\$ 400,000	\$ 386,730	\$ 400,000	
<b>TOTAL EDUCATION / MARKET TRANSF. COSTS</b>	<b>\$ 3,000,000</b>	<b>\$ 1,685,307</b>	<b>\$ 2,800,000</b>	<b>\$ 1,649,418</b>	<b>\$ 2,205,000</b>	<b>\$ 2,957,997</b>	<b>\$ 4,770,441</b>	<b>\$ 4,498,944</b>	<b>\$ 3,100,000</b>	<b>\$ 4,409,895</b>	<b>\$ 2,876,773</b>	
<b>PORTFOLIO LEVEL COSTS:</b>												
Total Measurement & Verification (M&V) (2)	\$ 1,200,000	\$ 1,200,000	\$ 2,377,000	\$ 2,369,268	\$ 3,621,050	\$ 3,345,272	\$ 3,557,036	\$ 3,519,822	\$ 3,573,000	\$ 354,994	\$ 3,498,456	
R&D/Emerging Tech	\$ 1,000,000	\$ 628,267	\$ 2,377,000	\$ 1,026,174	\$ 1,982,544	\$ 1,387,102	\$ 3,057,036	\$ 974,156	\$ 2,508,000	\$ 1,142,049	\$ 2,075,265	
Market Research		\$ 269,425	\$ 600,000	\$ 516,038	\$ 80,000	\$ 82,000	\$ 2,000,000.0	\$ 660,495	\$ 1,000,000.0	\$ 2,634,804	\$ 750,000.0	
Legal	\$ 500,000	\$ 568,883	\$ 200,000	\$ 52,783	\$ 350,000	\$ 246,483	\$ 300,000	\$ 147,022	\$ 200,000	\$ 252,034	\$ 200,000	
Tracking System	\$ 400,000	\$ 569,038	\$ 300,000	\$ 297,523	\$ 250,000	\$ 334,382	\$ 543,385	\$ 1,036,200	\$ 400,000	\$ 438,551	\$ 500,000	
Labor (3)	\$ 1,200,000	\$ 1,956,803	\$ 2,400,000	\$ 2,315,400	\$ 3,147,434	\$ 3,496,032	\$ 1,800,000	\$ 2,749,232	\$ 1,854,000	\$ 3,214,657	\$ 1,918,890	
General Portfolio Admin	\$ 800,000	\$ 59,532	\$ 1,411,000	\$ 620,251	\$ 430,000	\$ 190,147		\$ 159,232		\$ 152,814		
Subtotal Portfolio Admin	\$ 2,900,000	\$ 3,423,682	\$ 4,911,000	\$ 3,801,994	\$ 4,257,434	\$ 4,349,045	\$ 4,643,385	\$ 4,752,180	\$ 3,454,000	\$ 6,692,860	\$ 3,368,890	\$ -
Total Portfolio Admin Costs	\$ 8,100,000	\$ 6,937,255	\$ 12,465,000	\$ 8,846,855	\$ 12,066,028	\$ 12,039,417	\$ 16,027,898	\$ 13,745,102	\$ 12,635,000	\$ 12,599,797	\$ 11,819,384	\$ -

(1) Budget was established at the start of the plan year and may differ from actual plan filed

(2) PY1 - PY3 show actual M&V costs for the year; PY4 and PY5 show costs incurred as of August 31, 2013

(3) In years PY1-PY3 the portfolio labor costs reflect all Rider EDA labor. In Years PY4 and PY5, a portion of Rider EDA labor is allocated to program elements as requested by ICC Staff.

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 4.01 – 4.05**

**Date Received: October 15, 2013**

**Date Served: October 30, 2013**

**REQUEST NO. NRDC 4.01:**

In response to NRDC 2.01d, ComEd states that it received \$2.32 million in revenue for the 2012-2013 year (PY5).

- a. How much revenue did ComEd receive in each of the previous program years?
- b. How much revenue did ComEd receive (or does it expect to receive) for PY6?

**RESPONSE:**

Subject to and without waiving the objections and clarifications noted in ComEd's Data Request Response to NRDC 2.01, which are fully incorporated herein by reference, ComEd states as follows.

- a. ComEd received no PJM revenues associated with its energy efficiency programs offered pursuant to energy efficiency and demand response plans approved by the Commission pursuant to Section 8-103 of the Public Utilities Act in any year prior to the 2012-13 Plan year.
- b. ComEd expects to receive \$5.14 million from PJM for PY6 associated with its energy efficiency programs offered pursuant to energy efficiency and demand response plans approved by the Commission pursuant to Section 8-103 of the Public Utilities Act.

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 4.01 – 4.05**

**Date Received: October 15, 2013**

**Date Served: October 31, 2013**

**REQUEST NO. NRDC 4.04:**

For PY4 and PY5, please provide both budgeted and actual spending as well as both budgeted and actual net MWh savings in the same level of detail as provided in Table 5 of the Company's Plan 3 (i.e. by program, including DCEO and Portfolio Level costs). If the savings values are preliminary because they have not yet been verified by evaluators, please indicate that in the response.

**RESPONSE:**

ComEd objects to this request to the extent it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence in this docket. Without waiving these foregoing objections or any of ComEd's General Objections, ComEd states as follows.

Please see the attachment labeled as NRDC 4.04\_Attach 1. Please note that PY5 Net MWh are ex-ante values and that ComEd does not have DCEO Net MWh values for PY5.

**PY4 & PY5 Budget and Actual Costs (in '000's)**

Programs	PY4 Budget		PY4 Actual		PY5 Budget		PY5 Actual	
	Cost	Net MWHs						
<b>C&amp;I - EE Programs</b>								
Prescriptive	\$ 38,913	238,252	\$ 35,981	234,120	\$ 38,913	238,345	\$ 25,028	174,671
Custom	\$ 6,105	28,796	\$ 3,215	23,892	\$ 5,367	35,996	\$ 4,405	30,650
Retro-commissioning	\$ 5,032	26,880	\$ 4,838	25,021	\$ 4,682	29,568	\$ 2,004	18,190
New Construction	\$ 2,612	5,502	\$ 2,574	10,400	\$ 3,625	8,402	\$ 4,140	20,433
Compressed Air	\$ 2,073	18,151	\$ 1,276	2,997	\$ 2,786	19,967	\$ 5,098	8,778
Midstream Incentives	\$ 1,497	19,979	\$ 2,858	63,358	\$ 1,975	32,766	\$ 4,832	62,883
Small Business Direct Install	\$ 3,390	5,960	\$ 2,578	9,009	\$ 4,856	8,940	\$ 7,494	25,206
Energy Efficiency RFP	\$ 1,483	4,995	\$ -	-	\$ 2,494	13,499	\$ -	-
C&I CACES	\$ 263	430	\$ -	-	\$ 550	1,721	\$ -	-
Commercial Real Estate	\$ 703	-	\$ 425	-	\$ 1,997	5,245	\$ 1,032	9,849
Data Center Efficiency	\$ 416	-	\$ 288	1,840	\$ 918	6,500	\$ 1,541	7,976
<b>C&amp;I TOTAL</b>	<b>\$ 62,487</b>	<b>348,945</b>	<b>\$ 54,033</b>	<b>370,637</b>	<b>\$ 68,163</b>	<b>400,949</b>	<b>\$ 55,574</b>	<b>358,636</b>
<b>RESIDENTIAL - EE Programs</b>								
Lighting	\$ 18,371	181,601	\$ 18,880	319,243	\$ 15,337	133,937	\$ 16,357	305,449
Home Energy Reports	\$ 2,774	64,803	\$ 2,756	66,176	\$ 2,784	64,803	\$ 3,451	92,687
Appliance Recycling	\$ 8,379	33,371	\$ 8,205	72,302	\$ 7,040	31,782	\$ 7,253	31,869
CACES	\$ 4,153	8,233	\$ 1,061	2,133	\$ 4,031	9,606	\$ -	-
M-F Home Performance	\$ 1,394	6,110	\$ 1,599	9,456	\$ 2,027	9,014	\$ 2,056	15,131
Appliance Rebate	\$ 2,974	1,786	\$ 2,072	2,511	\$ 2,975	1,786	\$ 2,652	770
S-F Home Performance	\$ 365	438	\$ 465	468	\$ 747	1,085	\$ 692	934
Complete System Replacement	\$ -	-	\$ 1,093	377	\$ -	-	\$ 1,942	1,546
Elementary Education	\$ -	-	\$ 127	479	\$ -	-	\$ 322	1,760
New Construction	\$ 88	-	\$ 76	-	\$ 345	978	\$ 67	30
<b>RESIDENTIAL TOTAL</b>	<b>\$ 38,498</b>	<b>296,342</b>	<b>\$ 36,334</b>	<b>473,145</b>	<b>\$ 35,286</b>	<b>252,991</b>	<b>\$ 34,792</b>	<b>450,176</b>
Third Party Program Admin.	\$ 1,200	-	\$ 1,039	34	\$ 2,000	12,500	\$ -	31
<b>Total ComEd EE</b>	<b>\$ 102,185</b>	<b>645,287</b>	<b>\$ 91,406</b>	<b>843,816</b>	<b>\$ 105,449</b>	<b>666,440</b>	<b>\$ 90,366</b>	<b>808,843</b>
<b>DCEO</b>								
DCEO	\$ 40,039	113,624	\$ 35,050		\$ 40,523	114,634	\$ 34,541	
<b>Demand Response</b>								
Demand Response - AC Cycling	\$ 355		\$ 1,311		\$ 1,028		\$ 1,253	
<b>Portfolio-Level Costs</b>								
<b>Total Portfolio-Level Costs TOTAL</b>	<b>\$ 17,577</b>		<b>\$ 13,424</b>		<b>\$ 15,094</b>		<b>\$ 15,780</b>	
<b>PORTFOLIO TOTAL</b>								
<b>PORTFOLIO TOTAL</b>	<b>\$ 160,156</b>		<b>\$ 141,191</b>		<b>\$ 162,094</b>		<b>\$ 141,940</b>	
<b>ComEd Portfolio Cost (less DCEO)</b>	<b>\$ 120,117</b>		<b>\$ 106,141</b>		<b>\$ 121,571</b>		<b>\$ 107,399</b>	

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Natural Resources Defense Council ("NRDC") Data Requests**

**NRDC 5.01 – 5.05**

**Date Received: November 4, 2013**

**Date Served: November 8, 2013**

**REQUEST NO. NRDC 5.05:**

Regarding Attachment 1 to Com Ed's response to NRDC 1.02:

- a. for the Appliance Recycling program, incentives per unit will more than double (from about \$37 in PY5 to about \$89 in PY7-9). What is the explanation for that increase?
- b. For the Appliance Recycling program, implementation costs will decline from about \$84 in PY5 to about \$62 in PY7-9. What is the explanation for that decrease?
- c. For the Appliance Recycling program, the sum of incentives and implementation costs will increase from about \$121 in PY5 to about \$151 in PY7-9. What is the explanation for that increase?
- d. For the C&I Incentives program, gross savings are projected to be 15-23% lower in PY7-9 than in PY5 – and 22% to 28% lower on a per dollar basis (even after removing the portion of the budget associated with the Large C&I Pilot program for which no savings were estimated for PY7-9).
  - i. Is a portion of the reduction in savings a function of changing federal efficiency standards and related changes in TRM savings for linear fluorescent fixtures?
  - ii. If so, how much of the reduction in savings per dollar of spending is associated with that change?
  - iii. What other factors, if any, contribute in a significant way to the reduction?

**RESPONSE:**

- a. Please see ComEd's Response to Staff Data Request JLH 2.05. ComEd revised the treatment of customer incentives and recycling costs in its 2014-2016 Energy Efficiency and Demand Response Plan ("Plan 3") to address concerns by Staff. ComEd's 2008-2010 Energy Efficiency and Demand Response Plan ("Plan 1") and 2011-2013 Energy Efficiency and Demand Response Plan ("Plan 2") treated the customer incentive costs as an incentive cost and recycling costs as implementation costs.
- b. Please see ComEd's response to subpart (a), above.

- c. The planning effort for Plan 3 includes a base reward amount (incentive) of \$50 for each refrigerator and freezer for most of each Plan year. This is consistent with Plans 1 and 2. However, in PY5, ComEd offered a \$35 incentive for most of the year and used the \$50 incentive during only a portion of the year to help drive customer participation and meet our collection goal. For Plan 3, ComEd has included a \$75 incentive for a portion of each Plan year that will be used only if deemed necessary to help drive customer participation and meet the program collection goal. ComEd also factored in an increase in implementation costs during Plan 3 to ensure all required services (e.g., scheduling, collection, de-manufacturing, etc.) are adequately covered.
- d. As an initial matter, ComEd notes that the budget and kWh savings for the Large C&I Pilot are already incorporated into the C&I Incentives program for modeling purposes. In other words, kWh savings for the Large C&I Pilot are already accounted for in the Plan, but they have not been separated from the C&I Incentives program. See ComEd Ex. 1.0 at 67-68 & fn. 26. Forecasts of lower gross savings in the C&I Incentives program are based on the following:
- Standard measure migration to the Business Instant Lighting Discounts (“BILD”) program. A number of Standard measures have migrated to the BILD program since the launch of BILD in PY4. Moving energy-efficient lamps to BILD from Standard has made it easier for commercial and industrial customers to purchase the lamps, but has reduced gross energy savings attributable specifically to the Standard program. However, when projected Standard and BILD savings are combined, they show an overall increase in gross and net savings.
  - Migration of multi-family savings from the Standard program to the Multi-Family Comprehensive Energy Efficiency Program (“MCEEP”). MCEEP, launched in PY6, offers special incentives to multi-family building owners and tenants, including incentives for energy efficiency improvements in shared spaces (lobbies, hallways, laundry areas, fitness centers, etc.), which were previously handled by the Standard program. As a result, ComEd expects to see a reduction in Standard energy savings from this particular market segment.
  - Expansion of the Small Business Energy Savings (“SBES”) program. The significant expansion of SBES, which began in PY6, is projected to reduce the participation of small businesses in the Standard program. This is due both to increased marketing of the SBES program (which offers richer incentives than Standard for the most common improvements) and a broader definition of which businesses are eligible to participate in SBES.

- Eventual loss of ability to count T12 replacement/retrofit savings. In ComEd's Ex. 1.0, Appendix F, the *ComEd Commercial and Industrial Saturation/End Use, Market Penetration & Behavioral Study* (May 2013) determined that 66 percent of ComEd's commercial and industrial customers have one or more T12 linear fluorescent light fixtures. ComEd's understanding is that the Illinois TRM currently states that T12 retrofit/replacement savings cannot be counted after 12/31/15. If that is the case, ComEd believes it is unlikely that all T12s will be eliminated from our service territory by that date. T12 replacements/retrofits are a popular project type in the Standard program, and the inability to capture energy savings from these projects before T12s are depleted in the market will negatively impact the Standard program's gross energy savings.

Because of the factors described above, ComEd anticipates that it will need to increase marketing, outreach and bonus offerings to meet projected C&I Incentives program energy savings goals. This will translate to a higher cost per kWh overall.

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
The Coalition to Request Equitable Allocation of Costs Together ("REACT") Data Requests  
REACT 1.01 – 1.21  
Date Received: October 3, 2013  
Date Served: October 16, 2013**

**REQUEST NO. REACT 1.11:**

Please refer to ComEd Ex. 2.0, the Direct Testimony of Michael S. Brandt, at Lines 1089-1100, wherein Mr. Brandt describes the proposed "Large C&I Pilot."

- a. What customer classes or type of customers are eligible for the Large C&I Pilot? Please explain fully and in detail the basis for the definition of eligible customers.
- b. Is there a limit on the number of customers that can take service under the "Large C&I Pilot"? If so, please explain fully and in detail the basis for that limitation.
- c. Please refer to Lines 1093-1094, wherein Mr. Brandt states that ComEd "...would track that amount of EDA charges paid by the participant during Plan Years 7 through 9." Does ComEd currently track the EDA charges paid by individual customers?
- d. Please refer to Lines 1096-1097, wherein Mr. Brandt states, "...ComEd is still working out the details for this pilot..."
  - i. Have those details been worked out? If so, please explain fully and in detail the substance of those details. If not, please identify when ComEd anticipates those details will be worked out.
  - ii. Please explain fully and in detail what program "details" still are in development.
  - iii. Please explain fully and in detail what ComEd's plans are to develop those "details," including the names, titles, and contact information for all persons who will be working to develop those "details."
  - iv. Please explain fully and in detail why ComEd was unable to work out those details prior to filing its Plan.
  - v. Did ComEd investigate any other structure for the pilot program? If so, please explain fully and in detail the structure of each such alternative, and why it was not included in ComEd's Plan. If not, please explain fully and in detail why not.

**RESPONSE:**

ComEd objects to this request to the extent it seeks to impose obligations not otherwise imposed by applicable law or Commission orders. Without waiving this objection or any of ComEd's General Objections, ComEd states as follows.

As an initial matter, the Large C&I Pilot program template set forth in ComEd's 2014-2016 Energy Efficiency and Demand Plan (ComEd Ex. 1.0) notes that many elements of the pilot are "still in development". As reflected in ComEd's Data Request Response to REACT 1.08, the development of the Large C&I Pilot program occurred only shortly before the Plan's filing.

- a. Please see ComEd's Data Request Response to REACT 1.21.
- b. Please see ComEd's Data Request Response to REACT 1.21.
- c. No, ComEd does not currently track the EDA charges paid by individual customers.
- d.
  - i. No. The current details regarding the proposed Large C&I Pilot program are set forth in ComEd Ex. 1.0, the Direct Testimony of Michael S Brandt (ComEd Ex. 2.0), and ComEd's Data Request Response to REACT 1.08, REACT 1.11, REACT 1.13, REACT 1.14, REACT 1.15, REACT 1.16, REACT 1.17, REACT 1.18, REACT 1.19, REACT 1.20, REACT 1.21 and NRDC 2.07. As explained in these responses, ComEd expects to address the remaining details of the Pilot during final program design, which will occur following approval of ComEd Ex. 1.0.
  - ii. All program elements are still in development as outlined in the Large C&I Pilot program template set forth in ComEd Ex. 1.0 and as described further in ComEd's Data Request Response to REACT 1.13, REACT 1.14, REACT 1.15, REACT 1.16, REACT 1.17, REACT 1.18, REACT 1.19, REACT 1.20, and REACT 1.21.
  - iii. Please see ComEd's response to paragraph (i) of subpart (d), above. ComEd has not yet set a schedule for the full development of the Large C&I Pilot program, but expects that the majority of the work will occur following Commission approval of ComEd Ex. 1.0. Although ComEd has not identified at this time which ComEd employees will work on the Pilot, ComEd expects that the personnel listed in ComEd's Data Request Response to REACT 1.09 will be involved.
  - iv. The proposed Large C&I Pilot program is just that – a pilot, and no energy savings are associated with the pilot at this time. Because the Pilot is not, at this time, a core program element of ComEd Ex. 1.0, ComEd intended only to present the framework for the Pilot, which is fully set forth in ComEd Ex. 1.0.
  - v. Although ComEd does not understand what is meant by "other structure", ComEd did not consider any alternative large C&I pilot programs for inclusion in ComEd Ex. 1.0.

**ICC Docket No. 13-0495**

**Commonwealth Edison Company's Response to  
Illinois Commerce Commission ("STAFF") Data Requests**

**JLH 1.01 – 1.06**

**Date Received: September 10, 2013**

**Date Served: September 23, 2013**

**REQUEST NO. JLH 1.02:**

Please provide all work papers, analyses, data sets, and other documents used or relied upon in the preparation and presentation of the Commonwealth Edison Company's 2014-2016 Energy Efficiency and Demand Response Plan, ComEd Ex. 1.0 ("Plan"). Please provide documents in their native file format with working formulae intact.

**RESPONSE:**

Please see the attachments contained in the file folders labeled as JLH 1.02\_Attach 01 through JLH 1.02\_Attach 11. Due to large file sizes the attachments have been provided on a CD-ROM labeled as 2013CEE 0000007 and two (2) DVDs labeled as 2013CEE 0000008 and 2013CEE 0000009. The CD-ROM contains file folders labeled as JLH 1.02\_Attach 01 through JLH 1.02\_Attach 09. The file folders labeled as JLH 1.02\_Attach 10, JLH 1.02\_Attach10A and JLH 1.02\_Attach 10B are provided on the DVD labeled as 2013CEE 0000008, and the file folders labeled as JLH 1.02\_Attach 10C and JLH 1.02\_Attach 11 are located on the DVD labeled as 2013CEE 0000009.

The following table sets forth the program that corresponds with each of the attachments:

<b>Attachment</b>	<b>Program</b>
JLH 1.02_Attach 01	Complete System Replacement Program (CSR)
JLH 1.02_Attach 02	Energy Education Kits Program
JLH 1.02_Attach 03	Multi-Family Home Energy Savings Program
JLH 1.02_Attach 04	MidStream Incentives Lighting Program
JLH 1.02_Attach 05	New Construction Program
JLH 1.02_Attach 06	Residential Lighting Program
JLH 1.02_Attach 07	Residential New Construction Program
JLH 1.02_Attach 08	Single Family Home Energy Savings Program
JLH 1.02_Attach 09	Study-Based Programs
JLH 1.02_Attach 10	Incentive Programs
JLH 1.02_Attach 10A	Batch Custom Programs
JLH 1.02_Attach 10B	Batch Incentive Programs
JLH 1.02_Attach 10C	Batch Standard Programs
JLH 1.02_Attach 11	Appliance Recycling Program

PY7 - PY9 Projections

4/10/13 v3

10-Apr-13

	Wattage Equiv	Lumen Range	PY7 - 2014			PY8 - 2015			PY9 - 2016		
			# Bulbs	Incentive/Bulb	Total Incentive	# Bulbs	Incentive/Bulb	Total Incentive	# Bulbs	Incentive/Bulb	Total Incentive
Standard CFL	< 40	< 450	-	\$ 1.40	\$ -	-	\$ 1.35	\$ -	-	\$ 1.35	\$ -
	40	450	351,954	\$ 1.40	\$ 492,735.60	317,736	\$ 1.35	\$ 428,943.55	203,840	\$ 1.35	\$ 275,184.00
	60	800	5,689,988	\$ 1.40	\$ 7,965,983.20	5,136,795	\$ 1.35	\$ 6,934,673.13	3,295,451	\$ 1.35	\$ 4,448,858.85
	75	1100	438,478	\$ 1.40	\$ 613,869.20	395,848	\$ 1.35	\$ 534,394.42	253,952	\$ 1.35	\$ 342,835.20
	≥ 100	≥ 1600	719,580	\$ 1.40	\$ 1,007,412.00	649,621	\$ 1.35	\$ 876,988.89	416,757	\$ 1.35	\$ 562,621.95
Total Std			7,200,000	\$ 1.40	\$ 10,080,000.00	6,500,000	\$ 1.35	\$ 8,775,000.00	4,170,000	\$ 1.35	\$ 5,629,500.00
% of Total			86.72%			79.46%			69.27%		
Specialty CFL	< 40	< 450	53,646	\$ 3.00	\$ 160,938.00	53,646	\$ 3.00	\$ 160,938.00	22,430	\$ 2.50	\$ 56,075.00
	40	450	479,015	\$ 3.00	\$ 1,437,045.00	479,015	\$ 3.00	\$ 1,437,045.00	252,677	\$ 2.50	\$ 631,692.50
	60	800	223,256	\$ 3.00	\$ 669,768.00	223,256	\$ 3.00	\$ 669,768.00	75,504	\$ 2.50	\$ 188,760.00
	75	1100	69,766	\$ 3.00	\$ 209,298.00	69,766	\$ 3.00	\$ 209,298.00	39,844	\$ 2.50	\$ 99,610.00
	≥ 100	≥ 1600	24,317	\$ 3.00	\$ 72,951.00	24,317	\$ 3.00	\$ 72,951.00	9,545	\$ 2.50	\$ 23,862.50
Total Spc			850,000	\$ 3.00	\$ 2,550,000.00	850,000	\$ 3.00	\$ 2,550,000.00	400,000	\$ 2.50	\$ 1,000,000.00
% of Total			10.24%			10.39%			6.64%		
Standard LED	< 40	< 450	-	\$ 5.00	\$ -	-	\$ 4.00	\$ -	-	\$ 3.00	\$ -
	40	450	25,000	\$ 5.00	\$ 125,000.00	150,000	\$ 4.00	\$ 600,000.00	200,000	\$ 3.00	\$ 600,000.00
	60	800	100,000	\$ 7.00	\$ 700,000.00	400,000	\$ 6.00	\$ 2,400,000.00	750,000	\$ 5.00	\$ 3,750,000.00
	75	1100	2,000	\$ 10.00	\$ 20,000.00	10,000	\$ 8.00	\$ 80,000.00	30,000	\$ 7.00	\$ 210,000.00
	≥ 100	≥ 1600	1,000	\$ 10.00	\$ 10,000.00	5,000	\$ 8.00	\$ 40,000.00	30,000	\$ 7.00	\$ 210,000.00
Total Std LED			128,000	\$ 6.68	\$ 855,000.00	565,000	\$ 5.52	\$ 3,120,000.00	1,010,000	\$ 4.72	\$ 4,770,000.00
% of Total			1.54%			6.91%			16.78%		
Reflector LED	45	< 450	-	\$ 8.00	\$ -	-	\$ 8.00	\$ -	-	\$ 2.00	\$ -
	65	750	80,000	\$ 10.00	\$ 800,000.00	160,000	\$ 8.00	\$ 1,280,000.00	310,000	\$ 8.00	\$ 2,480,000.00
	75	800	5,000	\$ 10.00	\$ 50,000.00	35,000	\$ 8.00	\$ 280,000.00	60,000	\$ 8.00	\$ 480,000.00
	90	1100	5,000	\$ 10.00	\$ 50,000.00	20,000	\$ 8.00	\$ 160,000.00	20,000	\$ 8.00	\$ 160,000.00
	≥ 120	≥ 1600	-	\$ 10.00	\$ -	-	\$ 8.00	\$ -	-	\$ 8.00	\$ -
Total Spc LED			90,000	\$ 10.00	\$ 900,000.00	215,000	\$ 8.00	\$ 1,720,000.00	390,000	\$ 8.00	\$ 3,120,000.00
% of Total			1.08%			2.63%			6.48%		
Candelabra LED / Globe	< 40	< 450	5,000	\$ 5.00	\$ 25,000.00	10,000	\$ 3.00	\$ 30,000.00	10,000	\$ 3.00	\$ 30,000.00
Globe	40	310	5,000	\$ 5.00	\$ 25,000.00	10,000	\$ 5.00	\$ 50,000.00	10,000	\$ 3.00	\$ 30,000.00
Globe	60	710	5,000	\$ 5.00	\$ 25,000.00	10,000	\$ 5.00	\$ 50,000.00	10,000	\$ 3.00	\$ 30,000.00
Total Other LED			15,000	\$ 5.00	\$ 75,000.00	30,000	\$ 4.33	\$ 130,000.00	30,000	\$ 3.00	\$ 90,000.00
% of Total			0.18%			0.37%			0.50%		
LED Fixture			20,000	\$ 5.00	\$ 100,000.00	20,000	\$ 5.00	\$ 100,000.00	20,000	\$ 5.00	\$ 100,000.00
% of Total			0.24%			0.24%			0.33%		
TOTAL			8,303,000	\$ 1.75	\$ 14,560,000.00	8,180,000	\$ 2.00	\$ 16,395,000.00	6,020,000	\$ 2.44	\$ 14,709,500.00