

## **Briefs on Exception Summary**

### **I. Energy Efficiency**

#### **A. Lack of feedback Loop**

1. The IPA (144-146) provides clarification of its evolving position and a new conclusion that the utilities should coordinate with stakeholders to improve and clarify the RFPs.
2. The AG (9-10) offers revisions which do not seem to improve or clarify this issue. The AG again ties the feedback loop to the Section 8-103 programs.
3. CUB (2) wants the Commission to conclude potential studies set a useful benchmark for determining energy efficiency potential. CUB (3) also wants the Commission to order the utilities to exclude language from the RFPs which states that the utilities will administer or take over the administration of third party vendor programs and to order AIC and ComEd to include RFPs that invite program proposals for up to three years.

#### **B. Expansion of Section 8-103 Programs**

1. The IPA (145) provides a paragraph in which the Commission would allow - but not require - utilities to seek expansion of Section 8-103 programs, contingent on those programs being approved at a certain savings target.
2. The AG (12) wants the Commission to find that the utilities can and should offer their cost-effective, established programs to the IPA under Section 16-111.5B even though the following year a new three-year plan will be reviewed. The AG argues Section 16-111.5B programs should not grind to a halt because a new three-year plan is under consideration. The AG (17-18) also wants the Commission to conclude that any problems in implementing evaluation, measurement and verification of the IPA programs should be presented to the SAG for further refinement.

#### **C. DCEO Participation**

1. The IPA (144) recommends minor wording changes and invites DCEO to participate in workshops or any docketed proceeding.
2. The AG (5, 7-8) says at a minimum, the Commission should modify the Proposed Order to conclude that the barriers to consideration of DCEO energy efficiency programs in the utilities' RFP process and in the IPA procurement process should be part of the workshop process the Proposed Order recommends for other issues.

3. Staff (3-4) wants the Commission to initiate a new proceeding to consider DCEO's programs, as provided to the IPA.
4. NRDC (3) wants the Commission to fully investigate the absence of energy efficiency programs through the IPA process for low-income residential customers and solicit stakeholder input on a range of potential solutions to be implemented in the next annual procurement plan.

#### **D. Duplicative and Competing Programs**

1. The IPA (146) claims there is consensus on part of this issue. The IPA (147) wants the Commission to adopt its definitions (approach).
2. ComEd (3-4) wants the Commission to adopt the IPA approach laid out in the IPA's Replies to Responses and essentially proposes language from the IPA's Reply.
3. The AG (15) wants to modify the language, but not change the proposed order conclusion to address the issue in workshops.
4. CUB (4-5) says there is consensus and the IPAs approach to duplicative and competing is appropriate and should be adopted. CUB also wants the Commission find it is inappropriate for the utilities to have the authority to screen out programs which may provide benefits to Illinois ratepayers without negatively impacting existing utility programs. CUB also says this is not an appropriate issue for workshops.
5. NRDC (5) says the IPA's approach, including ComEd's two additional factors is appropriate and should be adopted. NRDC proposes additional language similar to ComEd.

#### **II. Full Requirements Products**

- A. ICEA (7) wants the Commission to affirmatively find that certain full requirements products meet the statutory requirements to be standard products and delete language that suggests other full requirements products do not. ICEA (10-11) wants the Commission to adopt its recommendations.
- B. RESA (2) agrees with ICEA.
- C. Exelon (4-5), essentially, takes the same position as ICEA.
- D. The IPA (93) proposes modifications to the conclusion that it claims clarify its position. The IPA (94-95) also claims it did not discuss Exelon's alternative proposal regarding full requirements products for no procurements after May, 2016 because, the Plan does not call for any such procurement for ComEd.
- E. ComEd (5) wants to clarify that it did not oppose full requirements products.

#### **III. Alternative Compliance Payments**

- A. The RS (Attachment 1) want the Commission to find that only the REC portion of LTPPAs should be curtailed. In the alternative, the RS want the Commission to find that curtailed RECs should be purchased at a price equal to the contract price under the LTPPAs less the day-ahead hourly LMPs.
- B. RESA (4) wants the Commission to require the IPA to notify Staff when there is a change in the assumptions underlying the ACP calculation. RESA also wants the Staff to publish revised ACPs as soon as possible.
- C. Exelon (8-9) wants the order to find that the issue of ACPs is not beyond the scope of procurement proceedings.

#### **IV. Load Forecasts**

The RS (Attachment 2) wants the Commission to adopt its modification to the base case load forecasts. The RS also wants the Commission to allow interested parties an opportunity to comment on the Spring 2014 load forecast updates.