



**ILLINOIS POWER AGENCY**

Anthony M. Star, Director

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## **Energy Efficiency as a Supply Resource Request for Comments**

**Issued: July 11, 2014**

**Due: July 25, 2014**

On June 18, 2014 the Illinois Power Agency held a workshop on Energy Efficiency as a Supply Resource.<sup>1</sup> In response to the workshop discussion, the IPA now requests interested parties to provide written responses to the questions below. Please email responses to Anthony Star ([Anthony.Star@illinois.gov](mailto:Anthony.Star@illinois.gov)) by July 25, 2014. All responses will be posted on the IPA's website.<sup>2</sup>

The solicitation of comments is intended for the IPA to receive ideas, information, and feedback from stakeholders. Decisions regarding inclusion in the IPA's proposed 2015 Procurement Plan<sup>3</sup> are at the sole discretion of the IPA, and final Plan is subject to the approval of the Illinois Commerce Commission.

### Questions

1. The IPA has traditionally looked at procurement blocks using regular definitions of those products as on-peak (16 hours on the 5 weekdays) or off-peak (8 hours on 5 weekdays, weekends and holidays). Should the IPA consider procurement of a new resource of demand reducing resources during the summer months for a narrower peak period? If so, how should that "super-peak" period be defined?
2. What types of products should qualify for delivery as a super-peak product? What measures can the IPA take to ensure that super-peak demand-side resources feature an actual lower delivered cost than supply side alternatives? Please provide evidence (either empirical, or modeled) for demand-side resources with delivered costs that could be lower cost than supply side resources.
3. Should a resource for this procurement also be eligible to participate in other energy efficiency (and/or demand response) programs? If so, how should the value of each be accounted for? For example, could a product have its kWh reductions separated between multiple programs? What timing challenges may result from including

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<sup>1</sup> See: [http://www2.illinois.gov/ipa/Pages/Plans\\_Under\\_Development.aspx](http://www2.illinois.gov/ipa/Pages/Plans_Under_Development.aspx) for more information on the Workshop.

<sup>2</sup> Any stakeholder wishing to provide the IPA with information it deems confidential and/or proprietary may submit both "public" and "confidential" versions of its written responses, with only the "public" version posted on the IPA website. Consistent with its duties under 20 ILCS 3855/1-120, the IPA will institute controls to protect against the disclosure of any confidential and/or proprietary information furnished by any stakeholder in this process.

<sup>3</sup> Pursuant to Section 16-111.5(d), the IPA will issue its regular draft procurement plan on August 15, 2014 and receive comments on it for 30 days. An updated draft plan will be filed with the Illinois Commerce Commission at the end of September for approval by the end of 2014.

- resources in both supply resource procurement and existing energy efficiency (and/or demand response) programs, and how can those be resolved?
4. How could delivery of demand-side resources be metered and/or verified? What provisions should apply for non-delivery?
  5. What limitations, if any, should be placed on customer classes that could provide these resources? Specifically, should it only be potentially eligible retail customers, or all customer classes? Should the resources have to be located within the service territory of the utility to which they are delivered?
  6. In 2014 the IPA is procuring energy blocks of 25 MW, down from 50 MW in previous procurements. What size block would be appropriate for this potential procurement?
  7. If the IPA were to propose the procurement of super-peak demand-side resources as part of its 2015 procurement plan, could these resources be procured for the upcoming delivery year (starting June, 2015), or should there be more time given to ramp up any new programs that would deliver these resources?
  8. Are there other approaches the IPA should consider in its procurement plan for procuring resources other than what it has traditionally procured that could lower the total cost of the portfolio used to serve eligible retail customers?