

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	)	
vs.	)	
North Shore Gas Company	)	Docket No. 25-0966
The Peoples Gas Light and Coke Company	)	
Reconciliation of Revenues Collected	)	
under Riders EOA with the actual costs	)	
associated with energy efficiency and	)	
on-bill financing programs	)	

DIRECT TESTIMONY
OF
SAM ADDISON

- 1 **Q. Please state your name and business address.**
- 2 A. Sam Addison, 200 East Randolph Street, Chicago, Illinois 60601.
- 3 **Q. By whom are you employed?**
- 4 A. WEC Business Services LLC.
- 5 **Q. What position do you hold with WEC Business Services LLC?**
- 6 A. I am Manager, State Regulatory Affairs, with WEC Business Services LLC.
- 7 **Q. What are your responsibilities in that position?**
- 8 A. I am responsible for performing activities related to regulatory research, rate
- 9 and tariff administration, billing and rate impact studies, accounting and
- 10 reporting requirements for The Peoples Gas Light and Coke Company
- 11 (“Peoples Gas” or the “Company”), and its sister utility, North Shore Gas
- 12 Company (“North Shore”). I also have managed and coordinated the
- 13 preparation and review of testimonies and exhibits pertaining to rate case

filings for Peoples Gas and North Shore pursuant to provisions of Part 285, 286, and 287 of the rules of the Illinois Commerce Commission (“ICC” or “Commission”) (83 Ill. Admin. Code Parts 285, 286, and 287).

Q. Please summarize your educational background and experience.

A. I received a Bachelor of Science in Finance from the Driehaus College of Business at DePaul University in 2013. In 2014, I joined Integrys Business Services and worked in the Finance for six years, serving in several positions of increasing responsibility and supporting, among other matters, the 2020 North Shore Gas Rate Case. In January 2022, I joined Common Wealth Edison Company as a Senior Financial Analyst supporting Financial Operations. In October 2022, I returned to WBS as a Project Specialist 3 in Regulatory Affairs team, where I support regulatory proceedings and related matters for Peoples Gas and North Shore.

Q. Please give a brief description of the operations and status of North Shore.

A. North Shore is a corporation organized and existing under the laws of the State of Illinois, having its principal office at 200 East Randolph Street, Chicago, Illinois 60601. It is engaged in the business of purchasing, distributing and selling natural gas to more than 168,000 customers in Cook and Lake Counties, Illinois. North Shore is a public utility within the meaning of the Public Utilities Act.

Q. Please give a brief description of the operations and status of Peoples Gas.

37 A. Peoples Gas is a corporation organized and existing under the laws of the
38 State of Illinois, having its principal office at 200 East Randolph Street,
39 Chicago, Illinois 60601. It is engaged in the business of purchasing,
40 distributing and selling natural gas to more than 889,000 customers in the
41 City of Chicago. Peoples Gas is a public utility within the meaning of the
42 Public Utilities Act.

43 **Q. Please describe the subject matter of this proceeding.**

44 A. North Shore's and Peoples Gas' Schedule of Rates for Gas Service each
45 includes Rider EOA, Energy Efficiency and On-Bill Financing Adjustment.
46 The Commission approved Rider EOA in Docket No. 10-0564. Rider EOA
47 became effective June 20, 2011. Each year, Rider EOA calls for North Shore
48 and Peoples Gas to file charges (called the "Effective Component") with the
49 Commission. The Rider EOA Effective Component is a per-therm charge to
50 cover the costs of the energy efficiency program and the On-Bill Financing
51 ("OBF") program. The portions of the Effective Component associated with
52 energy efficiency and OBF are based on the four year budgets from the fourth
53 plan filed with the Commission in Docket 21-0159. Rider EOA is applicable
54 to all Service Classifications ("S.C."); however, for energy efficiency, certain
55 large customers have been identified as "exempt" or "self-directing" by the
56 Department of Commerce and Economic Development ("DCEO") per criteria
57 set forth in Section 8-104(m) of the Public Utilities Act. Such customers are
58 not subject to Rider EOA and do not participate in North Shore's and Peoples
59 Gas' energy efficiency programs or the OBF program, which is directed to

residential customers. For North Shore, there is a separate Effective Component for:

- S.C. No. 1, which includes amounts for Residential Energy Efficiency and OBF programs;
- S.C. No. 2, which includes amounts for Residential Energy Efficiency, Commercial and Industrial Energy Efficiency, and OBF programs; and
- Combined S.C. Nos. 4, 5 and 7 (currently there are no customers under S.C. Nos. 5 or 7), which includes amounts for Commercial and Industrial Energy Efficiency programs.

For Peoples Gas, there is a separate Effective Component for:

- S.C. No. 1, which includes amounts for Residential Energy Efficiency and OBF programs;
- S.C. No. 2, which includes amounts for Residential Energy Efficiency, Commercial and Industrial Energy Efficiency, and OBF programs; and
- Combined S.C. Nos. 4, 5, 7 and 8, which includes amounts for Commercial and Industrial Energy Efficiency programs.

For Program Year beginning June 1, 2016 and extending through December 31, 2017, and then afterwards January 1 through December 31 of each year, Section E of Rider EOA require North Shore and Peoples Gas to file annually no later than March 31 a reconciliation of amounts billed in the Previous Program Year to the actual costs, as well as Reconciliation Adjustments (“RA”) for any amounts over or under collected from customers per the reconciliation. Such Reconciliation Adjustments would apply to a nine-month

reconciliation amortization period beginning April 1. This reconciliation also includes a reconciliation of amounts collected or refunded through the previous year's RA.

Section E of Rider EOA also requires that the Commission initiate an annual review. North Shore and Peoples Gas must file testimony addressing its reconciliation statement and the prudence and reasonableness of costs incurred and recovered under Rider EOA during the Program Year that is the subject of the reconciliation statement. Testimony of North Shore and Peoples Gas witness Christina Frank (NSG-PGL Exhibit 2.0) addresses the energy efficiency plan, programs implemented in the Program Year 2025, reasonableness and prudence of costs incurred, and costs incurred under the OBF program.

Q. Please describe the period that will be reconciled.

A. For Program Year 2025, Rider EOA requires a reconciliation of revenues for a twelve-month period. The reconciliation period, which is the subject of my testimony, is for the Program Period January 1, 2025, through December 31, 2025.

Q. Has North Shore and Peoples Gas published public notice as required in the Order in Docket No. 14-0640?

A. Yes. Public notice was published timely in the Lake County News-Sun and Chicago Tribune.

Q. Please describe NSG-PGL Exhibit 1.1N.

105 A. NSG-PGL Exhibit 1.1N is a statement of the RA components that will apply
 106 for each month of the nine-month reconciliation amortization period
 107 beginning April 1, 2026 and ending December 31, 2026 ("Statement") for all
 108 service classifications.

109 **Q. Was the Statement prepared under your supervision and direction?**

110 A. Yes, it was.

111 **Q. What is the purpose of the Statement?**

112 A. The Statement shows the applicable RA for customers served under North
 113 Shore's S.C. Nos. 1, 2 and combined 2, 4, 5 and 7 who are not classified as
 114 exempt or self-directing, for the North Shore programs¹. It also shows the
 115 derivation of each RA component and provides supporting data.

116 **Q. Please describe the elements of the Statement.**

117 A. In general, the Statement includes the following information:

- 118 • Page 1 shows the RA that will be billed over the nine-month
 119 reconciliation amortization period beginning April 1, 2026 for each
 120 Service Classification. The RA represents per-therm charges or
 121 refunds.
- 122 • Page 2 through 4 Column [B] show the determination of the RA as
 123 described under Section D(2) of Rider EOA for S.C. Nos. 1 and 2 for
 124 residential programs, and combined S.C. Nos. 2, 4, 5 and 7 for
 125 commercial and industrial programs..

¹ In Final Order ICC Docket No. 17-0212, DCEO's responsibility for the funding of certain energy efficiency programs was eliminated. Per that order, North Shore continued with certain energy efficiency programs previously responsible under DCEO.

- Page 2 shows the determination of the RA for S.C. No. 1. Lines 2 through 13 represent the calculation of the Total Reconciliation Dollar amounts, including Interest, for Residential Energy Efficiency. This amount, shown on Line 13, is the result of deducting EOA Revenues (EREV) from EOA Expenses (EEXP), adding the RA amount for the previous program year RA to be recovered or refunded (ERA2), adding the applicable Interest, and if any, adding the Factor O adjustment per the Order in Docket No. 24-0831. For calendar year 2026, the applicable interest rate established by the Commission is 3.5 percent pursuant to the order in Docket No. 25-1083. Line 14 represents the dollars-per-therm RA. It is derived by dividing the Total Reconciliation Dollar amount on Line 13 by the Total Therm Deliveries forecasted for the nine-month reconciliation amortization period (Line 3) that the RA will be in effect. An RA must calculate to \$0.0001 per therm or more for North Shore to include it on customer bills. Lines 16 through 27 represent the calculation of the Total Reconciliation Dollar amounts, including Interest, for the portion of Rider EOA attributable to OBF. This amount, shown on Line 27, is the result of deducting EOA Revenues related to OBF (OREV) from EOA Expenses related to OBF (OEXP), adding the RA related to OBF to be recovered or refunded for the previous program year RA (ORA2), adding the applicable Interest, and if any, adding the Factor O adjustment per the Order in Docket No. 24-0831. Line 28 represents

the dollars-per-therm RA. It is derived by dividing the Total Reconciliation Dollar amount on Line 27 by the Total Therm Deliveries forecasted for the nine-month reconciliation amortization period (Line 17) that the RA will be in effect. Similar calculations are performed for S.C. No. 2 Residential Energy Efficiency and OBF on Page 3, and combined S.C. Nos. 2, 4, 5 and 7 Commercial and Industrial Energy Efficiency on Page 4.

- Page 5 shows the North Shore program aggregation of monthly EOA Expenses (EEXP and OEXP), Revenues (EREV and OREV) and previous program year Reconciliation Adjustment (ERA1 and ORA1) amounts recovered or refunded. EEXP and OEXP represent the actual amount of expenses incurred by North Shore during the previous Program Period for energy efficiency and OBF. EREV represents 100% of billed revenues arising from application of the Effective Component during the previous Program Period for energy efficiency that are applicable to North Shore as allowed under the Rider. OREV represents billed revenues for OBF. The Reconciliation Adjustment ERA1 and ORA1 amounts represent the amounts collected or refunded during the previous reconciliation amortization period arising from the application of the RA from the Previous Program Period for energy efficiency and OBF. The totals for Expenses, Revenues, and RA amounts for each applicable service classification are shown on Line 15 for Residential Energy Efficiency,

172 Line 30 for Commercial and Industrial Energy Efficiency, and Line 45
 173 for OBF.

174 • Page 6 shows the forecasted total therm deliveries for the
 175 reconciliation amortization period of April 2026 through December
 176 2026. The total therm deliveries for S.C. No. 2 and combined S.C.
 177 Nos. 4, 5 and 7 are adjusted to exclude therm deliveries to individual
 178 customers reported by DCEO as exempt or self-directing who are not
 179 subject to Rider EOA. Therm totals used in calculations of per-therm
 180 charges are:

- 181 ○ Column C, Line 10 for S.C. No. 1 residential programs;
- 182 ○ Column F, Line 10 for S.C. No. 2 residential programs; and
- 183 ○ Columns F + I, Line 10 for combined S.C. Nos. 2, 4, 5 and 7
 184 commercial and industrial programs.

185 **Q. How much was calculated as refundable or recoverable from S.C. No. 1**
 186 **customers over the nine-month period beginning April 1, 2026, for**
 187 **residential energy efficiency and OBF?**

188 A. As shown on NSG-PGL Exhibit 1.1N, the reconciliation result is a charge of
 189 \$30,26.37 to customers (NSG-PGL Exhibit 1.1N, Page 2, Column B, Line 13
 190 plus Line 27).

191 **Q. What is the RA component that will be effective for S.C. No. 1 beginning**
 192 **April 1, 2026?**

193 A. The RA component for S.C. No. 1 customers will be a charge of \$0.0003 per
 194 therm (NSG-PGL Exhibit 1.1N, Page 1, Column B, Line 4).

195 **Q. How much was calculated as refundable or recoverable from S.C. No. 2**
 196 **customers over the nine-month period beginning April 1, 2026, for**
 197 **residential energy efficiency and OBF?**

198 A. As shown on NSG-PGL Exhibit 1.1N the reconciliation results in a charge of
 199 \$621,370.17 to customers (NSG-PGL Exhibit 1.1N, Page 3, Column B, Line
 200 13 plus Line 27).

201 **Q. How much was calculated as refundable or recoverable from combined**
 202 **S.C. Nos. 2, 4, 5 and 7 customers over the nine-month period beginning**
 203 **April 1, 2026, for commercial and industrial energy efficiency**
 204 **programs?**

205 A. As shown on NSG-PGL Exhibit 1.1N the reconciliation results in a charge of
 206 \$58,482.14 to customers (NSG-PGL Exhibit 1.1N, Page 4, Column B, Line
 207 13).

208 **Q. What is the RA component that will be effective for S.C. No. 2 beginning**
 209 **April 1, 2026, for residential, commercial and industrial energy**
 210 **efficiency and OBF?**

211 A. The RA component for S.C. No. 2 customers will be a charge of \$0.0114 per
 212 therm (NSG-PGL Exhibit 1.1N, Page 1, Column C, Line 4).

213 **Q. What is the RA component that will be effective for S.C. Nos. 4, 5, and 7**
 214 **beginning April 1, 2026, for commercial and industrial energy**
 215 **efficiency?**

216 A. The RA component for S.C. Nos. 4, 5 and 7 customers will be a charge of
 217 \$0.0008 per therm (NSG-PGL Exhibit 1.1N, Page 1, Column D, Line 4).

218 **Q. Please describe how the RA components will be included on**
 219 **customers' bills.**

220 A. The RA components were filed with the Commission on Information Sheet
 221 No. 34 and are added to the Effective Component adjustment amounts for
 222 the 2026 program year and billed as a single adjustment for each service
 223 classification effective April 1, 2026.

224 **Q. Please describe NSG-PGL Exhibit 1.1P.**

225 A. NSG-PGL Exhibit 1.1P is a statement of the RA components that will apply
 226 for each month of the nine-month reconciliation amortization period
 227 beginning April 1, 2026, and ending December 31, 2026 ("Statement") for all
 228 service classifications.

229 **Q. Was the Statement prepared under your supervision and direction?**

230 A. Yes, it was.

231 **Q. What is the purpose of the Statement?**

232 A. The Statement shows the applicable RA for customers served under Peoples
 233 Gas' S.C. Nos. 1, 2 and combined 2, 4, 5, 7 and 8 who are not classified as
 234 exempt or self-directing, for the Peoples Gas programs². It also shows the
 235 derivation of each RA component and provides supporting data.

236 **Q. Please describe the elements of the Statement.**

237 A. In general, the Statement includes the following information:

² In Final Order ICC Docket No. 17-0212, DCEO's responsibility for the funding of certain energy efficiency programs was eliminated. Per that order, Peoples Gas continued with certain energy efficiency programs previously responsible under DCEO.

- 238 • Page 1 shows the RA that will be billed over the nine-month
239 reconciliation amortization period beginning April 1, 2026, for each
240 Service Classification. The RA represents per-therm charges or
241 refunds.
- 242 • Page 2 through 4 Column [B] show the determination of the RA as
243 described under Section D(2) of Rider EOA for S.C. Nos. 1 and 2 for
244 residential programs, and combined S.C. Nos. 2, 4, 5, 7 and 8 for
245 commercial and industrial programs.
- 246 • Page 2 shows the determination of the RA for S.C. No. 1. Lines 2
247 through 13 represent the calculation of the Total Reconciliation Dollar
248 amounts, including Interest, for Residential Energy Efficiency. This
249 amount, shown on Line 13, is the result of deducting EOA Revenues
250 (EREV) from EOA Expenses (EEXP), adding the RA amount for the
251 previous program year RA to be recovered or refunded (ERA2),
252 adding the applicable Interest, and adding the Factor O adjustment
253 per the Order in Docket No. 24-0831, if any. For calendar year 2026,
254 the applicable interest rate established by the Commission is 3.5
255 percent pursuant to the order in Docket No. 25-1083. Line 14
256 represents the dollars-per-therm RA. It is derived by dividing the Total
257 Reconciliation Dollar amount on Line 13 by the Total Therm Deliveries
258 forecasted for the nine-month reconciliation amortization period (Line
259 3) that the RA will be in effect. An RA must calculate to \$0.0001 per
260 therm or more for Peoples Gas to include it on customer bills. Lines

16 through 27 represent the calculation of the Total Reconciliation Dollar amounts, including Interest, for the portion of Rider EOA attributable to OBF. This amount, shown on Line 27, is the result of deducting EOA Revenues related to OBF (OREV) from EOA Expenses related to OBF (OEXP), adding the RA related to OBF to be recovered or refunded for the previous reconciliation amortization period (ORA2), adding the applicable Interest, and if any, adding the Factor O adjustment per the Order in Docket No. 24-0831, if any. Line 28 represents the dollars-per-therm RA. It is derived by dividing the Total Reconciliation Dollar amount on Line 27 by the Total Therm Deliveries forecasted for the nine-month reconciliation amortization period (Line 17) that the RA will be in effect. Similar calculations are performed for S.C. No. 2 Residential Energy Efficiency and OBF on Page 3, and combined 2, 4, 5, 7 and 8 Commercial and Industrial Energy Efficiency on Page 4.

- Page 5 shows the Peoples Gas program aggregation of monthly EOA Expenses (EEXP and OEXP), Revenues (EREV and OREV) and previous reconciliation amortization period Reconciliation Adjustment (ERA1 and ORA1) amounts recovered or refunded. EEXP and OEXP represent the actual amount of expenses incurred by Peoples Gas during the previous Program Period for energy efficiency and OBF. EREV represents 100% of billed revenues arising from application of the Effective Component during the previous Program Period for

energy efficiency that are applicable to Peoples Gas as allowed under the Rider. OREV represents billed revenues for OBF. The Reconciliation Adjustment ERA1 and ORA1 amounts represent the amounts collected or refunded during the previous Program Period arising from the application of the RA from the Previous Program Period for energy efficiency and OBF. The totals for Expenses, Revenues, and RA amounts for each applicable service classification are shown on Line 15 for Residential Energy Efficiency, Line 30 for Commercial and Industrial Energy Efficiency, and Line 45 for OBF.

- Page 6 shows the forecasted total therm deliveries for the reconciliation amortization period of April 2026 through December 2026. The total therm deliveries for S.C. No. 2 and combined S.C. Nos. 4, 5, 7 and 8 are adjusted to exclude therm deliveries to individual customers reported by DCEO as exempt or self-directing who are not subject to Rider EOA.

Therm totals used in calculations of per-therm charges are:

- Column C, Line 10 for S.C. No. 1 residential programs;
- Column F, Line 10 for S.C. No. 2 residential programs; and
- Columns F + I, Line 10 for combined S.C. Nos. 2, 4, 5, 7 and 8 for commercial and industrial programs.

Q. How much was calculated as refundable or recoverable from S.C. No. 1 customers over the nine-month period beginning April 1, 2026, for residential energy efficiency and OBF?

307 A. As shown on NSG-PGL Exhibit1.1P the reconciliation result is a refund of
 308 \$5,984,241.92 to customers (NSG-PGL Exhibit 1.1P, Page 2, Column B, Line
 309 13 plus Line 27).

310 **Q. What is the RA component that will be effective for S.C. No. 1 beginning**
 311 **April 1, 2026?**

312 A. The RA component for S.C. No. 1 customers will be a refund of \$0.0161 per
 313 therm (NSG-PGL Exhibit 1.1P, Page 1, Column B, Line 4).

314 **Q. How much was calculated as refundable or recoverable from S.C. No. 2**
 315 **customers over the nine-month period beginning April 1, 2026, for**
 316 **residential energy efficiency and OBF?**

317 A. As shown on NSG-PGL Exhibit1.1P the reconciliation results in a charge of
 318 \$3,004,224.77 to customers (NSG-PGL Exhibit 1.1P, Page 3, Column B, Line
 319 13 plus Line 27).

320 **Q. How much was calculated as refundable or recoverable from combined**
 321 **S.C. Nos. 2, 4, 5, 7 and 8 customers over the nine-month period**
 322 **beginning April 1, 2026, for commercial and industrial energy efficiency**
 323 **programs?**

324 A. As shown on NSG-PGL Exhibit1.1P the reconciliation result is a charge of
 325 \$6,363,547.88 to customers (NSG-PGL Exhibit 1.1P, Page 4, Column B, Line
 326 13).

327 **Q. What is the RA component that will be effective for S.C. No. 2 beginning**
 328 **April 1, 2026, for residential, commercial and industrial energy**
 329 **efficiency and OBF?**

330 A. The RA component for S.C. No. 2 customers will be a charge of \$0.0211 per
331 therm (NSG-PGL Exhibit 1.1P, Page 1, Column C, Line 4).

332 **Q. What is the RA component that will be effective for S.C. Nos. 4, 5, 7 and**
333 **8 beginning April 1, 2026, for commercial and industrial energy**
334 **efficiency?**

335 A. The RA component for S.C. Nos. 4, 5, 7 and 8 customers will be a charge of
336 \$0.0128 per therm (NSG-PGL Exhibit 1.1P, Page 1, Column D, Line 4).

337 **Q. Please describe how the RA components will be included on**
338 **customers' bills.**

339 A. The RA components were filed with the Commission on Information Sheet
340 No. 33 and are added to the Effective Component adjustment amounts for
341 the 2026 program year and billed as a single adjustment for each service
342 classification effective April 1, 2026.

343 **Q. In accordance to Section E of Riders EOA of Peoples Gas' and North**
344 **Shore's Schedule of Rates, an internal audit report dated July 25, 2026**
345 **was filed to the ICC on August 1, 2026. Were there any observations**
346 **related to the Program Year 2025 period in the report?**

347 A. According to the internal audit report, the review of the reconciliation
348 adjustment revealed these calculations to be accurate, and expenses were
349 properly identified and recorded. The findings are detailed in the table below
350 attached the internal audit report as NSG-PGL Exhibit 1.2

351 **Q. Please explain NSG-PGL Exhibit 1.3N.**

352 A. NSG-PGL Exhibit 1.3N reflects the reconciliation of North Shore Gas energy
 353 efficiency program expenses including On Bill Financing between NSG-PGL
 354 Exhibit 1.1N and NSG-PGL Exhibit 2.1 which is sponsored by Company
 355 witness Christina Frank. Exhibit 2.1-North Shore Gas 2025 Quarter 4 ICC
 356 Report was filed to the ICC on February 17, 2026 and Exhibit 1.1N was filed
 357 to the ICC for Rider EOA reconciliation rates in effect April 1, 2026.

358 **Q. Please explain NSG-PGL Exhibit 1.3P.**

359 A. NSG-PGL Exhibit 1.3P reflects the reconciliation of Peoples Gas Energy
 360 Efficiency program expenses including On Bill Financing between NSG-PGL
 361 Exhibit 1.1P and NSG-PGL Exhibit 2.2 which is sponsored by Company
 362 witness Christina Frank. Exhibit 2.2-Peoples Gas 2025 Quarter 4 ICC Report
 363 was filed to the ICC on February 17, 2026 and Exhibit 1.1P was filed to the
 364 ICC for Rider EOA reconciliation rates in effect April 1, 2026. Upon
 365 reconciliation of the two Exhibits, items were identified related to (a)
 366 adjustment for actuals costs reflected in the 2025 Quarter 4 ICC Report that
 367 were 2025 expenses.

368

369 **Q. Does this conclude your direct testimony?**

370 A. Yes, it does.

North Shore Gas Company

**Energy Efficiency and On-Bill Financing Adjustment
Under Rider EOA
Schedule of Rates, ILL. C.C. No. 17**

Applicable to All Service Classifications

Statement of Reconciliation Adjustment

**Effective With Service Rendered
On and After April 1, 2026**

Line No.	Adjustments	Amount per Therm		
		Service Classification No. 1	Service Classification No. 2	Service Classification Nos. 4, 5, 7 and 8
	[A]	[B]	[C]	[D]
1	Residential Energy Efficiency Adjustments	\$ 0.0002 ¹	\$ 0.0106 ²	
2	Commercial/Industrial Energy Efficiency Adjustments		\$ 0.0008 ³	\$ 0.0008 ³
3	On-Bill Financing Adjustments	\$ 0.0001 ⁴	\$ - ⁵	
4	Total Reconciliation Adjustment (Sum of Lines 1-3)	<u>\$ 0.0003</u>	<u>\$ 0.0114</u>	<u>\$ 0.0008</u>

Notes:

¹ Page 2, Column B, Line 14

² Page 3, Column B, Line 14

³ Page 4, Column B, Line 14

⁴ Page 2, Column B, Line 28

⁵ Page 3, Column B, Line 28

North Shore Gas Company
Annual Reconciliation Calculation for Rider EOA
Fourteenth Program Year (January 1, 2025 - December 31, 2025)
Service Classification No. 1

Line No.	Item Description	Total North Shore Gas	Notes
	[A]	[B]	[C]
1	Calculation of Reconciliation Adjustment (RA)		
2	Calculation of Residential Energy Efficiency ERA1 ₁		
3	Total therms	107,381,466	P. 6, Col. C, Line 10
4	Energy Efficiency Expenses (EEXP)	\$ 1,824,068.57	P. 5, Col. C, Line 15 for North Shore Gas
5	Energy Efficiency Revenues (EREV)	1,797,512.10	P. 5, Col. G, Line 15 for North Shore Gas
6	Subtotal Residential ERA1 ₁	26,556.47	Line 4 - Line 5
7	Calculation of Residential Energy Efficiency ERA2 ₁		
8	ERA1 ₁ Previous Year	(218,236.89)	Previous Year Filing - Reconciliation Adjustment, p 2 line 13 (PY13)
9	ERA1 ₁ Previous Year Collections/(Refunds)	(208,514.85)	P. 5, Col. K, Line 15 for North Shore Gas P. 6, Col. K, Line 15 for DCEO
10	Subtotal Residential ERA2 ₁	(9,722.04)	Line 8 - Line 9
11	Calculation of Interest (3.5% annually)(1)	441.90	(Lines 6 + 10) x Interest Rate x 9 / 12
12	Factor O Adjustment	-	
13	Total Reconciliation Dollars	\$ 17,276.33	Line 6 + Line 10 + Line 11 + Line 12
14	Total Residential Energy Efficiency ERA	\$ 0.0002	Line 13 / Line 3
15			
16	Calculation of Residential On-Bill Financing ORA1 ₁		
17	Total Therms	107,381,466	P. 7, Col. C, Line 10
18	On-Bill Financing Expenses (OEXP)	\$ 67,137.98	P. 5, Col. C, Line 47
19	On-Bill Financing Revenues (OREV)	56,406.56	P. 5, Col. G, Line 47
20	Subtotal Residential ORA1 ₁	10,731.42	Line 18 - Line 19
21	Calculation of Residential On-Bill Financing ORA2 ₁		
22	ORA1 ₁ Previous Year	21,855.09	Previous Year Filing - Reconciliation Adjustment, p 2 line 27 (PY13)
23	ORA1 ₁ Previous Year Collections/(Refunds)	19,932.63	P. 5, Col. K, Line 47
24	Subtotal Residential ORA2 ₁	1,922.46	Line 22 - Line 23
25	Calculation of Interest (3.5% annually)(1)	332.16	(Lines 20 + 24) x Interest Rate x 9 / 12
26	Factor O Adjustment	-	
27	Total Reconciliation Dollars	\$ 12,986.04	Line 20 + Line 24 + Line 25 + Line 26
28	Total Residential On-Bill financing ORA	\$ 0.0001	Line 27 / Line 17
29			
30	<u>Notes:</u>		
31	(1) The interest rate set by the Illinois Commerce Commission for Calendar 2026 is:	3.5%	

North Shore Gas Company
Annual Reconciliation Calculation for Rider EOA
Fourteenth Program Year (January 1, 2025 - December 31, 2025)
Service Classification No. 2 Residential Programs

Line No.	Item Description	Total Peoples Gas	Notes
	[A]	[B]	[C]
1	Calculation of Reconciliation Adjustment (RA)		
2	Calculation of Residential Energy Efficiency ERA1 ₁		
3	Total therms	58,461,365	P. 6, Col. F, Line 10
4	Energy Efficiency Expenses (EEXP)	\$ 836,177.13	P. 5, Col. D, Line 15 for North Shore Gas
5	Energy Efficiency Revenues (EREV)	247,013.17	P. 5, Col. H, Line 15 for North Shore Gas
6	Subtotal Residential ERA1 ₁	589,163.96	Line 4 - Line 5
7	Calculation of Residential Energy Efficiency ERA2 ₁		
8	ERA1 ₁ Previous Year	376,272.91	Previous Year Filing - Reconciliation Adjustment, p 3 line 13 (PY13)
9	ERA1 ₁ Previous Year Collections/(Refunds)	359,960.46	P. 5, Col. L, Line 15 for North Shore Gas
10	Subtotal Residential ERA2 ₁	16,312.45	Line 8 - Line 9
11	Calculation of Interest (3.5% annually)(1)	15,893.76	(Lines 6 + 10) x Interest Rate x 9 / 12
12	Factor O Adjustment	-	
13	Total Reconciliation Dollars	\$ 621,370.17	Line 6 + Line 10 + Line 11 + Line 12
14	Total Residential Energy Efficiency ERA	\$ 0.0106	Line 13 / Line 3
15			
16	Calculation of Residential On-Bill Financing ORA1 ₁		
17	Total Therms	58,461,365	P. 7, Col. F, Line 10
18	On-Bill Financing Expenses (OEXP)	\$ -	P. 5, Col. D, Line 47
19	On-Bill Financing Revenues (OREV)	-	P. 5, Col. H, Line 47
20	Subtotal Residential ORA1 ₁	-	Line 18 - Line 19
21	Calculation of Residential On-Bill Financing ORA2 ₁		
22	ORA1 ₁ Previous Year		Previous Year Filing - Reconciliation Adjustment, p 3 line 27 (PY12)
23	ORA1 ₁ Previous Year Collections/(Refunds)	-	P. 5, Col. L, Line 47
24	Subtotal Residential ORA2 ₁	-	Line 22 - Line 23
25	Calculation of Interest (3.5% annually)(1)	-	(Lines 20 + 24) x Interest Rate x 9 / 12
26	Factor O Adjustment	-	
27	Total Reconciliation Dollars	\$ -	Line 20 + Line 24 + Line 25 + Line 26
28	Total Residential On-Bill financing ORA	\$ -	Line 27 / Line 17
29			
30	<u>Notes:</u>		
31	(1) The interest rate set by the Illinois Commerce Commission for Calendar 2026 is:	3.5%	

North Shore Gas Company
Annual Reconciliation Calculation for Rider EOA
Fourteenth Program Year (January 1, 2025 - December 31, 2025)
S.C. Nos. 2, 4, 5, 7 and 8 - Commercial and Industrial Programs

Line No.	Item Description	Total Peoples Gas	Notes
	[A]	[B]	[C]
1	Calculation of Reconciliation Adjustment (RA)		
2	Calculation of C&I Energy Efficiency ERA1 ₁		
3	Total therms	73,382,457	P. 6, Line 10, Cols. F+I
4	Energy Efficiency Expenses (EEXP)	\$ 2,041,375.67	P. 5, Col. F, Line 31 for North Shore Gas
5	Energy Efficiency Revenues (EREV)	1,975,580.96	P. 5, Col. J, Line 31 for North Shore Gas
6	Subtotal C&I ERA1 ₁	65,794.71	Line 4 - Line 5
7	Calculation of C&I Energy Efficiency ERA2 ₁		
8	ERA1 ₁ Previous Year	294,333.81	Previous Year Filing - Reconciliation Adjustment, p 4 line 13 (PY13)
9	ERA1 ₁ Previous Year Collections/(Refunds)	303,142.27	P. 5, Col. N, Line 31 for North Shore Gas
10	Subtotal C&I ERA2 ₁	(8,808.46)	Line 8 - Line 9
11	Calculation of Interest (3.5% annually)(1)	1,495.89	(Lines 6 + 10) x Interest Rate x 9 / 12
12	Factor O Adjustment	-	
13	Total Reconciliation Dollars	\$ 58,482.14	Line 6 + Line 10 + Line 11 + Line 12
14	Total C&I Energy Efficiency ERA	\$ 0.0008	Line 13 / Line 3
15			
16	<u>Notes:</u>		
17	(1) The interest rate set by the Illinois Commerce Commission for Calendar 2026 is:	3.5%	

North Shore Gas Company**North Shore Gas Energy Efficiency and On-Bill Financing Programs****Program Year Revenues and Expenses
Fourteenth Program Year (January 1, 2025 - December 31, 2025)**

Line No.	Month	Year	Expenses ¹				Revenues ²				RA1 Collections/(Refunds) ³				Line No.
			Service Classification No. 1	Service Classification No. 2	Service Classification Nos. 4, 5, 7, 8	Total	Service Classification No. 1	Service Classification No. 2	Service Classification Nos. 4, 5, 7, 8	Total	Service Classification No. 1	Service Classification No. 2	Service Classification Nos. 4, 5, 7, 8	Total	
	[A]	[B]	[C]	[D]	[E]	[F] [C]+[D]+[E]	[G]	[H]	[I]	[J] [G]+[H]+[I]	[K]	[L]	[M]	[N] [K]+[L]+[M]	
1	Residential Energy Efficiency														
2	Jan	2025	\$ 17,397.43	\$ 10,759.13	\$ -	\$ 28,156.56	\$ 356,323.06	\$ 50,775.03	\$ -	\$ 407,098.09	\$ (5,777.18)	\$ 5,070.29	\$ -	\$ (706.89)	2
3	Feb	2025	\$ 147,610.99	\$ 44,720.43	-	192,331.42	292,587.18	40,158.18	-	332,745.36	35.43	(522.20)	-	(486.77)	3
4	Mar	2025	\$ 115,892.32	\$ 40,205.57	-	156,097.89	194,269.19	25,458.99	-	219,728.18	(25.19)	(3,083.53)	-	(3,108.72)	4
5	Apr	2025	\$ 121,572.43	\$ 341,268.22	-	462,840.65	128,741.21	17,871.78	-	146,612.99	(27,281.44)	54,178.02	-	26,896.58	5
6	May	2025	\$ 105,740.61	\$ 41,028.89	-	146,769.50	87,956.83	12,089.39	-	100,046.22	(18,743.15)	32,711.98	-	13,968.83	6
7	June	2025	\$ 133,938.88	\$ 44,010.43	-	177,949.31	42,162.35	6,939.16	-	49,101.51	(8,924.31)	18,272.20	-	9,347.89	7
8	July	2025	\$ 175,184.31	\$ 66,710.51	-	241,894.81	39,688.83	5,242.74	-	44,931.57	(8,368.51)	14,498.88	-	6,130.37	8
9	August	2025	\$ 59,904.82	\$ 23,190.94	-	83,095.76	34,245.80	5,389.64	-	39,635.44	(7,202.14)	14,306.98	-	7,104.84	9
10	Septembe	2025	\$ 128,348.10	\$ 52,959.17	-	181,307.26	37,809.03	7,466.63	-	45,275.66	(7,982.52)	19,533.64	-	11,551.12	10
11	October	2025	\$ 109,070.86	\$ 37,053.04	-	146,123.90	80,472.52	11,317.49	-	91,790.01	(17,139.65)	30,291.25	-	13,151.60	11
12	November	2025	\$ 272,423.13	\$ 46,049.86	-	318,472.99	186,384.85	24,616.39	-	211,001.24	(39,676.11)	66,387.57	-	26,711.46	12
13	December	2025	\$ 244,479.86	\$ 33,334.28	-	277,814.14	316,871.25	39,687.75	-	356,559.00	(67,430.08)	108,315.38	-	40,885.30	13
14	Adjustments		\$ 192,504.83	\$ 54,886.66	-	247,391.49	-	-	-	-	-	-	-	-	14
15	Total		\$ 1,824,068.57	\$ 836,177.13	\$ -	\$ 2,660,245.70	\$ 1,797,512.10	\$ 247,013.17	\$ -	\$ 2,044,525.27	\$ (208,514.85)	\$ 359,960.46	\$ -	\$ 151,445.61	15
	Commercial and Industrial Energy Efficiency														
16	Jan	2025	-	-	-	22,239.13	-	312,913.42	37,142.39	350,055.81	-	6,392.97	3,194.77	9,587.74	16
17	Feb	2025	-	-	-	115,055.13	-	247,898.52	41,591.74	289,490.26	-	(659.05)	5,643.74	4,984.69	17
18	Mar	2025	-	-	-	126,804.30	-	157,857.03	32,524.68	190,381.71	-	135.80	(4,955.26)	(4,819.46)	18
19	Apr	2025	-	-	-	97,962.72	-	105,623.05	46,135.44	151,758.49	-	29,659.80	3,937.74	33,597.54	19
20	May	2025	-	-	-	129,822.12	-	73,616.17	35,686.73	109,302.90	-	19,003.79	13,578.19	32,581.98	20
21	June	2025	-	-	-	175,061.75	-	42,354.74	33,482.03	75,836.77	-	10,685.47	8,609.68	19,295.15	21
22	July	2025	-	-	-	129,262.21	-	32,481.96	35,246.36	67,728.32	-	8,410.74	9,063.35	17,474.09	22
23	August	2025	-	-	-	37,037.67	-	32,819.89	41,169.26	73,989.15	-	8,326.47	10,586.35	18,912.82	23
24	September	2025	-	-	-	245,401.74	-	45,340.56	31,316.00	76,656.56	-	11,434.59	8,052.67	19,487.26	24
25	October	2025	-	-	-	228,211.44	-	68,544.91	40,215.49	108,760.40	-	17,584.54	10,341.14	27,925.68	25
26	November	2025	-	-	-	192,643.78	-	149,838.02	37,511.21	187,349.23	-	38,555.19	9,645.74	48,200.93	26
27	December	2025	-	-	-	101,799.94	-	243,622.61	50,648.75	294,271.36	-	62,889.92	13,023.93	75,913.85	27
28	Adjustments		-	-	-	440,073.73	-	-	-	-	-	-	-	-	28
29	Total		-	-	-	\$ 2,041,375.67	\$ -	\$ 1,512,910.88	\$ 462,670.08	\$ 1,975,580.96	\$ -	\$ 212,420.23	\$ 90,722.04	\$ 303,142.27	29
30	On-Bill Financing														
31	Jan	2025	-	-	-	-	11,430.13	-	-	11,430.13	329.73	-	-	329.73	31
32	Feb	2025	5,570.27	-	-	5,570.27	9,337.82	-	-	9,337.82	(2.20)	-	-	(2.20)	32
33	Mar	2025	5,966.62	-	-	5,966.62	6,162.36	-	-	6,162.36	1.54	-	-	1.54	33
34	Apr	2025	5,507.99	-	-	5,507.99	4,118.27	-	-	4,118.27	2,566.28	-	-	2,566.28	34
35	May	2025	5,614.45	-	-	5,614.45	2,719.09	-	-	2,719.09	1,916.72	-	-	1,916.72	35
36	June	2025	5,500.89	-	-	5,500.89	1,175.54	-	-	1,175.54	778.16	-	-	778.16	36
37	July	2025	5,497.32	-	-	5,497.32	1,051.75	-	-	1,051.75	684.89	-	-	684.89	37
38	August	2025	5,493.84	-	-	5,493.84	827.02	-	-	827.02	497.66	-	-	497.66	38
39	September	2025	5,490.56	-	-	5,490.56	977.74	-	-	977.74	619.79	-	-	619.79	39
40	October	2025	5,597.34	-	-	5,597.34	2,487.39	-	-	2,487.39	1,814.36	-	-	1,814.36	40
41	November	2025	5,939.20	-	-	5,939.20	5,992.64	-	-	5,992.64	3,984.76	-	-	3,984.76	41
42	December	2025	5,481.21	-	-	5,481.21	10,126.81	-	-	10,126.81	6,740.94	-	-	6,740.94	42
43	Adjustment		5,478.29	-	-	5,478.29	-	-	-	-	-	-	-	-	43
44	Total		\$ 67,137.98	\$ -	\$ -	\$ 67,137.98	\$ 56,406.56	\$ -	\$ -	\$ 56,406.56	\$ 19,932.63	\$ -	\$ -	\$ 19,932.63	44

Notes:¹ Represents factors EEXP for energy efficiency, and OEXP for On-Bill Financing, as defined in Rider EOA.² Represents factors EREV for energy efficiency, and OREV for On-Bill Financing, as defined in Rider EOA.³ Represents factors ERA1 for energy efficiency, and ORA1 for On-Bill Financing, based on the prior year, as defined in Rider EOA.

North Shore Gas Company

Energy Efficiency and On-Bill Financing Adjustment

**Forecasted Total Therm Deliveries for Reconciliation Period¹
April 2026 through December 2026**

Line No.	Month	Year	Forecasted Total Therm Deliveries						Adjusted Service Classification No. 4, 5 & 7	Line No.
			Service Classification No. 1	Service Classification No. 2	Exempt and Self-Directing Customers	Adjusted Service Classification No. 2	Service Classification No. 4, 5 & 7	Exempt and Self-Directing Customers		
	[A]	[B]	[C]	[D]	[E]	[F] [D] - [E]	[G]	[H]	[I] [G] - [H]	
1	Apr	2026	15,613,346	8,356,656			3,987,684			1
2	May	2026	10,208,057	5,292,911			3,475,239			2
3	June	2026	5,657,831	3,160,595			3,229,351			3
4	July	2026	4,156,888	2,916,576			3,257,483			4
5	Aug	2026	3,906,294	2,955,560			3,274,332			5
6	Sept	2026	4,753,595	3,333,914			3,364,692			6
7	Oct	2026	11,641,834	6,251,427			3,501,427			7
8	Nov	2026	20,142,035	11,337,807			3,613,733			8
9	Dec	2026	31,301,586	16,120,482			4,278,460			9
10	Total		107,381,466	59,725,928	1,264,563	58,461,365	31,982,401	17,061,308	14,921,092	10

¹ Thermers are adjusted to exclude exempt and self-directing customers not subject to Rider EOA.



Rider Energy Efficiency and On-Bill Financing Adjustment Annual Audit

**Prepared by Audit Services
July 9, 2026**

Rider Energy Efficiency and On-Bill Financing Adjustment Annual Audit
Table of Contents

INTRODUCTION3

BACKGROUND3

SCOPE3

CONCLUSION3

APPENDIX A5

Rider Energy Efficiency and On-Bill Financing Adjustment Annual Audit

INTRODUCTION

A review of the Rider Energy Efficiency and On-Bill Financing Adjustment (Rider EOA) was performed by Audit Services. Rider EOA applies to both The Peoples Gas Light and Coke Company (PGL) and North Shore Gas Company (NSG), collectively referred to as the “Utilities”. The objective of this review was to verify the Utilities’ compliance with Rider EOA as required in the audit steps defined in the tariff. The Utilities are required to submit an internal audit report to the Illinois Commerce Commission (ICC) annually by August 1.

BACKGROUND

The Rider EOA adjustments recover expenses related to the Utilities’ energy efficiency and on-bill financing programs for a specific Calendar Year. The Rider EOA adjustments are comprised of two components, the Effective Component and the Reconciliation Adjustment. The Effective Component, billed from January to December, is a per-therm adjustment based on the budgeted expenses for the energy efficiency and on-bill financing programs for the current Calendar Year for each of the Utilities. The Reconciliation Adjustment, billed from April to December, is a per-therm adjustment used to reconcile the Effective Component revenues received to the actual energy efficiency and on-bill financing expenses for the prior Calendar Year.

Both Utilities determine separate Rider EOA adjustments for residential programs for Service Classifications (SC) No. 1 (Small Residential Service) and No. 2 (General Service). The Utilities also determine combined adjustments for commercial & industrial programs for SC No. 2, SC No. 4 (Large Volume Demand Service), SC No. 5 (Contract Service Electric Generation), SC No. 7 (Contract Service to Prevent Bypass), and SC No. 8 (PGL only – Compressed Natural Gas Service).

SCOPE

The scope of the audit included the Reconciliation Adjustment calculations and customer bills for Calendar Year 2025. The scope also included the Utilities’ Effective Component calculations for Calendar Year 2026.

To verify the accuracy of these calculations, we performed the steps required per Rider EOA. We verified:

- Expenses recovered through Rider EOA were not recovered through other approved tariffs,
- Rider EOA adjustments were properly billed to customers in the proper period,
- Rider EOA revenues were properly stated,
- Actual expenses were being identified and recorded properly to be reflected in the calculation of the Reconciliation Adjustment, and
- The percent increase in connection with gas service bills for the four-year reporting period for energy efficiency was within the statutory cap.

CONCLUSION

We determined the Effective Component calculations were accurate, except for a minor formula error that did not impact the calculated rates. During a review of the Reconciliation Adjustment, we identified immaterial invoicing errors, which did not impact the calculated rates. Other than the immaterial errors, we determined the rates were accurate and expenses were properly identified and recorded.

We determined that Rider EOA expenses were not recovered through other approved tariffs, Rider EOA adjustments were properly billed to customers in the correct period, and Rider EOA revenues were properly stated in the correct general ledger accounts. In addition, the Utilities were in compliance with the 2% statutory cap.

Appendix A is attached to detail the specific approach used to execute each of the testing steps. We thank all those involved in this audit for their assistance and support.

APPENDIX A

This Appendix provides additional details and results of the steps performed during the audit.

1. Accuracy of Effective Component Calculations

Annually, the Utilities are required to file an Effective Component based on the budgeted expenses for the energy efficiency and on-bill financing programs for that Calendar Year. To verify the accuracy of the Calendar Year 2026 Effective Component calculations filed on December 20, 2025, we compared the calculation spreadsheets to supporting documentation. We compared the budgeted expenses to those submitted to the ICC, and the forecasted therms to the Utilities' forecasting model and exempt customer extract. We also compared the formula used to calculate the Effective Component to the formula outlined in Rider EOA. The NSG Effective Component calculation spreadsheet contained a minor formula error, which did not impact the rates filed with the ICC.

Other than the error noted above, we determined the Calendar Year 2026 Effective Component calculations were accurate and in compliance with Rider EOA.

2. Accuracy of Reconciliation Adjustment Calculations

Annually, the Utilities are required to file a Reconciliation Adjustment, which reconciles the Effective Component revenues received to the actual energy efficiency and on-bill financing expenses for the Calendar Year. To verify the accuracy of the Calendar Year 2025 Reconciliation Adjustments filed on March 31, 2026, we compared the calculation spreadsheets to supporting documentation. We compared the Effective Component and Reconciliation Adjustment revenues to Business Warehouse revenue reports, the expenses to various invoice queries, and the forecasted therms to the Utilities' forecasting model and exempt customer extract. We also compared the formula used to calculate the Reconciliation Adjustments to the formula outlined in Rider EOA.

Other than the immaterial invoice errors noted in the Accuracy of Invoices section below, we determined the Calendar Year 2025 Reconciliation Adjustment calculations were accurate and in compliance with Rider EOA.

3. Accuracy of Invoices

Rider EOA expenses are recorded to specified Rider EOA general ledger accounts and WBS Cost Elements are used to classify an expense as either residential-SC No. 1, residential-SC No. 2, or commercial & industrial. To verify that invoices were supported and accurately recorded, we performed testing for two Rider EOA vendors. Franklin Energy Services, LLC (Franklin Energy) and Erthe Energy Solutions (Erthe) provide consulting services to facilitate the energy efficiency program on behalf of the Utilities. Calendar Year 2025 expenses were approximately \$29.0 million for Franklin Energy and \$3.7 million for Erthe out of \$36.4 million of total expenses related to Rider EOA.

We agreed the Calendar Year 2025 invoices to supporting documentation, including listings of incentive and rebate payments made, subcontractor invoices, and direct installation and labor summaries. We verified the correct allocation rates were used to classify expenses between PGL and NSG and between service classes, and compared billing rates to the contract, where applicable. We determined the invoices were accurate and properly recorded to be included in the Reconciliation Adjustment calculations, except for two immaterial invoicing errors that did not impact the calculated and filed Reconciliation Adjustment rates.

4. Accuracy of Rider EOA Adjustments and Expenses Not Recovered Through Other Approved Tariffs

The Utilities' customer information system (CIS) uses unique revenue codes to classify revenue which are then used to identify revenues for the Rider EOA calculations. We verified the total Rider EOA revenues included in the calculation agreed to the total Rider EOA revenues per the CIS for the months of January to December 2025. Based on our review, we determined the Rider EOA revenues were not recovered through other approved tariffs.

5. Accuracy of Rider EOA Adjustments on Customer Bills

To verify the accuracy of Rider EOA adjustments on customer bills, we recalculated the Rider EOA adjustment on 38 customer bills, including one bill for each customer offering. We also verified that the rates were accurately entered into the CIS for the effective dates of January 1, 2026 (initial Effective Component) and April 1, 2026 (Reconciliation Adjustment). Based on our analysis, we concluded the CIS accurately calculated the Rider EOA adjustments on the customer bills.

6. Accuracy of Rider EOA Revenues Properly Recorded in Appropriate General Ledger Accounts

CIS revenue information was used to record Rider-related entries in SAP, the Utilities' general ledger system. To verify Rider EOA revenues were recorded in appropriate accounts in SAP, we compared the total Rider EOA revenues per the CIS to the balances in SAP for the period of January to December 2025. We determined revenues were recorded in the appropriate SAP accounts.

7. Accuracy of Four-Year Statutory Cap Calculation

Per Rider EOA, the cost of energy efficiency programs implemented in any multi-year reporting period shall be limited to an amount that limits the estimated average increase in connection with gas service to no more than 2% in the applicable four-year reporting period. Costs related to the on-bill financing program are excluded from the determination of the limitation.

Taking into account Calendar Year 2022-2025 actual expenses, Regulatory Affairs determined that total expenses over the four-year reporting period were within the 2% cap based on the Fourth Multiyear Program Plan budget. As such, both Utilities met the 2% statutory cap. We also determined the calculation of the statutory cap was accurate.

NORTH SHORE GAS Section 8-1038/8-104 (EEPS) Costs - Program Reconciliation
Calendar 2025

NSG-PGL Exhibit 1.3N
Page 1 of 2

Section 8-1038/8-104 (EEPS) Cost Category	NS-PGL Ex. 2.1: 2025 Actual Costs January 1 to December 31			NS-PGL Ex. 1.1N: 2025 Actual Costs -adjusted to recover in Rider EOA RA rates filed March 31, 2026		2025 (AUDITED) Actual Costs YTD
Source:	ICC 04 Report filed February 17, 2026 under ICC Docket 21-0159					
	[A]	[B]	[C]	[D] = Sum of [A] to [C]	[E]	[F] = [D] + [E]
Program Expenditures by Sector						
C&I Programs (private sector)	\$ 1,190,556			\$ 1,190,556		\$ 1,190,556
Public Sector Programs	\$ 355,759			\$ 355,759		\$ 355,759
Residential Programs	\$ 774,362			\$ 774,362		\$ 774,362
Income Qualified Programs	\$ 1,181,642			\$ 1,181,642		\$ 1,181,642
Market Development Initiative	\$ 190,416			\$ 190,416		\$ 190,416
Third Party Programs (Beginning in 2019)				\$		\$
Total North Shore Gas Program Costs	\$ 3,692,734	\$ -	\$ -	\$ 3,692,734	\$ -	\$ 3,692,734
Portfolio-Level Costs by Portfolio Cost Category (Section 8-1038/8-104 EEPS)						
Demonstration of Breakthrough Equipment and Devices Costs	\$ 34,616			\$ 34,616		\$ 34,616
Market Transformation Programs	\$ 152,733			\$ 152,733		\$ 152,733
Evaluation Costs	\$ 100,092			\$ 100,092		\$ 100,092
Marketing Costs(including education and outreach)	\$ 165,016	\$ -		\$ 165,016		\$ 165,016
Portfolio Administrative Costs	\$ 623,569			\$ 623,569		\$ 623,569
Total North Shore Gas Portfolio-Level Costs	\$ 1,076,025	\$ -	\$ -	\$ 1,076,025	\$ -	\$ 1,076,025
Total North Shore Gas Program and Portfolio-Level Section 8-1038/8-104 (EEPS) Costs	\$ 4,768,759	\$ -	\$ -	\$ 4,768,759	\$ -	\$ 4,768,759

Rider EOA reconciliation program expenses filed March 31, 2026-- Exhibit 1.1N

	Energy Efficiency Expenses	On-Bill Financing Expenses	Total
page 2, col D, lines 4 and 18: SC. No. 1 Residential	\$ 1,824,069	\$ 67,138	\$ 1,891,207
page 3, col D, lines 4 and 18: SC. No. 2 Residential	\$ 836,177	\$ -	\$ 836,177
page 4, col D, lines 4: SC. No. 2, 4, 5,7 Commercial and Industrial	\$ 2,041,376	\$ -	\$ 2,041,376
1 Calendar 2025 Energy Efficiency Program Costs-Exhibit 1.1N	\$ 4,701,621	\$ 67,138	\$ 4,768,759
2 NS-PGL Ex. 2.1: 2025 Actual Costs January 1 to December 31		\$	\$ 4,768,759
3		\$	-
4			
5			
6			
7 Sum of Line 2 to Line 6 - Calendar 2025 Energy Efficiency Program Costs-Exhibit 1.1N		\$	\$ 4,768,759
8		\$	-
9 Line 7 + Line 8 - Calendar 2025 Energy Efficiency Program Costs Incurred		\$	\$ 4,768,759

North Shore Gas Company

North Shore Gas Energy Efficiency and On-Bill Financing Programs

**Program Year Revenues and Expenses
Fourteenth Program Year (January 1, 2025 - December 31, 2025)**

Line No.	Month	Year	Expenses ¹				Revenues ²				RA1 Collections/(Refunds) ³				Line No.
			Service Classification No. 1	Service Classification No. 2	Service Classification Nos. 4, 5, 7, 8	Total	Service Classification No. 1	Service Classification No. 2	Service Classification Nos. 4, 5, 7, 8	Total	Service Classification No. 1	Service Classification No. 2	Service Classification Nos. 4, 5, 7, 8	Total	
	[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	[K]	[L]	[M]	[N]	
			[C]+[D]+[E]				[G]+[H]+[I]				[K]+[L]+[M]				
1	Residential														1
	Energy Efficiency														
2	Jan	2025	\$ 17,397.43	\$ 10,759.13	\$ -	\$ 28,156.56	\$ 356,323.06	\$ 50,775.03	\$ -	\$ 407,098.09	\$ (5,777.18)	\$ 5,070.29	\$ -	\$ (706.89)	2
3	Feb	2025	\$ 147,610.99	\$ 44,720.43	-	192,331.42	292,587.18	40,158.18	-	332,745.36	35.43	(522.20)	-	(486.77)	3
4	Mar	2025	\$ 115,892.32	\$ 40,205.57	-	156,097.89	194,269.19	25,458.99	-	219,728.18	(25.19)	(3,083.53)	-	(3,108.72)	4
5	Apr	2025	\$ 121,572.43	\$ 341,268.22	-	462,840.65	128,741.21	17,871.78	-	146,612.99	(27,281.44)	54,178.02	-	26,896.58	5
6	May	2025	\$ 105,740.61	\$ 41,028.89	-	146,769.50	87,956.83	12,089.39	-	100,046.22	(18,743.15)	32,711.98	-	13,968.83	6
7	June	2025	\$ 133,938.88	\$ 44,010.43	-	177,949.31	42,162.35	6,939.16	-	49,101.51	(8,924.31)	18,272.20	-	9,347.89	7
8	July	2025	\$ 175,184.31	\$ 66,710.51	-	241,894.81	39,688.83	5,242.74	-	44,931.57	(8,368.51)	14,498.88	-	6,130.37	8
9	August	2025	\$ 59,904.82	\$ 23,190.94	-	83,095.76	34,245.80	5,389.64	-	39,635.44	(7,202.14)	14,306.98	-	7,104.84	9
10	September	2025	\$ 128,348.10	\$ 52,959.17	-	181,307.26	37,809.03	7,466.63	-	45,275.66	(7,982.52)	19,533.64	-	11,551.12	10
11	October	2025	\$ 109,070.86	\$ 37,053.04	-	146,123.90	80,472.52	11,317.49	-	91,790.01	(17,139.65)	30,291.25	-	13,151.60	11
12	November	2025	\$ 272,423.13	\$ 46,049.86	-	318,472.99	186,384.85	24,616.39	-	211,001.24	(39,676.11)	66,387.57	-	26,711.46	12
13	December	2025	\$ 244,479.86	\$ 33,334.28	-	277,814.14	316,871.25	39,687.75	-	356,559.00	(67,430.08)	108,315.38	-	40,885.30	13
14	Adjustments		\$ 192,504.83	\$ 54,886.66	-	247,391.49	-	-	-	-	-	-	-	-	14
15	Total		\$ 1,824,068.57	\$ 836,177.13	\$ -	\$ 2,660,245.70	\$ 1,797,512.10	\$ 247,013.17	\$ -	\$ 2,044,525.27	\$ (208,514.85)	\$ 359,960.46	\$ -	\$ 151,445.61	15
16	Ex. 1.2 Adjustments from Audit Findings					\$ -									16
17	Total - adjusted for Audit findings		\$ 1,824,068.57	\$ 836,177.13	\$ -	\$ 2,660,245.70	\$ 1,797,512.10	\$ 247,013.17	\$ -	\$ 2,044,525.27	\$ (208,514.85)	\$ 359,960.46	\$ -	\$ 151,445.61	17
						-									
18	Commercial and Industrial														18
	Energy Efficiency														
19	Jan	2025				22,239.13	-	312,913.42	37,142.39	350,055.81	-	6,392.97	3,194.77	9,587.74	19
20	Feb	2025				115,055.13	-	247,898.52	41,591.74	289,490.26	-	(659.05)	5,643.74	4,984.69	20
21	Mar	2025				126,804.30	-	157,857.03	32,524.68	190,381.71	-	135.80	(4,955.26)	(4,819.46)	21
22	Apr	2025				97,962.72	-	105,623.05	46,135.44	151,758.49	-	29,659.80	3,937.74	33,597.54	22
23	May	2025				129,822.12	-	73,616.17	35,686.73	109,302.90	-	19,003.79	13,578.19	32,581.98	23
24	June	2025				175,061.75	-	42,354.74	33,482.03	75,836.77	-	10,685.47	8,609.68	19,295.15	24
25	July	2025				129,262.21	-	32,481.96	35,246.36	67,728.32	-	8,410.74	9,063.35	17,474.09	25
26	August	2025				37,037.67	-	32,819.89	41,169.26	73,989.15	-	8,326.47	10,586.35	18,912.82	26
27	September	2025				245,401.74	-	45,340.56	31,316.00	76,656.56	-	11,434.59	8,052.67	19,487.26	27
28	October	2025				228,211.44	-	68,544.91	40,215.49	108,760.40	-	17,584.54	10,341.14	27,925.68	28
29	November	2025				192,643.78	-	149,838.02	37,511.21	187,349.23	-	38,555.19	9,645.74	48,200.93	29
30	December	2025				101,799.94	-	243,622.61	50,648.75	294,271.36	-	62,889.92	13,023.93	75,913.85	30
31	Adjustments					440,073.73	-	-	-	-	-	-	-	-	31
32	Total					\$ 2,041,375.67	\$ -	\$ 1,512,910.88	\$ 462,670.08	\$ 1,975,580.96	\$ -	\$ 212,420.23	\$ 90,722.04	\$ 303,142.27	32
33	Ex. 1.2 Adjustments from Audit Findings					\$ -									33
34	Total - adjusted for Audit findings		\$ -	\$ -	\$ -	\$ 2,041,375.67	\$ -	\$ 1,512,910.88	\$ 462,670.08	\$ 1,975,580.96	\$ -	\$ 212,420.23	\$ 90,722.04	\$ 303,142.27	34
						-									
35	On-Bill Financing														35
36	Jan	2025				-	11,430.13	-	-	11,430.13	329.73	-	-	329.73	36
37	Feb	2025	5,570.27	-	-	5,570.27	9,337.82	-	-	9,337.82	(2.20)	-	-	(2.20)	37
38	Mar	2025	5,966.62	-	-	5,966.62	6,162.36	-	-	6,162.36	1.54	-	-	1.54	38
39	Apr	2025	5,507.99	-	-	5,507.99	4,118.27	-	-	4,118.27	2,566.28	-	-	2,566.28	39
40	May	2025	5,614.45	-	-	5,614.45	2,719.09	-	-	2,719.09	1,916.72	-	-	1,916.72	40
41	June	2025	5,500.89	-	-	5,500.89	1,175.54	-	-	1,175.54	778.16	-	-	778.16	41
42	July	2025	5,497.32	-	-	5,497.32	1,051.75	-	-	1,051.75	684.89	-	-	684.89	42
43	August	2025	5,493.84	-	-	5,493.84	827.02	-	-	827.02	497.66	-	-	497.66	43
44	September	2025	5,490.56	-	-	5,490.56	977.74	-	-	977.74	619.79	-	-	619.79	44
45	October	2025	5,597.34	-	-	5,597.34	2,487.39	-	-	2,487.39	1,814.36	-	-	1,814.36	45
46	November	2025	5,939.20	-	-	5,939.20	5,992.64	-	-	5,992.64	3,984.76	-	-	3,984.76	46
47	December	2025	5,481.21	-	-	5,481.21	10,126.81	-	-	10,126.81	6,740.94	-	-	6,740.94	47
48	Adjustment		5,478.29	-	-	5,478.29	-	-	-	-	-	-	-	-	48
49	Total		\$ 67,137.98	\$ -	\$ -	\$ 67,137.98	\$ 56,406.56	\$ -	\$ -	\$ 56,406.56	\$ 19,932.63	\$ -	\$ -	\$ 19,932.63	49
50	Ex. 1.2 Adjustments from Audit Findings		\$ -	\$ -	\$ -	\$ -									50
51	Total - adjusted for Audit findings		\$ 67,137.98	\$ -	\$ -	\$ 67,137.98	\$ 56,406.56	\$ -	\$ -	\$ 56,406.56	\$ 19,932.63	\$ -	\$ -	\$ 19,932.63	51
						-									
	Total - adjusted for Audit findings		\$ 1,891,206.55	\$ 836,177.13	\$ -	\$ 4,768,759.34									
	Ex. 1.2 Adjustments from Audit Findings		\$ -	\$ -	\$ -	\$ -									
	Total - adjusted for Audit findings		\$ 1,891,206.55	\$ 836,177.13	\$ -	\$ 4,768,759.34									
						0.00									

Notes:

¹ Represents factors EEXP for energy efficiency, and OEXP for On-Bill Financing, as defined in Rider EOA.

² Represents factors EREV for energy efficiency, and OREV for On-Bill Financing, as defined in Rider EOA.

³ Represents factors ERA1 for energy efficiency, and ORA1 for On-Bill Financing, based on the prior year, as defined in Rider EOA.

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	)	
	)	
vs.	)	
	)	
North Shore Gas Company	)	Docket No. 25-0966
The Peoples Gas Light and Coke Company	)	
	)	
Reconciliation of revenues collected	)	
under Riders EOA with the actual costs	)	
associated with energy efficiency and	)	
on-bill financing programs	)	

Direct Testimony of Christina Frank

TABLE OF CONTENTS

I.	INTRODUCTION	3
II.	NORTH SHORE GAS COMPANY	
A.	ENERGY EFFICIENCY OVERVIEW	5
B.	RESIDENTIAL PROGRAMS	10
C.	COMMERCIAL & INDUSTRIAL (C&I) PROGRAMS	11
D.	INCOME QUALIFIED PROGRAMS	15
III.	THE PEOPLES GAS LIGHT AND COKE COMPANY	
A.	ENERGY EFFICIENCY OVERVIEW	17
B.	RESIDENTIAL PROGRAMS	22
C.	COMMERCIAL & INDUSTRIAL (C&I) PROGRAMS	23
D.	INCOME QUALIFIED PROGRAMS	27
IV.	OTHER PROGRAM IMPLEMENTATION MATTERS	29
V.	ON-BILL FINANCING	29
VI.	CONCLUSION	31

DIRECT TESTIMONY
OF
CHRISTINA FRANK

1 **I. INTRODUCTION**

2 Q. Please state your name and business address.

3 A. My name is Christina Frank. My business address is 200 East Randolph,
4 Chicago, Illinois, 60601.

5 Q. By whom are you employed?

6 A. WEC Business Services LLC ("WBS").

7 Q. What position do you hold?

8 A. I am the Director Energy Efficiency and C&I Customer Strategy

9 Q. What are your responsibilities in that position?

10 A. I am responsible for the administration of the North Shore Gas Company's
11 ("North Shore") and The Peoples Gas Light and Coke Company's ("Peoples
12 Gas") natural gas energy efficiency programs. I will sometimes refer to North
13 Shore Gas and Peoples Gas collectively as "the Utilities" or alternatively
14 NS/PGL. I manage our contractors and oversee energy savings results and
15 budget expenditures, manage program strategy and design to ensure results,
16 coordinate activities with neighboring utilities including joint programs with
17 Commonwealth Edison Company ("ComEd"), and interface with third-party
18 evaluators and the Illinois Stakeholder Advisory Group ("SAG").

19 Q. Please summarize your educational background and experience.

20 A. I have a Bachelors degree in Political Science from the University of
21 Missouri. I have been working in the energy efficiency industry since 2007 and
22 during that time I have led energy efficiency program administration and

implementation of programs serving C&I, multi-family, residential and small business customers. Prior to my current role with WBS, I held positions with a non-profit organization and a consulting firm where I oversaw energy efficiency program delivery and provided strategic direction and leadership to cross-functional teams.

Q. On whose behalf are you providing testimony?

A. I am testifying on behalf of North Shore Gas and Peoples Gas.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to: provide information about the Fourth Energy Efficiency Plan (the "Plan") that the Utilities implemented pursuant to the Illinois Commerce Commission's ("Commission") Order in Docket No. 21-0159, describe the programs that the Utilities implemented in 2025, describe the costs that the Utilities incurred during the 2025 reconciliation period, demonstrate that the incurred programs were, in general, consistent with the approved Plan, and the costs of those programs were properly incurred to ensure the Utilities work toward achieving the Plan net therm savings goals. I also address an overview of the on-bill financing ("OBF") program that the Commission approved in Docket No. 10-0090. North Shore Gas and Peoples Gas witness Sam Addison addresses North Shore Gas' and Peoples Gas' Rider EOA reconciliation statements (NSG-PGL Ex. 1.0).

Q. Does your testimony have any attachments?

A. Yes. I am providing four attachments which breakout individual program results as follows:

NSG-PGL Exhibit 2.1 - North Shore Gas 2025 Quarter 4 ICC Report

NSG-PGL Exhibit 2.2 - Peoples Gas 2025 Quarter 4 ICC Report

NSG-PGL Exhibit 2.3 - North Shore Gas / Peoples Gas Net to Gross Values

NSG-PGL Exhibit 2.3 provides the North Shore Gas and Peoples Gas net-to-gross (“NTG”) ratios from September 18, 2024 as updated through evaluation, measurement, and verification (“EM&V”) findings from final third party evaluation reports and the SAG consensus process.

Q. What is the reconciliation period for 2025?

A. This reconciliation applies to the 2025 Program Year, January 1, 2025 through December 31, 2025, for the program approved by the Commission in its final order in Docket No. 21-0159.

Q. Please summarize the conclusions from your testimony.

A. While I am not an attorney, I believe the costs incurred during 2025 for the development and implementation of the Utilities’ energy efficiency program were prudent and reasonable. The 2025 spending and corresponding program activity continued activities in the Income Qualified and Public Sector programs and achievement of therm savings towards the Plan savings goals within the budgets available. Note, while the Utilities’ compliance with the final order in Docket No. 21-0159 are based on achieving the savings goals for the Fourth Plan Period, for planning and execution purposes, internal operational budgets and internal goals for therm savings are calculated annually. In 2025,

- Per the Fourth Quarter Report for 2025 (NSG Ex. 2.1), North Shore Gas achieved 120% of the internal 2025 savings goal utilizing 100% of the 2025 annual budget.
- Per the Fourth Quarter Report for 2025 (PGL Ex. 2.2), Peoples Gas achieved 119% of the internal 2025 savings goal utilizing 99% of the 2025 annual budget.

In 2025 the On Bill Financing (OBF) program provided 3 new loans and continued 36 existing loans to Peoples Gas customers. In 2025 the OBF program provided 1 new loan and continued 26 existing loans to North Shore Gas customers.

II. NORTH SHORE GAS COMPANY

A. ENERGY EFFICIENCY OVERVIEW

Q. Please provide an overview of the Plan as described in the compliance filing for North Shore Gas in Docket No. 21-0159.

A. The overriding objectives of the Plan are to achieve the savings goals as approved in the final order in Docket No. 21-0159 in a cost-effective manner while providing programs to residential, income eligible and business customers. North Shore Gas designed flexible, scalable, best practice programs that allowed for partnering with ComEd, the electric utility operating within the North Shore Gas service territory, streamlining administration, and delivery while maximizing customer participation. In the reconciliation period, the North Shore Gas portfolio included three programs: 1) Residential Programs, 2) Business Programs, and 3) Income Qualified Programs. Each program is addressed in detail later in my

testimony. The Plan also specified the budgets for support of EM&V; Research and Development and Market Transformation; Market Development Initiative; and the On Bill Financing program.

Q. Can the Plan be modified during the course of a Plan period?

A. Yes. Once the Plan is approved, North Shore Gas is allowed to make appropriate changes in response to changing market conditions and other factors. Those changes are discussed in quarterly reports filed in Docket No. 21-0159 and, in certain cases, are brought to SAG for review.

Q. Were there changes to the TRM that had any impact on measures offered in 2025?

A. There were a total of 155 changes which included: 26 Errata changes, 119 measure revisions, 8 new additional measures, and two measure retirements. This is summarized on Table 1.2, of section 1.2, of Volume 1 of Version 13 of the IL-TRM (approved by the Commission in Docket No. 24-0750). Some of these changes impacted measure savings in the Peoples Gas and North Shore Gas business, multi-family and single family residential programs.

Q. Does North Shore Gas participate in SAG?

A. Yes, pursuant to the final order in Docket No. 21-0159, North Shore Gas and Peoples Gas participate in the SAG.

Q. You listed one Residential program North Shore Gas offered in 2025. Did North Shore Gas incur any costs for Residential programs that were not implemented in the reconciliation period?

A. No.

115 Q. You listed one Business program North Shore Gas offered in 2025. Did
116 North Shore Gas incur any costs for C&I programs that were not implemented in
117 the reconciliation period?

118 A. No.

119 Q. You listed one Income Qualified program North Shore Gas offered in
120 2025. Did North Shore Gas incur any costs for income eligible programs that
121 were not implemented in the reconciliation period?

122 A. No.

123 Q. What costs did North Shore Gas incur during the 2025 reconciliation period for
124 these programs?

125 A. A detailed breakdown of the costs, by category, is shown on NSG-PGL
126 Exhibit 2.1 - North Shore Gas 2025 Quarter 4 ICC Report. Costs are categorized
127 in the sections that follow and include the total North Shore Gas Energy
128 Efficiency Portfolio ("EEP") costs. Costs are allocated into the following
129 categories:

130 (1) Administrative costs include time and expense associated with portfolio
131 oversight, management, and planning. These are costs required for overall
132 portfolio management that are not specifically tied to one program. Administrative
133 costs also include time and expense associated with SAG meetings and TRM
134 activities. 2025 total administrative costs were \$623,569 or 13% of North Shore
135 Gas total Utility EEP costs (NSG-PGL Exhibit 2.1, page 2).

136 (2) Non-incentive program costs includes program management, program
137 reporting, customer assistance, and quality control checks performed by energy

experts, call center operations, application processing and fulfillment, and building and maintaining trade ally partnerships. Non-incentive costs also include costs incurred for the Market Development Initiative , as defined in the North Shore Gas stipulated agreement for Plan Four. 2025 total non-incentive program costs were \$1,710,300 or 36% of North Shore Gas total Utility EEP costs (NSG-PGL Exhibit 2.1, page 1).

(3) Marketing costs support those activities associated with program outreach and portfolio awareness. They include brochures and other collateral materials needed to support individual programs including application forms, development and placement of advertisements and campaigns, website creation and management, email newsletters, memberships, and subscriptions. 2025 total marketing costs were \$165,016 or 3% of North Shore Gas total Utility EEP costs (NSG-PGL Exhibit 2.1, page 2).

(5) Incentive costs refer to rebates that are paid to customers or contractors to offset the costs of installed qualifying equipment. This line item is titled "Incentive Costs" in NSG-PGL Exhibit 2.1. Rebates are an income transfer cost from one party to another (i.e., program administrator to customer). 2025 total incentive costs comprised \$1,982,434 or 42% of North Shore Gas total Utility EEP costs (NSG-PGL Exhibit 2.1, page 1).

(6) Evaluation costs (EM&V) are costs incurred for the impact and process evaluations by an independent third party provider, referred to herein as the third party evaluator. Performance of EM&V is a requirement under 220 ILCS 5/8-104(f) (8). This line item is titled "Evaluation Costs" in the Plan. 2025 total EM&V

161 costs were \$100,092 or 2% of North Shore Gas total Utility EEP costs (NSG-PGL
162 Exhibit 2.1, Page 2).

163 Q. What are the total costs for the 2025 reconciliation period?

164 A. The total North Shore Gas EEP costs for the reconciliation period are
165 \$4,768,759 .

166 Q. What are the total therm savings associated with the North Shore Gas
167 program in 2025?

168 A. Total net therm savings for North Shore Gas' Utility EEP Programs in
169 2025 were 1,817,838 pending final third party evaluation results (NSG-PGL
170 Exhibit 2.1 Page 1).

171 Q. Please describe the TRM that you used in your calculations and that you
172 reference in your testimony.

173 A. TRM version 13 dated September 20, 2024 with an effective date of
174 January 1, 2025, as approved by the Commission in its final order in Docket No.
175 24-0750, was used in 2025.

176 Q. What is the basis for the therm savings?

177 A. Savings are based on third party evaluator's 2025 deemed net-to-gross
178 values and evaluated realization rates for each program offered. This is
179 consistent with the prior requirements of the Commission's Orders in Docket
180 Nos. 12-0528 and 13-0077, the most recent Commission final order on the TRM
181 Policy Document in Docket No. 24-0750, the latest TRM applicable to 2025 and
182 consensus in the SAG process. NSG-PGL Exhibit 2.3, which lists these values
183 by program and describes their application for 2025.

184 Q. Will these savings numbers be adjusted in the future for 2025?

185 A. Yes. The savings values for 2025 will be retroactively adjusted to
186 correspond with finalized 2025 evaluation reports in accordance with the Utilities'
187 interpretation of the Commission's Order and input from SAG; specifically, the
188 realization rates by program.

189 **B. RESIDENTIAL PROGRAMS**

190 Q. What are the Residential Programs?

191 A. The Residential Programs contain two offerings: Single Family and Multi-
192 Family. Within the Single Family offering, residential customers are provided
193 access to energy efficiency via two paths – Home Energy Rebates and Home
194 Energy Assessments. Home Energy Rebates offers rebates on energy-efficient
195 heating, ventilation, air conditioning and water heating equipment and qualifying
196 weatherization projects. Home Energy Assessments offers energy-saving
197 products installed in homes at no-cost to the customer. The Home Energy
198 Assessment program is a joint program offering provided in partnership with
199 ComEd. Homeowners can reduce their energy and water use with the installation
200 of products available to owners of single-family homes, two-flats, and individually
201 metered condos and townhomes. Renters are also eligible with permission from
202 their landlords. Offerings within the Multi-Family path include Multi-Family Energy
203 Savings, Prescriptive and Custom Rebates, and Partner Trade Ally programs.
204 The Multi-Family Energy Savings program is a joint program offering provided in
205 partnership with ComEd. The program offers free direct installation of energy-
206 saving measures for multi-family buildings. Prescriptive rebates are standard

207 incentive amounts for common types of energy efficiency measures. Custom
208 incentives are awarded for the non-standard technologies or for projects that do
209 not include a one-for-one replacement. The Partner Trade Ally offering is
210 provided in partnership with select trade allies who have been vetted by the
211 program.

212 Q. What are the total costs that North Shore Gas incurred in connection with
213 these programs during the reconciliation period?

214 A. Total costs incurred for the Residential Programs in 2025 were \$774,362
215 (NSG-PGL Exhibit 2.1, page 1).

216 Q. Were the costs reasonable?

217 A. Yes. The Residential Programs achieved 107% of the annual savings goal
218 using 97% of the 2025 Residential Program budget

219 Q. What were the therm savings from the Residential Programs during the
220 reconciliation period?

221 A. Preliminary therm savings from the Residential Programs were 339,847
222 net therms (NSG-PGL Exhibit 2.1, page 1).

223 **C. BUSINESS PROGRAMS**

224 Q. What is the Small and Midsize Business Program?

225 A. The Small and Midsize Business Program offers free energy assessments
226 and free direct installation of energy saving measures to qualifying customers via
227 program energy advisors. Additional recommended energy saving measures are
228 installed by trade allies, who leverage program rebates to reduce project costs.

229 Customers with North Shore Gas rate Service Class 2 accounts, that use less
230 than 400,000 therms per year, are eligible to participate in this program.

231 Q. What are the total costs that North Shore Gas incurred in connection with
232 this program during the reconciliation period?

233 A. North Shore Gas incurred \$281,149 for this program during the
234 reconciliation period (NSG-PGL Exhibit 2.1, Page 1).

235 Q. Were the costs reasonable?

236 A. Yes. The Small and Midsize Business Program achieved 218% of its
237 therm savings goal, utilizing 81% of the program budget (NSG-PGL Exhibit 2.1,
238 Page 1).

239 Q. What were the therm savings from the Small Business Program during the
240 reconciliation period?

241 A. Preliminary therm savings from the Small Business Program were
242 327,699 therms (NSG-PGL Exhibit 2.1, page 1).

243 Q. What is the C&I Program?

244 A. The Commercial & Industrial (C&I) Program offers several paths for C&I
245 customers with North Shore Gas' rate Service Class 2 or larger accounts. These
246 paths include Prescriptive and Custom Rebates, Gas Optimization Studies,
247 Retro-commissioning, Engineering Studies, and Staffing Grants. Each path is
248 described briefly below.

249 Prescriptive rebates are provided for common types of energy efficiency
250 measures in C&I buildings, including demand control ventilation, steam trap
251 testing and repairs, boiler tune-ups, and pipe insulation. Custom rebates are

available to customers with energy saving projects outside the prescriptive rebates and with variables that can affect the savings of those projects. Custom rebates may include boiler and burner retrofits and replacements, heat exchangers, heat recovery (blow down and economizers), as well as pipe insulation. Gas Optimization Studies provide customers with an analysis of energy-using systems to help identify no- and low-cost improvements to achieve natural gas savings in C&I buildings. Retro-commissioning offers a full-building tune-up through a systematic evaluation of mechanical and electrical systems to help facilities perform optimally and is offered in partnership with ComEd. Engineering Studies provide an analysis of a single system within a facility's operations to support implementation of a natural gas saving project. Staffing Grants offer up to \$50,000 per customer per year to fund a project manager to guide projects to completion for customers who have energy efficiency projects that cannot be completed due to lack of staff time or availability.

Q. What are the total costs that North Shore Gas incurred in connection with this program during the reconciliation period?

A. North Shore Gas incurred \$909,406 for the C&I Program during the reconciliation period (NSG-PGL Exhibit 2.1, page 1).

Q. Were the costs reasonable?

A. Yes. The program reached 123% of its annual therm savings goal using 96% of its 2025 budget.

Q. What were the therm savings from the C&I Program during the reconciliation period?

275 A. Preliminary net natural gas savings from the C&I Program were 859,905
276 therms (NSG-PGL Exhibit 2.1, page 1).

277 Q. What is the Public Sector Program?

278 A. The Public Sector Program offers the same exact paths as the C&I
279 program but targets Public Sector customers as defined by Future Energy Jobs
280 Act (Public Act 99-0906) which includes local government, municipal
281 corporations, school districts, and community college districts. See above C&I
282 section for program descriptions for Public Sector customers.

283 Q. What are the total costs that North Shore Gas incurred in connection with
284 this program during the reconciliation period?

285 A. North Shore Gas incurred \$355,759 for the Public Sector Program during
286 the reconciliation period (NSG-PGL Exhibit 2.1, page 1).

287 Q. Were the costs reasonable?

288 A. Yes. The program reached 98% of its 2025 therm savings goal using 96%
289 of its 2025 budget.

290 Q. What were the therm savings from the Public Sector Program during the
291 reconciliation period?

292 A. Preliminary net natural gas savings from the Public Sector Program were
293 147,245 therms (NSG-PGL Exhibit 2.1, page 1).

294

295 **D. INCOME QUALIFIED PROGRAMS**

296 Q. What are the Income Qualified Programs?

297 A. Income Eligible Programs target the underserved income eligible market,
298 providing services designed to make it easy for single-family and multi-family
299 income eligible customers to take advantage of cost-effective energy saving
300 retrofits. Within the Income Eligible Programs, there are paths for single-family
301 and multi-family customers. Within Single Family, North Shore Gas offers Home
302 Energy Assessment, Home Energy Savings Retrofits, and the Illinois Home
303 Weatherization Assistance Program (IHWAP). IHWAP Weatherization services
304 are provided to low-income residents through local community action agencies or
305 not for profit agencies. IHWAP leverages state and federal funds to supplement
306 incentives from the utility programs. Home Energy Assessment offers energy-
307 saving products installed in homes at no-cost to the customer. The Home Energy
308 Assessment program is a joint program offering provided in partnership with
309 ComEd. Homeowners can reduce their energy and water use with the installation
310 of products available to owners of single-family homes, two-flats, and individually
311 metered condos and townhomes. Renters are also eligible with permission from
312 their landlords. Home Energy Retrofits offers direct install products and no-cost
313 weatherization services for Income-Eligible Single-Family home customers. It is
314 delivered jointly with ComEd through approved agencies or partners. Within
315 Multi-Family programs, North Shore Gas offers Income Eligible Multi-family
316 Savings Program, Public Housing Energy Savings, Multi-family Income Eligible
317 Partner Trade Ally, and Income Eligible Kits programs. The Income Eligible Multi-
318 family Savings program provides building owners with free technical assistance
319 to identify energy efficiency opportunities and install measures. Expenses are

fully covered by the program, from the direct installation of energy efficiency products into tenants' units (light bulbs, aerators, showerheads, etc.), to common area measures, and more extensive measures requiring building owner co-pay. This program is a joint offering in partnership with ComEd. The Public Housing Energy Savings program offers prescriptive and custom rebates for gas measures in housing owned by Public Housing Authorities. This program is a joint program offering provided in partnership with ComEd. The Multi-family Income Eligible Partner Trade Ally program is a program delivered by vetted Partner Trade Allies. These Trade Allies are given higher rebate amounts to serve geographically income-eligible customers with retrofit measures. Income Eligible Kits provides income-qualified customers with a kit of energy efficiency measures to self-install. The Income Eligible Kits are distributed by ground mail to qualified customers vetted by the Low-Income Home Energy Assistance Program (LIHEAP) and is provided in partnership with ComEd.

Q. What are the total costs that North Shore Gas incurred in connection with these programs during the reconciliation period?

A. North Shore Gas incurred \$1,181,642 in costs for the Income Qualified Programs during the reconciliation period (NSG-PGL Exhibit 2.1, page 1).

Q. What were the therm savings from the Income Qualified Programs during the reconciliation period?

A. Preliminary net natural gas savings from the Income Qualified Programs were 143,142 therms (NSG-PGL Exhibit 2.1, page 1).

343 **III. THE PEOPLES GAS LIGHT AND COKE COMPANY**
344 **A. ENERGY EFFICIENCY OVERVIEW**
345

346 Q. Please provide an overview of the Plan as described in the compliance
347 filing of Peoples Gas filed in Docket No. 21-0159.

348 A. The overriding objectives of this Plan are to achieve the savings goals as
349 approved in the final order in Docket No. 21-0159 in a cost-effective manner
350 while providing programs to residential, income eligible and business customers.
351 Peoples Gas designed flexible, scalable, best practice programs that allowed for
352 partnering with ComEd, the electric utility operating within the Peoples Gas
353 service territory, streamlining administration and delivery while maximizing
354 customer participation. In the reconciliation period, the Peoples Gas portfolio
355 included three programs: 1) Residential Programs, 2) Business Programs, and 3)
356 Income Qualified Programs. Each program is addressed in detail later in my
357 testimony. The Plan also specified the budgets for support of the EM&V;
358 Research and Development and Market Transformation; Market Development
359 Initiative; and the OBF program.

360 Q. Can the Plan be modified during the course of a Plan period?

361 A. Yes. Once the Plan is approved, Peoples Gas is allowed to make
362 appropriate changes in response to changing market conditions and other
363 factors. Those changes are discussed in quarterly reports filed in Docket No. 21-
364 0159 and, in certain cases, are brought to SAG for review.

365 Q. Did changes to the TRM have any impact on measures offered in 2025?

366 A. There were a total of 155 changes which included: 26 Errata changes, 119
367 measure revisions, 8 new additional measures, and two measure retirements.

368 This is summarized on Table 1.2, of section 1.2, of Volume 1 of the Version 13
369 IL-TRM (approved by the Commission in Docket No. 24-0750). Some of these
370 changes impacted measure savings in the Peoples Gas and North Shore Gas
371 business, multi-family and single family residential programs.

372 Q. Does Peoples Gas participate in SAG?

373 A. Yes, pursuant to the final order in Docket No. 21-0159, North Shore Gas
374 and Peoples Gas participate in the SAG.

375 Q. You listed one Residential program Peoples Gas offered in 2025. Did
376 Peoples Gas incur any costs for Residential programs that were not implemented
377 in the reconciliation period?

378 A. No.

379 Q. You listed one Business program Peoples Gas offered in 2025. Did
380 Peoples Gas incur any costs for Business programs that were not implemented
381 in the reconciliation period?

382 A. No.

383 Q. You listed one Income Qualified program Peoples Gas offered in 2025.
384 Did Peoples Gas incur any costs for Income Qualified programs that were not
385 implemented in the reconciliation period?

386 A. No.

387 Q. What costs did Peoples Gas incur during the 2025 reconciliation period for
388 these programs?

389 A. A detailed breakdown of the costs, by category, is shown on NSG-PGL
390 Exhibit 2.2 - Peoples Gas 2025 Quarter 4 ICC Report. Costs are categorized in

the sections that follow and include the total Peoples Gas EEP costs. The costs are allocated into the following categories:

(1) Administrative costs include time and expense associated with portfolio oversight, management, and planning. These are costs required for overall portfolio management that are not specifically tied to one program. Administrative costs also include time and expense associated with SAG meetings and TRM activities. 2025 total administrative costs were \$2,579,772, or 8% of Peoples Gas total Utility EEP costs (NSG-PGL Exhibit 2.2, page 2).

(2) Non-incentive costs include program management, program reporting, customer assistance and quality control checks performed by energy experts, call center operations, application processing and fulfillment, and building and maintaining trade ally partnerships. Non-incentive costs also include costs incurred for the Market Development Initiative, as defined in the Peoples Gas stipulated agreement for Plan Four. 2025 total non-incentive costs were \$10,838,632, or 34% of Peoples Gas total Utility EEP costs (NSG-PGL Exhibit 2.2, page 1).

(3) Marketing costs support those activities associated with program outreach and awareness. They include brochures and other collateral materials needed to support individual programs including application forms, development and placement of advertisements and campaigns, website creation and management, email newsletters, memberships, and subscriptions. 2025 total marketing costs were \$1,188,677, or 4% of Peoples Gas total Utility EEP costs (NSG-PGL Exhibit 2.2, page 2).

414 (5) Incentive costs refer to rebates that are paid to customers or
415 contractors to offset the costs of installed qualifying equipment. This line item is
416 titled "Incentive Costs" in NSG-PGL Exhibit 2.2. Rebates are an income transfer
417 cost from one party to another (i.e., program administrator to customer). 2025
418 total incentive costs were \$14,668,959, or 46% of Peoples Gas total Utility EEP
419 costs (NSG-PGL Exhibit 2.2, page 1).

420 (6) EM&V costs are costs incurred for the impact and process evaluations
421 by an independent third party provider, referred to herein as the third party
422 evaluator. Performance of EM&V is a requirement under 220 ILCS 5/8-104(f)(8).
423 This line item is titled "Evaluation Costs" in the Plan. 2025 total EM&V costs were
424 \$697,422, or 2% of Peoples Gas total Utility EEP costs (NSG-PGL Exhibit 2.2,
425 page 2).

426 Q. What are the total costs for the 2025 reconciliation period?

427 A. The total Peoples Gas EEP costs that I address in my testimony for the
428 reconciliation period were \$31,587,982 (NSG-PGL Exhibit 2.2, page 2).

429 Q. What are the total therm savings associated with the Peoples Gas
430 program in 2025?

431 A. Total net therm savings for Peoples Gas' Utility EEP Programs in 2025
432 were 8,068,819 pending final third party evaluation results (NSG-PGL Exhibit
433 2.2., page 1).

434 Q. Please describe the TRM that you used in your calculations and that you
435 reference in your testimony.

436 A. TRM Version 13 dated September 20, 2024 with an effective date of
437 January 1, 2025, as approved by the Commission in its final order in Docket No.
438 24-0750, was used in 2025.

439 Q. What is the basis for the therm savings?

440 A. Savings are based on third party evaluator's 2025 deemed net-to-gross
441 values and evaluated realization rates for each program offered. This is
442 consistent with the prior requirements of the Commission's Orders in Docket
443 Nos. 12-0528 and 13-0077, the most recent Commission final order on the TRM
444 applicable to 2025 in Docket No. 24-0750 and consensus in the SAG process.
445 NSG-PGL Exhibit 2.3, which lists these values by program and describes their
446 application for 2025.

447 Q. Will these savings numbers be adjusted in the future for 2025?

448 A. Yes. The savings values for 2025 will be retroactively adjusted to
449 correspond with finalized 2025 evaluation reports in accordance with the Utilities'
450 interpretation of the Commission's Order and input from SAG; specifically, the
451 realization rates by program.

452 **B. RESIDENTIAL PROGRAMS**

453 Q. What are the Residential Programs?

454 A. The Residential Programs contain two offerings: Single Family and Multi-
455 Family. Within the Single Family offering, residential customers are provided
456 access to energy efficiency via two paths – Home Energy Rebates and Home
457 Energy Assessments. Home Energy Rebates offers rebates on energy-efficient
458 heating, ventilation, air conditioning and water heating equipment and qualifying

weatherization projects. Home Energy Assessments offers energy-saving products installed in homes at no-cost to the customer. The Home Energy Assessment program is a joint program offering provided in partnership with ComEd. Homeowners can reduce their energy and water use with the installation of products available to owners of single-family homes, two-flats, and individually metered condos and townhomes. Renters are also eligible with permission from their landlords. Offerings within the Multi-Family path include Multi-Family Energy Savings, Prescriptive and Custom Rebates, and Partner Trade Ally programs. The Multi-Family Energy Savings program is a joint program offering provided in partnership with ComEd. The program offers free direct installation of energy-saving measures for multi-family buildings. Prescriptive rebates are standard incentive amounts for common types of energy efficiency measures. Custom incentives are awarded for the non-standard technologies or for projects that do not include a one-for-one replacement. The Partner Trade Ally offering is provided in partnership with select trade allies who have been vetted by the program.

Q. What are the total costs that Peoples Gas incurred in connection with these programs during the reconciliation period?

A. Total costs incurred for the Residential Programs in 2025 were \$3,229,715 (NSG-PGL Exhibit 2.2, page 1).

Q. Were the costs reasonable?

A. Yes. The Residential Programs achieved 113% of the annual savings goal while using 107% of the annual program budget. NSG-PGL Exhibit 2.2, page 1.

482 Q. What were the therm savings from the Residential Programs during the
483 reconciliation period?

484 A. Preliminary therm savings from the Residential Programs were 1,429,863
485 net therms (NSG-PGL Exhibit 2.2, page 1).

486

487 **C. BUSINESS PROGRAMS**

488 Q. What is the Small and Midsize Business Program?

489 A. The Small and Midsize Business Program offers free energy assessments
490 and free direct installation of energy saving measures to qualifying customers via
491 program energy advisors. Additional recommended energy saving measures are
492 installed by trade allies, who leverage program rebates to reduce project costs.
493 Customers with Peoples Gas rate Service Class 2 accounts, that use less than
494 400,000 therms per year, are eligible to participate in this program.

495 Q. What are the total costs that Peoples Gas incurred in connection with this
496 program during the reconciliation period?

497 A. Peoples Gas incurred \$2,165,844 for this program during the
498 reconciliation period (NSG-PGL Exhibit 2.2, page 1).

499 Q. Were the costs reasonable?

500 A. Yes. The Small and Midsize Business Program achieved 91% of its
501 annual therm savings goal, utilizing 122% of the annual program budget (NSG-
502 PGL Exhibit 2.2, page 1).

503 Q. What were the therm savings from the Small and Midsize Business
504 Program during the reconciliation period?

505 A. Preliminary therm savings from the Small and Midsize Business Program
506 were 698,225 net therms (NSG-PGL Exhibit 2.2, page 1).

507 Q. What is the C&I Program?

508 A. The Commercial & Industrial (C&I) Program offers several paths for C&I
509 customers within Peoples Gas Service Class 2 or larger accounts. These paths
510 include Prescriptive and Custom Rebates, Gas Optimization Studies, Retro-
511 commissioning, Engineering Studies, and Staffing Grants. Each path is described
512 briefly below.

513 Prescriptive rebates are provided for common types of energy efficiency
514 measures in C&I buildings, including demand control ventilation, steam trap
515 testing and repairs, boiler tune-ups, and pipe insulation. Custom rebates are
516 provided to customers with energy saving projects outside the prescriptive
517 rebates and with variables that can affect the savings of those projects such as
518 boiler and burner retrofits and replacements, heat exchangers, heat recovery
519 (blow down and economizers), as well as pipe insulation. Gas Optimization
520 Studies provide customers with an analysis of energy-using systems to help
521 identify no- and low-cost improvements to achieve natural gas savings in C&I
522 buildings. Retro-commissioning offers a full-building tune-up through a
523 systematic evaluation of mechanical and electrical systems to help facilities to
524 perform optimally. Low-cost energy-saving operational improvements that can
525 pay for themselves in 18 months or less are identified. Engineering Studies
526 provide an analysis of a single system within a facility's operations to support
527 implementation of natural gas saving project. Staffing Grants offer up to \$50,000

per customer per year to fund a project manager to guide projects to completion for customers who have energy efficiency projects that cannot be completed due to lack of staff time or availability.

Q. What are the total costs that Peoples Gas incurred in connection with this program during the reconciliation period?

A. Peoples Gas incurred \$2,998,872 for the C&I Program during the reconciliation period (NSG-PGL Exhibit 2.2, page 1).

Q. Were the costs reasonable?

A. Yes. The program reached 89% of its annual therm savings goal using 72% of its annual budget.

Q. What were the therm savings from the C&I Program during the 2025 reconciliation period?

A. Preliminary net natural gas savings from the C&I Program were 1,730,286 therms (NSG-PGL Exhibit 2.2, page 1).

Q. What is the Public Sector Program?

A. The Public Sector Program offers the same exact paths as the C&I program but targets Public Sector customers as defined by Future Energy Jobs Act (Public Act 99-0906) which includes local government, municipal corporations, school districts, and community college districts. See the above C&I section for program descriptions for Public Sector customers.

Q. What are the total costs that Peoples Gas incurred in connection with this program during the reconciliation period?

550 A. Peoples Gas incurred \$2,975,440 for the Public Sector Program during
551 the reconciliation period (NSG-PGL Exhibit 2.1, page 1).

552 Q. Were the costs reasonable?

553 A. Yes. The program reached 153% of its 2025 therm savings goal using
554 117% of the annual budget (NSG-PGL Exhibit 2.2, page 2).

555 Q. What were the therm savings from the Public Sector Program during the
556 reconciliation period?

557 A. Preliminary net natural gas savings from the Public Sector Program were
558 1,629,230 therms (NSG-PGL Exhibit 2.1, page 1).

559 **D. INCOME QUALIFIED PROGRAMS**

560 Q. What are the Income Qualified Programs?

561 A. Income Eligible Programs target the underserved income eligible market,
562 providing services designed to make it easy for single-family and multi-family
563 income eligible customers to take advantage of cost-effective energy saving
564 retrofits. Within the Income Eligible Programs, there are paths for single-family
565 and multi-family customers. Within Single Family, Peoples Gas offers Home
566 Energy Assessment, Home Energy Savings Retrofits, and the Illinois Home
567 Weatherization Assistance Program (IHWAP). IHWAP Weatherization services
568 are provided to low-income residents through local community action agencies or
569 not for profit agencies. IHWAP leverages state and federal funds to supplement
570 incentives from the utility programs. Home Energy Assessment offers energy-
571 saving products installed in homes at no-cost to the customer. The Home Energy
572 Assessment program is a joint program offering provided in partnership with

573 ComEd. Homeowners can reduce their energy and water use with the installation
574 of products available to owners of single-family homes, two-flats, and individually
575 metered condos and townhomes. Renters are also eligible with permission from
576 their landlords. Home Energy Retrofits offers direct install products and no-cost
577 weatherization services for Income-Eligible Single-Family home customers. It is
578 delivered jointly with ComEd through approved agencies or partners. Within
579 Multi-Family programs, Peoples Gas offers Income Eligible Multi-family Savings
580 Program, Public Housing Energy Savings, Multi-family Income Eligible Partner
581 Trade Ally, and Income Eligible Kits programs. The Income Eligible Multi-family
582 Savings program provides building owners with free technical assistance to
583 identify energy efficiency opportunities and install measures. Expenses are fully
584 covered by the program, from the direct installation of energy efficiency products
585 into tenants' units (light bulbs, aerators, showerheads, etc.), to common area
586 measures, and more extensive measures requiring building owner co-pay. This
587 program is a joint offering in partnership with ComEd. The Public Housing Energy
588 Savings program offers prescriptive and custom rebates for gas measures in
589 housing owned by Public Housing Authorities. This program is a joint program
590 offering provided in partnership with ComEd. The Multi-family Income Eligible
591 Partner Trade Ally program is a program delivered by vetted Partner Trade Allies.
592 These Trade Allies are given higher rebate amounts to serve geographically
593 income-eligible customers with retrofit measures. Income Eligible Kits provides
594 income-qualified customers with a kit of energy efficiency measures to self-
595 install. The Income Eligible Kits are distributed by ground mail to qualified

customers vetted by the Low-Income Home Energy Assistance Program (LIHEAP) and is provided in partnership with ComEd.

Q. What are the total costs that Peoples Gas incurred in connection with these programs during the reconciliation period?

A. Peoples Gas incurred \$13,197,558 for the Income Qualified Programs during the reconciliation period (NSG-PGL Exhibit 2.2, page 1).

Q. What were the therm savings from the Income Qualified Programs during the reconciliation period?

A. Preliminary net natural gas savings from the Income Eligible Programs were 2,581,215 therms (NSG-PGL Exhibit 2.2, page 1).

IV. OTHER PROGRAM IMPLEMENTATION MATTERS

Q. How did NSG-PGL participate in SAG?

A. At least one NSG-PGL representative attended every SAG meeting during 2025. In addition to attending and participating in SAG meetings, the Utilities had a representative fully participate in the development of the Illinois TRM. This representative was also a participant in the SAG Technical Advisory Committee. Additionally, NSG-PGL participated in the SAG Planning process for the 2026-2029 Energy Efficiency Plan in 2025. As noted above, the costs of these activities are classified as administrative costs.

Q. Did the Utilities present to the SAG regarding the programs and overall portfolio progress, successes, and challenges during 2025?

618 A. In addition to our participation in every SAG meeting, the Utilities provided
619 an update to the SAG each time an update was requested.

620 **V. ON BILL FINANCING**

621 Q. Please describe the Utilities' OBF programs.

622 A. Section 19-140 of the Public Utilities Act requires the Utilities to implement
623 an OBF program. Costs are recovered for the Utilities OBF programs through
624 residential, multi-family, and small business customers and cost recovery is
625 through the same mechanism as for the energy efficiency programs. The idea
626 behind the OBF program is to make it easier for consumers to invest in measures
627 to save energy by allowing customers to pay for the measure over time on their
628 monthly utility bill. Mirroring the requirements of the energy efficiency rebate
629 programs, eligible customers can finance high efficiency furnaces, boilers, and
630 weatherization measures through their utility bill.

631 Q. How did the Utilities determine qualifying measures under the OBF
632 program?

633 A. A measure screening tool is used.

634 Q. Why were some customers declined from participating?

635 A. Reasons for declining applications included bankruptcy, low credit scores,
636 and delinquency on current obligations.

637 Q. Did any customers default on payments during the reconciliation period?

638 A. There were no bankruptcies filed in 2025 for PGL and NSG.

639 Q. What were the total costs that the Utilities incurred during the
640 reconciliation period?

641 A. North Shore Gas incurred \$67,138 and Peoples Gas incurred \$80,618 for
642 the OBF program during the reconciliation period. NSG-PGL Exhibit 1.3N and
643 NSG-PGL 1.3P respectively.

644 Q. What types of costs did the Utilities incur during the reconciliation period?

645 A. The types of costs incurred for OBF were for measure qualification and
646 coordination, financial institution costs, and EM&V.

647 Q. Were these costs reasonable?

648 A. Yes. The OBF program, both the law and the Commission-approved tariff,
649 include many requirements governing participation, including requirements
650 governing customers leaving the program. Preparing to offer and administering
651 the OBF program requires significant resources.

652 **VI. CONCLUSION**

653 Q. Does this complete your direct testimony?

654 A. Yes.

Statewide Quarterly Report Template

Tab 1: Ex Ante Results

Q4 2025

Background:

*Definitions used within this template correspond to IL Energy Efficiency Policy Manual Version 2.0.

*Footnotes have been added where clarifying information may be helpful.

*See Section 6.6 of IL Energy Efficiency Policy Manual Version 2.0 for a full list of requirements for Program Administrator Quarterly Reports.

Instructions:

Sector-level refers to residential and commercial and industrial Programs pursuant to Section 8-103B and 8-104; and Third-Party Energy Efficiency Implementation Program pursuant to Section 8-103B(g)(4).

*If a utility offers Demand Response, information should be listed separately in this table as a separate program.

*If Program Administrators want to include historical spend information, they can do so. ICC Staff appreciates this information. However, providing historical spend data is not a requirement for Quarterly Reports; it is a requirement for Annual Reports.

*For Program Costs Year to Date (YTD), each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.

*Program Administrators will also report information on low income, public sector, public housing, and market transformation consistent with Program delivery requirements of Sections 8-103B and 8-104 of the Act.

*Program Administrators are encouraged to report public sector savings at the program-level, where available.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

North Shore Gas Ex Ante Results - Section 8-103B/8-104 (EEPS) Programs - Q4 2025

Section 8-103B/8-104 (EEPS) Program	Net Energy Savings Achieved (therms)	2025 Original Plan Savings Goal (therms)****	Approved Net Energy Savings Goal (therms)***	Implementation Plan Savings Goal (therms)	% Savings Achieved Compared to Implementation Plan Savings Goal	Program Costs YTD	Incentive Costs YTD	Non-Incentive Costs YTD	2025 Original Plan Budget*	2025 Approved Budget**	% of Costs YTD Compared to Approved Budget
Business Programs											
Commercial & Industrial Program (Includes Commercial Food Service)	859,905	633,565	688,898	698,000	123%	\$ 909,406	\$ 620,254	\$ 289,153	\$ 858,429	\$ 946,874	96%
Small Business	327,699	167,151	175,847	150,000	218%	\$ 281,149	\$ 95,577	\$ 185,573	\$ 326,106	\$ 347,578	81%
Public Sector	147,245	48,311	50,730	150,000	98%	\$ 355,759	\$ 108,327	\$ 247,432	\$ 344,690	\$ 370,622	96%
Business Programs Subtotal	1,334,849	849,027	915,474	998,000	134%	\$ 1,546,315	\$ 824,157	\$ 722,158	\$ 1,529,225	\$ 1,665,074	93%
<i>Business Programs - Private Sector Total</i>	<i>1,187,604</i>	<i>800,716</i>	<i>864,745</i>	<i>848,000</i>	<i>140%</i>	<i>\$ 1,190,556</i>	<i>\$ 715,830</i>	<i>\$ 474,725</i>	<i>\$ 1,184,535</i>	<i>\$ 1,294,453</i>	<i>92%</i>
<i>Business Programs - Public Sector Total</i>	<i>147,245</i>	<i>48,311</i>	<i>50,730</i>	<i>150,000</i>	<i>98%</i>	<i>\$ 355,759</i>	<i>\$ 108,327</i>	<i>\$ 247,432</i>	<i>\$ 344,690</i>	<i>\$ 370,622</i>	<i>96%</i>
Residential Programs											
Single Family	324,783	422,460	445,346	307,585	106%	\$ 699,585	\$ 448,800	\$ 250,785	\$ 818,502	\$ 720,471	97%
Multi-Family	15,064	82,118	82,187	11,482	131%	\$ 74,776	\$ 21,537	\$ 53,239	\$ 172,795	\$ 76,215	98%
Residential Programs Subtotal	339,847	504,578	527,534	319,067	107%	\$ 774,362	\$ 470,337	\$ 304,024	\$ 991,297	\$ 796,687	97%
Income Qualified Programs											
IHWAP-braided - Single Family	1,940			-	N/A	\$ 64,262	\$ 36,490	\$ 27,772	N/A	\$ 27,831	N/A
IHWAP Utility-only - Single Family	N/A			N/A	N/A		N/A		N/A		N/A
Non-IHWAP - Single Family	107,237			119,797	N/A	\$ 548,143	\$ 334,575	\$ 213,568	N/A	\$ 552,292	N/A
<i>Single Family Subtotal</i>	<i>109,176</i>	<i>72,200</i>	<i>76,192</i>	<i>119,797</i>	<i>91%</i>	<i>\$ 612,405</i>	<i>\$ 371,065</i>	<i>\$ 241,340</i>	<i>\$ 426,282</i>	<i>\$ 580,123</i>	<i>106%</i>
IHWAP-braided - Multi-Family	-			-	N/A	\$ -	\$ -	\$ -	N/A	\$ -	N/A
IHWAP Utility-only - Multi-Family	N/A			N/A	N/A		N/A		N/A		N/A
Non-IHWAP - Multi-Family	33,965			75,441	N/A	\$ 569,237	\$ 316,874	\$ 252,363	N/A	\$ 452,079	N/A
Gas-only-TA - Multi-Family	33,965	37,060	39,241	75,441	N/A	\$ -	\$ -	\$ -	N/A	\$ -	N/A
<i>Multi Family Subtotal</i>	<i>33,965</i>	<i>37,060</i>	<i>39,241</i>	<i>75,441</i>	<i>45%</i>	<i>\$ 569,237</i>	<i>\$ 316,874</i>	<i>\$ 252,363</i>	<i>\$ 397,079</i>	<i>\$ 452,079</i>	<i>126%</i>
Income Qualified Programs Subtotal	143,142	109,260	115,433	195,238	73%	\$ 1,181,642	\$ 687,940	\$ 493,703	\$ 823,361	\$ 1,032,201	114%
Third Party Programs (Section 8-103B - Beginning in 2019)											
Third Party Programs (Section 8-103B - Beginning in 2019) Subtotal											
Demonstration of Breakthrough Equipment and Devices	-	3,846	3,873	-							
Research and Development and Market Transformation					N/A	-	N/A	N/A	N/A	N/A	N/A
Demonstration of Breakthrough Equipment and Devices Subtotal	-	3,846	3,873	-		\$ -	\$ -	\$ -	\$ -	\$ -	N/A
Market Development Initiative						190,416	\$ -	\$ 190,416	\$ 100,000	\$ 188,445	
Market Development Initiative Subtotal	N/A	N/A	N/A	N/A	N/A	\$ 190,416	\$ -	\$ 190,416	\$ 100,000	\$ 188,445	101%
Overall Total North Shore Gas Section 8-103B/8-104 (EEPS) Programs	1,817,838	1,466,712	1,562,315	1,512,305	120%	\$ 3,692,734	\$ 1,982,434	\$ 1,710,300	\$ 3,443,883	\$ 3,682,408	100%

*Original Plan Budget refers to the budget contained in the approved EE Plan, which could be the original filed EE Plan or a compliance EE Plan.

**Approved Budget refers to the Program Administrator's current budget for this Program Year, that may have been modified in light of the flexibility policy. This may also be the Implementation Plan Budget.

***The Approved Net Energy Savings Goal refers to the most updated portfolio-level savings goal. In the case of Section 8-104 programs, the values in this column should match the Adjusted Energy Savings Goal contained in the Program Administrator's updated Adjustable Savings Goal Template.

****Original Plan Savings Goal refers to the original savings goal approved in the Commission's Final Order approving the EE Plan. For Section 8-104 programs, this value should match the Plan Energy Savings Goal set forth in the completed Adjustable Savings Goal Template.

Statewide Quarterly Report Template

Tab 2: Costs

Q4 2025

Instructions:

*For Program and Portfolio-Level Costs, each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

Instructions:

*"Sector-level" refers to residential and commercial and industrial Programs pursuant to Section 8-103B and 8-104; and Third-Party Energy Efficiency Implementation Program pursuant to Section 8-103B(g)(4).

*If a utility offers Demand Response, information should be listed separately in this table as a separate program.

*If Program Administrators want to include historical spend information, they can do so. ICC Staff appreciates this information. However, providing historical spend data is not a requirement for Quarterly Reports; it is a requirement for Annual Reports.

*For Program Costs Year to Date (YTD), each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.

*Program Administrators will also report information on low income, public sector, public housing, and market transformation consistent with Program delivery requirements of Sections 8-103B and 8-104 of the Act.

*Program Administrators are encouraged to report public sector savings at the program-level, where available.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

North Shore Gas Section 8-103B/8-104 (EEPS) Costs - Q4 2025

Section 8-103B/8-104 (EEPS) Cost Category	2025 Actual Costs YTD
Program Expenditures by Sector	
C&I Programs (private sector)	\$ 1,190,556
Public Sector Programs	\$ 355,759
Residential Programs	\$ 774,362
Income Qualified Programs	\$ 1,181,642
Market Development Initiative	\$ 190,416
Third Party Programs (Beginning in 2019)	
Total North Shore Gas Program Costs	\$ 3,692,734
Portfolio-Level Costs by Portfolio Cost Category (Section 8-103B/8-104 EEPS)	
Research and Development - Demonstration of Breakthrough Equipment and Devices Costs	\$ 34,616
Market Transformation Programs	\$ 152,733
Evaluation Costs	\$ 100,092
Marketing Costs (including education and outreach)	\$ 165,016
Portfolio Administrative Costs	\$ 623,569
Total North Shore Gas Portfolio-Level Costs	\$ 1,076,025
Total North Shore Gas Program and Portfolio-Level Section 8-103B/8-104 (EEPS) Costs	\$ 4,768,759

Section 8-103B/8-104 (EEPS) Costs - Q4 2025

Overall Total Costs	2025 Actual Costs YTD	2025 Approved Budget	% of Costs YTD Compared to Approved Budget
Total North Shore Gas Program and Portfolio-Level Section 8-103B/8-104 (EEPS) Costs	\$ 4,768,759	\$ 4,720,756	101%

Statewide Quarterly Report Template
Tab 3: Historical Energy Saved
Q4 2025

Instructions:
*Each Program Administrator will fill out the historical "Energy Saved" table for Quarterly Reports. The "IL Department of Commerce Energy Saved" historical table may also be added to each utility's Quarterly Report.
*Program Administrators are encouraged to provide source references for greater transparency.

North Shore Gas Section 8-103B/8-104 (EEPS) Energy Saved (therms) as of Q4 2025

Program Year	Evaluation Status (Ex Ante, Verified***, or ICC Approved)	Net Energy Savings Achieved (therms)	Original Plan Savings Goal** (therms)	Net Energy Savings Goal* (therms)	% of Net Energy Savings Goal Achieved****
EPY1- 6/1/08-5/31/09					
EPY2- 6/1/09-5/31/10					
EPY3- 6/1/10-5/31/11					
Electric Plan 1 Total	--	--	--	--	--
EPY4/GPY1- 6/1/11-5/31/12	ICC Approved	370,075	555,036	555,036	67%
EPY5/GPY2- 6/1/12-5/31/13	ICC Approved	1,011,467	1,110,072	1,110,072	91%
EPY6/GPY3- 6/1/13-5/31/14	ICC Approved	2,514,260	1,665,107	1,665,107	151%
Electric Plan 2/Gas Plan 1 Total	ICC Approved	3,895,802	3,330,215	3,330,215	117%
EPY7/GPY4- 6/1/14-5/31/15	Verified	2,071,497	1,401,317	1,401,317	148%
EPY8/GPY5- 6/1/15-5/31/16	Verified	1,899,591	1,407,703	1,407,703	135%
EPY9/GPY6- 6/1/16-12/31/17	Verified	1,531,692	1,369,034	2,181,433	70%
Electric Plan 3/Gas Plan 2 Total	--	5,502,780	4,178,054	4,990,453	110%
2018	Verified - 2/17/22	1,554,872	2,196,540	2,196,540	71%
2019	Verified - 2/17/22	2,216,396	1,941,718	1,918,175	116%
2020	Verified - 2/17/22	2,285,299	1,790,399	1,771,603	129%
2021	Verified - 10/11/22	2,591,449	1,931,439	1,933,162	134%
2018-2021 Plan Total		8,648,015	7,860,096	7,819,480	111%
2022	Verified - 11/27/23	1,652,678	1,664,853	1,700,148	97%
2023	Verified - 11/18/24	1,998,927	1,612,313	1,744,403	115%
2024	Ex Ante	1,786,467	1,504,589	1,604,783	111%
2025	Ex Ante	1,817,838	1,466,712	1,562,315	116%
2022-2025 Plan Total		7,255,910	6,248,466	6,611,648	110%

Footnotes:
*Net Energy Savings Goal refers to the most updated portfolio-level savings goal. In the case of Section 8-104 programs, the values in this column should match the Adjusted Energy Savings Goal contained in the Program Administrator's updated Adjustable Savings Goal Template.
**Original Plan Savings Goal refers to the original savings goal approved in the Commission's Final Order approving the EE Plan. For Section 8-104 programs, this value should match the Plan Energy Savings Goal set forth in the completed Adjustable Savings Goal Template.
***Verified savings refer to evaluator estimated savings that are intended to count toward compliance with a Program Administrator's energy savings goal. Verified savings generally utilize deemed net-to-gross ratios and IL-TRM algorithms, where applicable. See also the definition of 'savings verification' in the IL-TRM Policy Document.
****The % Net Energy Savings Achieved reflects the percent to the Adjusted Energy Savings Goal, which may vary from the Implementation Plan Savings Goal and percentage shown on Tab 1.

IL Department of Commerce and Economic Opportunity Energy Saved (therms)

Department	EPY1	EPY2	EPY3	EPY4/ GPY1	EPY5/ GPY2	EPY6/ GPY3	EPY7/ GPY4	EPY8/ GPY5	EPY9/ GPY6*
Net Savings Achieved (MWh or therms)									
Evaluation Status (Ex Ante, Verified**, or ICC Approved)	--	--	--	116,426 ICC Approved	271,864 ICC Approved	288,363 ICC Approved	173,093 ICC Approved	10,992 ICC Approved	285,181 ICC Approved
Source	--	--	--	Docket 15- 0298	Docket 15- 0298	Docket 15- 0298	DCEC Summary 12/20/2024	EPY7/GPY4 DCEO Cost Effectiveness	EPY7/GPY4 DCEO Cost Effectiveness

Footnotes:
*Electric Program Year 9 (EPY9) and Gas Program Year 6 (GPY6) covers energy efficiency programs offered from June 1, 2016 to May 31, 2017.
**Verified savings refer to evaluator estimated savings that are intended to count toward compliance with a Program Administrator's energy savings goal. Verified savings generally utilize deemed net-to-gross ratios and IL-TRM algorithms, where applicable. See also the definition of 'savings verification' in the IL-TRM Policy Document.

Statewide Quarterly Report Template
Tab 4: Historical Other - Environmental and Economic Impacts
Q4 2025

Instructions:
*Each Program Administrator should complete the Environmental and Economic Impacts table for Quarterly Reports.
*Each Program Administrator should include a footnote to explain how performance metrics are derived (for example: the calculation for "Direct Portfolio Jobs.")

Instructions:
**"Sector-level" refers to residential and commercial and industrial Programs pursuant to Section 8-103B and 8-104; and Third-Party Energy Efficiency Implementation Program pursuant to Section 8-103B(g)(4).
*If a utility offers Demand Response, information should be listed separately in this table as a separate program.
*If Program Administrators want to include historical spend information, they can do so. ICC Staff appreciates this information. However, providing historical spend data is not a requirement for Quarterly Reports; it is a requirement for Annual Reports.
*For Program Costs Year to Date (YTD), each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.
*Program Administrators will also report information on low income, public sector, public housing, and market transformation consistent with Program delivery requirements of Sections 8-103B and 8-104 of the Act.
*Program Administrators are encouraged to report public sector savings at the program-level, where available.
*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

Environmental and Economic Impacts for the North Shore Gas Service Territory as of Q4 2025

Performance Metrics (Equivalents)*	EPY1	EPY2	EPY3	EPY4/ GPY1	EPY5/ GPY2	EPY6/ GPY3	EPY7/ GPY4	EPY8/ GPY5	EPY9/ GPY6****	2018	2019	2020	2021	2022	2023	2024	2025
Net Energy Savings Achieved (therms)**				486,501	1,283,331	2,802,623	2,244,590	1,910,583	1,816,873	1,554,872	2,216,396	2,285,299	2,591,449	1,656,048	1,968,266	1,786,467	1,817,838
Carbon reduction (tons)				2,574	6,790	14,829	11,876	10,109	9,613	7,346	10,733	11,272	12,898	8,762	10,414	9,452	9,618
Cars removed from the road				547	1,442	3,148	2,521	2,146	2,041	1,560	2,319	2,435	2,805	1,888	2,317	2,205	2,243
Acres of trees planted				3,362	8,868	19,366	15,510	13,202	12,554	8,646	14,017	14,720	15,802	10,369	12,419	9,481	9,648
Number of homes powered for 1 year*^				297	784	1,711	1,370	1,167	1,109	880	1,239	1,301	1,553	1,104	1,313	1,269	1,292
Direct Portfolio Jobs *****											9	12	11	10	12	11	9
Income qualified homes served***									25	108	138	2,087	1,577	3,504	2,528	2,502	2,198

Footnotes:

*Unless otherwise noted, performance metrics for carbon reduction, cars removed from the road, and acres of trees planted are derived from the U.S. EPA Greenhouse Gas Equivalencies Calculator:

***This includes Sections 8-103, 8-103B, 8-104, and 16-111.5B savings achieved. In addition, this includes Illinois Department of Commerce and Economic Opportunity program savings achieved through May 31, 2017.

***To the extent the portfolio offers a low income program and tracks participation, Low income customers were previously served by the IL Department of Commerce and Economic Opportunity until May 31, 2017. Utilities began serving both low income and public sector customers on June 1, 2017.

****Electric Program Year 9 (EPY9) and Gas Program Year 6 (GPY6) covers energy efficiency programs offered from June 1, 2016 to December 31, 2017.

*****Direct Portfolio Jobs will be updated at least once per year.

*^Number of homes powered for 1 year is derived from the U.S. EPA Greenhouse Gas Equivalencies Calculator: <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

Statewide Quarterly Report Template

Tab 6: Historical Costs

Q4 2025

Instructions:

*Each Program Administrator will fill out the "Historical Energy Efficiency Costs" table for Quarterly Reports.

*For Costs, each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter or Program Year, regardless of what Program Year the costs are associated with. Costs include both Program and Portfolio-Level Costs as well as On-Bill Financing costs.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

North Shore Gas Service Territory Historical Energy Efficiency Costs as of Q4 2025

Program Year	Actual North Shore Gas EEPS Costs	Actual DCEO EEPS Costs	Total Actual EEPS Costs (North Shore Gas + DCEO)	Actual Section 16-111.5B Costs	Total Actual EEPS + Section 16-111.5B Costs
EPY1- 6/1/08-5/31/09	\$ -	\$ -	\$ -	\$ -	\$ -
EPY2- 6/1/09-5/31/10	\$ -	\$ -	\$ -	\$ -	\$ -
EPY3- 6/1/10-5/31/11	\$ -	\$ -	\$ -	\$ -	\$ -
Electric Plan 1 Total	\$ -	\$ -	\$ -	\$ -	\$ -
EPY4/GPY1- 6/1/11-5/31/12	\$ 1,000,041	\$ 273,915	\$ 1,273,956	\$ -	\$ 1,273,956
EPY5/GPY2- 6/1/12-5/31/13	\$ 2,413,861	\$ 534,455	\$ 2,948,316	\$ -	\$ 2,948,316
EPY6/GPY3- 6/1/13-5/31/14	\$ 5,349,947	\$ 700,570	\$ 6,050,517	\$ -	\$ 6,050,517
Electric Plan 2/Gas Plan 1 Total	\$ 8,763,849	\$ 1,508,940	\$ 10,272,789	\$ -	\$ 10,272,789
EPY7/GPY4- 6/1/14-5/31/15	\$ 3,201,124	\$ 866,273	\$ 4,067,397	\$ -	\$ 4,067,397
EPY8/GPY5- 6/1/15-5/31/16	\$ 3,084,511	\$ 762,187	\$ 3,846,698	\$ -	\$ 3,846,698
EPY9/GPY6- 6/1/16-12/31/17	\$ 6,107,762	\$ 722,450	\$ 6,830,212	\$ -	\$ 6,830,212
Electric Plan 3/Gas Plan 2 Total	\$ 12,393,397	\$ 2,350,910	\$ 14,744,307	\$ -	\$ 14,744,307
Program Year	Actual North Shore Gas EEPS Costs YTD	Approved North Shore Gas EEPS Budget	% of Costs YTD Compared to Approved Budget		
2018 - Verified 2/17/22	\$ 4,026,594	\$ 4,141,043	97%		
2019 - Verified 2/17/22	\$ 3,951,074	\$ 4,141,043	95%		
2020 - Verified 2/17/22	\$ 3,586,530	\$ 4,141,043	87%		
2021 - Verified 10/11/22	\$ 3,950,330	\$ 4,141,043	95%		
2018-2021 Plan Total	\$ 15,514,528	\$ 16,564,172	94%		
2022 - Verified 11/27/23	\$ 3,342,408	\$ 4,098,601	82%		
2023 - Verified 11/18/24	\$ 4,113,884	\$ 4,098,601	100%		
2024	\$ 4,013,457	\$ 4,098,601	98%		
2025	\$ 4,768,759	\$ 4,098,601	116%		
2022-2025 Plan Total	\$ 16,238,508	\$ 16,394,404	99%		

*The % of Costs YTD Compared to the Approved Budget reflects the percent to the Plan Budget, which may vary from the annual Approved Implementation Budget and percentage shown on Tab 1.

Statewide Quarterly Report Template
Tab 7: Historical Other - IQ Multi-Family Participation
 Q4 2025

Instructions:
 *Each Program Administrator should complete the IQ Multi-Family Participation table for Quarterly Reports.
 *Gas-Only Program Administrator should complete the Trade-Ally-Driven IQ Multi-Family Participation table for Quarterly Reports

Instructions:
 Other to be completed by SAG

IQ Multi-Family Participation for the North Shore Gas Service Territory as of Q4 2025

Zip Code	2022		2023		2024		2025	
	Quantity of Buildings Served	Quantity of Apartment/Condo Units	Quantity of Buildings Served	Quantity of Apartment/Condo Units	Quantity of Buildings Served	Quantity of Apartment/Condo Units	Quantity of Buildings Served	Quantity of Apartment/Condo Units
60002	0	0	0	0	0	0	0	0
60015	0	0	0	0	0	0	0	0
60022	0	0	0	0	0	0	0	0
60030	0	0	0	0	1	148	0	0
60031	0	0	0	0	4	51	0	0
60035	0	0	1	209	1	4	0	0
60037	209	209	0	0	0	0	0	0
60040	0	0	0	0	0	0	0	0
60044	0	0	0	0	0	0	0	0
60045	0	0	0	0	0	0	0	0
60046	0	0	0	0	0	0	0	0
60047	0	0	0	0	0	0	0	0
60048	0	0	0	0	0	0	0	0
60060	0	0	0	0	0	0	0	0
60061	0	0	0	0	0	0	15	216
60062	0	0	0	0	0	0	0	0
60064	11	58	4	46	1	20	1	6
60069	0	0	0	0	0	0	0	0
60075	0	0	0	0	0	0	0	0
60079	0	0	0	0	0	0	0	0
60083	0	0	1	6	0	0	0	0
60085	54	926	9	112	23	536	3	168
60087	26	961	1	1	9	414	0	0
60088	0	0	1	819	1	819	0	0
60089	0	0	0	0	0	0	0	0
60093	0	0	0	0	0	0	0	0
60096	0	0	0	0	0	0	0	0
60099	7	53	1	139	2	139	1	59

IQ Trade-Ally-Driven Multi-Family Participation for the North Shore Gas Service Territory as of Q4 2025

Participation Metrics	2022	2023	2024	2025
Quantity of Buildings Served	0	0	0	0
Quantity of (Apartment/Cond) Units Served	0	0	0	0
Quantity of Buildings Assessed	0	0	0	0
Quantity of Units Assessed	0	0	0	0
Quantity of Buildings with Direct Installations Only	0	0	0	0
Quantity of Units with Direct Installations Only	0	0	0	0
Quantity of Buildings with Direct Installs and Major Meas	0	0	0	0
Quantity of Units with Direct Installs and Major Measures	0	0	0	0

Statewide Quarterly Report Template
Tab 8: Historical Other - IQ Participation and Measures
2025

Instructions: *Each Program Administrator should complete the tables for the Annual Reports.
Instructions: Other to be completed by SAG

IQ Program Participation for the North Shore Gas Service Territory in 2025

IQ Program Participation for the North Shore Gas Service Territory in 2025

[illegible]

Footnote:

*Single Family participants and incentive spend exclude kits.

IQ Building Retrofit Materials Used for the North Shore Gas Service Territory in 2025

The Building Related Activities Led by the North Shore Gas Service Territory in 2020				
Number of Projects	2019	2020	2021	2022
Quantity of Projects with the following occupational inspection measures:				
Inspection - Respirator	0	4	0	0
Inspection - Clothing	0	4	0	0
Inspection - Safety Goggles	0	4	0	0
Inspection - Fall Protection	0	4	0	0
Pre-Inspection - PPEs	0	0	0	0
Pre-Inspection - Safety Training	0	0	0	0
Pre-Inspection - Other	0	0	0	0
Inspection - Other	0	0	0	0
Quantity of Projects with the following occupational Standards/C-occups in general:				
General Occupational Standards - PPEs	0	0	0	0
General Occupational Standards - Hygiene	0	0	0	0
General Occupational Standards - Lifting	0	0	0	0
General Occupational Standards - Hydration	0	0	0	0
General Occupational Standards - Communication	0	0	0	0
General Occupational Standards - Other	0	0	0	0
Quantity of Projects with the following occupational Standards/C-occups in the field:				
HVAC - Occupants' Standard - Hydration	0	0	0	0
HVAC - Occupants' Standard - Hygiene	0	0	0	0
HVAC - Occupants' Standard - Lifting	0	0	0	0
HVAC - Occupants' Standard - Hydration	0	0	0	0
HVAC - Occupants' Standard - Hygiene	0	0	0	0
HVAC - Occupants' Standard - Hydration	0	0	0	0
HVAC - Occupants' Standard - Hydration	0	0	0	0

Statewide Quarterly Report Template
Tab 9: Historical Other - Health & Safety
2025

Instructions:
*Each Program Administrator should complete for Quarterly Reports.

Instructions:
Other to be completed by SAG

IQ Whole Building Retrofit Health & Safety Spend for the North Shore Gas Service Territory				
Health & Safety Spend	2022	2023	2024	2025
Single Family			\$8,650	\$19,597
Multi-Family			\$9,311	\$76,650

IQ Whole Building Retrofit Health & Safety Metrics for the North Shore Gas Service Territory in 2025				
Health & Safety Metrics	2022	2023	2024	2025
Number of Properties Assessed - Single Family	7	32	21	52
Number of Properties Assessed - Multi-Family	39	2	15	22
Number of Properties with Identified Health & Safety Issues	11	32	17	34
Number of Properties Deferred due to Health & Safety Issues	0	13	1	4
Quantity of Properties with the Following Health and Safety Issues Identified				
Electrical Safety	0	1	0	0
Natural Gas Safety	0	13	0	0
Fire Safety	7	6	2	6
Indoor Air Quality	7	20	0	6
Other	4	6	17	20

IQ Whole Building Retrofit Health & Safety Narrative for the North Shore Gas Service Territory	
Qualitative Narrative	
Q1 2025	Single Family - 13 total Single Family properties were assessed, and 9 of these properties had health and safety issues identified: (2) fire safety, (3) removing moisture damage, (2) vapor barriers, (1) mold remediation and (1) mouse infestation Multi-Family - Three health and safety projects enabled a large weatherization project. The health and safety project included 4,200 square foot of ceiling mitigation and insulating 408 flex ducts and roof caps. The effort focused on 15 buildings serving 216 units representing a health and safety investment of \$355/unit
Q2 2025	Single Family - In Q2, 8 single family properties were assessed, and 6 of these properties had H&S issues identified, including: 10 natural gas safety, 2 fire safety, 6 indoor air quality, 2 vapor barriers, 1 mold remediation and 1 leak Multi-Family - In Q2, 19 H&S assessments were conducted with no H&S needs. The North Shore Gas offering goals were achieved in Q1, so no further projects were completed
Q3 2025	Single Family - In Q3, 12 single family properties were assessed, and 7 of those properties had H&S issues identified, including: 2 fire safety, 2 vapor barriers, 1 dryer vent, 1 ceiling repair, and 1 mold remediation. Multi-Family - In Q3, 2 assessments were conducted; however, those assessments did not identify any H&S issues. The North Shore Gas offering goals were achieved in Q1, so no further projects were completed.
Q4 2025	Single Family - In Q4, 19 single family properties were assessed, and 12 of those properties had H&S issues. Multi-Family - N/A

Instructions:
*Each Program Administrator should complete for Quarter 2 Reports for the previous year. North Shore Gas reports this information in the Quarter 4 Report of the same year.

IQ Whole Building Retrofit Health & Safety Spend by Zip Code for 2025		
Zip Code	Economically Disadvantaged Area (Y/N)	Health & Safety Spend
60001	Y	\$0
60011	Y	\$0
60022	N	\$0
60030	Y	\$812
60031	Y	\$553
60035	Y	\$678
60037	N	\$0
60040	N	\$0
60044	Y	\$855
60045	Y	\$0
60046	Y	\$0
60047	Y	\$0
60048	Y	\$126
60060	Y	\$678
60061	Y	\$76,650
60062	Y	\$0
60064	Y	\$500
60069	N	\$0
60075	N	\$9,000
60079	N	\$0
60083	N	\$110
60085	Y	\$2,497
60087	Y	\$1,228
60088	Y	\$0
60089	Y	\$0
60093	Y	\$0
60094	Y	\$122
60099	Y	\$1,728

Statewide Quarterly Report Template
Tab 10: Diverse Contracting
2025

Instructions:

*Each Program Administrator should complete for Q2 and Q4 Reports.

**If a Program Administrator has two (2) or less diverse contractors in a tier level and/or diverse category, this reporting requirement will be waived to protect the confidentiality of contract values.

Quantity of Diverse Contractors

	Quantity of Diverse Contractors		
	Primary Contractors	Secondary Contractors	Total Contractors
Women-owned businesses	3	6	9
Minority-owned businesses			
Veteran-owned businesses	0	0	0
Woman and minority-owned business			
Woman and veteran-owned business	0	0	0
	Total		12

Diverse Contractor Spend

	Diverse Primary Contractor Spend			Diverse Secondary Contractor Spend			All Diverse Contractor Spend		
	Implementation, Bundle Management, and Marketing	Incentives and Other Fees	Total Spend	Implementation, Bundle Management, and Marketing	Incentives and Other Fees	Total Spend	Implementation, Bundle Management, and Marketing	Incentives and Other Fees	Total Spend
Women-owned businesses	20.06%	0.00%	11.72%	8.05%	0.00%	4.70%	28.10%	0.00%	16.42%
Minority-owned businesses									
Veteran-owned businesses	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Woman and minority-owned business									
Woman and veteran-owned business	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Total						32.20%	6.68%	21.59%

Statewide Quarterly Report Template

Tab 1: Ex Ante Results

Q4 2025

Background:

*Definitions used within this template correspond to IL Energy Efficiency Policy Manual Version 2.0.

*Footnotes have been added where clarifying information may be helpful.

*See Section 6.6 of IL Energy Efficiency Policy Manual Version 2.0 for a full list of requirements for Program Administrator Quarterly Reports.

Instructions:

Sector-level refers to residential and commercial and industrial Programs pursuant to Section 8-103B and 8-104; and Third-Party Energy Efficiency Implementation Program pursuant to Section 8-103B(g)(4).

*If a utility offers Demand Response, information should be listed separately in this table as a separate program.

*If Program Administrators want to include historical spend information, they can do so. ICC Staff appreciates this information. However, providing historical spend data is not a requirement for Quarterly Reports; it is a requirement for Annual Reports.

*For Program Costs Year to Date (YTD), each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.

*Program Administrators will also report information on low income, public sector, public housing, and market transformation consistent with Program delivery requirements of Sections 8-103B and 8-104 of the Act.

*Program Administrators are encouraged to report public sector savings at the program-level, where available.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

Peoples Gas Ex Ante Results - Section 8-103B/8-104 (EEPS) Programs - Q4 2025

Section 8-103B/8-104 (EEPS) Program	Net Energy Savings Achieved (therms)	2025 Original Plan Savings Goal (therms)****	Approved Net Energy Savings Goal (therms)***	Implementation Plan Savings Goal (therms)	% Savings Achieved Compared to Implementation Plan Savings Goal	Program Costs YTD	Incentive Costs YTD	Non-Incentive Costs YTD	2025 Original Plan Budget*	2025 Approved Budget**	% of Costs YTD Compared to Approved Budget
Business Programs											
Commercial & Industrial Program (Includes Commercial Food Service)	1,730,286	1,296,728	1,363,170	1,934,403	89%	\$ 2,998,872	\$ 1,400,736	\$ 1,598,136	\$ 2,133,564	\$ 4,140,599	72%
Small Business	698,225	1,185,352	1,349,557	765,000	91%	\$ 2,165,844	\$ 1,138,985	\$ 1,026,859	\$ 1,886,221	\$ 1,778,096	122%
Public Sector	1,629,230	534,270	621,462	1,065,000	153%	\$ 2,975,440	\$ 1,608,453	\$ 1,366,987	\$ 2,430,247	\$ 2,534,940	117%
Business Programs Subtotal	4,057,741	3,016,351	3,334,189	3,764,403	108%	\$ 8,140,156	\$ 4,148,174	\$ 3,991,983	\$ 6,450,032	\$ 8,453,634	96%
<i>Business Programs - Private Sector Total</i>	<i>2,428,511</i>	<i>2,482,081</i>	<i>2,712,727</i>	<i>2,699,403</i>	<i>90%</i>	<i>\$ 5,164,717</i>	<i>\$ 2,539,721</i>	<i>\$ 2,624,996</i>	<i>\$ 4,019,785</i>	<i>\$ 5,918,694</i>	<i>87%</i>
<i>Business Programs - Public Sector Total</i>	<i>1,629,230</i>	<i>534,270</i>	<i>621,462</i>	<i>1,065,000</i>	<i>153%</i>	<i>\$ 2,975,440</i>	<i>\$ 1,608,453</i>	<i>\$ 1,366,987</i>	<i>\$ 2,430,247</i>	<i>\$ 2,534,940</i>	<i>117%</i>
Residential Programs											
Single Family	427,409	895,861	952,257	353,687	121%	\$ 1,342,989	\$ 430,107	\$ 912,882	\$ 1,646,321	\$ 1,387,028	97%
Multi-Family	1,002,454	1,210,837	1,231,644	909,713	110%	\$ 1,886,726	\$ 1,336,357	\$ 550,369	\$ 1,797,355	\$ 1,643,388	115%
Residential Programs Subtotal	1,429,863	2,106,698	2,183,901	1,263,400	113%	\$ 3,229,715	\$ 1,766,464	\$ 1,463,251	\$ 3,443,676	\$ 3,030,416	107%
Income Qualified Programs											
IHWAP-braided - Single Family	40,603			39,685	N/A	\$ 569,203	\$ 450,053	\$ 119,150	N/A	\$ 569,893	N/A
IHWAP Utility-only - Single Family	N/A			N/A	N/A	-	N/A	N/A	N/A	N/A	N/A
Non-IHWAP - Single Family	880,392			877,289	N/A	\$ 4,549,477	\$ 3,190,767	\$ 1,358,710	N/A	\$ 4,575,122	N/A
<i>Single Family Subtotal</i>	<i>920,995</i>	<i>895,896</i>	<i>934,393</i>	<i>916,974</i>	<i>100%</i>	<i>\$ 5,118,680</i>	<i>\$ 3,640,821</i>	<i>\$ 1,477,860</i>	<i>\$ 5,685,910</i>	<i>\$ 5,145,015</i>	<i>99%</i>
IHWAP-braided - Multi-Family	50,220			25,000	N/A	\$ 1,319,764	\$ 1,018,377	\$ 301,386	N/A	\$ 1,315,354	N/A
IHWAP Utility-only - Multi-Family	N/A			N/A	N/A	-	N/A	N/A	N/A	N/A	N/A
Non-IHWAP - Multi-Family	1,610,000			797,895	N/A	\$ 6,759,114	\$ 4,095,123	\$ 2,663,991	N/A	\$ 6,936,063	N/A
Gas-only-TA - Multi-Family	-			-	N/A	\$ -	\$ -	\$ -	N/A	\$ -	N/A
<i>Multi Family Subtotal</i>	<i>1,660,220</i>	<i>1,061,496</i>	<i>1,107,801</i>	<i>822,895</i>	<i>202%</i>	<i>\$ 8,078,878</i>	<i>\$ 5,113,501</i>	<i>\$ 2,965,377</i>	<i>\$ 8,097,617</i>	<i>\$ 8,251,418</i>	<i>98%</i>
Income Qualified Programs Subtotal	2,581,215	1,957,391	2,042,194	1,739,869	148%	\$ 13,197,558	\$ 8,754,321	\$ 4,443,237	\$ 13,783,527	\$ 13,396,433	99%
Third Party Programs (Section 8-103B - Beginning in 2019)											
Third Party Programs (Section 8-103B - Beginning in 2019) Subtotal											
Demonstration of Breakthrough Equipment and Devices											
Research and Development and Market Transformation	-	12,182	12,370	-	N/A	-	N/A	N/A	N/A	N/A	N/A
Demonstration of Breakthrough Equipment and Devices Subtotal	-	12,182	12,370	-		\$ -	\$ -	\$ -	\$ -	\$ -	N/A
Market Development Initiative	N/A	N/A	N/A	N/A	N/A	\$ 940,161	\$ -	\$ 940,161	\$ 700,000	\$ 927,231	
Market Development Initiative Subtotal	N/A	N/A	N/A	N/A	N/A	\$ 940,161	\$ -	\$ 940,161	\$ 700,000	\$ 927,231	101%
Overall Total Peoples Gas Section 8-103B/8-104 (EEPS) Programs	8,068,819	7,092,622	7,572,654	6,767,672	119%	\$ 25,507,590	\$ 14,668,959	\$ 10,838,632	\$ 24,377,234	\$ 25,807,714	99%

*Original Plan Budget refers to the budget contained in the approved EE Plan, which could be the original filed EE Plan or a compliance EE Plan.

**Approved Budget refers to the Program Administrator's current budget for this Program Year, that may have been modified in light of the flexibility policy. This may also be the Implementation Plan Budget.

***The Approved Net Energy Savings Goal refers to the most updated portfolio-level savings goal. In the case of Section 8-104 programs, the values in this column should match the Adjusted Energy Savings Goal contained in the Program Administrator's updated Adjustable Savings Goal Template.

****Original Plan Savings Goal refers to the original savings goal approved in the Commission's Final Order approving the EE Plan. For Section 8-104 programs, this value should match the Plan Energy Savings Goal set forth in the completed Adjustable Savings Goal Template.

Statewide Quarterly Report Template**Tab 2: Costs**

Q4 2025

Instructions:

*For Program and Portfolio-Level Costs, each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

Instructions:

**"Sector-level" refers to residential and commercial and industrial Programs pursuant to Section 8-103B and 8-104; and Third-Party Energy Efficiency Implementation Program pursuant to Section 8-103B(g)(4).

*If a utility offers Demand Response, information should be listed separately in this table as a separate program.

*If Program Administrators want to include historical spend information, they can do so. ICC Staff appreciates this information. However, providing historical spend data is not a requirement for Quarterly Reports; it is a requirement for Annual Reports.

*For Program Costs Year to Date (YTD), each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.

*Program Administrators will also report information on low income, public sector, public housing, and market transformation consistent with Program delivery requirements of Sections 8-103B and 8-104 of the Act.

*Program Administrators are encouraged to report public sector savings at the program-level, where available.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

Peoples Gas Section 8-103B/8-104 (EEPS) Costs - Q4 2025

Section 8-103B/8-104 (EEPS) Cost Category	2025 Actual Costs YTD
Program Expenditures by Sector	
C&I Programs (private sector)	\$ 5,164,717
Public Sector Programs	\$ 2,975,440
Residential Programs	\$ 3,229,715
Income Qualified Programs	\$ 13,197,558
Market Development Initiative	\$ 940,161
Third Party Programs (Beginning in 2019)	
Total Peoples Gas Program Costs	\$ 25,507,590
Portfolio-Level Costs by Portfolio Cost Category (Section 8-103B/8-104 EEPS)	
Research and Development - Demonstration of Breakthrough Equipment and Devices Costs	\$ 128,619
Market Transformation Programs	\$ 1,485,901
Evaluation Costs	\$ 697,422
Marketing Costs (including education and outreach)	\$ 1,188,677
Portfolio Administrative Costs	\$ 2,579,772
Total Peoples Gas Portfolio-Level Costs	\$ 6,080,391
Total Peoples Gas Program and Portfolio-Level Section 8-103B/8-104 (EEPS) Costs	\$ 31,587,982

Section 8-103B/8-104 (EEPS) Costs - Q4 2025

Overall Total Costs	2025 Actual Costs YTD	2025 Approved Budget	% of Costs YTD Compared to Approved Budget
Total Peoples Gas Program and Portfolio-Level Section 8-103B/8-104 (EEPS) Costs	\$ 31,587,982	\$ 32,345,403	98%

Statewide Quarterly Report Template
Tab 3: Historical Energy Saved
Q4 2025

Instructions:
*Each Program Administrator will fill out the historical "Energy Saved" table for Quarterly Reports. The "IL Department of Commerce Energy Saved" historical table may also be added to each utility's Quarterly Report.
*Program Administrators are encouraged to provide source references for greater transparency.

Peoples Gas Section 8-103B/8-104 (EEPS) Energy Saved (therms) as of Q4 2025

Program Year	Evaluation Status (Ex Ante, Verified***, or ICC Approved)	Net Energy Savings Achieved (therms)	Original Plan Savings Goal** (therms)	Net Energy Savings Goal* (therms)	% of Net Energy Savings Goal Achieved****
EPY1- 6/1/08-5/31/09					
EPY2- 6/1/09-5/31/10					
EPY3- 6/1/10-5/31/11					
Electric Plan 1 Total	—	—	—	—	—
EPY4/GPY1- 6/1/11-5/31/12	ICC Approved	2,053,902	2,806,711	2,806,711	73%
EPY5/GPY2- 6/1/12-5/31/13	ICC Approved	8,127,906	5,613,423	5,613,423	145%
EPY6/GPY3- 6/1/13-5/31/14	ICC Approved	11,405,070	8,420,134	8,420,134	135%
Electric Plan 2/Gas Plan 1 Total	ICC Approved	21,586,878	16,840,268	16,840,268	128%
EPY7/GPY4- 6/1/14-5/31/15	Verified	10,209,732	7,585,865	7,585,865	135%
EPY8/GPY5- 6/1/15-5/31/16	Verified	8,015,976	7,476,068	7,476,068	107%
EPY9/GPY6- 6/1/16-12/31/17	Verified	10,526,904	7,246,748	11,584,548	91%
Electric Plan 3/Gas Plan 2 Total	—	28,752,612	22,308,681	26,646,481	108%
2018	Verified - 2/17/22	7,347,414	9,868,975	9,868,975	74%
2019	Verified - 2/17/22	10,073,462	9,505,670	9,291,954	108%
2020	Verified - 2/17/22	14,054,624	9,457,541	9,291,937	151%
2021	Verified - 10/11/23	11,273,139	9,493,167	9,375,596	120%
2018-2021 Plan Total		42,748,639	38,325,353	37,828,462	113%
2022	Verified - 11/27/23	9,699,484	8,907,711	9,084,005	107%
2023	Verified - 11/18/24	9,839,935	8,467,378	9,040,516	109%
2024	Ex Ante	8,979,021	7,825,528	8,278,884	108%
2025	Ex Ante	8,068,819	7,092,622	7,572,654	107%
2022-2025 Plan Total		36,587,259	32,293,240	33,976,058	108%

Footnotes:
*Net Energy Savings Goal refers to the most updated portfolio-level savings goal. In the case of Section 8-104 programs, the values in this column should match the Adjusted Energy Savings Goal contained in the Program Administrator's updated Adjustable Savings Goal Template.
**Original Plan Savings Goal refers to the original savings goal approved in the Commission's Final Order approving the EE Plan. For Section 8-104 programs, this value should match the Plan Energy Savings Goal set forth in the completed Adjustable Savings Goal Template.
***Verified savings refer to evaluator estimated savings that are intended to count toward compliance with a Program Administrator's energy savings goal. Verified savings generally utilize deemed net-to-gross ratios and IL-TRM algorithms, where applicable. See also the definition of 'savings verification' in the IL-TRM Policy Document.
****The % Net Energy Savings Achieved reflects the percent to the Adjusted Energy Savings Goal, which may vary from the Implementation Plan Savings Goal and percentage shown on Tab 1.

IL Department of Commerce and Economic Opportunity Energy Saved (therms)

Department	EPY1	EPY2	EPY3	EPY4/ GPY1	EPY5/ GPY2	EPY6/ GPY3	EPY7/ GPY4	EPY8/ GPY5	EPY9/ GPY6*
Net Savings Achieved (kWh or therms)	--	--	--	2,014,079	885,035	3,506,352	1,698,460	665,858	2,165,478
Evaluation Status (Ex Ante, Ex Post, or ICC Approved)	--	--	--	ICC Approved	ICC Approved	ICC Approved	ICC Approved	ICC Approved	ICC Approved
				Docket 15- 0298	Docket 15- 0298	Docket 15- 0298	DCEO Summary Impact Evaluation Report EPY7-9 GPY4-6	EPY6-9/GPY4-6 DCEO Evaluation	EPY6-9/GPY4-6 DCEO Evaluation
Source	--	--	--						

Footnotes:
*Electric Program Year 9 (EPY9) and Gas Program Year 6 (GPY6) covers energy efficiency programs offered from June 1, 2016 to May 31, 2017.
**Verified savings refer to evaluator estimated savings that are intended to count toward compliance with a Program Administrator's energy savings goal. Verified savings generally utilize deemed net-to-gross ratios and IL-TRM algorithms, where applicable. See also the definition of 'savings verification' in the IL-TRM Policy Document.

Statewide Quarterly Report Template
Tab 4: Historical Other - Environmental and Economic Impacts
Q4 2025

Instructions:

*Each Program Administrator should complete the Environmental and Economic Impacts table for Quarterly Reports.

*Each Program Administrator should include a footnote to explain how performance metrics are derived (for example: the calculation for "Direct Portfolio Jobs.")

Instructions:

**"Sector-level" refers to residential and commercial and industrial Programs pursuant to Section 8-103B and 8-104; and Third-Party Energy Efficiency Implementation Program pursuant to Section 8-103B(g)(4).

*If a utility offers Demand Response, information should be listed separately in this table as a separate program.

*If Program Administrators want to include historical spend information, they can do so. ICC Staff appreciates this information. However, providing historical spend data is not a requirement for Quarterly Reports; it is a requirement for Annual Reports.

*For Program Costs Year to Date (YTD), each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter, regardless of what Program Year the costs are associated with.

*Program Administrators will also report information on low income, public sector, public housing, and market transformation consistent with Program delivery requirements of Sections 8-103B and 8-104 of the Act.

*Program Administrators are encouraged to report public sector savings at the program-level, where available.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

Environmental and Economic Impacts for the Peoples Gas Service Territory as of Q4 2025																	
Performance Metrics (Equivalents)*	EPY1	EPY2	EPY3	EPY4/ GPY1	EPY5/ GPY2	EPY6/ GPY3	EPY7/ GPY4	EPY8/ GPY5	EPY9/ GPY6****	2018	2019	2020	2021	2022	2023	2024	2025
Net Energy Savings Achieved (therms)**				4,067,981	9,012,941	14,911,422	11,908,192	8,681,834	12,692,382	7,347,414	10,073,462	14,054,624	11,273,139	9,064,409	9,917,359	8,979,021	8,068,819
Carbon reduction (tons)				21,524	47,687	78,896	63,006	45,936	67,155	35,591	51,002	72,330	58,705	47,960	52,473	47,508	42,692
Cars removed from the road				4,570	10,125	16,751	13,377	9,753	14,258	7,557	11,019	15,633	12,767	10,334	11,677	11,081	9,958
Acres of trees planted				28,109	62,278	103,035	82,283	59,990	87,702	41,888	66,606	94,498	71,923	56,757	62,575	47,653	42,823
Number of homes powered for 1 year^A				2,484	5,503	9,104	7,271	5,301	7,749	4,262	5,885	8,350	7,069	6,041	6,613	6,380	5,733
Direct Portfolio Jobs *****											59	83	79	67	71	59	49
Income qualified homes served***									668	1,327	4,724	22,395	19,223	59,602	39,989	32,902	17,334

Footnotes:

*Unless otherwise noted, performance metrics for carbon reduction, cars removed from the road, and acres of trees planted are derived from the U.S. EPA Greenhouse Gas Equivalencies Calculator:

**This includes Sections 8-103, 8-103B, 8-104, and 16-111.5B savings achieved. In addition, this includes Illinois Department of Commerce and Economic Opportunity program savings achieved through May 31, 2017.

***To the extent the portfolio offers a low income program and tracks participation. Low income customers were previously served by the IL Department of Commerce and Economic Opportunity until May 31, 2017. Utilities began serving both low income and public sector customers on June 1, 2017.

****Electric Program Year 9 (EPY9) and Gas Program Year 6 (GPY6) covers energy efficiency programs offered from June 1, 2016 to December 31, 2017.

*****Direct Portfolio Jobs will be updated at least once per year.

^ANumber of homes powered for 1 year is derived from the U.S. EPA Greenhouse Gas Equivalencies Calculator: <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

Statewide Quarterly Report Template
Tab 6: Historical Costs
Q4 2025

Instructions:

*Each Program Administrator will fill out the "Historical Energy Efficiency Costs" table for Quarterly Reports.

*For Costs, each Program Administrator should include actual costs incurred from the beginning of the Program Year through the end of the applicable quarter or Program Year, regardless of what Program Year the costs are associated with. Costs include both Program and Portfolio-Level Costs as well as On-Bill Financing costs.

*Program Administrators should add a footnote specifying if there are non-rider energy efficiency costs that are not reported in the Quarterly Reports.

Peoples Gas Service Territory Historical Energy Efficiency Costs as of Q4 2025

Program Year	Actual Peoples Gas EEPS Costs	Actual DCEO EEPS Costs	Total Actual EEPS Costs (Peoples Gas + DCEO)	Actual Section 16-111.5B Costs	Total Actual EEPS + Section 16-111.5B Costs
EPY1- 6/1/08-5/31/09	\$ -	\$ -	\$ -	\$ -	\$ -
EPY2- 6/1/09-5/31/10	\$ -	\$ -	\$ -	\$ -	\$ -
EPY3- 6/1/10-5/31/11	\$ -	\$ -	\$ -	\$ -	\$ -
Electric Plan 1 Total	\$ -	\$ -	\$ -	\$ -	\$ -
EPY4/GPY1- 6/1/11-5/31/12	\$ 4,720,309	\$ 2,338,766	\$ 7,059,075	\$ -	\$ 7,059,075
EPY5/GPY2- 6/1/12-5/31/13	\$ 17,413,390	\$ 3,068,743	\$ 20,482,133	\$ -	\$ 20,482,133
EPY6/GPY3- 6/1/13-5/31/14	\$ 20,982,409	\$ 7,309,465	\$ 28,291,874	\$ -	\$ 28,291,874
Electric Plan 2/Gas Plan 1 Total	\$ 43,116,108	\$ 12,716,974	\$ 55,833,082	\$ -	\$ 55,833,082
EPY7/GPY4- 6/1/14-5/31/15	\$ 15,552,645	\$ 5,265,253	\$ 20,817,898	\$ -	\$ 20,817,898
EPY8/GPY5- 6/1/15-5/31/16	\$ 14,385,731	\$ 4,864,207	\$ 19,249,938	\$ -	\$ 19,249,938
EPY9/GPY6- 6/1/16-12/31/17	\$ 33,095,405	\$ 4,266,483	\$ 37,361,888	\$ -	\$ 37,361,888
Electric Plan 3/Gas Plan 2 Total	\$ 63,033,781	\$ 14,395,943	\$ 77,429,724	\$ -	\$ 77,429,724
Program Year	Actual Peoples Gas EEPS Costs YTD	Approved Peoples Gas EEPS Budget	% of Costs YTD Compared to Approved Budget *		
2018 - Verified 2/17/22	\$ 24,646,499	\$ 27,492,564	90%		
2019 - Verified 2/17/22	\$ 26,918,182	\$ 27,492,564	98%		
2020 - Verified 2/17/22	\$ 29,237,648	\$ 27,492,564	106%		
2021 - Verified 10/11/22	\$ 24,475,164	\$ 27,492,564	89%		
2018-2021 Plan Total	\$ 105,277,493	\$ 109,970,256	96%		
2022 - Verified 11/27/23	\$ 25,005,836	\$ 29,049,031	86%		
2023 - Verified 11/18/24	\$ 28,231,254	\$ 29,049,031	97%		
2024	\$ 29,968,679	\$ 29,049,031	103%		
2025	\$ 31,587,982	\$ 29,049,031	109%		
2022-2025 Plan Total	\$ 114,793,752	\$ 116,196,124	99%		

*The % of Costs YTD Compared to the Approved Budget reflects the percent to the Plan Budget, which may vary from the annual Approved Implementation Budget and percentage shown on Tab 1.

Statewide Quarterly Report Template
Tab 7: Historical Other - IQ Multi-Family Participation
Q4 2025

Instructions:
*Each Program Administrator should complete the IQ Multi-Family Participation table for Quarterly Reports.
*Gas-Only Program Administrator should complete the Trade-Ally-Driven IQ Multi-Family Participation table for Quarterly Reports
Instructions:
Other to be completed by SAG

Zip Code	2022		2023		2024		2025	
	Quantity of Buildings Served	Quantity of Apartment/Condo Units	Quantity of Buildings Served	Quantity of Apartment/Condo Units	Quantity of Buildings Served	Quantity of Apartment/Condo Units	Quantity of Buildings Served	Quantity of Apartment/Condo Units
60601	0	0	0	0	0	0	0	0
60602	0	0	0	0	0	0	0	0
60604	0	0	0	0	0	0	0	0
60605	0	0	0	0	0	0	1	207
60606	0	0	0	0	0	0	0	0
60607	2	4	1	3	1	20	1	200
60608	36	465	3	243	44	3,821	3	14
60609	1	3	1	5	3	29	3	68
60610	0	0	2	444	11	648	1	29
60611	0	0	0	0	15	383	0	0
60612	4	33	7	998	24	672	3	54
60613	7	904	3	134	7	615	7	603
60614	1	40	2	172	36	1,002	11	583
60615	32	1,239	34	1,342	61	4,154	52	1,667
60616	14	713	11	1,853	18	2,279	12	1,884
60617	19	672	8	348	74	678	11	103
60618	9	109	4	87	23	251	5	64
60619	72	949	55	986	104	1,245	29	431
60620	65	1,147	43	752	34	412	21	273
60621	18	297	15	333	11	88	20	652
60622	1	18	4	503	5	50	2	103
60623	19	131	16	314	13	109	15	92
60624	30	321	11	635	8	234	4	223
60625	29	501	16	301	13	415	8	101
60626	77	2,341	37	997	51	1,042	38	1,460
60628	127	1,110	9	349	39	535	13	257
60629	28	336	37	534	15	179	13	110
60630	1	25	3	59	0	0	0	0
60631	0	0	0	0	3	23	1	11
60632	7	4	0	34	4	53	2	4
60633	0	0	0	0	1	4	0	0
60634	1	44	0	0	7	7	14	152
60636	5	19	2	7	17	379	1	9
60637	42	1,104	37	804	18	364	31	714
60638	1	3	0	0	5	123	1	12
60639	13	227	5	51	11	310	11	284
60640	21	958	17	1,158	29	978	4	993
60641	10	252	3	69	14	242	8	150
60642	1	524	0	0	1	4	2	90
60643	5	125	5	114	10	285	4	53
60644	44	964	21	728	21	795	27	754
60645	22	394	10	258	10	181	7	324
60646	0	0	0	0	3	107	1	10
60647	11	183	3	79	39	1,201	4	61
60649	82	1,657	93	2,623	64	1,480	33	1,099
60651	15	528	6	100	9	96	6	234
60652	1	11	0	0	10	609	1	4
60653	2	670	14	851	7	244	11	444
60654	0	0	0	0	0	0	0	0
60655	0	0	3	46	0	0	0	0
60656	0	0	0	0	0	0	1	4
60657	0	0	0	0	5	282	7	258
60659	21	427	13	258	14	750	10	224
60660	29	1,703	18	984	21	1,059	12	707
60661	0	0	0	0	0	0	0	0
60707	0	0	0	0	2	1,547	1	4
60827	0	0	0	0	0	0	0	0

IQ Trade-Ally-Driven Multi-Family Participation for the Peoples Gas Service Territory as of Q4 2025

Participation Metrics	2022	2023	2024	2025
Quantity of Buildings Served	11	0	0	0
Quantity of (Apartment/Condo) Units Served	0	0	0	0
Quantity of Buildings Assessed	11	0	0	0
Quantity of Units Assessed	0	0	0	0
Quantity of Buildings with Direct Installations Only	0	0	0	0
Quantity of Units with Direct Installations Only	0	0	0	0
Quantity of Buildings with Direct Installs and Major Measure	11	0	0	0
Quantity of Units with Direct Installs and Major Measure	0	0	0	0

Instructions:
*Each Program Administrator should complete for Quarter 4 Reports.

Size	Housing Type	Number of Buildings				Number of Apartments	
		Central Heating System	Individual Heating System	Central Heating System	Individual Heating System	Central Heating System	Individual Heating System
Buildings <20 Units	Public Housing	1			12		
	Subsidized Housing	7	3		57		18
	Unsubsidized Housing	219	59		1,800		297
Buildings 20-49 Units	Public Housing						158
	Subsidized Housing						
	Unsubsidized Housing	92	3		2,862		145
Buildings w/50+ Units	Public Housing						126
	Subsidized Housing	4			510		
	Unsubsidized Housing	83	16		9,016		584

IQ Multi-Family Funding Sources for the Peoples Gas Service Territory

Report on any funding sources leveraged or combined for the IQ MF EE program where a Program Administrator leverages over \$500,000 or more per year.

Additional Funding Source	
Funding Source	Illinois Home Weatherization Assistance Program and ComEd
Amount of Funding	\$1,146,061 from IHWAP state funds and \$529,851 from ComEd
What was the funding used for?	To support IHWAP projects to install energy efficiency measures at CHA and Mercy Housing locations.
Was there any joint or coordinated implementation with the leveraged funding entity and/or any constraints or program modifications resulting from leveraging?	Franklin Energy coordinated this work with CEDA (Community Economic Development Association of Cook County.)
Was there any required owner co-pays or financing? If yes, include detail on what measures require copays and the amounts required.	No copays were needed for these projects.

Statewide Quarterly Report Template
Tab 8: Historical Other - IQ Participation and Measures
2025

Instructions: *Each Program Administrator should complete the tables for the Annual Reports.
Instructions: Other to be completed by SAIG

IQ Program Participation for the Peoples Gas Service Territory in 2025

IQ Program Participation for the Peoples Gas Service Territory in 2025

IQ Program Participation for the Peoples Gas Service Territory in 2025

[illegible]

Footnote:
*Single Family participants and incentive spend exclude kits

[illegible]

Statewide Quarterly Report Template
Tab 9: Historical Other - Health & Safety
2025

Instructions:
*Each Program Administrator should complete for Quarterly Reports.

Instructions:
Other to be completed by SAG

IQ Whole Building Retrofit Health & Safety Spend for the Peoples Gas Service Territory				
Health & Safety Spend	2022	2023	2024	2025
Single Family			\$88,144	\$75,659
Multi-Family			\$44,029	\$24,793

IQ Whole Building Retrofit Health & Safety Metrics for the Peoples Gas Service Territory in 2025				
Health & Safety Metrics	2022	2023	2024	2025
Number of Properties Assessed - Single Family	1,392	1,264	363	485
Number of Properties Assessed - Multi-Family	494	285	264	218
Number of Properties with Identified Health & Safety Issues	787	919	391	420
Number of Properties deferred due to Health & Safety Issues	109	165	14	83
Quantity of Properties with the following Health and Safety Issues identified:				
Electrical Safety	7		8	19
Natural Gas Safety	1	241	8	24
Fire Safety	403	300	194	194
Indoor Air Quality	392	449	18	14
Other	384	451	81	241

IQ Whole Building Retrofit Health & Safety Narrative for the Peoples Gas Service Territory	
Executive Narrative:	
Q1 2025	Single Family -310 total Single Family properties were assessed -238 health and safety issues were identified: (4) electrical safety, (7) natural gas safety and (80) fire safety (smoke detectors) -The remaining 147 being other, which included (94) dryer vent, with the remaining being mold, pest, vermiculite and leaks Multi-Family -40 assessments were completed with health and safety issues identified at 14 locations -Two health and safety projects were supported to complete pipe insulation and a tune-up of one site and weatherization of a different site -The \$5,950 investment in health and safety enabled \$23,946 in energy efficiency incentives and the achievement of 13,946 therms
Q2 2025	Single Family -In Q2, 175 single family properties were assessed and 148 H&S issues were identified: 5 electrical safety, 8 natural gas safety and 43 fire safety -The other issues identified included bulk moisture leaks, suspected mold, pest and dryer vent issues Multi-Family -In Q2, H&S issues were identified at 14 locations -Eleven H&S projects were supported to enable weatherization projects and natural gas mechanical projects -The H&S investment enabled \$34,798 in energy efficiency incentives, achieved 12,823 therms and paved the way for more projects that will occur later in 2025
Q3 2025	Single Family -In Q3, no single family properties were assessed since offering goals have been achieved. Multi-Family -In Q3, MFS conducted 38 assessments in the Peoples Gas territory and none of those assessments identified H&S issues. However, MFS completed four projects that required H&S improvements that were contractor referrals without a program assessment. Three of four projects involved weatherization and one involved gas mechanicals.
Q4 2025	Single Family -N/A Multi-Family -N/A

Instructions:
*Each Program Administrator should complete for Quarter 2 Reports for the previous year. Peoples Gas reports this information in the Quarter 4 Report of the same year.

IQ Whole Building Retrofit Health & Safety Spend by Zip Code for 2025		
Zip Code	Economically Disadvantaged Area (EDA)	Health & Safety Spend
60401	Y	\$0
60402	N	\$0
60404	N	\$0
60405	Y	\$0
60406	N	\$0
60407	Y	\$0
60408	Y	\$810
60409	Y	\$2,025
60410	Y	\$0
60411	Y	\$0
60412	Y	\$510
60413	Y	\$0
60414	Y	\$0
60415	Y	\$440
60416	Y	\$0
60417	Y	\$3,695
60418	Y	\$1,305
60419	Y	\$4,817
60420	Y	\$10,782
60421	Y	\$84
60422	Y	\$0
60423	Y	\$203
60424	Y	\$1,531
60425	Y	\$0
60426	Y	\$0
60428	Y	\$14,398
60429	Y	\$4,622
60430	Y	\$1,558
60431	Y	\$590
60432	Y	\$214
60433	Y	\$0
60434	Y	\$1,744
60436	Y	\$1,544
60437	Y	\$2,215
60438	Y	\$8,121
60439	Y	\$1,645
60440	Y	\$0
60441	Y	\$1,736
60442	Y	\$0
60443	Y	\$14,869
60444	Y	\$240
60445	Y	\$30
60446	Y	\$703
60447	Y	\$1,343
60449	Y	\$1,019
60451	Y	\$2,918
60452	Y	\$4,301
60453	Y	\$487
60454	Y	\$0
60455	Y	\$2,363
60456	Y	\$130
60457	Y	\$0
60459	Y	\$1,400
60460	Y	\$722
60461	N	\$0
60701	Y	\$1,194
60821	Y	\$260

Statewide Quarterly Report Template
 Tab 10: Diverse Contracting
 2025

Instructions:

*Each Program Administrator should complete for Q2 and Q4 Reports.

**If a Program Administrator has two (2) or less diverse contractors in a tier level and/or diverse category, this reporting requirement will be waived to protect the confidentiality of contract values.

Quantity of Diverse Contractors

	Quantity of Diverse Contractors		
	Primary Contractors	Secondary Contractors	Total Contractors
Women-owned businesses	3	5	8
Minority-owned businesses			
Veteran-owned businesses	0	0	0
Woman and minority-owned business			
Woman and veteran-owned business	0	0	0
	Total		11

Diverse Contractor Spend

	Diverse Primary Contractor Spend			Diverse Secondary Contractor Spend			All Diverse Contractor Spend		
	Implementation, Bundle Management, and Marketing	Incentives and Other Fees	Total Primary Contractor Spend	Implementation, Bundle Management, and Marketing	Incentives and Other Fees	Total Secondary Contractor Spend	Implementation, Bundle Management, and Marketing	Incentives and Other Fees	Total Diverse Contractor Spend
Women-owned businesses	19.36%	0.00%	10.37%	1.28%	0.00%	0.69%	21%	0%	11%
Minority-owned businesses									
Veteran-owned businesses	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0%	0%	0%
Woman and minority-owned business									
Woman and veteran-owned business	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0%	0%	0%
	Total						23%	5%	15%

