

March 2, 2016

The Honorable Bruce Rauner
Governor of Illinois
207 State House
Springfield, IL 62706

Dear Governor Rauner:

As you know, energy efficiency is the lowest-cost demand side energy resource – cheaper than electric or gas generation or renewables. Even with the Supreme Court’s recent stay of the Clean Power Plan, the electric power sector is evolving toward a cleaner, more efficient energy system. As the regulators and energy planners in your state continue their daily work to ensure reliable and affordable electricity to consumers, we encourage you to maximize your investment in energy efficiency. By reducing the need for power generation, energy efficiency provides emissions reductions quickly, locally, and at a lower cost than other compliance options. It is also the only option that achieves sustained local job creation and concurrently reduces emissions while mitigating the cost impacts of Clean Power Plan implementation and giving Illinois residents and businesses control over their energy bills. Actions such as improving manufacturing energy efficiency, reducing commercial buildings’ energy use, and delivering residential energy efficiency upgrades are the quickest and cheapest means to meet energy demand while simultaneously improving air quality.

Today, every state has at least some experience delivering energy-efficiency programs administered by electric and natural gas utilities and the private sector. These programs have been very successful and can be expanded significantly. In addition, there are opportunities in Illinois to achieve significant emissions reductions through the implementation of non-utility administered energy-efficiency policies and programs. Such programs include investments in combined heat and power generation (CHP), adoption of building energy codes that leverage above-code green building certification, residential retrofit financing programs, and procurement of energy savings performance contracts (ESPCs) to upgrade large buildings and facilities, the last of which Illinois is already utilizing. Non-utility efficiency programs, taken as a whole, generate as much investment in energy savings as utility programs and should not be underestimated. For example, the ESPC market in the U.S. generates more than \$5 billion annually in new investments.

We commend the energy-efficiency investments Illinois has already made, such as the support and implementation of CHP projects, and the commitment to residential and commercial building code compliance through a stakeholder advisory group and code trainings. The Clean Power Plan offers new incentives to expand your existing programs and maximize the use of this least-cost mechanism, energy efficiency, for compliance. To maximize cost-effective emissions reductions under the plan, we also recommend that you opt into the Clean Energy Incentive Program (CEIP).

The attached fact sheet shows how the implementation of a few common energy-efficiency policies, such as adoption of an energy-savings target, updated building energy codes, and increased use of combined heat and power generation can meet over 80 percent of Illinois’ 2030 compliance limit under

the Clean Power Plan, all while saving customers money, creating jobs, and growing the Illinois economy. In fact, incorporating energy efficiency into your plan could save the people of Illinois \$5.4 billion, not to mention avoiding over 29 million tons of carbon dioxide emissions and provide for cleaner, healthier air.

Energy efficiency is not a “new” resource for meeting customer energy needs; however, applying these policies to achieve carbon reduction goals under Section 111(d) of the Clean Air Act is an entirely new context. Several resources are available for your staff and responsible state agencies to guide your decisions about Clean Power Plan implementation options, regardless of whether you pursue a mass-based or a rate-based plan. For further information and to ask questions specifically about incorporation of energy efficiency into your plan, please contact the National Association of State Energy Officials at <http://cpp.naseo.org/asq>, or any of the contacts below.

We are ready to work with you and your state officials to ensure that efforts to reduce emissions via the Clean Power Plan or any other means are as cost effective as possible. **Energy efficiency is the cleanest, fastest, most cost-effective compliance strategy available, and has the most direct impact on controlling consumers’ utility bills.** Energy efficiency is also embraced by the private sector because of the operating costs it saves and its value for resilience and risk reduction. Additionally, energy efficiency creates lasting, local, non-exportable jobs and grows the economy while reducing consumer costs. We encourage you to use it robustly, and we stand ready to assist you.

Cc: Illinois Public Utilities Commission; Illinois Department of Commerce and Economic Opportunity, Energy and Recycling Office; Illinois Environmental Protection Agency, Bureau of Air

Sincerely,

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