

Illinois Energy Efficiency Stakeholder Advisory Group:
2025 SAG Plan
January 1 to December 31, 2025
Final (6/4/2025)

I. Background

The Illinois Energy Efficiency Stakeholder Advisory Group (SAG) is an advisory body established by the Illinois Commerce Commission (ICC) that is open to all interested participants. SAG is a forum that allows parties to provide early and ongoing input on energy efficiency programs, express different opinions, better understand the opinions of others, and foster collaboration and consensus, where possible and appropriate. This SAG Plan includes an overview of SAG activities from January 1 to December 31, 2025. The SAG is independently facilitated by Celia Johnson, Celia Johnson Consulting LLC. Inova Energy Group will continue as a subcontractor to Celia Johnson Consulting in 2025, providing meeting support to the Facilitator.

SAG participants include Illinois utilities administering energy efficiency programs (Ameren Illinois, ComEd, Nicor Gas, and Peoples Gas – North Shore Gas); stakeholders representing environmental advocacy, consumer advocacy, and ratepayer advocacy; ICC Staff; program implementation contractors; independent evaluators; the Illinois TRM Administrator; community-based organizations; and other interested companies and organizations. Participation in large group SAG, SAG Subcommittee and SAG Working Group meetings is open to all interested parties, unless a topic may present a financial conflict of interest.

II. SAG Plan Flexibility

Illinois utilities (Ameren Illinois, ComEd, Nicor Gas, Peoples Gas and North Shore Gas) filed individual Energy Efficiency Plans for 2026-2029 with the Commission for approval on February 28, 2025.¹ Following past precedent, SAG takes a meeting break following EE Plan filings. Regular SAG meetings are proposed to resume in July 2025. However, there is also a Large Group SAG meeting scheduled in mid-June, for IL-TRM policy issues to be considered by interested SAG participants. While utility EE Plan approval dockets are open at the Commission, SAG will not discuss items that are at issue in those dockets.

The SAG Facilitator recognizes the 2025 SAG Plan may need to be updated following Commission approval of the 2026-2029 EE Plans. Any updates to the 2025 SAG Plan will be discussed with utilities, interested stakeholders, and the SAG Steering Committee, and communicated to SAG.

¹ See SAG EE Dockets webpage for EE Plan docket numbers: <https://www.ilsag.info/resources/energy-efficiency-dockets/>

III. SAG Meetings

Table 1 below describes various categories of SAG meetings, including the SAG Steering Committee, Large Group SAG, SAG Technical Advisory Committee, SAG Subcommittees, and SAG Working Groups.

Table 1: SAG Meetings	
Meeting Category	Description
SAG Steering Committee	<p>Members of the SAG Steering Committee include senior representatives of utilities, community-based organizations, and non-financially interested stakeholder participants. The Steering Committee provides substantive feedback to the SAG Facilitator on: (1) annual SAG Plans; and (2) progress towards meeting annual SAG Plan goals to ensure that the time spent on SAG is as productive and valuable as possible.²</p> <p>The SAG Steering Committee distribution list includes Illinois utility representatives and non-financially interested stakeholders that signed 2022-2025 Stipulated Agreements with Illinois utilities. For 2025, the SAG Facilitator also included additional non-financially interested stakeholders that signed a 2026-2029 Stipulated Agreements with an Illinois utility.</p> <p>Meetings are anticipated on a bi-annual basis.</p>
Large Group SAG	<p>Large Group SAG meetings cover Program Administrator reporting, Portfolio planning, Program planning, fund shifts, and topics of general interest, as directed by the Commission or requested by SAG participants. Topics are scheduled as time and resources permit.³</p> <p>Participation in the Large Group SAG is open to all SAG participants, unless there is a topic that involves a financial conflict of interest.</p> <p>The SAG Facilitator prioritizes topics and issues that are required by Illinois Energy Efficiency Policy Manual Version 3.0, or as it may be updated from time to time; directives to SAG from the ICC; and ICC-approved stipulated agreements between individual utilities and non-financially interested parties. Large Group SAG meetings are generally held on a quarterly basis. Due to open EE Plan approval dockets in 2025, two quarterly SAG meetings are planned (July and November).</p>

² See Policy Manual Version 3.0, Section 3.3, Advisory Role: SAG Steering Committee

³ See Policy Manual Version 3.0, Section 3.3, Advisory Role: Large Group SAG

Table 1: SAG Meetings	
Meeting Category	Description
SAG Technical Advisory Committee (TAC)	<p>Technical Advisory Committee (TAC) meetings address updates to the IL-TRM, EM&V issues, and other issues of a technical nature. General SAG attendees will be briefed on topics covered in the TAC, as needed.⁴</p> <p>In recent years, TAC meetings have focused on the annual Illinois TRM update process, facilitated by the Illinois TRM Administrator, VEIC. The SAG Facilitator coordinates with the IL-TRM Administrator and participates in TAC meetings, as needed.</p> <p>Energy efficiency topics of a technical nature that are unrelated to the Illinois TRM update process are addressed in SAG Subcommittee or SAG Working Group meetings.</p>
SAG Subcommittees	<p>SAG Subcommittees are established for necessary issue-specific topics based on Commission directives, Policy Manual requirements, stipulated agreements or SAG requests. Subcommittees are established as need arises.⁵</p> <p>Participation in a SAG Subcommittee is open to all SAG participants, unless there is a topic that involves a financial conflict of interest. SAG participants may self-select to join a Subcommittee. The SAG Facilitator maintains a separate distribution list for each Subcommittee. Subcommittee meetings are scheduled as needed.</p> <p>In 2025, two (2) SAG Subcommittees will be convened by the SAG Facilitator:</p> <ol style="list-style-type: none"> 1. Equity Subcommittee 2. Network Lighting Controls Subcommittee
SAG Working Groups	<p>SAG Working Group meetings address short-term issues that need resolution. SAG Working Group participants may recommend next steps to SAG Subcommittee(s) or the Technical Advisory Committee.⁶</p> <p>SAG Working Group meetings are established to provide an opportunity for updates on a specific area of interest. Participation in a SAG Working Group is open to all SAG participants, unless there is a topic that involves a financial conflict of interest. SAG participants may self-select to join a Working Group. The SAG Facilitator maintains a separate distribution list</p>

⁴ See Policy Manual Version 3.0, Section 3.3, Advisory Role: *SAG Technical Advisory Committee (TAC)*. Meetings address updates to the IL-TRM, EM&V issues, and other issues of a technical nature. General SAG attendees will be briefed on topics covered in the TAC, as needed. More detailed TAC responsibilities in the context of updating the IL-TRM are outlined in the IL-TRM Policy Document. The most current IL-TRM Policy Document is posted on the Illinois Commerce Commission website: <https://www.icc.illinois.gov/programs/illinois-statewide-technical-reference-manual-for-energy-efficiency>.

⁵ See Policy Manual Section 3.0, Section 3.3, Advisory Role: SAG Subcommittees

⁶ See Policy Manual Section 3.0, Section 3.3, Advisory Role: SAG Working Groups

Table 1: SAG Meetings	
Meeting Category	Description
	<p>for each Working Group. Working Group meetings are scheduled as needed.</p> <p>In 2025, three (3) Working Groups will be convened by the SAG Facilitator:</p> <ol style="list-style-type: none"> 1. Market Transformation Savings Working Group 2. Non-Energy Impacts Working Group 3. Reporting Working Group

A. Recurring SAG Activities

There are a number of topics that require recurring discussion in the SAG, as referenced in Illinois Energy Efficiency Policy Manual Version 3.0. The SAG Facilitator will organize the following SAG activities related to recurring topics in 2025:

1. Reports-Outs: Schedule utility report-outs to SAG twice per year. Quarterly reports will be posted to the SAG website. For quarters where utilities are not presenting to SAG, utility reports will be circulated to SAG participants by email.
2. Annual Report-Outs: Schedule annual utility report-outs following the end of each program year (combined with report-outs under 1a). Annual reports will be posted to the SAG website.
3. IL-TRM Update Process: Circulate information about the IL-TRM measure prioritization process prior to the launch of the annual IL-TRM process; post IL-TRM deliverables on the SAG website; and circulate IL-TRM deliverables and other materials to SAG, as requested by the IL-TRM Administrator.
4. Evaluation Work Plans: Schedule SAG meeting(s) on an annual basis for evaluators to present an overview of draft EM&V work plans for the next program year. Draft EM&V work plans will be posted to the SAG website for review and comment. Notice will be circulated to SAG directing that comments on draft EM&V work plans shall be submitted to utilities, ICC Staff, and evaluators within fifteen (15) business days, or such other timeline mutually agreed to by the Parties. Final EM&V work plans will be posted on the SAG website.
5. Evaluation Reports: Draft and final evaluation reports will be posted on the SAG website, as they are made available by independent evaluators.
6. Net-to-Gross Updates: Organize and facilitate meeting(s) to discuss annual updates to Net-to-Gross (NTG) values in September 2025, for the 2026 program year. Independent evaluators share initial NTG recommendations by September 1, 2025, with final values determined by October 1, 2025. Draft and final NTG documents and other NTG meeting communications will be posted to the SAG website and circulated to SAG.

7. Adjustable Savings Goals: Organize and facilitate discussions regarding gas utility Adjustable Savings Goals for the 2025 program year, if needed. At a minimum, draft Adjustable Savings Goal spreadsheets for gas utilities will be circulated to interested stakeholders for review. The 2025 update to gas utility Adjustable Savings Goals will be posted on the SAG website.⁷
8. Updates to the Policy Manual: Organize and facilitate Policy Manual Subcommittee meetings on an as-needed basis.

B. SAG Coordination

As described in the SAG Process Guidance document, Section VI, Coordination with Other Processes, the SAG Facilitator will coordinate with other Illinois energy efficiency advisory processes, including 1) Annual update process for the IL-TRM through the SAG TAC, facilitated by Vermont Energy Investment Corp. (VEIC), the IL-TRM Administrator⁸; 2) Income Qualified North EE Advisory Committee; and 3) Income Qualified South EE Advisory Committee.

C. SAG Subcommittees

There are two (2) SAG Subcommittees in 2025, including:

- Equity Subcommittee
- Network Lighting Controls Subcommittee

SAG Equity Subcommittee

- **Wednesday, July 16 (10:00 – 12:00)**
 - Nicor Gas MDI Assessment results
 - Nicor Gas presents a beta interactive mapping mechanism, to follow-up on Equity and Affordability Reporting metrics finalized in June 2024⁹
- **Tuesday, July 29 (1:00 – 4:00)**
 - IQ North Leadership Team request to discuss procedural issue on re-launching IQ North Advisory Committee
 - Northern Illinois Utilities' Home Energy Savings Income Eligible Single Family Upgrades Program
 - Overview of the customer journey and understanding implementation and contractor implementation processes. Stakeholders request that entities familiar with this program participate in the meeting.
 - Discuss minimum participation criteria that determines whether a home is weatherized and customer prioritization for major measures in the northern Illinois utilities' Home Energy Savings Income Eligible Single Family Upgrades Program.

⁷ See Adjustable Savings Goals policy for gas utilities: http://www.ilsag.info/adjustable_savings_goals.html

⁸ See IL-TRM page of the SAG website for additional information: <https://www.ilsag.info/technical-reference-manual/>

⁹ See Equity and Affordability Reporting Metrics: https://www.ilsag.info/wp-content/uploads/Equity-and-Affordability-Reporting-Policy-Metrics_FINAL-Clean-6-20-2024.pdf

- Excerpt from ComEd’s stipulation: *The minimum attic insulation criterion that determines whether a home is weatherized in its HES program is R19, with the ability to bring the insulation level up to R49-R50. ComEd commits to working with stakeholders and related utilities, in 2025, to adjust the minimum participation criteria that determines whether a home is weatherized and customer prioritization for major measures in its Home Energy Savings (HES) aka IE Single Family Upgrades program. ComEd will not consider HVAC efficiency or lack of duct sealing opportunity (E&F Within 2025 Retrofits Prioritization Criteria Proposed changes) when prioritizing customers for HES weatherization services.*
 - Excerpt from Peoples Gas and North Shore Gas stipulation: *The Companies commit to discussing IE SF retrofit prioritization criteria in the SAG Equity Subcommittee.*
- **Tuesday, September 23 (9:30 – 12:30)**
 - Follow-up discussion from July 29 meeting
 - Peoples Gas and North Shore Gas MDI Assessment results
- **Tuesday, October 28 (10:00 – 12:00) – Joint Meeting with IQ South Advisory Committee**
 - Subject to approval by the Commission, the Ameren 2026 Plan Stipulation includes a commitment to start discussions in 2025 on whether and to what extent implementation contractors, subcontractors, trade allies, customers or community organizations face consistent and recurring challenges related to contractual work in the delivery of the EE portfolio and, if so, how Ameren Illinois might address those challenges while ensuring transparency and alignment with its approved plan.
 - IQ South Advisory Committee report-out
- **Tuesday, December 9 (10:00 – 12:00)**
 - ComEd MDI Assessment Results
 - Additional topics TBD

SAG Network Lighting Controls Subcommittee

- **Wednesday, August 27 (10:00 – 11:30 am)**
 - Network Lighting Controls update from ComEd
 - Brief Network Lighting Controls update from Ameren Illinois

D. SAG Working Groups

There are three (3) SAG Working Groups in 2025, including:

- Market Transformation Savings Working Group
- Non-Energy Impacts Working Group
- Reporting Working Group

Market Transformation (MT) Savings Working Group

- **Tuesday, October 7 (10:00 – 12:00)**
 - Status update on Illinois utility MT initiatives
 - Ameren Illinois High Performance Windows update: Resource Innovations presentation on theory-based evaluation
 - Additional utility MT updates TBD

Non-Energy Impacts Working Group

- **Wednesday, November 5 (9:30 – 12:30)**
 - Ameren Illinois NEI Research: Accessibility Pilot (Opinion Dynamics)
 - ComEd NEI Research: Updates to NEI Participant Study methodologies (Guidehouse)
 - Explanation of updated COBRA model (Guidehouse)

Reporting Working Group

- **Wednesday, August 20 (10:00 – 11:30 am)**
 - Follow-up discussion to July Large Group SAG meeting, to finalize the semi-annual reporting policy to be proposed by Ameren Illinois

IV. Large Group SAG Topics for 2025

This section includes Large Group SAG topics anticipated to be scheduled in 2025. Meeting agendas will be finalized with presenters in advance of each meeting. Topics are scheduled at Large Group SAG meetings based on priority, as time and resources permit.

A. Energy Efficiency Portfolio Topics

1. Ameren Illinois proposed policy change to reporting timing (see Illinois EE Policy Manual Section 6.5, Program Administrator Quarterly Reports)
2. ComEd proposed residential New Construction income qualified eligibility guideline (See Illinois EE Policy Manual Section 4.3, Income Eligibility Verification Guidelines for Low Income Customers)
3. Utilities report-out on the progress of energy efficiency portfolios (Ameren Illinois and ComEd in July; Nicor Gas, Peoples Gas and North Shore Gas in November)
4. Ameren Illinois electrification update, including algorithms, models, and assumptions used to calculate bill impacts¹⁰
5. ComEd electrification update, including algorithms, models, and assumptions used to calculate bill impacts¹¹
6. Update on federal energy efficiency opportunities through the Inflation Reduction Act (IRA)

¹⁰ See IL EE Policy Manual Section 12.2, Electrification Bill Impacts: *At least once per year, electric utilities shall share algorithms, models, and assumptions used to calculate bill impacts, including how they are presented to Customers, with participants in the SAG. The electric utilities will present their approaches to interested SAG parties (leveraging existing meetings where possible), consider and discuss feedback, and provide responses.*

¹¹ Id.

7. Follow-up discussion on ComEd policy resolution for the 2025 program year regarding an attribution methodology for 2025, to apply to midstream energy efficiency programs in determining income eligible (“IE”) participation within midstream energy efficiency electrification (“EEE”) measures

B. Evaluation Topics

1. Opinion Dynamics presentation on 2025 study results for Ameren Illinois, which may include:
 - a. Heat pump incentive & program design study
 - b. IQ electrification targeting & barriers study
 - c. IQ credit & collections study
2. Guidehouse presentation on 2025 study results for ComEd, which may include:
 - a. Process evaluation of the Income Eligible Multifamily Program
 - b. Process evaluation of mapping assistance needs and targeting delivery of weatherization services
 - c. Impact and Process Evaluation of the pilot to connect customers with payment trouble to energy efficiency
3. Annual process to reach agreement on Net-to-Gross (NTG) values for the 2026 program year, with initial NTG value recommendations provided by independent evaluators; and
4. Annual meeting for evaluators to present draft evaluation plans for 2026

V. Large Group SAG Schedule

Table 3 below includes the proposed 2025 schedule for Large Group SAG meetings. Meetings of the SAG Steering Committee, SAG Subcommittees, and SAG Working Groups are not listed in the table below.

Final Large Group SAG meeting agendas will be circulated to participants approximately five (5) Business Days before each meeting. Meeting dates and the agenda topics listed in Table 3 are subject to change.

Table 3: Large Group SAG 2025 Schedule		
Date / Time	Agenda	Next Steps
Mon. May 12 Large Group SAG Meeting 10:00 – 11:30 am	<u>SAG Planning Meeting</u> SAG Facilitator presents final draft 2025 SAG Plan and schedule; request for comments. Request feedback on 2024 SAG Planning Process.	Final comments on the 2025 SAG Plan due by Wednesday, May 28 SAG Facilitator to finalize the 2025 SAG Plan and post on the website by Wednesday, June 4

Table 3: Large Group SAG 2025 Schedule		
Date / Time	Agenda	Next Steps
<p>Monday, June 9 Large Group SAG Meeting</p> <p>9:00 – 11:00 am Teleconference</p>	<p>Introduce IL-TRM policy issues for SAG review, including:</p> <ol style="list-style-type: none"> Review and potential update of stakeholder compromise on general service lamps: <ul style="list-style-type: none"> Residential screw-based LED lamps LED screw-based omnidirectional bulbs New measures involving renewable/solar generation <ul style="list-style-type: none"> Solar as Energy Efficiency Solar Air Heating Solar Water Heating Energy efficiency upgrades at a site with significant on-site generation Revisiting the Electric Vehicle as an efficiency measure issue <p>IL-TRM policy issues are summarized here: IL-TRM Policy Issues for SAG Review (5/20/25)</p>	<p>Comments on IL-TRM policy issues due by Monday, June 30</p> <p>A follow-up discussion will be held with interested participants on Wednesday, July 9 and Wednesday, July 23</p> <p>Goal is to resolve policy issue(s) before August 1 IL-TRM deliverable</p>
<p>Tues. July 22 (Day 1) Large Group SAG Meeting</p> <p>1:00 – 4:00 pm Teleconference</p> <p>Wed. July 23 (Day 2) Large Group SAG Meeting</p> <p>1:00 – 4:00 pm Teleconference</p>	<p><u>Quarterly SAG Meeting (Quarter 3)</u></p> <p>Utility report-outs on EE Portfolio progress:</p> <ul style="list-style-type: none"> Ameren Illinois Quarterly Report-out ComEd Quarterly Report-out <p>Proposed policy changes:</p> <ul style="list-style-type: none"> SAG Facilitator overview of process to address policy issues Ameren Illinois proposed reporting policy change ComEd proposed residential New Construction income qualified eligibility guideline <p>Leveraging the Inflation Reduction Act:</p> <ul style="list-style-type: none"> Home Energy Rebate Program Update from Illinois Environmental Protection Agency and DCEO 	<p>Comments on the Ameren Illinois reporting policy proposal due by Tuesday, August 12; follow-up discussion in Reporting Working Group on Wednesday, August 27</p> <p>Comments on the ComEd eligibility proposal due by Tuesday, August 12; schedule follow-up discussion, if needed</p>

Table 3: Large Group SAG 2025 Schedule		
Date / Time	Agenda	Next Steps
<p>September 2025 <i>Large Group SAG Meetings</i></p>	<p>NTG Recommendations*: Four Large Group SAG teleconference meetings will be held to discuss evaluator Net-to-Gross (NTG) recommendations for the 2026 program year.</p> <ul style="list-style-type: none"> • Meeting 1 – Wednesday, Sept. 3 (9:30 – 12:00): Evaluators present initial recommended NTG values for Illinois utilities. Discuss questions and follow-up. • Meeting 2 – Wednesday, Sept. 10 (10:00 – 12:00): Follow-up discussion on recommended NTG values. Discuss consensus on recommended values. • Meeting 3 – Wednesday, Sept. 17 (10:00 – 12:00): Follow-up discussion on recommended NTG values. Discuss consensus on recommended values. • Meeting 4 – Wednesday, Sept. 24 (10:00 – 12:00): Final meeting to discuss follow-up and consensus on recommend values. 	<p>NTG values for the program year beginning Jan. 1, 2026 must be finalized by independent evaluators by Oct. 1, 2025</p>
<p>Wed. Nov. 12 10:00 am – 4:00 pm</p> <p>In-person (Chicago) with teleconference option</p>	<p><u>Quarterly SAG Meeting (Quarter 4)</u></p> <ul style="list-style-type: none"> • Ameren Illinois Electrification Update <ul style="list-style-type: none"> ○ Electrification initiative results to date for 2025 ○ Bill impacts (per Policy Manual requirement) • ComEd Electrification Update <ul style="list-style-type: none"> ○ Electrification initiative results to date for 2025 ○ Bill impacts (per Policy Manual requirement) ○ ComEd and Guidehouse update on Income Eligible Electrification methodology for midstream programs • Nicor Gas Quarterly Report-out • Peoples Gas & North Shore Gas Quarterly Report-out • Guidehouse evaluation study updates for ComEd • Opinion Dynamics evaluation study updates for Ameren Illinois 	<p>Follow-up items will be circulated after the meeting</p>

Table 3: Large Group SAG 2025 Schedule		
Date / Time	Agenda	Next Steps
<p>Tues. Dec. 2 (Day 1) 9:30 am – 12:00 pm</p> <p>Wed. Dec. 3 (Day 2) 10:00 am – 12:00 pm</p>	<p>Draft EM&V Work Plans: SAG meets annually each December to discuss draft evaluation plans for the next program year.</p> <p>Day 1: Evaluators present an overview of draft 2026 evaluation plans for Ameren Illinois and ComEd EE programs</p> <p>Day 2: Evaluators present an overview of draft 2026 evaluation plans for Nicor Gas, Peoples Gas & North Shore Gas EE programs</p>	<p>Draft evaluation plans / EM&V work plans will be available for review and comment on or before December 15</p> <p>SAG Facilitator to post on the SAG website and circulate notice to SAG</p>