

# SAG Reporting Policy Changes Stakeholder Feedback

SAG Reporting Working Group  
September 8, 2025



# Reporting Policy Comments

## NRDC: Policy Manual Budget Shifts



*NRDC: NRDC is supportive of the Ameren-proposed redlines, except for the proposal to make it optional to report significant program budget shifts in just semi-annual narrative reports and not in quarterly template reports. Quarterly template reports include budgeted spending by program so any shifts in budgets should be reflected in those numbers. Under Policy Manual Section 6.5, item vii. b (Budget Shifts) should be included in the list of quarterly template report criteria.*



Ameren Response: Ameren proposes that Program Administrators report significant budget shifts, as defined under Policy Manual Section 6.1 Program Flexibility and Budgetary Shift Rules, in quarterly template reports, and that redlines in Section 6.1 providing the option to report in semi-annual narrative reports be removed.

For consistency with Section 6.1, Ameren proposes that under Policy Manual Section 6.5, item vii. b (Budget Shifts) be included in the list of quarterly template report criteria and not the list of semi-annual report criteria.



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# Reporting Policy Comments

## NRDC: Diverse Contracting Reporting Metrics



*NRDC: Given both (1) the comment from Ameren that electric utilities are required by statute to report on workforce equity at least quarterly and (2) the list of reporting items for contractors and subcontractors are all numbers (no narrative discussion), NRDC believes it would be appropriate for such information to be reported in Excel templates on a quarterly basis. NRDC suggests the same applies to trade ally diversity reporting.*



Ameren Response: Ameren proposes that all Program Administrators report Diverse Contracting Reporting Metrics in the quarterly template reports.

For supplier metrics, Ameren proposes (1) electric Program Administrators report quarterly and (2) gas Program Administrators report bi-annually in Q2 and Q4 reports, consistent with the frequencies agreed to by the Reporting Working Group.

For trade ally metrics, Ameren proposes no change to the annual reporting frequency agreed to by the Reporting Working Group, in Q2 reports for the previous year.



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## Community Investment Corp (CIC) and Peoples Gas & North Shore Gas (PGNS): Multi-Family Reporting Metrics



*CIC: CIC supports the proposed change to move from quarterly to semi-annual reporting but does not support the proposal to have independent evaluators complete the housing-type and size breakdowns instead of program administrators. Including this data in the semi-annual reports will ensure it remains consistently available, regardless of changes to each utility's Evaluation Plan or differences in reporting approaches between utilities.*

*PGNS: Peoples Gas and North Shore recommends that reporting be allowed to come from the Program Administrator or the Evaluator, in either the Annual Evaluation Reports or the semi-annual narrative reports.*



**Ameren Response:** Ameren proposes no change to the annual reporting frequency agreed to by the Reporting Working Group. Ameren proposes reporting by Program Administrators in Q2 semi-annual narrative reports for the previous program year (as agreed to by the Reporting Working Group) unless reported by Evaluators in Annual Evaluation Reports, to avoid duplicative reporting.



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# Reporting Policy Comments

## Commission Staff: Policy Manual Proceeding



*Staff: The proposal to reduce the reporting frequency for several subsections of Section 6.5 from quarterly to semi-annual directly conflicts with the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission's Final Order in Docket 23-0761. Under Policy Manual Version 3.0, all subsections of Section 6.5 are required to be reported on a quarterly basis, and there is no provision in the Final Order or the Policy Manual that approves a unilateral reduction in reporting frequency or selective reassignment of language to a semi-annual narrative.*

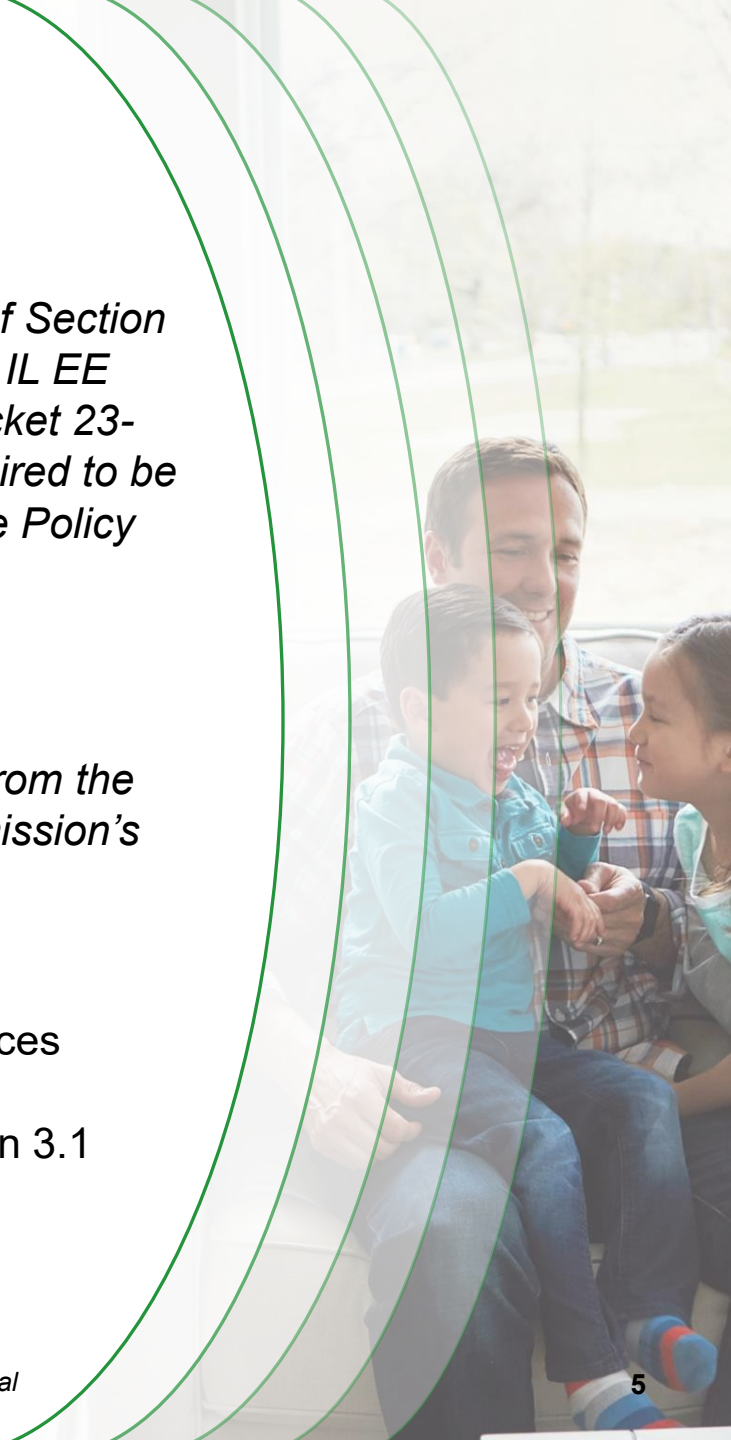
*Any reduction in the reporting frequency or reassignment of required reporting elements—including metrics—from quarterly to semi-annual directly diverges from the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission's Final Order in Docket 23-0761.*



Ameren proposes that Staff requests the Commission to initiate a proceeding to consider adoption of Policy Manual Version 3.1 to update Section 6 and references in other sections to reporting, as needed for consistency. Ameren proposes that changes to reporting metrics documents not be effective unless and until Version 3.1 is approved.



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## Policy Manual Proceeding



Ameren envisions the following schedule to adopt Policy Manual Version 3.1 which generally follows the cadence for adoption of Version 2.1 in 2022

SAG comments on redlines due	September 23
Staff report to the ICC (*)	October 7
Commission initiates proceeding	October 30
Staff testimony due	November 14
Response testimony due	December 1
Draft Order	December 15
Final Order	First ICC meeting in 2026

(\*) Draft available from Ameren using the report for Version 2.1 as a template



# Reporting Policy Proposal

## Next Steps

- Ameren to provide updated redlines of the Policy Manual and Reporting Metrics documents by September 9
- Redlines will be circulated with a request for written comments by September 23



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