

IL EE Stakeholder Advisory Group (SAG) Request for Comments on IL-TRM Policy Issue #2: Renewable / Solar Generation

Instructions:

- Using this template, send written comments on IL-TRM Policy Issue #2 to the SAG Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com by **Friday, July 11**.
- Include “TRM Policy Issue Feedback” in the subject line of the email.
- Following the July 11 written comment deadline:
 - All comments will be posted on the [SAG website](#), and circulated to SAG.
 - Next steps will be reviewed following the comment deadline, including whether a follow-up meeting is needed, or whether a non-consensus comparison exhibit should be prepared.
- Deadline Reminder:
 - The goal is to resolve IL-TRM policy issues before the August 1, 2025 IL-TRM deliverable.

Comments Submitted By:

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Policy Issue #2: New Measures Involving Renewable / Solar Generation

Policy Issue #2, Question 1: Does the statutory definition of “energy efficiency” allow a solar as energy efficiency measure (i.e. rooftop solar generation) in the Illinois TRM?

Thank you for the opportunity to comment on the IL-TRM Policy Issue #2: Renewable / Solar Generation. Community Investment Corporation (CIC), is a non-profit organization and Community Development Financial Institution (CDFI). We provide financing to preserve multifamily affordable rental housing in the Chicago area. CIC's primary market niche is locally-owned, unsubsidized, naturally occurring affordable housing stock (also known as NOAH) that constitutes the majority of affordable rental housing in Chicago and across the country.

The Preservation Compact, the public policy arm of CIC, develops policies and supports partners in preserving multifamily affordable housing. In collaboration with CIC, it plays a key role in shaping and implementing energy efficiency policies and programs, including the Energy Savers program launched in 2008. This initiative was designed to combat rising energy costs and promote energy efficiency in the multifamily housing sector—a sector historically overlooked in energy efficiency funding. Through a partnership with Elevate, a leading national nonprofit based in Chicago, CIC implemented energy-saving measures in more than 11,300 rental units. This effort resulted in \$23.3 million in loans and \$2.8 million in grants.

The Preservation Compact and CIC agree with stakeholders that rooftop solar generation, including solar photovoltaic (PV) systems, does not meet the statutory definition of energy efficiency. These statutes

define energy efficiency as measures that reduce the amount of electricity consumed. Rooftop solar changes the source of electricity, but it does not reduce the total electricity used, and therefore should not be included as an energy efficiency measure within the Technical Reference Manual (TRM).

Including solar PV in the TRM would divert limited funds away from whole-building energy efficiency programs. These programs are critical to reducing energy burdens for renters, improving building performance, and delivering community-wide benefits by lowering overall electricity consumption. The cheapest and greenest energy is the energy we don't use. The energy efficiency programs currently in the TRM help property owners reduce overall energy use, without regard to energy source.

Multifamily building owners, especially those serving lower-income renters, rely on these targeted energy efficiency resources. Current programs provide critical funding to implement practical, high-impact retrofits, like insulation, air sealing, and heating and cooling systems upgrades. These upgrades improve comfort, reduce utility costs, and extend the life of affordable housing stock. Expanding the TRM to include solar PV threatens to dilute these essential efforts and reduce the reach and impact of true energy efficiency programs.

Policy Issue #2, Question 2: Does the statutory definition of “energy efficiency” allow a solar thermal measure (i.e. solar hot water and solar air heaters) in the Illinois TRM?

The Preservation Compact and CIC maintain that solar thermal measures such as solar hot water and solar air heaters does meet the statutory definition of energy efficiency as outlined in 20 ILCS 3855/1-10 and 220 ILCS 5/8-104(b). Including solar-assisted heat pumps or other solar thermal systems in the TRM would expand consumer choice while staying rooted in efficiency. These technologies offer meaningful energy savings on their own and complement existing measures by making buildings more efficient overall. In short, solar thermal reduces energy use at the point of consumption and fits squarely within both the letter and intent of Illinois’ energy efficiency framework.

Background Information

See the statutory definition of “energy efficiency”- excerpted from Illinois Power Agency Act (20 ILCS 3855/1-10) and Public Utilities Act (220 ILCS 5/8-104(b)):

"Energy efficiency" means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use. "Energy efficiency" includes voltage optimization measures that optimize the voltage at points on the electric distribution voltage system and thereby reduce electricity consumption by electric customers' end use devices. "Energy efficiency" also includes measures that reduce the total Btus of electricity, natural gas, and other fuels needed to meet the end use or uses.

June 23 Large Group SAG meeting materials:

- [Facilitator Introduction to June 23 SAG Meeting](#)
- [ComEd Presentation](#)
- [Discussion Slides for June 23 SAG Meeting](#)

Additional SAG meeting materials related to the “Solar as EE” policy issue:

- [ComEd Presentation \(June 9 SAG meeting\): Solar as Energy Efficiency](#)
- [ComEd Follow-up: Solar as EE in Other States](#)
- [ComEd Follow-up: Position on the grouping of solar PV and solar thermal technologies/measures](#)
- [Solar as Energy Efficiency – Residential New Measure \(ComEd – updated following June 9 meeting\)](#)
- [Solar as Energy Efficiency – Commercial & Industrial New Measure \(ComEd – updated following June 9 meeting\)](#)
- Spreadsheets that support the solar as EE workpapers:
 - [EE Residential Solar](#)
 - [PV Watts ETDF Calculations](#)
 - [Simultaneous Adjustment Factor Analysis – Residential](#)

Additional IL-TRM workpaper related to renewable policy issue:

- [Residential Solar Water Heater New Measure \(Ameren Illinois\)](#)