

IL EE Stakeholder Advisory Group (SAG) Request for Comments on Inflation Reduction Act (IRA) Savings Attribution Proposal

Instructions:

- Using this template, send written comments to the SAG Facilitator, Celia Johnson:
Celia@CeliaJohnsonConsulting.com **by Wednesday, January 28, 2026.**
- Include “IRA Proposal Feedback” in the subject line of the email.
- All comments will be posted on the [SAG website](#), and circulated to SAG.

Background Information:

- During the [January 13, 2026 Large Group SAG meeting](#), Illinois utilities (Ameren Illinois, ComEd, Nicor Gas, Peoples Gas and North Shore Gas) jointly shared an IRA savings attribution proposal.
- Please review the following materials from the January 13 meeting:
 - [Illinois EPA Presentation: IRA Home Energy Rebate Program Update](#)
 - [Joint Utility Presentation: Inflation Reduction Act \(IRA\) Savings Attribution Discussion](#)
- A follow-up meeting is anticipated on **Friday, February 6 (9:30 – 11:00 am)** to discuss comments received.

Comments Submitted By:

Name: Emily Sims

Company or Organization: American Council for an Energy-Efficient Economy (ACEEE)

Company or Organization Website (if applicable): <https://www.aceee.org/>

Email: esims@aceee.org

Phone: 1-202-672-1389

Question 1: Please describe comments and /or questions on the joint utilities’ IRA savings attribution proposal, excerpted from slide 6 of the [January 13 presentation to SAG](#):

IRA Savings Attribution Proposal

- Replicating the existing approach and methodology used with IHWAP.
- A 50% cost contribution for eligible measures by funding utility or utilities (based on fuel type/savings) for full (100%) savings attribution to the funding utility or utilities for funded measures.
 - » Utility/utilities fund 50% of the total cost for eligible measures, as calculated by the CAA; includes material, labor and CAA administration and implementation fees.

Response:

Dear Ms. Johnson,

The American Council for an Energy-Efficient Economy (ACEEE) is a nonprofit research organization based in Washington, D.C. that for more than four decades has been a leader on energy efficiency policy and analysis. Its independent research advances investments, programs, and behaviors that use energy more effectively while helping to build an equitable and affordable clean energy future across all sectors of the economy.

ACEEE is grateful for the opportunities to participate in the Illinois Energy Efficiency Stakeholder Advisory Group (SAG) and for the opportunity to share comments in support of the Illinois joint utilities' IRA savings attribution proposal. ACEEE research¹ has identified utility partnerships as key to the success and effectiveness of IRA Home Energy Rebate programs. **ACEEE is supportive of the utilities' savings attribution proposal for a 50% cost contribution for eligible measures by funding utility or utilities (based on fuel type/savings) for full (100%) savings attribution to the funding utility or utilities for funded measures.**

Coordination of IRA and utility programs is a crucial strategy for maximizing energy efficiency benefits for households and businesses, particularly for low-income households. As illustrated by ACEEE, utility coordination can expand the reach of state programs, increasing the savings per project and number of households served². Additionally, the influx of federal funding can accelerate market transformation in the retrofit market, increasing product availability and bolstering workforce development³.

ACEEE recommends that regulators incentivize utility coordination with IRA funds by establishing proportional attribution of energy savings relative to utility involvement⁴. Savings attribution approaches that incentivize utility investment in braided programs create a necessary mechanism for coordinated implementation. Without regulatory approval for utilities to attribute savings, utilities do not have an incentive to coordinate with IRA program implementation. In determining the attribution methodology used for IHWAP funds (50% utility cost share with 100% savings attribution), the Illinois utilities and the ICC agreed that the utilities' funding contributions to IHWAP can be assumed to cover the full, incremental measure costs of utility-funded measures, as the IHWAP program administrative funds do not proportionally increase with the increase in utility program dollar contributions⁵. As the

¹ Amman, Jennifer. 2024. *Residential Retrofit Programs to Complement Federal Rebate Programs Series*. ACEEE. <https://www.aceee.org/topic-brief/2024/12/residential-retrofit-programs-complement-federal-rebate-programs-series-brief-1>.

² Amman, Jennifer. 2025. *Residential Retrofit Programs to Complement Federal Rebate Programs, Brief 2: Navigating Regulatory Mandates for Utility Program Investments*. ACEEE. <https://www.aceee.org/topic-brief/2025/02/residential-retrofit-programs-complement-federal-rebate-programs-brief-2>.

³ Amman, Jennifer. 2025. *Residential Retrofit Programs to Complement Federal Rebate Programs Series, Brief 3: Leveraging Federal Investments for Long Term Market Transformation*. ACEEE. <https://www.aceee.org/topic-brief/2025/04/residential-retrofit-programs-complement-federal-rebate-programs-series-brief-3>.

⁴ Kresowik, Mark. 2023. *Regulators Can Encourage Utilities to Help Implement New Home Energy Rebates*. ACEEE. <https://www.aceee.org/blog-post/2023/10/regulators-can-encourage-utilities-help-implement-new-home-energy-rebates>.

⁵ *Claiming Savings from Income Qualified Weatherization Programs Where Multiple Entities*

same rationale would apply to utilities' funding contributions to IRA program implementation, ACEEE supports the Illinois utilities' proposal to use the same attribution methodology as is used for IHWAP. Further, as DOE is not attributing energy savings from the Home Energy Rebate programs, there is no issue of double counting savings.

In establishing an attribution methodology for braiding of IRA and utility funds, ACEEE recommends the ICC require the utilities to enable data sharing, promote stakeholder engagement, simplify applications for access to IRA programs and incentives, and support community action agencies interested in growing capacity to deliver services to more customers.

- ACEEE research⁶ identifies data access as an important element for utility and state collaboration to support compliance with DOE requirements for Home Energy Rebates, to help program administrators identify customers that can benefit from energy upgrades, and to evaluate program implementation. Data transparency is essential for effective collaboration across implementing agencies, and the ICC should ensure access to utility data, with adequate privacy protections.
- The ICC can encourage utilities to include robust stakeholder engagement processes to incorporate feedback from program participants and other key stakeholders⁷ in the Home Energy Rebate programs. Stakeholder engagement processes can help utilities and state agencies prioritize addressing any stakeholder concerns, expanding reach of programs, and achieving equitable outcomes.
- The ICC can also direct utilities to use simplified applications for braiding IRA dollars with utility energy efficiency program fund and use of one-stop-shop approaches to reduce the number of transactions required for customers to access programs, both of which are identified as best practices by ACEEE research⁸.
- The ICC can encourage utilities to support community action agencies who are interested in growing their capacity to deliver IHWAP, Home Energy Rebates, and energy efficiency services to more customers.

ACEEE strongly supports the Illinois utilities' efforts to braid funds with IRA programs to maximize benefits to customers and encourages the ICC to enable utilities to provide a 50% cost contribution for full (100%) savings attribution to the funding utilities. We would like to emphasize ACEEE's willingness to offer technical assistance in support of Illinois' efforts to leverage joint IRA and utility funds. We look

Provide Funding Settlement Stipulation. https://www.ilsag.info/wp-content/uploads/SAG_files/Landing_Page/Executed_IHWAP_Stipulation_on_Savings_Attribution_2019-01-24.pdf.

⁶ Amman, Jennifer. 2024. *Residential Retrofit Programs to Complement Federal Rebate Programs Series, Brief 1: Program Design and Delivery.* ACEEE. <https://www.aceee.org/topic-brief/2024/12/residential-retrofit-programs-complement-federal-rebate-programs-series-brief-1>.

⁷ Ibid.

⁸ Amman, Jennifer. 2025. *Residential Retrofit Programs to Complement Federal Rebate Programs Series, Brief 3: Leveraging Federal Investments for Long Term Market Transformation.* ACEEE. <https://www.aceee.org/topic-brief/2025/04/residential-retrofit-programs-complement-federal-rebate-programs-series-brief-3>.

forward to promoting your achievements in this area and also stand ready to assist with planning for continuity of energy upgrade efforts beyond the IRA funding period. Thank you for this comment opportunity.

Sincerely,

A handwritten signature in black ink that reads "Emily J. Sims". The signature is written in a cursive, flowing style.

Emily Sims, Senior Policy Associate, State & Utility, ACEEE