

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:

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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:

NRDC supports the Illinois utilities' joint IRA savings attribution proposal, underscored by the Department of Commerce and Economic Opportunity (DCEO).

First, we find that utility partnership in delivering IRA incentive programs will be key to the success of program delivery and intended energy and utility bill savings.

Second, the proposal is consistent with the existing attribution methodology used for IHWAP-braiding under DCEO. Since the IRA funding will be administered through DCEO, delivered by Community Action Agencies (CAAs), and likely co-mingled with IHWAP funds, it seems problematic to have different attribution frameworks for parallel utility braiding efforts.

We look forward to thinking through program design elements of braiding IRA dollars with utility EE programming to ensure the delivery is as seamless as possible for CAAs as well as program participants. Topics include, but are not limited to, the simplicity of participant applications, a reasonable level of data requirements for program managers, etc.