



The National Consumer Law Center (“NCLC”), the Community and Economic Development Association of Cook County (“CEDA”) and Urban Efficiency Group (together here as “Weatherization Equity Advocates” or “WEA”) appreciate the opportunity to file written comments related to the September 18, 2025 Stakeholder Advisory Group (“SAG”) Equity Subcommittee meeting, and the Northern Illinois Joint Utilities’ Home Energy Savings (“HES”) 2026 Retrofits Prioritization Plan. These comments are presented with two goals in mind:

1) the adoption of best practices that are centered on lowering energy burdens and improving the health, safety and comfort of the homes of financially struggling customers of Commonwealth Edison, Nicor Gas and Peoples Gas/North Shore Gas companies through the utility-sponsored, income-qualified (“IQ”) weatherization program; and

2) encouraging robust communication and consultation among the utilities, implementers, subcontractors and stakeholders within the utility-sponsored income-qualified weatherization programs to ensure equitable contracting practices that provide opportunities for Illinois-based weatherization professionals and remedy perceived deficiencies in the HES program.

Additionally, these comments emphasize the U.S. Department of Energy (“DOE”) Weatherization Assistance Program (“WAP”) and Illinois Home Weatherization Assistance Program’s (“IHWAP”) recognition of the social determinants of health, ensuring that weatherization services not only lower utility bills but also address health outcomes, housing stability, and energy resilience. To that end, attached is a Summary Matrix that seeks to align the program with DOE WAP & IHWAP Objectives, and incorporate best practices recommendations.

As discussed in the September 18th Equity Subcommittee meeting, Weatherization Equity Advocates have both specific and general recommendations to make regarding HES practices and protocols. Specific recommendations were also provided in the WEA PowerPoint presented at the meeting, which is attached as an Appendix to these Comments.

The HES program should not be focused on achieving utility annual savings goals.

DOE WAP and IHWAP best practices recommend balancing energy savings with improved resilience against climate extremes, prioritizing investments that reduce long-term energy burdens while safeguarding occupant health and safety.

The utility’s search for savings goals achievement should exclude a focus on the IQ weatherization programs—both the braided and HES programs. The mission of weatherization is to ensure lower energy burdens and improve the health and safety of the customer’s home in a holistic manner—not to be a source for cherry-picked savings opportunities. The General Assembly recognized this fact in the energy efficiency statutes, as did the Illinois Commerce Commission in case rulings when they declared that IQ programs need not be “cost-effective” per se, as defined in statute. *See, e.g.,* 220 ILCS 8-103B(f)(5). This includes remaining flexible on health and safety spending per home encountered within the confines of the overall health and safety budget. In short, all available opportunities for the installation of energy efficiency measures and necessary health and safety investments, within IHWAP guidelines, should be embraced as part of the HES program. Currently, the budget for IQ weatherization services within the utility-sponsored programs is insufficient to meet the vast and growing need across Illinois. This shortfall poses a serious threat to the very households these programs are intended to serve, while simultaneously diminishing contracting opportunities for the existing contractor network. The resulting workforce reductions undermine the intent and impact of the Market Development Initiatives (“MDI”), which were established to expand and strengthen Illinois’ clean energy workforce.

Given this reality, we encourage the utilities to advocate in current SB 40 negotiations for a higher percentage of EE budgets being dedicated to IQ zero-cost weatherization programs, and removal of those budgets from the energy savings calculation requirements to better ensure best practices in the delivery of these programs.

Customers who qualify for the Illinois Home Weatherization Assistance Program (“IHWAP”) should be given a choice of which program, IHWAP or HES, best serves their needs.

Best practices include presenting program choices within the broader framework of social determinants of health, acknowledging that access to efficient, safe housing directly impacts health, financial stability, and community resilience.

It is WEA’s understanding that efforts are made by the utilities to channel customers who qualify for IHWAP (income at or below 200% of FPL) into that program automatically at various times of the year, depending on the existing HES budget remaining. Customers should be provided detailed charts that identify the difference in measures and health and safety investments between each program so that the customer can make an informed decision as to which program best serves their needs. Estimated wait periods for services should accompany that information.

The utilities should reach out to, and work with, community representatives to ensure equitable home restoration due to extreme weather.

During the September 18, 2025 SAG Equity Subcommittee meeting, Cheryl Watson raised the point that many communities within Chicago are experiencing rehab and repair issues due to extreme weather and flooding. Communication with communities by the utilities to ensure that Federal Emergency Management Agency (“FEMA”) assistance is directed to addressing

home infrastructure barriers to future weatherization opportunities should begin and continue. In alignment with DOE WAP guidance on resilience and equity, best practices encourage utilities to integrate extreme weather preparedness and energy resiliency planning into community engagement, ensuring vulnerable populations are prioritized.

Initial Assessments in the HES program to determine eligibility of homes is deficient.

Best practices also require assessments to capture indicators of social determinants of health—such as indoor air quality, safety hazards, and energy insecurity—to design interventions that holistically improve family well-being.

Contractors working in the HES program report repeated instances of arriving at customer homes that have been referred for weatherization services only to find that the home either did not qualify or that opportunities for measure installation have been overlooked. Professionals performing assessments or walk-throughs that directly impact program participation, scope of work development or installation of energy efficiency measures should hold necessary industry-respected credentials. In that regard, the initial walk-through should be held by the contractor and not a third party. This will reduce the number of visits to the customer’s home, reduce the fallout percentage (currently averaging 60% as reported by some contractors) of projects advanced for weatherization, and provide a better savings value for both the utility and ratepayers. The utilities should revisit this contract and protocol and allow BPI-certified entities to make the initial assessment and minimize the number of visits to the customer’s home.

WEA have several recommendations to improve the protocols and requirements that impact which measures are installed in a home.

WEA reviewed the protocols provided by the utilities and made several recommendations on eliminating missed opportunities to employ best energy efficiency weatherization practices in the program. See the attached PowerPoint presentation for those details.

Illinois should create an Open Access Data Portal.

Various vendors have created their own data portals at significant cost, ultimately picked up by ratepayers. These portals are inconsistent among vendors. This creates inefficiencies in the delivery of the programs, as well as placing Illinois-based implementers at a significant disadvantage when it comes to bidding on program implementation contracts. In short, use of “proprietary” portals is both inefficient and provides glaring advantages in winning Tier 1 or Tier 2 contracts with the utilities for certain vendors. To remedy this problem, Illinois utilities should create and use an Open Access Data Portal that “lives” with the utility. To further advance best practices, such a portal should include anonymized data tracking energy burden, health and safety outcomes, and resiliency measures to guide continuous improvement of program delivery.

Illinois utilities repeatedly use out-of-state contractors to implement their ratepayer-funded EE programs.

While the Clean Energy Jobs Act (“CEJA”) does not mandate that energy efficiency projects must use Illinois-based firms, its funding, incubator, and training programs are designed to build and sustain local Illinois businesses so that public clean energy investments directly benefit Illinois communities. The opportunities provided to firms outside of Illinois to procure contracts while ignoring local talent that possess the knowledge, skills, and weatherization capabilities is misaligned with CEJA goals. WEA recommend that the Utilities provide procurement opportunities to local contractors through an equitable procurement process, giving preference to Illinois-based firms. If local talent is unable to be sourced, then expand the opportunity to non-Illinois-based firms.

Summary Matrix: Alignment with DOE WAP & IHWAP Objectives

Section	DOE WAP / IHWAP Objective	Best Practice Recommendation
Introduction & Framing	Emphasize reduction of energy costs, energy equity, health, and safety for low-income households.	Explicitly integrate social determinants of health and equity as guiding frameworks.
Utility Savings Goals vs. Mission	Balance energy efficiency savings with occupant health, safety, and energy burden reduction.	Prioritize holistic interventions and resilience over utility-only savings metrics.
Customer Choice Between IHWAP and HES	Ensure informed client consent and transparency in program options.	Provide side-by-side program comparisons, wait times, and implications for health and financial stability.
Equitable Home Restoration & Extreme Weather	Support resilience against climate extremes and address structural barriers.	Engage FEMA and community groups to integrate resiliency planning and prioritize vulnerable populations.
Initial Assessments	Require certified professionals and DOE-approved tools; capture whole-home needs.	Include health, safety, and social determinants data in assessments to design holistic interventions.
Protocols & Missed Opportunities	Implement DOE-approved measure lists and state flexibility for comprehensive treatment.	Review and update protocols to ensure no missed opportunities in addressing energy burden and resiliency.
Open Access Data Portal	Maintain program integrity, transparency, and accountability.	Track outcomes beyond energy savings, including health, safety, and resiliency metrics.
Use of Out-of-State Contractors	Build and sustain local contractor capacity and workforce development.	Prioritize Illinois-based firms and culturally competent services to advance health equity and resiliency.

APPENDIX

NCLC/CEDA/Urban Efficiency Group Presentation for September 18, 2025 SAG Equity Subcommittee Meeting

Response to Northern Illinois Utility Income-Qualified Weatherization Protocols