

## **Submitter Contact Information**

Name: Illinois Energy Efficiency for All\* (IL EEFA)

Website: [www.energyefficiencyforall.org/states/illinois/](http://www.energyefficiencyforall.org/states/illinois/) - (involved organizations and contact info listed on the website)

*\*Note that the below feedback is not submitted by every individual IL EEFA partner, but based on conversations/priorities of IL EEFA*

### Feedback Topic Areas

Income Qualified / Income Eligible Programs

### ***Overarching Income Qualified Feedback:***

1. For which utility will you be sharing feedback (Ameren Illinois, ComEd, Nicor Gas, Peoples Gas & North Shore Gas, or all Illinois utilities)?

All utilities\*

*\*These are just initial reactions, and not full feedback from these organizations.*

2. Briefly describe the feedback.

- **Need to address immediate crisis needs - COVID implications, shutoffs, energy affordability issues, and energy assistance needs in coordination with energy efficiency**
  - **Difficult to be talking to the utility and talking about EE when people are being disconnected right now in the middle of a pandemic.** Even though LIHEAP customers are supposed to be under the voluntary moratorium - people are still being shut-off.
  - BIPOC (Black, Indigenous, People of Color) and under-resourced communities in Illinois have extremely high energy burdens, which are only being exacerbated due to COVID-19.
  - EE is often low on the priority list (or not even on the radar) for those experiencing energy access and affordability issues. Need to connect EE and immediate assistance.
  - Need to ensure EE programs are known and relevant to BIPOC and under-resourced communities - so they can access programs but also so community members and groups can help to directly shape future programs via the SAG/IQ meetings or other mechanisms.

- ComEd mentioned working on a connection between EE and energy assistance. What are other utilities doing to connect assistance/credit and collections and EE?
  - If utility affordability is a key part and priority of IQ EE programs, then energy assistance and consumer protections need to be a part of EE conversations and co-delivered solutions
- **Energy Affordability targeting and reporting**
  - Need to figure out ways to report and measure energy and utility affordability
  - ComEd proposed helping customers ensure that they are seeing actual sustainable savings on their bills and beginning to track customer bill impacts.
    - Are other utilities considering a similar approach for their portfolio? We recommend all utilities consider tracking the impacts of their programs on bills and energy affordability overall.
- **Connections to low-income solar**
  - Low-income solar programs are another option for helping Illinois BIPOC and under-resourced communities with energy affordability. Some options for better low-income solar and IQ EE co-delivery and coordination:
    - Referrals between IQ EE programs and Solar for All
      - Would be a two-way street - Solar for All referring to IQ EE programs and vice versa
    - Adding a few solar feasibility questions to an energy audit
    - R&D pilot with IL's low-income solar program - Solar for All
- **Equity hiring/workforce development**
  - Glad to see interest in this within utility presentations - but more detail and next steps need to be worked out.
  - At a minimum there should be a SAG/IQ workgroup started on this topic to share best practices and actionable next steps

*We would like to leave room for additional Input/discussion from other SAG/IQ members on any of the above topics during Nov 16 meeting.*

### **Feedback on Income Qualified / Income Eligible Programs**

1. For which utility will you be sharing feedback (Ameren Illinois, ComEd, Nicor Gas, Peoples Gas & North Shore Gas, or all Illinois utilities)?

All utilities and individual utility feedback\*

*\*These are just initial reactions, and not full feedback from these organizations.*

2. Do you have feedback to share for multi-family or single-family initiatives (or both)?

IQ multi-family

### 3. Briefly describe the feedback.

#### ● **All utilities**

- **Ensure robust IQ MF budgets**
  - Better understanding of IQ SF vs IQ MF program budgets by utility, and rationale behind division.
  - Are there projected units/buildings served yet within these budgets?
    - Would like a better understanding the portion of properties in the service territory that would be served by proposed budgets
  - Would like a comparison between this plan's budget and last plan's budget
- **True One Stop Shop**
  - Are all utilities doing a one-stop shop for their IQ MF programs?
  - What does this mean to each utility?
  - We would like to ensure we have a shared definition. One-stop shop is not just about marketing and communications of a program, but also about whole building work, a robust suite of measures, and generous incentives.
- **Correct placement in IQ MF vs. market-rate**
  - Should ensure that customers are routed to the correct program
  - Concern about IQ buildings going through market-rate MF programs
- **Co-Delivery**
  - Are programs being delivered jointly - gas and electric
  - More details needed about where this is happening, not happening, and if it's not - how to improve co-delivery or at least coordination
- **2-3 flats**
  - Clarity on unit size and ownership requirements for SF vs. MF (where do 2-3 flats land?)
    - Are there ways to make these definitions consistent across utility territories
- **Health and safety**
  - Little mention of health and safety issues being addressed through utility and/or leveraged funds.
    - Except for healthy homes listed under Nicor. Would like more detail on this proposal too.
  - This has been raised as a need at IQ meetings and in the EE ideas proposals.
  - How are the utilities addressing H&S barriers in both IQ SF and MF? This is a priority for IL EEFA partners.
- **Reporting**
  - Would like to better understand reporting and data collection for IQ and IQ MF programs
  - Utilities should report unique program progress for IQ MF, in addition to and separate from IQ overall.

- For all relevant reporting categories, budget, spending, savings, participation, etc.
  - **CBO/CAA engagement and leadership**
    - Community-based organizations and community action agencies in black, brown, and under-resourced communities should be directly engaged in and directly influencing programs. CBOs and CAAs are critical trusted messengers within their communities, and also know what solutions are best for their communities. CBOs/CAAs should be a key part of all IQ EE and EE design, implementation, and can help communities to access and utilize program offerings.
    - Community groups should be in leadership roles in the IQ committees and SAG, and their perspectives should be required in planning, agenda-setting, and EE decision-making.
    - For IQ MF programs - also key to engage local housing groups - including affordable housing advocates, developers, agencies, and housing justice/renter advocacy groups
    - What plans do utilities have to engage the above-mentioned groups? In delivering programs, accessing programs, but also influencing the design of programs.
- **Ameren:**
  - **True One-Stop Shop Approach**
    - Glad to see Ameren's commitment to this approach.
    - Want to ensure this definition is aligned with best practices presented in SAG/IQ EE ideas meetings
  - **IQ MF Robust Incentives, Spend, and Savings**
    - Need a better understanding of why IQ MF savings level are so low, and if the program is really doing deep retrofit work
    - What measures are included, and where are incentive levels at?
    - NRDC recommended a ramp up to \$6-\$8 M/year on IQ MF, so while we're glad to see a doubling of IQ MF spend to around \$2M on the electric side - more budget is still needed to make a deep investment in IQ MF properties in order to truly fulfill the intent of the one-stop shop design
  - **MF IHWAP**
    - Given there is a concentration of IQ MF in Peoria, Springfield, and Champaign, we recommend exploring opportunities and interest in those areas for IQ MF braided IHWAP programs.
    - Need to better understand barriers - and see how Ameren could support and ensure MF IHWAP is an option in at least relevant parts of Ameren's territory
  - **Co-delivery**

- Would like more detail on what electric-gas co-delivery is happening or planned in overlapping territory with Nicor.
- **ComEd:**
  - **More detail/clarity needed on IQ targeting**
    - IL EEFA partners would like more detail and clarity on ComEd's lowest income targeting proposal - part of the new proposed design and targeting approach for IQ. Is this truly targeting? Or is it going to change eligibility?
    - We agree with the intent to ensure that the lowest income residents in ComEd's territory are participating in IQ EE programs, but ComEd should keep the eligibility open and flexible.
    - We want to ensure the recently agreed IQ MF eligibility verification requirements agreed upon in the policy manual will still be in place.
    - There are important IQ MF specific factors that need to be considered - and we would like to ensure this new proposed approach does not make things overly restrictive. Especially because there are many unsubsidized/naturally occurring affordable housing buildings in ComEd's territory.
    - We would be happy to be a part of further design on a targeting approach, and mainly want to ensure eligibility criteria is not changing for IQ MF.
  - **More Detail Needed on Shifting Res EE to IQ**
    - In the new proposed design and targeting, there was also a bucket of proposed work described titled "Shift current Residential EE offerings to Income Eligible customers".
      - We would also like clarity on how this would work for IQ MF.
      - Is this market-rate MF dollars going to IQ MF? And what would trigger this? If IQ MF funds get depleted? Or something else?
  - **Market-rate vs. IQ MF**
    - We would like to ensure MF buildings/tenants get flagged properly for the IQ MF programs – rather than market-rate MF, so they can access the deep incentives needed for IQ MF work.
  - **Health & Safety**
    - Is ComEd planning to continue their IQ H&S funding/measures within the IQ MF channel? And are there plans to expand this at all? We would like to see this continue.
  - **Connections between assistance & EE**
    - We are happy to see ComEd acknowledge the need to better connect EE and assistance/credit and collection.
      - Does ComEd have any more detail on this approach? Or how they plan to work out the details?

- We want to ensure IQ MF is included, and that the proper program design is put in place for both IQ SF and MF residents to have immediate assistance help and long-term EE support.
    - This type of work is also going to require robust data collection and reporting to truly understand the effect on energy affordability overall.
    - IL EEFA partners would be happy to be a part of future design of this critical approach
  - **Co-delivery**
    - Want to better understand co-delivery with PG/NSG and Nicor on IQ programs - where is joint electric-gas delivery happening and where are there gaps? What are the barriers to co-delivery?
  - **IQ budget overall & IQ SF vs. IQ MF budget**
    - Pleased to see ComEd's continued commitment to IQ spending, and considerable proposed increase
    - Want to better understand the IQ SF vs IQ MF breakdown. As of now, it looks like 55% of IQ spend is going to IQ SF, and 45% to IQ MF. But at a previous IQ presentation, we heard ComEd say it was shifting to more IQ \$ to IQ MF, to better reflect ComEd's service territory. Is that still the case?
- **Nicor:**
  - **IQ MF funding**
    - Clarity on funding levels for IQ MF
      - NRDC proposal included at least 30% of IQ funding go to IQ MF (also consistent with 2018-2021 plan stipulation)
    - How does the budget compare to the current portfolio's budget? If there are overall increases in EE and IQ EE budget, we would also like to see increases in IQ MF EE budget as well.
  - **IQ MF program design**
    - Would like more detail on program design for IQ MF.
  - **Healthy Homes**
    - Happy to see this mention of healthy homes work in Nicor's proposed IQ programs.
      - Would like to see more detail on this proposal, and to ensure IQ MF is included.
  - **Co-delivery**
    - Want to better understand co-delivery on IQ MF programs with ComEd and Ameren.
- **PG/NSG:**
  - **Clarity on funding levels for IQ MF**

- NRDC proposal included at least 40% of IQ funding go to IQ MF (also consistent with 2018-2021 plan stipulation)
  - How does the budget compare to the current portfolio's budget? If there are overall increases in EE and IQ EE budget, we would also like to see increases in IQ MF EE budget.
- **Program Design**
  - Would like more detail on program design for IQ MF
- **Co-delivery**
  - Want to better understand co-delivery on IQ MF programs with ComEd.

*Would like to leave room for additional Input/discussion from other SAG/IQ members on any of the above feedback during Nov 16 meeting.*

#### 4. Background/rationale

*About IL EEFA:*

Illinois Energy Efficiency for All (IL EEFA) focuses on increasing access to energy efficiency and solar in the affordable multifamily housing sector. We do this work so people in under-invested communities – particularly Black, Indigenous, People of Color (BIPOC) communities – who have been marginalized can equitably benefit from the health, economic, and environmental advantages of energy and water efficiency and renewable energy. Our work primarily helps communities and families that spend upward of 20 percent of their income on energy, a burden that is unsustainable for these communities and generally missing from our energy policy conversation. Reducing energy use in affordable multifamily housing will improve the quality of life for Illinois residents, preserve affordable housing, reduce the energy burden on those who feel it the hardest, and cut carbon pollution.

*Why affordable multifamily:*

Energy efficiency programs need to include specific, tailored strategies for affordable multifamily housing. Due to existing barriers and undersized programs, low-income multifamily buildings are typically underserved by existing energy efficiency programs. Energy efficiency measures are far less likely to be installed in multifamily rentals than in any other type of housing. Multifamily units occupied by low-income renters had 4.1 fewer energy efficiency features in 2005 and 4.7 fewer in 2009 compared with other households (Pivo, 2014). This translates to significant unrealized low-income multifamily energy savings. A 2016 report by Energy Efficiency for All and the American Council for an Energy Efficient Economy also found that low-income multifamily households “faced the highest average energy burdens in the Southeast and Midwest regions” compared to other regions. Energy efficiency improvements in multifamily homes can reduce energy-related expenses, cut energy waste, and protect the health of residents.