

IL EE Stakeholder Advisory Group (SAG) Request for Comments on IL-TRM Policy Issues

Comments Submitted By:

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Policy Issue #1: Review Stakeholder Compromise on General Service Lamps

Policy Issue #1, Question 1: Ameren Illinois proposed to align IL-TRM Version 14.0 with Ameren's 2026-2029 EE Plan stipulation, to continue to offer lighting via direct install in the Income Qualified (IQ) Single Family and Multifamily channels. Do you have comments or feedback on this Ameren Illinois proposal? Please explain.

See excerpt from Ameren Illinois 2026-2029 EE Plan stipulation (page 9):

- *As reflected in the batch files, Ameren Illinois will continue to offer lighting via direct install in its IQ Single-Family and Multifamily channels. Direct install of General Purpose Lighting (GPL) will only occur in instances where non-LED lighting currently exists in a customer's home or multifamily building and with such inefficient lamps being recycled or otherwise disposed of by the program. The Parties agree to support Ameren Illinois in its efforts to modify the Technical Reference Manual Version v14, to allow continued direct install of lighting in IQ Single-Family and Multifamily properties.*

IL OAG Comments: IL OAG supports this proposal, as we support the direct installation of LEDs.

Policy Issue #1, Question 2: ComEd proposed to extend eligibility in IL-TRM Version 14.0 for General Service Lamp (GSL) offerings to income qualified customers through 2029, including:

1. EE kits
2. Retail programs

Do you have comments or feedback on the ComEd proposal? Please explain.

IL OAG Comments: IL OAG opposes the extension of eligibility for GSL offerings to income qualified customers through 2029 through any offerings other than direct installation. Given the change in standards that will eliminate market options whose consumption is higher than LED lighting, the timeframe when these upgrades can have an impact depends upon immediate implementation. Further, as noted in the recent PJM stakeholder process resulting in EE being removed as a capacity resource for the PJM base residual auction, EE measures achieved through offerings other than direct

installation raise concerns about causation and whether those savings are achieved.¹ Put another way, utilities should not be able to claim savings, and consequently incentive bonuses, for EE measures that may not be implemented by the end user. Further, GSL offerings are different from savings claimed by the utilities from other non-direct install measures because of federal standards.

Policy Issue #1, Question 3: During the June 9 SAG meeting, several stakeholders suggested ComEd consider using the same approach as Ameren Illinois, offering lighting via direct install in the Income Qualified (IQ) Single Family and Multifamily channels. Do you have comments or feedback on this proposed approach? Please explain.

IL OAG Comments: IL OAG supports the extension of eligibility for GSL offerings to income qualified customers through 2029, as we support the direct installation of LEDs.

Policy Issue #1, Question 4: Should the measure lifetime for LED bulbs continue to be eight (8) years in IL-TRM Version 14.0? Please explain.

Background information for policy issue #1:

- [IL-TRM Administrator Presentation: Overview of Policy Issues](#) – see slides 4-5
- [ComEd Presentation: EISA Exemption for General Service Lamps](#)
- See [IL-TRM Version 13.0](#) LED measures, including:
 - 5.5.6 LED Specialty Lamps
 - 5.5.8 LED Screw Based Omnidirectional Bulbs
 - 5.5.9 LED Fixtures

IL OAG Comments: IL OAG has no position on Question 4 for Policy Issue #1.

Policy Issue #3: Energy Efficiency Upgrades at a Site with Significant On-Site Generation

Policy Issue #3, Question 1: If a utility energy efficiency program implements a measure in a building that has on-site renewable energy supply, can the program claim energy efficiency savings from that measure? Please explain.

Background information for policy issue #3:

- [IL-TRM Administrator Presentation: Overview of Policy Issues](#) – see slide 8
- [Guidehouse Memo: Energy Efficiency Measures in Net Zero Buildings \(June 3, 2025\)](#)

IL OAG Comments: IL OAG respectfully requests that the comment deadline for Policy Issue #3, Questions 1 and 2, be extended until after the July 24 meeting. During the previously held SAG meeting on June 9, 2025 for the discussion of the pending policy issues for the TRM, there was not an extensive

¹ See generally Monitoring Analytics, *IMM EE Package Proposal*, (July 10, 2024), https://www.monitoringanalytics.com/reports/Presentations/2024/IMM_MIC_EE_Package_Proposal_20240710.pdf.

or meaningful discussion of this issue. Additionally, IL OAG sees the issue of savings evaluation for a building with on-site renewable energy supply as tied to Policy Issue #4, Solar as an EE Resource, which has a comment deadline of July 11. Because this policy issue is significant and emergent, has not been discussed in detail by the SAG, and is tied to Policy Issue #4, IL OAG respectfully requests an extension of the comment period until after additional discussion occurs on July 24.

Additional IL OAG Comments: Subject to and without waiving the response to Policy Issue #3, Question 1, IL OAG respectfully submits the following questions regarding this policy issue:

- 1.) How do other states evaluate efficiency savings at sites with on-site behind-the-meter renewable generation?
- 2.) Referring to Guidehouse’s memo re: Energy Efficiency Measures in Net Zero Buildings dated June 3, 2025, provide statutory support for the “Arguments” on page 2.
- 3.) If behind-the-meter on-site renewable generation expands because of utility intervention, how do we ensure this does not lead to an increased infrastructure investment expenses because of variable or increased load (assuming these projects do not have battery components)?
- 4.) Clarify whether these questions exclusively apply to on-site, behind-the-meter, renewable projects, or whether they would apply to all on-site, behind-the-meter, generation projects (e.g. gas generation)?

Policy Issue #3, Question 2: If a utility claims savings from an energy efficiency measure in a building that has on-site renewable energy supply, should there be any limits to those savings? Please explain.

IL OAG Comments: Please see the answer for Policy Issue #3, Question 1.

Policy Issue #4: Revisiting the electric vehicle as an efficiency measure issue

Policy Issue #4, Question 1: Can electric utilities claim energy efficiency savings for incentives used to encourage customers to purchase a more efficient Electric Vehicle over a standard baseline Electric Vehicle within separate vehicle classes? Please explain.

Background information for policy issue #4:

- [IL-TRM Administrator Presentation: Overview of Policy Issues](#) – see slides 9-16
- [Ameren Illinois Presentation: New Measure - Light Duty Electric Vehicles](#)
- [Light Duty Electric Vehicle New Measure \(Ameren Illinois\)](#)
- Additional Reference Provided: [ACEEE White Paper: Electric Vehicle Efficiency: Unlocking Consumer Savings and Environmental Gains \(August 2024\)](#)

IL OAG Comments: IL OAG opposes electric utilities claiming energy efficiency savings for incentives used to encourage customers to purchase more efficient Electric Vehicle (“EV”) over a standard baseline EV

within separate vehicle classes. IL OAG has previously opposed this Policy Issue² and continues to oppose its inclusion in the Illinois EE program.

First, the Beneficial Electrification (“BE”) provision of CEJA already provides a mechanism for the promotion of efficient EVs and cost recovery.³ We continue to assert that the BE provision of CEJA is the appropriate place to encourage the adoption of efficient EVs. This is especially important given the budget limitations of the EE program and the statutory prioritization of EE investment in income-qualified communities, which are also unlikely to benefit from incentives for the claimed savings for more efficient EVs.

Second, we have concerns about free ridership in the incentivization of more efficient EV purchase. Given the costs of EVs, and customers’ typical priorities for choosing new cars (e.g. size, style, make or brand, warranty, safety), it is unlikely that a customer would choose a different EV than their preferred make and model to secure a rebate that is likely to be insignificant relative to the total cost of the EV. While a more significant rebate amount could influence this decision and minimize free ridership, given total EE budget limitations and cost-effectiveness mandates, which include specific spending prioritization, we do not think the net-to-gross process is sufficient to address these concerns.

² See Comments from the Office of the Illinois Attorney General and National Consumer Law Center Responding to Ameren and ComEd Proposals, June 26, 2024, https://www.ilsag.info/wp-content/uploads/IL-AG-and-NCLC-Comments-on-Ameren-and-ComEd-Proposals_June-2024.pdf.

³ See 20 ILCS 627/45. While much of the mandate is for promotion of charger installations and adoption of time of use approaches, Section 45 also enables rebates directly to customers for EVs.