**Income Qualified Multi-Family Reporting Principles**

**Proposed Metrics – for December 19, 2023 SAG Reporting Working Group Meeting**

The text ***in italics*** below is the final Policy Manual Version 3.0 language. The text **in red** below represents draft proposed reporting metrics prepared by several stakeholders. The comments **in blue** below is from utilities (Ameren Illinois, ComEd, Nicor Gas, Peoples Gas and North Shore Gas)

*Each Program Administrator will report on the effectiveness of its efforts to deliver efficiency improvements to the income qualified multi-family housing sector. In addition to standard Program reporting on spending and savings, Program Administrators will report on a statewide set of metrics designed to provide insight into a variety of other Program and policy objectives including:*

1. *The mix of buildings being treated. This could include breakdowns between public housing, subsidized housing and unsubsidized housing; the type/size of buildings.*

**Timing:** Quarterly

**Reporting Location:** Quarterly reports. The Quarterly reports will include the spreadsheet populated with data. Within a given program year the data will reflect cumulative year-to-date data in each quarterly report.

**Metrics:** See spreadsheet. Reporting includes the number of projects, buildings and units participating in IQ multi-family EE programs in the following building categories:

* Public housing (meaning housing where the government owns or rents an apartment)
* Subsidized housing (meaning state or federal assisted housing, such as the low income housing tax credit properties, project based vouchers, etc.)
* Unsubsidized housing (meaning IQ multifamily housing that is neither public nor has project-based subsidies, this category may include properties with tenants that have tenant-based housing vouchers)

**Collective Utility Comments:**

* + 1. Is there is a public data set that can be universally utilized for subsidized vs unsubsidized?
			- Stakeholder Response:
				1. Yes – there is publicly available data on this. Community Investment Corp. will look into this and follow-up. Utilities could also add this to the application in the future, whether the project is subsidized or not.
				2. For unsubsidized vs subsidized: We believe the delineation between unsubsidized affordable housing and subsidized affordable housing (non-PH) is critical – we want to understand whether one is being served more than the other. Very different capital improvement approaches; outreach approaches; administrative capacity; incentive needs; size and type of portfolios
				3. Trying to reveal if affordable housing sectors are served differently and if we can improve by sector. Confirm that all sectors of affordable housing stock is being served – adjusting approach as needed.
		2. Furthermore, the delineation between non-PHA subsidized vs unsubsidized may not highlight much.
		3. Ultimately what are we trying to reveal with the building type breakdown?
			- Stakeholder Response to 2 and 3: We want to understand whether utilities are effectively getting to all building types, and we will not know that without the data.

For each type of housing above, projects will be further broken out by size:

* Projects <20 units
* Projects 20-49 units
* Projects >50 units

**Collective Utility Comments:**

* + - 1. Is this proposed unit range appropriate for this metric?
			2. Ultimately what are we trying to reveal with the building type breakdown?

Stakeholder Response: The source for this breakdown is consistent with Census Bureau (American Community Survey) Data. We are trying to understand the types of buildings that are being served. Open to other breakdowns if utilities have others readily available.

1. *Levels of joint delivery and/or coordinated delivery between gas and electric utilities.*

**Timing:** Quarterly

**Reporting Location:** Add to the narrative section of the quarterly reports

**Metrics:** In the Program Descriptions section of the quarterly report, briefly describe whether the IQ MF program is jointly delivered, or coordinated. If joint or coordinated, include additional explanation on how the utilities work together including whether:

* There is a single vendor hired?
* There is a single point of contact?
* There is a single application form?

**Collective Utility Comments:**

We are doing all aforementioned items and is it necessary to reaffirm this status quarterly?

Stakeholder Response: We are interested in a narrative description included in the quarterly report, but it doesn’t need to be updated every quarter. This would only be updated if the program design changes.

For reference, here are general definitions for “joint” and “coordinated” delivery:

* Joint = EE program that is jointly funded by more than one utility,
* Coordinated = EE programs where utilities work together on program delivery, but program is not joint
* In addition, for the 2023 evaluations (conducted in 2024) the evaluators will investigate the level and effectiveness, in both reducing barriers to participation and comprehensively addressing efficiency opportunities, of offering one-stop-shopping services and jointly or in a coordinated fashion delivering the MF programs.

**Collective Utility Comments:**

1. We can agree to this particular evaluation project but there is no need to capture this as a quarterly reporting metric.
	1. Stakeholder Response: We agree this is not a quarterly metric. We are interested in this being evaluated in 2024.
2. Furthermore, this evaluation should only be conducted in the event the utility offers their MF program in a joint manner.
	1. Stakeholder Response: We disagree. One Stop Shop is not limited to jointly delivered programs.
3. *The comprehensiveness of efficiency upgrade opportunities being addressed in participating buildings. This would include a particular emphasis on understanding the level of uptake of building envelope, HVAC equipment, water heating equipment and other major Measures (vs. just lower cost measures through direct installation and/or other delivery mechanisms) and barriers encountered in increasing uptake of such major Measures.*
4. *Uptake of new technologies. This would include, but not be limited to, cold climate heat pumps and heat pump water heaters.*

**Timing:** Quarterly

**Reporting Location:** Quarterly reports. The Quarterly reports will include the spreadsheet populated with data. Within a given program year the data will reflect cumulative year-to-date data in each quarterly report.

**Metrics:** See spreadsheet. Reporting includes data on the number of projects, buildings, and apartments receiving various measures. In addition, for shell and heat pump measures, reporting includes separate reporting on whether the measures are applicable (qualified project), and if a project is qualified but the measures were not installed, the reasons why.

**Collective Utility Comments:**

1. We can agree to the evaluation but the data reporting does not be required to be captured as a quarterly reporting metric.
	1. Stakeholder Response: We did not propose this to be evaluation data reporting.
2. We propose that evaluators extract the data and provide the data within our annual evaluation reports. (Both for Measure Reporting table and Qualified Owners vs Unqualified Owners tables)
	1. Stakeholder Response: We support the evaluators extracting this data on an annual basis, including in their evaluation reports, starting with the 2023 evaluations.
		1. Confirm whether the utilities support the nature of the data requested in the Excel document to be included in annual evaluation reports: [Income Qualified Multi-Family Reporting Tables (Excel)](https://www.ilsag.info/wp-content/uploads/MF-Metrics-DRAFT-11-16-2023.xlsx)
		2. Confirm that utilities track this data to be able to share it with the evaluators for inclusion in annual reports.
3. Furthermore, with respect to the Measure Reporting table on the equipment uptake, why is it necessary to view the data at such a granular level?
	1. We propose to report on DI vs comprehensive.
	2. Stakeholder Response: Stakeholders want this level of granularity to understand what a typical comprehensive project does/does not include, how it changes over time, etc.
4. *Leveraging of other funding sources to support income qualified multifamily retrofits.*

**Timing:** Annual Q4 Report

**Reporting Location:** Add to the narrative section of the annual Q4 report

**Metrics:** Report on any funding sources combined for the IQ MF EE program, including:

1. Funding source;
2. Amount of funding; and
3. Brief description of what the funding is being used for
4. Brief description of any joint or coordinated implementation with the leveraged funding entity and/or any constraints or program modifications resulting from leveraging;
5. Any required owner co-pays or financing, including detail on what measures require copays and the amounts required

**Collective Utility Comments:**

1. It will be necessary to further define “leverage” and how it is applied.

Stakeholder Response: Reporting on any other sources of funds that are being combined with utility EE funds. May want to use “combined” instead of “leveraged.” Stakeholders are interested in a narrower set of combined funding – such as public agency funding.

1. *Geographic distribution. This would include where buildings are served, which could be provided by zip code and/or census tract.*

**Timing:** Quarterly Reports

**Reporting Location:** Quarterly reports

**Metrics:**

1. Report IQ MF participation quarterly by zip code, including 1) projects, 2) buildings, and 3) units, provided in an Excel format added to the Statewide Quarterly Report Template. Within a given program year the data will reflect cumulative year-to-date data in each quarterly report.
2. A heat map showing the geographic IQ MF participation (number of units) by zip code, with an overlay of all residential customers that are on a payment plan and/or LIHEAP (also by zip code). The heat maps will provide a general indication of the level of either participation in the MF program or the general magnitude of residential customers on PIPP/LIHEAP.

**Collective Utility Comments:**

1. PIPP/LIHEAP is a poor indicator of equitable participation given inconsistency in participation. We propose using the disadvantaged area definition first, then overlaying MF program incentives provided across our territories to show distribution in disadvantaged areas.
	1. Stakeholder Response: Stakeholders accept using the disadvantaged area definition first, and overlaying MF program incentives provided across each of the utilities service territories to show distribution in disadvantaged areas.
		1. Additional mapping options, by address:
			1. <https://r3.illinois.gov/eligibility>
			2. <https://www.illinoissfa.com/environmental-justice-communities/>
2. The mapping mechanisms will require more time to develop and more than likely will not be ready within an 8-month. In the interim, the Nicor Gas team will work to develop a beta product that can be shared with Stakeholders as an attempt to illustrate our current capabilities.
	1. Stakeholder Response: Stakeholders are interested in at a minimum, receiving the list of building participants by zip code or census tract, starting April 1, 2024 (which is the reporting policy effective date). Stakeholders are interested in receiving this information quarterly.
		1. Confirm whether the Nicor Gas team will work on this on behalf of all of the utilities?
3. At least once per 4-year EE Plan, evaluators will analyze IQ MF participation at the census tract level, and the general correlation between MF participation and low income census tracts.

**Collective Utility Comments:**

1. We should allow for a non-evaluator party that is external to the Utility to conduct the research.
	1. Stakeholder Response: If the utilities can provide mapping as requested above, then the separate analysis is not needed.
2. Ultimately, why should an evaluation be conducted at a four-year interval?
	1. Stakeholder Response: See above comment.

*Program Administrators shall work with interested stakeholders to reach consensus in developing the specific metrics to address these reporting needs. The metrics may evolve over time.*

*The list of metrics will be posted on the SAG and LIEEAC website(s). The metrics will be referenced in, and lessons learned from reported metric data will be referenced in, the Program Administrators’ quarterly and/or annual reports and discussed in SAG and LIEEAC with the goal of improving Program delivery and outcomes.*