

# Introduction to IL-TRM

## Policy Issue #1: Lighting

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July 9, 2025 SAG Small Group Meeting

# July 9 SAG Small Group Meeting

## Lighting Policy Issue #1

**Policy issue:** Review and potential update of stakeholder compromise on general service lamps

- ❖ Summary of comments received on questions 1-3
- ❖ Ameren Illinois response to policy comments
- ❖ ComEd response to policy comments
- ❖ Discussion and Q&A

**Measure life issue:** Led by VEIC

- ❖ Summary of comments received on question 4
- ❖ Discussion and Q&A

**Discuss Next Steps for Policy Issue #1:** Is the issue resolved, or is additional discussion needed at the July 24 meeting?

# Lighting Policy Issue #1

## Questions:

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?
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?

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?
4. Should the measure lifetime for LED bulbs continue to be eight (8) years in IL-TRM Version 14.0?

# Lighting Policy Issue #1

Feedback was due on Monday, June 30. Comments are posted on the SAG website:

- ❖ [ICC Staff](#)
- ❖ [Illinois Office of the Attorney General](#)
- ❖ [NRDC](#)
- ❖ [Opinion Dynamics](#)

### **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.

<b><u>ICC Staff</u></b>	<b><u>IL Office of the Attorney General</u></b>	<b><u>NRDC</u></b>	<b><u>Opinion Dynamics</u></b>
<p>Supports retaining a narrowly targeted lighting offering for the Income Qualified (IQ) Single-Family and Multifamily channels but under strict conditions. Staff raises concerns about ensuring accurate documentation and compliance, including:</p> <ul style="list-style-type: none"><li>❖ Ameren must document that every bulb swapped through the direct install program was operational and non-LED at the time of installation, validating the necessity of replacement.</li><li>❖ Processes must be in place to guarantee that all removed inefficient lamps are recycled or disposed of in compliance with environmental rules.</li><li>❖ Energy savings calculations must account for higher free-ridership and the likelihood of early burn-outs to ensure reported savings are accurate.</li></ul> <p>These measures aim to prevent inflated energy savings and ensure compliance with environmental and operational standards.</p>	<p>Supports this proposal, as we support the direct installation of LEDs.</p>	<p>Supports this proposal, as we were one of the signatories to the Ameren Stipulation.</p> <p>If an EE program visits a home and an inefficient incandescent / halogen lamp is discovered in use (in a high use location), there will be energy savings from removing that inefficient lamp and replacing it with an efficient LED as long as the program that replaces the inefficient lamp also disposes it (rather than given to the resident who could use it later, in which case there would be no lifetime savings). Though such savings would be relatively short-lived, it is reasonable for utilities to pursue them in the context of low-income (&lt; 80% Area Median Income) direct install efforts because they are low cost and any bill reductions for such households have value in reducing energy burdens.</p>	<p>Supports this proposal from a technical perspective.</p> <p>Any non-LED lighting currently installed is using energy irrespective of current federal standards for lighting products, and replacing such lighting will yield energy savings. What the measure life for those savings should be is a separate item that is addressed in Question 4 below.</p>

**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 (IQ) customers through 2029, including: 1) EE Kits and 2) Retail programs. Do you have questions or feedback on the ComEd proposal? Please explain.

<b><u>ICC Staff</u></b>	<b><u>IL Office of the Attorney General</u></b>
<p>Supports the ComEd proposal to extend GSL offerings to IQ customers through 2029, including EE kits and retail programs, however through limited distribution through CBOs or utility-run EE kit programs that:</p> <ul style="list-style-type: none"><li>(1) ship only to addresses verified as low-income, and</li><li>(2) exclude the basic A-line LEDs that are now plentiful and cheap in every big-box aisle.</li></ul> <p>As a consideration, specialty shapes—globes, candelabras, reflectors—that still cost more than four dollars apiece could remain in the retail programs because they continue to be cost-effective savings; however, upstream retail incentives for standard A-19 LEDs should sunset after Program Year 2025, reflecting the sharply lower incremental savings available under the new federal 45-lumen-per-watt baseline.</p>	<p>Opposes the extension of eligibility for GSL offerings to IQ 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.</p> <p>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.</p> <p>Utilities should not be able to claim savings, and consequently incentive bonuses, for EE measures that may not be implemented by the end user. GSL offerings are different from savings claimed by the utilities from other non-direct install measures because of federal standards.</p>

**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 and 2) Retail programs. Do you have questions or feedback on the ComEd proposal? Please explain.

<u>NRDC</u>	<u>Opinion Dynamics</u>
NRDC opposes this proposal as it is unreasonable to assume that there would be any material savings relative to what would have happened without the utility EE program intervention.	<p>While replacing inefficient lighting products known to be existing in customer homes can safely be assumed to produce energy savings, providing incentives for the sale of LED lighting products via retail channels cannot be safely assumed to do so.</p> <ul style="list-style-type: none"><li>Federal regulations mean that LED lighting products are the only lighting products currently available for sale in the general service lamp class. Therefore, customers should generally not be able to procure new inefficient lighting products at the time of sale. LED lighting incentivized through retail channels in Illinois has always been considered a time of sale measure and therefore there should be no savings associated with a strict technical analysis of these measures. While the logic for kits is slightly different, broadly speaking the assumptions for kits should be considered to be similar.</li></ul> <p>LED lighting sales through retail channels, even to low-income customers, are subject to net-to-gross ratios in many cases (e.g. sales of lighting to low income customers through big box stores). The existing NTG ratios associated with these sales are not applicable in the current regulatory environment and updated NTG research would be likely to find nearly complete free-ridership for these measures.</p> <p>Opinion Dynamics is not aware of any energy efficiency program elsewhere in the country that expects to continue incentivizing the purchase of LEDs on the timeline ComEd proposes here, and from a purely technical/energy savings perspective, we do not believe doing so would be appropriate. We do understand that there may be public policy reasons to support providing such incentives to low-income customers that SAG may wish to debate and we do not take a position on those issues.</p>

**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.

<u>IL Office of the Attorney General</u>	<u>NRDC</u>	<u>Opinion Dynamics</u>
IL OAG supports the extension of eligibility for GSL offerings to income qualified customers through 2029, as we support the direct installation of LEDs.	NRDC supports this position for the reasons stated in response to Question #1 (see slide 5).	As with our support of the Ameren Illinois proposal, from a technical perspective we believe ComEd would be entirely justified to pursue this path.



# Discussion on Questions 1-3

- ❖ Ameren Illinois Response
- ❖ ComEd Response
- ❖ Additional Discussion and Q&A

# Discussion on Question 4 - Measure Life

- ❖ Summary of comments received (VEIC)
- ❖ Additional Discussion and Q&A

# Next Steps for Lighting Policy Issue

Are the policy questions resolved, or is additional discussion needed at the July 24 SAG Small Group meeting?

# Contact Information

**SAG Facilitation:** [Celia Johnson Consulting](#)

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