

**Illinois EE Stakeholder Advisory Group
Large Group SAG Meeting**

Tuesday, March 5, 2024

9:30 – 11:30 am

Teleconference

Attendees and Meeting Notes

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Meeting Materials

Posted on the [March 5 meeting page](#):

- [Illinois EPA Office of Energy Presentation: Inflation Reduction Act Home Energy Rebates](#)
- [National Consumer Law Center Presentation: Essential Consumer Protections in Inflation Reduction Act Home Energy Rebate Programs](#)
- [SAG Facilitator Presentation: SAG Portfolio Planning Process Update](#)

Attendees

Celia Johnson, SAG Facilitator
Jorge Medina Zambrano, Inova Energy Group (SAG Meeting Support)
AJ Young, Greenlink
Abby Brokaw, Illinois EPA Office of Energy
Abigail Miner, IL Attorney General's Office
Alisa Garcia, ICF
Alyssa Latuchie, Franklin Energy
Amy Jewel, Elevate
Andrew Cottrell, ScottMadden
Andrey Gribovich, DNV
Andy Gorecki, Franklin Energy
Andy Vaughn, Leidos
Jenna Hart, BCMW Community Services
Babette Washington, Ameren Illinois
Cassidy Kraimer, Community Investment Corp.
Caty Lamadrid, Inova Energy Group
Chase Counts, Greenbound
Cheryl Watson, Equitable Resilience & Sustainability
Chris Neme, Energy Futures Group, representing NRDC
Chris Vaughn, Nicor Gas
Christian Koch, MEEA
Christopher Frye, Guidehouse
Crystal Warner, Michaels Energy
Dan Merchant III, Resource Innovations

Deb Dynako, Slipstream
Dena Jefferson, Franklin Energy
Denise Moore, Black Business Alliance Peoria Chapter
Dheeraj Kodi, Resource Innovations
Dominique Boczek, ICF
Elizabeth Horne, ICC Staff
Emily Carter, Frontier Energy
Erin Kempster, Opinion Dynamics
Erin Stitz, AEG
Fernando Morales, Ameren Illinois
Gordon Fon, Walker-Miller Energy Services
Hannah Collins, Leidos
Hannah Howard, Opinion Dynamics
Hilary Snover, CLEARResult
Houston Downen, Frontier Energy
Josh Sharon, ComEd
Jamie McCloskey, Staples Energy
Jarred Nordhus, Peoples Gas & North Shore Gas
Jason Fegley, Ameren Illinois
Jean Gibson, Peoples Gas & North Shore Gas
Jeff LeBrun, SEEL
Jeff Carroll, DNV
Jeff Erickson, Guidehouse
Jim Fay, ComEd
Jim Poynton, Ameren Illinois
John Carroll, Ameren Illinois
John DeRosa, IL EPA Office of Energy
John Lavallee, Ameren Illinois
Jonathan Skarzynski, Nicor Gas
Kalee Whitehouse, VEIC (IL-TRM Administrator)
Karen Lusson, National Consumer Law Center (NCLC)
Kari Ross, NRDC
Kate Shonk, Citizens Utility Board
Kathryn Brewer, CLEARResult
Keely Hughes, The JPI Group
Keith Cronin, VEIC (IL-TRM Administrator)
Kelly Gunn, ComEd
Ken Parker, Community Investment Corp.
Ken Walczak, DarkSky Chicago
Kielan Rathjen, U.S. EPA
Kim Brown, ComEd
Kim Janas, IL Attorney General's Office
Kristen Kalaman, Resource Innovations
Kyle Danko, ComEd
LaJuana Garrett, Nicor Gas
Laura Agapay-Read, Guidehouse
Leyah Williams, ICC Staff
Lili Florez Monroy, Peoples Gas & North Shore Gas
Maddie Wazowicz, MEEA
Madeline Semanisin, NRDC
Margaret Marchant, Frontier Energy

Maria Onesto Moran, Green Home Experts
Mark Gentry, Franklin Energy
Mark Milby, ComEd
Mark Szczygiel, Nicor Gas
Mary Ellen Guest, Chicago Bungalow Association
Matt Armstrong, Ameren Illinois
Michael Brandt, Elevate
Michele McSwain, Sustainable Environmental and Economic Development Solutions
Mike King, Nicor Gas
Miritza Thorpe, Ameren Illinois
Molly Graham, MEEA
Nate Baer, Staples Energy
Neil Curtis, Guidehouse
Nick Lovier, Ameren Illinois
Nick Warnecke, Ameren Illinois
Nicole Popejoy, IACAA
Omayra Garcia, Peoples Gas & North Shore Gas
Olivia Wein, NCLC
Paige Dunlevy, ICF
Pat Justis, Ameren Illinois
Paul Campbel, ICF
Pauravi Shah, ComEd
Philip Halliburton, ComEd
Philip Mosenthal, Optimal Energy, representing IL AG and NCLC
Rashaan Keeton, Center for Energy & Environment
Ryan Kroll, Driftless Energy
Sabrina de la Vega, The Adhoc Group
Sam Stahl, Ameren Illinois
Sara Castleberry, Resource Innovations
Sarah Amspacher, Resource Innovations
Selena Worster Walde, ERTHE Energy Solutions
Seth Craig-Snell, SCS Analytics
Sri Paruchuri, Resource Innovations
Sumi Han, DNV
Thomas Ketchum, South Suburban Action Conference
Ted Weaver, First Tracks Consulting, representing Nicor Gas
Thomas Drea, Ameren Illinois
Tina Grebner, Ameren Illinois
Victoria Nielsen, ScottMadden
Wade Morehead, Morehead Energy
Wael El-Sharif, 360 Energy Group
Wendy Jaehn, Resource Innovations
Will Baker, Google
Xander Mitchell, The Adhoc Group
Zach Obert, Franklin Energy
Zachary Froio, AEG

Opening and Introductions

Purpose of March 5th SAG Meeting:

1. For the Illinois Environmental Protection Agency to educate SAG about federal EE funding opportunities for Illinois through the Inflation Reduction Act;
2. For National Consumer Law Center to educate SAG on Inflation Reduction Act program design and consumer protection recommendations; and
3. For the SAG Facilitator to provide a Planning Process update.

Leveraging the Inflation Reduction Act in Illinois

John DeRosa, Illinois EPA Office of Energy

Introduction

- The Illinois EPA Office of Energy supports energy efficiency, resiliency, and clean energy through public partnerships and inter-agency collaborations to reduce the energy burden and improve energy equity in Illinois.
- Staff of five currently in the Office of Energy.
- Federal funding sources
 - State Energy Program (SEP)
 - New Infrastructure Investment and Jobs Act
 - New Inflation Reduction Act (IRA)
- State funding sources
 - Energy Efficiency Trust Fund
 - Renewable Energy Trust Fund
- There are various program initiatives beyond rebates, including energy assessments for low-income housing and public water supply efficiency
- New Programs Est. in Federal Inflation Reduction Act
 - Home Efficiency Rebates Program and Home Electrification & Appliance Rebates Program
 - Initial work has focused on program familiarization
 - The future RFP process will not be discussed in detail

Inflation Reduction Act (IRA) Home Energy Rebate Programs

- There are two programs through IRA: Home Efficiency Rebates Program and Home Electrification and Appliance Rebate Program
- Both programs are income-based with allocations for low and moderate incomes
- The Home Efficiency Rebate Program focuses on whole-home efficiency improvements based on modeled or measured pathways.
 - \$132 million
 - Income –based rebate amounts with requirements for allocating funds to low-income and multi-family low-income housing
- The Home Electrification and Appliance Rebate Program focuses on residential electric upgrades.
 - \$131 million
 - Income-based rebate amounts with requirements for allocating funds to low-income and multi-family low-income housing

Home Efficiency Rebate Program

- There are two types of buildings targeted: single-family and multifamily

- See slide 6 for single family table with modeled energy savings, income level, and rebate amounts
- See slide 7 for multifamily table
- Eligibility criteria includes income level and energy savings and there is consideration of increasing rebate amount at the state level.
- IL EPA is interested in the program covering 100% of project costs. Approval is required from DOE.
- Eligibility criteria ensures equitable distribution of funds based on income levels within the building.

Cassidy Kraimer – What type of documentation is required for multifamily property owners to verify tenant income?

- *John DeRosa – This will be included in our implementation blueprint. There are a number of different ways to get access to income information. The current plan involves partnering with a vendor to manage much of the income verification process. We are aligning our approach with existing metrics for income verification, though there isn't a definitive solution yet.*

Cassidy Kraimer – Will there be an opportunity to provide feedback on that process?

- *John DeRosa – Yes.*
- *Abigail Miner – Can you clarify how the public feedback will operate?*
- *John DeRosa – There will be public sessions, probably in the second half of 2024. We may have to go through an RFP process first. Our implementer would need to be part of that.*
- *Abby Brokaw: Offering public sessions is a requirement of the programs, as written in the application instructions, as part of the community benefits plan.*
- *Chris Neme – Is this feedback for stakeholders who are present today or the general public? And if it's both, is that going to be one process or two separate processes?*
- *John DeRosa – Public input sessions are planned for the second half of the year, pending finalization of the future RFP process. These sessions are mandated as part of the Community Benefits Plan, as outlined in application instructions. There is collaboration with the National Association of State Energy Officials (NASEO) for additional guidance, given their role in coordinating efforts among states working on similar programs.*

Chris Neme – The first tier of efficiency is the lesser of \$4000 or 80% of project costs and it's up to 8000 or 80% of project costs for 35% savings and higher. You're considering covering 100% of the project costs?

- *John DeRosa – Yes, and that would be for low risk and both efficiency tiers as it will be difficult to differentiate between each tier for all low-income households. These requests must be approved by the DOE. There needs to be an effort to stack all possible rebates and cost reductions in order to cover 100%.*
- *Abby Brokaw: The goal is for low income customers to get 100% coverage.*
- *Chris Neme: Talking to IL utilities will be key.*
- *Olivia Wein (via chat) – I believe the IRA statute says states can ask DOE to cover up to 100% for low-income (up to 80% AMI. additional info: The IRA HOMES statutes allows states to ask DOE for increased coverage for low or moderate income households. Moderate income defined as bn 80% AMI- 150% AMI.*

Cassidy Kraimer – Can rebates be applied to work done in the past? If so, is there a timeframe that the rebates cover?

- Abby Brokaw – There is mention of retroactive language in the statute, suggesting coverage from August 2022 onwards. However, both programs require a home assessment before installation, conducted by certified contractors or auditors. This requirement presents a challenge for retroactively applying rebates to past purchases.
- Olivia Wein (via chat) – For the HOMES program, it is technically possible, but the DOE has firm requirements. DOE has a checklist. The HEAR program is not retroactive.

Cheryl Watson – If a consumer is in a disaster area, such as flooding, and they need restorative work done, would that be covered? There should be information or guidelines shared on how to electrify homes that need to be restored. In Chicago, we had disaster designations last year due to rain and flooding. This would be an opportunity for these homes to be upgraded.

- John DeRosa – We will look into this opportunity to coordinate.

Cassidy Kraimer (via chat) – Is the max rebate the same for single family and multifamily?

- John DeRosa – The instructions say \$14,000 per low income dwelling unit in a multi-family building if the eligible entity is a multifamily building owner.
- Abby Brokaw – Yes, it is \$14,000 for both. The application instructions state \$14,000 per AMI dwelling unit, in a MF building, if the eligible entity is a MF building owner. There could be multiple dwelling units in a single building.
- Olivia Wein (via chat) – Yes. Can combine the max limits in MF, e.g., for 10 LI households, with heat pumps, you can combine to get 10 x \$8,000 to provide up to \$80,000 for a central heat pump system. This is a DOE example.
- Olivia Wein (via chat) – For low income MF, DOE chart shows up to 100% of qualified project cost, up to 50% of qualified project cost.
- Rashad Keeton – There is no building- or project-level max for multifamily in addition to (up to) \$14k per unit?
- Abby Brokaw – The total cost of rebates for the entire building cannot exceed \$14,000 per unit. We can check to clarify this. IL EPA will send a link to the application instructions. MF instructions can be found on pages 48-49.

Home Electrification and Appliance Rebate Program

- Discussion of various product rebates available (see slides 8-9)
 - Appliances
 - Heat Pump Water Heater
 - Heat Pump for Space Heating or Cooling
 - Electric Stove, Cooktop, Range, Oven, or Heat Pump Clothes Dryer
 - Building Materials
 - Electric Load Service Center
 - Insulation, Air Sealing, and Ventilation
 - Electric Wiring
- Double-dipping is not allowed – cannot receive the same rebates from both programs.

- There is a focus on electrifying homes and replacing gas appliances with electric ones with rebates outlined for items such as electric stoves, clothes dryers, and service box upgrades.
- The maximum rebate is \$14,000 per home.

Will Baker – Are there considerations about readiness to increase electric load?

- *John DeRosa – This would likely not be covered with this funding, but will look into the smart thermostat idea.*
- *Will Baker – DOE states we will need 160 GWs of VPPs by 2030.*
- *Karen Lusson – Smart thermostats are available through the utility programs. Those utility programs are supposed to follow certain protocols to make sure the home is a good candidate for a smart thermostat.*
- *Abby Brokaw – We have not decided on any program restrictions at this point. We will likely need to have more conversations with ICC, utilities and others about grid planning. We have had a lot of conversations about other agencies*
- *Will Baker – If utility programs are out there, we should find a way to connect with existing current programs, especially as panel upgrades are needed.*
- *Chris Neme – Both of the utilities have demand response reduction goals from grid plans. The electric utilities should be looking at every opportunity to reduce demand. As you start talking with the utilities, think about leveraging not just the utility programs, but other utility initiatives.*
- *Karen Lusson – We are happy to hear this program will be heavily focused on reaching low income homes. Generally speaking, low income homes are not always good candidates for demand response programs, but nature of the life situations of persons who are struggling financially. Hours working may vary, for example. Any kind of demand response program ideas or connections should take into account the circumstances of the individual home.*

Andy Gorecki (via chat) – Is there a draft of the rebate application for Home Efficiency & Electrification available online?

- *Seth Craigo-Snell (via chat) Lots of good information at: [Home Energy Rebates Application Guidance - Department of Energy.](#)*

Funding Allocation

- Slides 10-11 include details on allocation amounts for each rebate program for each state, with Illinois highlighted
- Allocation breakdown includes funds for administration and low-income households (<80% AMI)
- DOE mandates 40.4% of allocation for low-income households
- The minimum allocation for low-income single-family homes is almost \$43 million, and for multifamily homes, it's nearly \$11 million.
- Remaining funds (~\$52 million) allocated for low to moderate-income groups.
- IL EPA considering increasing minimum amounts for low-income households.

Amy Jewel (via chat) – How are disadvantaged communities defined or identified?

- *Abby Brokaw – The definition of disadvantaged communities in Illinois is primarily based on the EJ Start screening tool used by the Illinois EPA, ensuring consistency across the agency's programs. This tool expands coverage compared to others used by DOE, incorporating additional*

factors for identification. The decision to use EJ Screen was approved by US EPA to maintain uniformity in identifying and distributing funds to disadvantaged communities.

- Cheryl Watson – EJScreen tool is not accurate and communities are left out. Advocacy groups in Chicago have raised concerns about the effectiveness of current tools used for identifying disadvantaged communities, such as the EJ Screen. These tools fail to accurately represent communities' needs and disparities, leading to inequitable outcomes. One proposal is to adopt a more comprehensive approach, like the three-zone system used for funding other programs, which considers various socioeconomic factors to address gaps in urban areas across Illinois. The goal is to ensure a higher level of equity by reevaluating existing perspectives and methodologies to prevent unintentional exclusion of communities. IL R3 Zones: <https://r3.illinois.gov/eligibility>

State Implementation Blueprint

1. Community Benefits Plan
 2. Education and Outreach Strategy
 3. Consumer Protection Plan
 4. Utility Data Access Plan
 5. Privacy and Security Risk Assessment for State Systems
 6. Market Transformation Plan (1 year after award date)
- The blueprint will be submitted to DOE, including the 6 items above.
 - This blueprint must be completed 60 days prior to program launch.
 - Programs run through 2031, or until the funds are exhausted.

State Community Benefits Plan

1. Engage community and labor
 2. Engage and support a skilled and qualified workforce
 3. Incorporate diversity, equity, inclusion and accessibility
 4. Address Justice 40 Initiative
- Presentation outlines the timeline and requirements for program implementation.
 - Details the components of the community benefits plan, including engagement with stakeholders and addressing equity, and inclusion. Various stakeholders to be engaged, such as contractors, workforce development groups, and financial institutions.
 - The Office of Environmental Justice and translation services will be used for outreach efforts.

Incentive Program

- See slide 14
- DOE offers incentive programs, including product rebates, aimed at governmental entities, commercial entities, contractors, and nonprofits.
- Incentives are provided to support these entities in assisting individuals with applying for rebate programs.
- There are limits on the types of products covered, with a maximum of \$500 per dwelling.
- The incentive is intended to encourage outreach efforts within local communities to promote awareness of rebate and energy efficiency programs.

Ongoing Discussions

- The program aims to integrate rebate programs with existing energy efficiency initiatives and utilities efforts. Discussions have been held with electrical cooperatives and the Department of Commerce to ensure alignment with weatherization programs.
- Partnerships with the Department of Commerce include applying for training programs and exploring energy auditor training.
- Collaborations with the Illinois Finance Authority involve discussions on access to capital for small businesses and program coordination.
- There is consideration of the order of operations for various programs, including energy efficiency, electrification, solar, and marketing efforts.
- The Climate Pollution Reduction grant discussions focus on avoiding overlap with existing programs and filling gaps, particularly in commercial and heat pump initiatives.
- Ongoing conversations aim to ensure effective coordination and avoid duplication of efforts while identifying and addressing any gaps in the program.

Karen Lusson – We haven't been able to view the utility responses to IEPA's questions about their programs. Can you say, given the responses that you received, that you're optimistic that these rebate opportunities can be braided and stacked with the existing utility programs, as well as our state's weatherization program? I know that's your goal, and we hope it can be achieved.

- *John DeRosa – We recognize the complexity of the federal programs and are confident we will fund a solution through ongoing discussions with utilities.*

Timelines

- See slide 16
- End of March: State of IL application deadline for federal IRA programs
- Mid to late 2024: Release of the Request for Proposals (RFP) to find a vendor for program implementation, alongside public input sessions.
- Late 2024 to early 2025: Finalization and submission of the implementation blueprint to DOE, followed by the launch of the rebate program.
- Late 2024 through 2031 (or until program funds are exhausted): Implementation and continuation of the rebate program.

Seth Craigo-Snell (via chat) – Has IL EPA thought about strategies for managing the available funding through the entire period? Is the expectation that there would be limitations on the spending on an annual basis or that the funding would be spent through as quickly as the market will allow?

Inflation Reduction Act Program Design and Consumer Protection Recommendations

Karen Lusson and Olivia Wein, National Consumer Law Center (NCLC)

- NCLC provides insights into essential consumer protections needed for IRA home energy rebate programs.
- Established in 1969, NCLC operates from offices in Boston and Washington DC, with remote staff across the country.
- The organization advocates for various low-income interests related to housing, credit, student loans, litigation, energy, utilities, bankruptcy, finance, and auto affordability.

Roadmap

- Summary of IRA Rebate Programs
- Program Design Recommendations
- Tenant Protections
- Consumer Protection Best Practices

IRA Rebate Programs

- On Aug. 16, 2022, President Biden signed the landmark Inflation Reduction Act, which provides nearly \$400 billion to support clean energy and address climate change, including \$8.8 billion for the Home Owner Managing Energy Savings (HOMES) Rebates Program or Home Efficiency Rebates Program (IRA Sec. 50121), and the High-Efficiency Electric Home Rebates or Home Electrification and appliance Rebates (HEEHRA or HEAR) Program (IRA Sec. 50122).
- The U.S. DOE estimates these rebates will save households up to \$1 billion annually on energy bills and support over 50,000 U.S. jobs through its duration up to 2031.

HEEHRA or HEAR Program

- There is a big focus on retrofits and electrification opportunities for homes, aiming to cover 100% of costs for low-income customers, emphasizing the importance of avoiding financial burdens on low-income households.
- There is mention of the availability of state home energy efficiency contractor training grants, as well as point-of-sale discounts and contractor incentives.
- There is a substantial allocation of funds for Illinois, aiming to improve energy affordability for customers, especially low-income ones prioritizing participation in rebate programs for those in need and incorporating affordability data into program decisions, to ensure no unintended consequences for financially struggling customers.
- High Efficiency Electric Home Rebate Act (HEEHRA) or Home Electrification and Appliance Rebates (HEAR), includes \$4.5 billion in direct rebates for low- and moderate-income households.
- For low-income households, HEEHRA/HEAR covers new, efficient electric appliances, providing low income households rebates of up to \$14,000, covering:
 - Energy Star electric heat pump installation for space heating and cooling, up to a cap of \$8,000.
 - Energy Star electric heat pump water heater, up to \$1,750.
 - Energy Star electric stove, cooktop, range or oven or Energy Star electric heat pump clothes dryer, up to \$840, and
 - Up to \$4,000 for an upgraded breaker box, \$2,500 for upgraded electrical wiring, and \$1,600 for insulation, ventilation, and sealing.
- For moderate income households, the same rebates are available to cover 50% of the costs.
- DOE estimates the program will allow roughly one million low- and moderate-income households to go electric.

Home Energy Training Grants

- IRA provides state-based Home Energy Efficiency Contractor training grants. States can partner with nonprofits for program development and implementation. The aim is to train contractors to install clean energy technologies in homes.

Key Features in the Rebate Programs

- HEAR rebate features point-of-sale discounts through contractors and retailers.

- HOMES rebate structured to reduce the purchase price.
- There are contractor incentives included for work in disadvantaged communities.
- The statute prohibits combining rebates with other federal grants for the same measure, but it allows combination with federal programs like weatherization.
- Solar is not included in IRA rebate programs.
- IRA rebates are not considered as income for assistance program applications.

Illinois Allocations

- Substantial allocations for Illinois, intended for state weatherization and utility programs.
- HOMES rebate program: \$132,219,190
- HEAR program: \$131,452,470
- Total: \$263,671,660

Affordability Matters

- There is a wealth of zip code level affordability data dealing with the Commerce Commission on its credit and collections website page. It's an interactive page and highlights that affordability is a problem throughout Illinois.
- These programs are viewed not only as avenues for introducing new technologies and enhancing weatherization in homes but also as crucial means to enhance the affordability of monthly energy bills for customers, especially low-income ones. Individuals often find themselves grappling with tough decisions about which essential aspects of life to sacrifice to meet their monthly energy expenses.

Karen Lusson (via chat) – Illinois utilities report monthly on a variety of credit and collections data by zip code, including arrearages and disconnections, which reveals the location of communities where affordability of utility bills is a problem. Here's a link to the pages where the utilities report that info:
<https://www.icc.illinois.gov/chief-clerk-office/filings/list?sd=638396640000000000&dts=365&ft=2&dt=240&ddt=10127>

Chris Neme (via chat) – One potential challenge with measured savings for low-income housing is that some low-income customers may take a portion of their efficiency "savings" in the form of comfort (e.g., they can now afford to raise the thermostat setting a little). This can make a comparison of estimated savings with "actual" savings something other than an "apples-to-apples" comparison. Not to say that there isn't value in measured savings, but need to be careful in interpreting results.

AJ Young, Greenlink – For most affordable housing, affordability is already bound to the property.

Definition of Low and Moderate-Income Households

- Low Income: Below 80% of the Area Median Income (AMI), aligned with weatherization program criteria.
- Moderate income: Between 80% to 150% of AMI.
- Thresholds for Multifamily Buildings:
 - Multifamily and moderate-income multifamily buildings require at least 50% of households to meet the income threshold. This threshold applies to each housing unit within the building.

- A low-income multifamily building as a building with at least 50% of households with income less than 80% AMI
- A moderate-income multifamily building as a building with at least 50% of households with income less than 150% AMI.

Program Design Recommendations

- The Department of Energy has established categorical eligibility for certain programs, such as Medicaid, SNAP, Lifeline program, free and reduced school lunch, and some housing programs. These programs supplement the income eligibility criteria for the Illinois weatherization program.
- Sequencing programs are important to ensure the home is ready for equipment installations. Proper sequencing helps mitigate the risk of increased utility bills due to improperly sized equipment.
- Addressing building envelope issues through weatherization or utility-funded programs before implementing equipment rebate programs is important.
- There is a prohibition on combining rebates for the same measure, highlighting the need for careful program coordination and sequencing to avoid duplication.
- Grant programs cannot use federal funds for the exact same measure but can within the same project.
- Efficient data flow enhances the success of braiding, stacking, and sequencing resources for program effectiveness.

Protect Customers

- Sensitivity to customer information privacy, especially regarding participation in low-income programs or income eligibility.
- Mitigation of risks associated with high-pressure sales tactics or unauthorized access to sensitive information needs to be considered. Enrollment and program awareness should prioritize security and transparency to protect participants' information and interests.

Advisory Groups

- Advocate and Advisory Group Benefits:
 - Provides insights for structuring outreach and program design and acts as a responsive mechanism for ensuring program integrity, facilitating rapid identification and correction of issues.
- Importance of Establishing an Advisory Group:
 - Ensures faster and more responsive program management and enables iterative program design and improvement.
- Importance of Program Packaging:
 - Simplifies understanding of available programs and enrollment process for residential households and increases chances of success for program utilization, especially in rating and stacking scenarios.
- Navigators act as guides in the complex program landscape, educating consumers on program rules and steps assisting in determining eligibility for various programs, and recommending sequencing of actions.
- Navigators need to be funded to ensure their availability and effectiveness.
- Trusted navigators from the community can help reach harder-to-reach populations with low trust levels as they mitigate distrust, especially in communities affected by scams, by providing accurate information and guidance.
- Language and Trust Barriers:

- Navigators contribute to overcoming language barriers and building trust with households.
- NCLC and the National Housing Law Project will soon publish a resource guide for engaging in stakeholder opportunities related to the IRA rebates. The guide will provide insights into engaging with stakeholders and making recommendations, particularly in areas where states have discretion.
- Many recommendations are jointly developed with the National Housing Law Project, especially regarding tenant protection.
- Advocates are encouraged to consider and advocate for increased funding for low-income households and full coverage of project costs to ensure equity and effective targeting.
- Categorical Eligibility:
 - DOE maintains a four-page list of programs for categorical eligibility.
 - Utilizing this list can facilitate easier enrollment into the rebate programs.
- HOMES Rebate Program Design:
 - Efficiency rebate program allows for a flexible program design. Options include relying on modeled savings, measured savings, or a combination of both. Many existing energy efficiency programs use modeled savings.
 - Exploring the possibility of piloting measured savings with the homes rebate program.
- Stakeholder Engagement for Community Benefits Plans:
 - Emphasizes the importance of engaging unconventional stakeholders.
 - The plan aims to extend program benefits to disadvantaged and overburdened communities and focuses on facilitating comprehensive investments in homes for safety and sustainability.

Cassidy Kraimer – What is the recommended mechanism to enforce tenant protections would it be a deed restriction or some other tool and would eliminate EPA be the holder of this information?

- *Olivia Wein – Landlords may certify compliance with regulations, but mechanisms are needed to ensure honesty. Complaint mechanisms serve as a crucial tool to identify issues and enforce compliance. The involvement of landlord and tenant groups is essential to understanding existing infrastructure and enforcement of protections.*

- Utility Allowance for Tenants: Tenants in subsidized housing receive a utility allowance.
- Investments in property may lead to a reduction in utility allowances for tenants.
- Tenant advocates should ensure that utility allowances remain sufficient to avoid further financial strain on tenants.
- Involvement of tenant advocates is crucial to address concerns regarding utility allowances.
- Feedback from both regular tenants and tenants in subsidized housing should be gathered to inform consumer protections effectively\
- Enforcement Mechanism:
 - Addendums to the lease should clearly outline rights and obligations, including enforcement procedures and penalties.
 - Provide a user-friendly option on the Illinois EPA website for consumer questions and complaints.
 - Include a section for consumers to share their stories, allowing for concise descriptions of issues for effective resolution.

- Tenants should be informed of their rights and the enforceability of addendums for effective enforcement.

Cassidy Kraimer – What is NCLC's recommended mechanism to enforce tenant protections? Would it be a deed restriction or some other tool? Would IL EPA be the holder of this information?

- *Karen Lusson – I think what Olivia is highlighting is that DOE guidance prohibits landlords from trying to profit off the installation of rebated equipment/measures installed, by raising rents, evicting a tenant, etc.*
- Qualified Contractor List:
 - Requirement to avoid pitfalls like solar scams or fraudulent clean energy financing.
 - Highlighted the importance of maintaining a current and publicized qualified contractor list and conducting training and outreach to educate consumers about checking the list before engaging contractors. Also, holding honest discussions about criteria for delisting contractors by clearly outlining criteria for listing and delisting contractors.

Other Consumer Protections (2)

- Without braiding and stacking with other programs, consumers may resort to high-interest financing to cover the remaining cost because the appliance rebate program may not fully cover the cost of the measure or project.
 - This is particularly concerning in urgent situations such as equipment breakdowns or post-disaster scenarios.
- Prioritizing no-cost programs to right-size IRA investments and minimizing the financial burden on consumers is crucial.
- Direct eligible consumers to existing free programs like LIHEAP or Weatherization if available.

Other Consumer Protections (3)

- Avoid Mandatory Arbitration Clauses:
 - Contracts should not include mandatory arbitration clauses to ensure consumers retain their legal rights.
- Ensure that consumer protections remain intact even if contracts are assigned to third parties.
- Obligations and rights should persist despite changes in ownership or assignment of contracts.
- Contracts should uphold consumer rights and obligations regardless of contractual assignments or changes in ownership.

Other Consumer Protections (4)

- Ensure consumers can receive electronic records if they opt for electronic signatures.
- Avoid fraudulent practices like tapping the screen or signing blank boxes on tablets.
- Pay attention to E-Sign regulations and avoid practices that may compromise consumer rights.

Chase Counts (via chat) – Service providers and program administrators need to take a building science house- as-a-system approach to home retrofits. Improving building envelopes and installing more efficient HVAC may reduce dehumidification capacity in the home, especially if exhaust-only ventilation is in

place. Excess humidity can result in catastrophic conditions. Utilizing the Weatherization Assistance Program (WAP) network may mitigate these concerns and bring additional resources to the table for qualifying households. I'm a consultant for NCAP, a trade association of sorts for WAP providers. If anyone would like to learn more discuss further, I'm available at chase@greenbound.org.

SAG Planning Process Update

Celia Johnson, SAG Facilitator

Energy Efficiency Ideas Reminder

- **Friday, March 15 Deadline:** Energy Efficiency Idea submittals due
 - [Use the Electronic EE Ideas Template](#)
 - Participants may use the [EE Ideas Word template](#) to collaborate on EE Idea submittals
 - Focus on ideas utilities should consider as they develop 2026-2029 EE Plans
 - Proposed ideas may be challenging to evaluate without enough information – please submit fully developed ideas and make a good faith effort to fill out as much information as possible in the template

SAG Financial Conflict of Interest Policy

- As described on [slides 9-11](#) of the facilitator presentation, the SAG Financial Conflict of Interest policy will not be changed for 2024, except for minor edits. This conflicts policy is in the SAG Process Guidance Document, and is referenced in annual SAG Plans.
 - Excerpted information from slides:
 - Majority of SAG meetings are open to all interested parties, to encourage discussion by stakeholders representing a variety of interests
 - There are limited situations where SAG participation needs to be closed to utilities and non-financially interested parties only – when a topic or process presents a financial conflict of interest
 - Non-financially interested party = a company or organization that does not receive funding from an Illinois utility (for EE or other work)
 - Financially interested party = a company or organization that receives funding from an Illinois utility
 - Examples of conflict situations:
 - Discussing confidential or proprietary information
 - Reviewing and discussing a draft Request for Proposals
 - Discussing a vendor performance issue
 - Negotiating a final EE policy
 - EE Plan negotiations with individual utilities
 - SAG Facilitator identifies conflict situations before a meeting or process.
 - Participants who have a financial interest are asked to recuse themselves from participating.
 - At the January 17th Large Group SAG meeting, feedback was requested on an updated conflicts policy that would allow community-based organizations who receive smaller amounts of funding to participate in “non-financially interested party” meetings.
 - I received feedback from several stakeholders that changing the policy would be inconsistent with past Commission rulings on conflicts of interest.

- The SAG Financial Conflict of Interest Policy will not be changed – when a SAG meeting or process involves a conflict, only utilities and non-financially interested parties are eligible to participate.
 - [SAG Financial Conflict of Interest Policy – 2024 Update \(redline final\)](#)
 - [SAG Financial Conflict of Interest Policy – 2024 Update \(clean final\)](#)
- **Tuesday, April 30 Extended Deadline:** Eligible stakeholders who want to participate in EE Plan negotiations will notify SAG Facilitator

Closing and Next Steps

IL EPA Office of Energy Follow-up Items:

1. IL EPA to confirm the total cost of rebates for a multi-family building cannot exceed \$14,000 per unit.
2. A question was raised about reviewing multi-family application information. IL EPA will send a link to the application instructions.
3. Has IL EPA thought about strategies for managing the available funding through the entire period? Is the expectation that there would be limitations on the spending on an annual basis or that the funding would be spent through as quickly as the market will allow?

National Consumer Law Center (NCLC) Follow-up Items:

- NCLC will share the final Inflation Reduction Act recommendations report with SAG when it is available.