

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

Instructions:

- Using this template, send written comments on IL-TRM Policy Issues¹ #1, #3, and #4 to the SAG Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com by **Monday, June 30**.
- Include “TRM Policy Issue Feedback” in the subject line of the email.
- All comments will be posted on the [SAG website](#), and circulated to SAG.
- Small group follow-up meetings are planned on July 9 and July 24. The goal is to resolve IL-TRM policy issues before the August 1, 2025 IL-TRM deliverable.

Comments Submitted By:

Name: [Kari Ross & Chris Neme](#)

Company or Organization: [Natural Resources Defense Council \(NRDC\)](#)

Company or Organization Website (if applicable):

Email: kross@nrdc.org and cneme@energyfuturesgroup.com

Phone: [Kari: 312-651-7914; Chris: 802-363-6551](#)

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.*

NRDC Response:

- NRDC supports this proposal, as we were one of the signatories to the Ameren Stipulation.
- Our rationale is that 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 (two years or less – see response to Question #4 below), it is reasonable for utilities to

¹ Policy issue #2 related to renewable/solar EE measures will be discussed at a follow-up SAG meeting on Monday, June 23. Written comments will be requested after the June 23 meeting, with a deadline of Friday, July 11. A written comment template will be circulated following the June 23 meeting.

pursue them in the context of low-income ($\leq$ 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.

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.

NRDC Response:

- 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.
- With respect to retail sales, it is illegal to sell anything other than efficient LEDs so there is no “time of purchase” efficiency upgrade opportunity.
- With respect to kits, the efficient LED that is provided to customers would either (1) replace an existing LED; (2) eliminate the purchase of a new LED; or (3) allow for a customer to replace an inefficient lamp currently in use. In the first two cases, the baseline is already an efficient lamp so there are no savings. In the third case, it is likely that any household (especially a financially challenged household) that would remove an inefficient lamp would store that lamp (rather than throw it away) and re-install it in the future, so there would be zero lifetime energy savings (i.e., there may be savings in the very short-term when the lamp is replaced with an LED, but there would be an off-setting increase in consumption (i.e., negative savings) when the stored incandescent is re-installed later). In addition, NRDC is generally skeptical of the benefits of EE kits compared to direct-install or whole-home program offerings and would consistently prioritize measures be delivered to income-qualified (as well as market rate) homes via those channels (instead of through kits).
- Note that ComEd has argued that one reason to consider its proposal is that its baseline study found that there are a substantial number of lighting sockets in which low-income households, in particular, were found to be using inefficient lamps. However, the surveys for those homes were conducted in early 2024. Incandescent/halogen lamps installed in moderate to high use locations will only last two years or less. And any new product purchased after 2023 has to be an efficient LED. Thus, the study results referenced by ComEd are not relevant to program years 2026 through 2029.
- NRDC is unaware of any other jurisdiction that allows for claiming savings from either of these channels.

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.

NRDC Response:

- NRDC supports this position for the reasons stated in response to Question #1 above.

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

NRDC Response:

- No. Any incandescent/halogen lamp that might be replaced through direct installation would not be expected to last (and to therefore provide inefficient lighting) for more than two years. Once such a lamp reached the end of its life, the baseline would become a new LED as that is the only thing that can now be purchased. Thus, the savings life should be just two years.

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.

NRDC Response:

- Yes. The fact that there may be on-site supply of electricity does not change the fact that the efficiency measure will reduce electricity consumption by the measure, which is the statutory goal. To the extent that the result of the reduced consumption is that the on-site generation simply provides more power to the grid, the efficiency measure is having the same impact on the amount electricity that the grid is required to produce.

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.

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 \(June 3, 2025\)](#)

NRDC Response:

- No. See response to 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 \(August 2024\)](#)

NRDC Response:

- Conceptually, NRDC is supportive of the notion that an efficient EV – i.e., one that consumes less kWh per year than a standard EV a customer would otherwise have purchased – could be a legitimate electric efficiency measure.
- The rationale for this position – again, conceptually – is that whenever a customer is in the market to buy an electricity-consuming product there can be an opportunity to influence the purchase so that they buy an efficient version of the product instead of a less efficient or “standard” version of the product. We do not see why EVs are different in this regard than lighting products, air conditioners or refrigerators. The fact that there may be other sources of funds for the purchase of EVs generally does not change that conceptual point if the focus of the utility EE program is not to promote all EVs but only highly efficient ones. If any other Illinois utility ratepayer funded EV promotions or incentives are also designed specifically to promote efficient EVs instead of standard EVs, our response might be different.
- That said, NRDC has concerns about the potential for a utility EE program to effectively promote the purchase of efficient EVs. Our biggest concern is that research on this issue in the Pacific Northwest seems to suggest that the federal mileage rating system upon which Ameren proposes to base savings estimates is not very accurate – and likely significantly over-estimating actual operating efficiency – for at least some EV manufacturers’ models (including many that have among the best efficiency ratings). We also have other concerns about the specifics of Ameren’s proposal, including (1) basing the assumed efficiency of a standard EV on the average efficiency of all EV *models* available rather than sales weighted average of the models that are actually being purchased today; and (2) assuming that the “baseline” is one standard deviation below the average efficiency rather than the average efficiency.