

NRDC and NCLC Comments on Solar Thermal as EE

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Solar Thermal Should be Counted as EE

- Proposal consistent with statute
 - Key statutory language: *“‘Energy efficiency’ means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use...”*
 - Solar water heating (and other solar thermal) does reduce the amount of electricity (or gas) “consumed”.
- Solar thermal’s use of heat from sun to reduce electricity/gas is similar to other EE measures
 - Ground source heat pumps extract heat from ground or groundwater to lower heating/cooling kWh
 - Air source heat pumps extract heat from the air
 - Passive solar design reduces heating need in buildings by taking advantage of solar gains thru windows
 - Incorporating “daylighting” into new commercial buildings uses “free” light from outside to reduce kWh consumption
 - All of these – and more – have been supported by EE programs across the country for decades