

## **IL EE Stakeholder Advisory Group (SAG) Request for Comments on IL-TRM Policy Issue #2: Renewable / Solar Generation**

### **Instructions:**

- Using this template, send written comments on IL-TRM Policy Issue #2 to the SAG Facilitator, Celia Johnson: [Celia@CeliaJohnsonConsulting.com](mailto:Celia@CeliaJohnsonConsulting.com) by Friday, July 11.
- Include “TRM Policy Issue Feedback” in the subject line of the email.
- Following the July 11 written comment deadline:
  - All comments will be posted on the [SAG website](#), and circulated to SAG.
  - Next steps will be reviewed following the comment deadline, including whether a follow-up meeting is needed, or whether a non-consensus comparison exhibit should be prepared.
- Deadline Reminder:
  - The goal is to resolve IL-TRM policy issues before the August 1, 2025 IL-TRM deliverable.

### **Comments Submitted By:**

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### **Policy Issue #2: New Measures Involving Renewable / Solar Generation**

**Policy Issue #2, Question 1:** Does the statutory definition of “energy efficiency” allow a solar as energy efficiency measure (i.e. rooftop solar generation) in the Illinois TRM?

[No comments.](#)

**Policy Issue #2, Question 2:** Does the statutory definition of “energy efficiency” allow a solar thermal measure (i.e. solar hot water and solar air heaters) in the Illinois TRM?

[We believe the definition of EE in the IPA Act and PUA allows for solar thermal measures. Our opinion is that solar thermal measures clearly can reduce the amount of electricity or natural gas consumed to meet a given enduse \(e.g. water heating\). The TRM already includes other measures that make direct use of solar energy in an unconverted form \(e.g. TRM Measure 4.5.11 Solar Light Tubes\), and there is no reason that there should be any difference between these measures and a solar thermal measure such as a water heater in their policy treatment.](#)

[In addition, as we have already stated: SAG has previously discussed the issue of solar thermal and has reached this same interim conclusion \(it should be allowed\) in the past. This most recently occurred during the development of Policy Manual 3.0, but as a result of this question being packaged under a policy proposal that included other measures \(e.g. Combined Heat and Power\), consensus was not able to be reached on the overall proposal under debate. To avoid repeating this conversation yet again, we think that regardless of the outcome of Question 1, this item should be resolved to allow solar thermal measures in the TRM.](#)

## Background Information

See the statutory definition of “energy efficiency”- excerpted from Illinois Power Agency Act (20 ILCS 3855/1-10) and Public Utilities Act (220 ILCS 5/8-104(b)):

"Energy efficiency" means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use. "Energy efficiency" includes voltage optimization measures that optimize the voltage at points on the electric distribution voltage system and thereby reduce electricity consumption by electric customers' end use devices. "Energy efficiency" also includes measures that reduce the total Btus of electricity, natural gas, and other fuels needed to meet the end use or uses.

### June 23 Large Group SAG meeting materials:

- [Facilitator Introduction to June 23 SAG Meeting](#)
- [ComEd Presentation](#)
- [Discussion Slides for June 23 SAG Meeting](#)

### Additional SAG meeting materials related to the “Solar as EE” policy issue:

- [ComEd Presentation \(June 9 SAG meeting\): Solar as Energy Efficiency](#)
- [ComEd Follow-up: Solar as EE in Other States](#)
- [ComEd Follow-up: Position on the grouping of solar PV and solar thermal technologies/measures](#)
- [Solar as Energy Efficiency – Residential New Measure \(ComEd – updated following June 9 meeting\)](#)
- [Solar as Energy Efficiency – Commercial & Industrial New Measure \(ComEd – updated following June 9 meeting\)](#)
- Spreadsheets that support the solar as EE workpapers:
  - [EE Residential Solar](#)
  - [PV Watts ETDF Calculations](#)
  - [Simultaneous Adjustment Factor Analysis – Residential](#)

### Additional IL-TRM workpaper related to renewable policy issue:

- [Residential Solar Water Heater New Measure \(Ameren Illinois\)](#)