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 Issues[1] #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:

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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.*

We support this proposal from a technical perspective. 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.

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

[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.

Do you have comments or feedback on the ComEd proposal? Please explain.

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. 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.

Furthermore, we would note that 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.

As we shared in the June 9 SAG meeting, 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.

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.

As with our support of the Ameren Illinois proposal, from a technical perspective we believe ComEd would be entirely justified to pursue this path.

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.

From a purely technical perspective, our opinion is that the measure lifetime for LED bulbs offered through direct install in low income channels should generally be the expected remaining life of the existing product(s) replaced by the LED. This is because once existing products fail, federal regulations mean that LEDs should be the only available product on the market to replace them.

Reasonable assumptions for the full measure life of products that LED bulbs might replace are: ~5 years when replacing compact fluorescent lamps (CFLs), and ~1-2 years when replacing incandescent lamps (halogen or otherwise). How the remaining useful life should be assumed to compare to these full measure life assumptions is a difficult question to definitively answer, and it may be more expedient to simply credit the programs with the full measure life of the products replaced rather than attempting to negotiate a remaining useful life assumption.

A few additional topics for consideration:

1) Past Illinois agreements have added some additional time to measure life to account for sell-through of inefficient bulbs. Our opinion at this point is that sell-through of inefficient bulbs should have reached its conclusion and therefore does not need to be accounted for. We are not aware of any field studies that have validated this opinion to date and if other parties disagree on this point it could be useful to do some field data collection to confirm.

2) Another topic that is frequently brought up when talking about the appropriate measure life for these measures is possible customer stockpiling of inefficient products (e.g. if a program direct installs a LED bulb to replace a halogen bulb, while the remaining useful life of that halogen bulb may be only a year, the customer may also have additional halogen bulbs in storage that otherwise would have been installed on burnout). In our minds, the programs would ideally address this issue by also addressing these stockpiled products. Per the Ameren stipulation, "addressing" this issue should consist of recycling or otherwise disposing of the products. It is unclear to us whether the language in the Ameren stipulation was intended to address stockpiled bulbs or only installed bulbs. As long as stockpiling is addressed by the programs, it is reasonable to credit the programs in some manner for addressing that issue, potentially by extending measure lives for the installed products replaced to compensate.

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

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.

No comments.

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.

No comments.

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)

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.

No comments.

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)