

# Illinois EE Stakeholder Advisory Group Policy Manual Subcommittee

Wednesday, August 3, 2022 Meeting: Kick-Off Part 2  
9:30 am – 12:30 pm  
Teleconference

## Attendees and Meeting Notes

### Meeting Materials

- Posted on the [Policy Manual Subcommittee page](#):
  - [August 3, 2022 Policy Manual Subcommittee Agenda](#)
  - [Policy Manual Version 3.0 Kick-Off Part 2 \(SAG Facilitator Presentation\)](#)
  - [Policy Manual Subcommittee Policy Principles – Questions to Consider \(SAG Facilitator\)](#)
  - [Proposed Policy Tracker – Request for Feedback \(updated 7/26/2022\)](#)
  - Policy Manual Subcommittee Version 3.0 Plan:
    - [Policy Manual Subcommittee Version 3.0 Plan \(7/26 Clean Version\)](#)
    - [Policy Manual Subcommittee Version 3.0 Plan \(7/26 Redline Compared to June Draft\)](#)
  - All Proposed Policies are posted on the [Policy Manual Subcommittee page](#)

### Attendees (by webinar)

Celia Johnson, SAG Facilitator  
Greg Ehrendreich, Midwest Energy Efficiency Alliance (MEEA) – Meeting Support  
Abigail Miner IL Attorney General's Office  
Gregory Norris, ACES 4 Youth  
Allen Dusault, Franklin Energy  
Andrew Cottrell, Applied Energy Group  
Andrey Gribovich, DNV  
Andy Vaughn, Leidos  
Annette Beitel, Future Energy Enterprises (IQ Committee Senior Facilitator)  
Billy Davis, Bronzeville Community Development Partnership  
Charles Ampong, Guidehouse  
Cheryl Johnson, People for Community Recovery  
Chris Neme, Energy Futures Group, representing NRDC  
Christina Pagnusat, Peoples Gas & North Shore Gas  
Christopher Vaughn, Chris Vaughn  
Cynthia Segura, Citizens Utility Board  
Dalitso Sulamoyo, Champaign County Regional Planning Commission (CCRPC)  
David Brightwell, ICC Staff  
David Kilgore, Ameren Illinois / Leidos  
Erin Stitz, Applied Energy Group  
Jean Gibson, Peoples Gas & North Shore Gas  
Jeff Erickson, Guidehouse  
Jim Dillon, Ameren Illinois  
Jim Fay, ComEd  
Joe Giamberdino, Citizens Utility Board  
Jonathan Skarzynski, Nicor Gas

Jonathan Kleinman, Aiqueous  
Kalee Whitehouse, VEIC (IL-TRM Administrator)  
Karen Lusson, National Consumer Law Center  
Katherine Elmore, Community Investment Corp.  
Keith Goerss, Ameren Illinois  
Kevin Grabner, Guidehouse  
LaJuana Garret, Nicor Gas  
Marjorie Kennedy, Jenner & Block  
Mark Szczygiel, Nicor Gas  
Martha White, Nicor Gas  
Matt Armstrong, Ameren Illinois  
Michael Brandt, Elevate  
Michael Pittman, Ameren Illinois  
Molly Lunn, ComEd  
Nelson May, Future Energy Enterprises  
Omayra Garcia, Peoples Gas & North Shore Gas  
Phil Mosenthal, Optimal Energy, representing NCLC and IL AG's Office  
Rebecca McNish, ComEd  
Samarth Medakkar, MEEA  
Scott Eckel, ICC  
Seth Craigo-Snell, SCS Analytics  
Stephen Robinson, Northwest Austin Council  
Steve Grzenia, Nicor Gas  
Sy Lewis, Meadows Eastside Community Resource Organization  
Tamika Cole, Walker-Miller Energy Services  
Taso Tsiganos, IL Attorney General's Office  
Tim Dickison, Ameren Illinois  
Tina Grebner, Ameren Illinois  
Travis Hinck, GDS Associates  
Tyler Sellner, Opinion Dynamics  
Wade Morehead, Morehead Energy  
Zach Ross, Opinion Dynamics

## **Opening & Introductions**

*Celia Johnson, SAG Facilitator*

Purpose of meeting:

1. To request feedback from Policy Manual Subcommittee participants following the meeting; and
2. To discuss income qualified / income eligible policy proposals at a high level to better understand each proposal and identify initial questions and/or feedback

## **Policy Manual Subcommittee Kick-Off Part 2**

*Celia Johnson, SAG Facilitator*

- Update Process
  - Creating an EE Policy Manual was a directive to SAG from the Commission in 2014. 2 excerpts included on slide to highlight info in the Manual on background and goals.

- Purpose of this Policy Manual update process is to discuss policy proposals and reach agreement on v3.0. Separate TRM policy document – some of these may be more appropriate for that document instead.
- The kick-off meetings will identify initial questions and feedback – future meetings will dig deeper and make edits.
- New policies were proposed earlier this year (due mid-June). Slide breaks down policies into categories – as shown in the Policy Tracker document.
- Not considering new policy proposals unless there is consensus to add it to the discussion – same process used by TRM Administrator. Some proposals may be best addressed in another venue.
- Final consensus on the policies to include will include final language and effective dates. Will be determined at the end of this process. Projected process end April 2023. Goal of filing for approval by end of June 2023. Proposed to be agreement between utilities and non-financially interested stakeholders. This is the process that was previously used. There is a proposal to discuss today about CBOs/CAAs being included as non-financially interested parties.
- Goal is to reach consensus before Manual is submitted to the Commission. If we cannot reach agreement, there will be a comparison exhibit and a docket will resolve open issues.
- Feedback requests – Due August 17<sup>th</sup>
  1. Policy Manual Subcommittee Plan and Updated Schedule
    - Final comments on plan & schedule as circulated last week and posted on the webpage. Plan is to meet monthly. Also proposing a few meetings in person depending on comfort levels. Also, may be Policy Manual Small Groups established to develop language to bring back to the group.
  2. Whether policies addressed by SAG from 2019-2021 should be considered in the Policy Manual process
    - Kick Off Part 1 provided background on this – policies that were discussed after the last Manual had been approved by Commission. One in “Final Draft” and 4 that were previously resolved. Should they be included in the Manual v3.0? If so, they need to be scheduled for discussion.
  3. Identify policy proposals that may not be appropriate for the Policy Manual, or may belong in another forum
    - Consider – is each appropriate for consideration in the Manual? It may belong better to another forum than the Subcommittee. Following the June Kick Off Part 1, created a Policy Principles document to guide feedback including whether proposals are needed, or whether they may be more appropriate to discuss in another forum.
- Policy Principles (review of shared document) [Policy Manual Subcommittee Policy Principles – Questions to Consider \(SAG Facilitator\)](#)
  - These are questions to consider when thinking about policies and whether it should be in the Manual, etc.
    - 1) Is it directly related to EE?
    - 2) Who does the policy impact?
    - 3) Is the policy a long-term solution?
    - 4) Does the policy belong in another forum?
    - 5) Is the policy a negotiated stipulation term?
    - 6) Is the policy needed?
    - 7) Is the policy a topic in an open ICC docket?

- Template for feedback shown on screen – [Proposed Policy Tracker – Request for Feedback \(updated 7/26/2022\)](#)
  - Review of layout of document and instructions for filling out the document
  - Will be used to put together a document to share all feedback with the group
- **Discussion**
  - Karen Lusson: It's important to note that simply because a policy is already included in a stipulation shouldn't negate the relevance of proposing that language to the Policy Manual discussions. There are important agreements in those stipulations and should be able to be proposed as official policy if appropriate. For people who haven't participated in this process before to keep in mind that those proposals shouldn't necessarily be kicked out of the process.
  - Phil Mosenthal: On feedback #2, is that also about whether policies should be considered. Is it just a subset of the things in #3?
  - Celia Johnson: Feedback request #2 refers to policies we already resolved as a group from 2019-2021, with the exception of market transformation which are in 'final draft' form. Request for feedback is whether they are just left as resolved on the SAG website or whether they go in the Manual. Feedback request #3 refers to policies that have been proposed in this process for the first time; should they be considered in the Policy Manual?

## **Discuss Proposed Policies: IQ North Committee Leadership Team and Facilitator**

### [Policy Proposals from IQ North Committee Leadership Team and IQ North Facilitator](#)

*Annette Beitel, Future Energy Enterprises, IQ Committee Senior Facilitator; Sy Lewis, Meadows Eastside Community Development Org.; Billy Davis, Bronzeville Community Development Partnership; Steve Robinson, Northwest Austin Council; and Cheryl Johnson, People for Community Recovery*

### **Policy Proposals from IQ-N Facilitator:**

1. **Create single section in EE Policy Manual for IQ Policies**
  - To the extent feasible, to make it easier for IQ participants to focus on what is more relevant to them.
2. **Policy that all IQ items discuss through SAG and/or SAG subcommittees should be grouped so that interested IQ participants can participate in targeted way.**
  - In the past in SAG, IQ proposals/topics have been scattered throughout meetings. Feedback from IQ participants is that it is hard to participate if the topics aren't concentrated. For future meetings, this is a request that there is an IQ-specific agenda grouping.

### **Policy Proposals from IQ-N Leadership Team:**

1. **Policies to Ensure Non-For-Profits are Implementing Energy Efficiency Programs and Measures, per statutory requirement set forth below, including, but not limited to:**
  - a. IQ Funding Expenditure Review (Annette Beitel, presenting for Naomi Davis):  
Review of expenditures from 2018 – 2021 to assess how much IQ funding was implemented by non-for-profits, and if non-for-profits not used to implement energy

efficiency programs and measures “not practicable” – how utility decided standard “not practicable” met.

- Request is to review past expenditures to see how much was implemented by NPOs and if they weren’t used, how the standard was met.
- Comes from statutory language in FEJA and CEJA that describes/mandates that agencies and NPOs should be used to implement IQ programs to the “extent practicable” and we want to see how that has been implemented.

b. CBO/CAA Contract and Program Oversight (Annette Beitel, presenting for Naomi Davis): The LIEEAC Leadership Teams should have ability to

review/comment/affirm all contracts (including Market Development Initiative contracts) for Income Qualified (IQ) energy efficiency programs and measures, prior to such contracts being executed by the utility to ensure all statutory and community issues are addressed.

- This relates to contract oversight for contracts that impact IQ programs. Per language in FEJA, IQ Committee has ability to oversee design & implementation. It’s important that contracts that establish how programs will be implemented, that IQ has the ability to review that before they are finalized. If a Leadership member is a subject of that contract, they wouldn’t be part of the review. This would enable changes before contracts are finalized.

c. CBO/CAA Capacity Building (Presented by Sy Lewis): Ensure utilities provide support to enable local non-for-profits to develop skills, capabilities and knowledge to effectively serve their communities implementing low-income energy efficiency programs and measures.

- We’re asking that a capacity building policy be put in writing because right now we don’t have anything that gives us leeway to develop materials, flyers, information to directly serve the population.

d. CBO/CAA Energy Efficiency Program and Measure Proposals (Presented by Sy Lewis): Ensure ability for CBOs/CAAs to receive fair consideration and support for energy efficiency program and measures they would like to design and implement.

- To give an example, something like when an idea is put up – that idea can be fleshed out, designed and implemented separately. And we would like that to be put up front.

e. Standard Form Contract for CBOs/CAAs (Annette Beitel, presenting for Naomi Davis): Policy for utilities in collaboration with the LIEEAC Leadership Team

statewide, standard-form contract for CBOs/CAAs to implement energy efficiency programs and measures that contain reasonable and appropriate terms for CBOs/CAAs that is mutually agreeable to CBOs/CAAs. The utilities now have very restrictive cyber security/PII provisions. CBOs/CAAs will not be able to meet them. It will be important to have “form,” standardized cyber, insurance and other key general terms and conditions that will apply to CBOs/CAAs, non-profits and small businesses (ideally).

- This is due to experience with contract in the last cycle – observation that it took a long, long time to negotiate and finalize. Provisions like cybersecurity, PII, etc. Recommend to make it easier for CBOs/CAAs to contract in the future. A standard form that will address the concerns and issues across multiple contracts and make the process easier.

- Recognition of the fact that there are going to have to have different provisions than a large implementation firm. Those should be worked out early on and developed as part of the standard contract to make it efficient.
- f. Standard, Appropriate, Mutually Agreeable Metrics for Evaluating CBO/CAA Programmatic Success (Annette Beitel, presenting for Naomi Davis): Common, CBO/CAA-approved metrics for programmatic success and data requirements to demonstrate success.
- This comes out of Naomi's experience as one of the early CBOs to contract with ComEd. The perspective is that it is important to discuss up front what the program is going to be evaluated against – savings or other important metrics – and developed in collaboration. So, the end result is measured on agreed metrics rather than metrics determined at the end. Co-creation of metrics and reflecting community perspectives that may go beyond traditional metrics.
- g. Protection of CBO/CAA Relationships/Intellectual Property (Presented by Sy Lewis): Policies to ensure that CBO/CAA relationships and program designs/other intellectual property not used by large implementing companies and/or utilities.
- This is to ensure that organizations can take ownership of their ideas. It can't be made that they can't move forward because the utility now own their idea since it got put out on the table. This is about who has control over the information – should protect it when CBOs put it out on the table.
- h. Access to Tools (Presented by Sy Lewis): CBOs/CAAs must have free and equal access to tools needed to design, track and evaluate CBO/CAA programs, including the cost-effectiveness calculator.
- CBOs/CAAs need to have equal access to the tools – how to use it, when it is to be used, etc. We want to have the same tools available to us.
- i. Evaluation (Presented by Sy Lewis): CBOs/CAAs must be given equal access (equal to the utilities) to evaluators who will be evaluating their programs, including review of evaluator contract, evaluation design, any early, ongoing, draft and/or final memos, white papers, reports, etc.
- The same with the evaluators – we want to be able to see what the utility sees, so we can measure what we are doing in our organizations the same way.
- j. Independent Oversight (Presented by Cheryl Johnson): Policies to ensure CBOs/CAAs have independent recourse if disagreements arise during contract negotiation, implementation and/or evaluation of CBO/CAA-developed and implemented programs, and/or any input that CBOs/CAAs have regarding income qualified contracts and/or programs that are implemented and/or evaluated by entities that are not local CBOs/CAAs.
- If there is a contract and a disagreement, we need to have protection to help us negotiate through the process. Example of problems at a training facility, there should be a process for subcontractors and how relationships are continued between subs and contractors. It is unfair if they can drop you at will. We try to deliver opportunities for our communities, but issues raised in a training we were involved with and when we addressed those issues there was no recourse to resolve it. Instead, we were dropped and unable to participate. There need to be

recourse policies to come to an agreement rather than kicked off because of disagreement between parties.

- [Annette Beitel] I have heard this from multiple people. If a CBO/CAA is a sub to an implementer or direct to a utility, there is an imbalance of power. Especially when there are legal issues. Also, there is a fear of retaliation – if I speak up an assert my rights, I'll get dropped or blackballed. The request here is to acknowledge the imbalance in experience as well. We have educated, experienced people in the Leadership Committee but they are new to this particular industry. They are seeking an ability to level the balance of power in disputes to avoid black-balling or sand-bagging.

### **Discussion on Proposals in #1:**

- Molly Lunn ComEd: This list is introduced by the IQ N Leadership Committee – would these be for just the IQ North utilities or statewide?
  - [Annette Beitel] These were developed by the IQ North leadership team, due to geographic ease. The point of these issues is to surface them and get them resolved. If they go in the Policy Manual, I think they would be statewide. The Leadership Team wants these issues resolved, whatever the forum.
- Karen Lusson: These proposals are important and why we push for MDI provisions in the stipulations. We have heard about problems diverse contractors have faced on the imbalance of power and the threat of appropriation of ideas and business models.
- Cheryl Johnson: Comments can be derogatory or discriminatory – those are violations. And making subs feel uncomfortable doing business.
- Chris Neme: I think some of these are potentially very applicable statewide for the policy manual. Wanted to better understand the EE program and measure proposals item. Could you elaborate what you mean by fair consideration and support for programs you want to design and implement? Is part of that the consideration of compensation for investment in developing intellectual property? Is there an example of a problem that could illustrate this for us?
  - Sy Lewis: One of the reasons I am hesitant is retaliation or problems with the program moving forward. I put forth a program called “Light up the Night” right before the pandemic. Seemed to be a great idea. It was clear that once it was put forth in the Program Ideas, it wasn't really my idea anymore, I was just implementing the idea. Even though it was near & dear and the product of many years of work. I had difficulty getting support for the program – we'll do this thing for you, we need you to do these things, etc. - it was okay except it felt like we were being punished for not being able to implement some measures based on things we had no control over. We did not feel supported. The utility doesn't think in terms of small CBO organizations. We can't just implement at the drop of a hat. We need the utility consideration and support to help with those things – we need either time or money and that's not what is happening. Not just to me, so we want it to be in the Manual that it is ensured. Creating fairness across the board.
- Phil Mosenthal: There is merit in the utilities providing support and training. It occurs to me that there is a not insignificant budget impact. Would be helpful to clarify and understand where the funds are envisioned to come from – what budget (IQ Committee budget allocated by the utilities or from the EE budget)?
  - Annette Beitel: The budget for the IQ Committee from both CEJA and the contracts, I think it could be extended to provide some skills and knowledge. But I'm not sure it covers implementation skills by statute. A working group could

figure out what skills and capabilities the CBOs need support for and how we can develop those skills efficiently.

- Sy Lewis: It should come from the EE budget, not the budget for having a robust IQ Committee – it's not to implement. We have enough difficulty just trying to parse out training money for CBOs/CAAs on giving out information in a consistent manner. Just being able to provide to communities in a language they understand.

## **2. Policies to Minimize Disconnections (Presented by Cheryl Johnson)**

- a. Policy to ensure all customers who have been identified as a disconnection risk, including those behind on bills, are affirmatively reached out to educate them about all services available to them to help them reduce and pay their bills, including utility energy efficiency programs, state-funded programs such as IHWAP and LIHEAP, etc.
- b. Policies to ensure customers facing disconnection risk receive energy education on how to read their bills, understand greatest energy using equipment and practices and how to manage their energy use.
  - When it comes to at-risk customers, utility knows where they are geographically. But there is nothing there to provide an intervention. We can't live without electricity. In disadvantaged communities like public housing, there should be an intervention to prevent disconnection. We have to educate. It's not there on energy efficiency, to teach them how to reduce their burden. They don't understand the burden even exists. Need to even be able to read the bill and understand their usage. We can't even get past customer service when the disconnection notice comes. Without any education to prevent the cycle from repeating – there is something missing. If there is some kind of program to be developed to look at the at-risk population and to intervene and prevent their disconnection and refer to the service programs that are out there. Utilities know where their disconnections happen and where the population exists. We need to intervene in that and prevent disconnections – it will save lives.
  - **Discussion:**
    - Karen Lusson: Agree and support. We have zip code level data to tell the utility where to focus its attention.

## **3. Policy to Ensure and Facilitate IQ Energy Assistance Program Cross-Referrals (Presented by Sy Lewis)**

- a. "Policy Rule" that cross-referral must occur, identify the IQ Programs and Initiatives that should be subject to cross-referral, ensure customers get assistance/coaching from the program in accessing the other programs/initiatives that could help them, then have EM&V do some spot checking to make sure the referral is occurring consistently and customers are able to take advantage of other programs available to them.
  - It's a portion of what Cheryl just mentioned in terms of education and training. If someone has LIHEAP, they should be referred to PIPP, solar, or other programs that they may be eligible for. That should be automatic, and spot checking should ensure it is consistent. We have the data.

- b. “One-Stop Shop” for Customer Sign-Ups for ALL bill assistance and IQ energy programs so that customers do not have to repeatedly sign-up and/or gather different documentation for multiple assistance programs, including those offered through federal and state funds (such as LIHEAP, LIWAP and IHWAP).
  - Instead of having to run from one place to the next, repeating things for multiple programs and seasons. Seniors dragging out to an Agency in the dead of winter to provide all their information. When we went downstate, we found documents are different in how they are being provided and accessed in different areas. We don’t understand why it isn’t the same easy, speedy way everywhere. Consistency is needed across the board on how information is gathered. Utilities have the records. There needs to be an easier way for the people who need these programs to be able to access them.
- c. “Customer Journey Map” and “Customer Feedback Survey” (Presented by Stephen Robinson) for IQ customers to ensure that their experience is as seamless and positive as possible; customer feedback from all IQ customers after they have engaged in programs to ensure they are being treated with dignity, respect and the same speed and efficiency that a “market-rate” customer might receive.
  - We need a vehicle to track positive and negative feedback from customers to ensure there is equity in efficiency and the way we help the customers. Right now, there is nothing in place to give us that direction. We need that to move forward in a positive direction.
  - Discussion:
    - Chris Neme: For the customer feedback and journey map, are you talking about just in the context of EE or across the range of services?
      - A: Yes, customer service, but even with just EE we just don’t have the information from the customer and distributors.

**4. Policies to Track and Report on Illinois Home Weatherization Program (IHWAP), including Braided Efforts (Presented by Annette Beitel)**

- a. Policies that require tracking and reporting of IHWAP program funds and braiding efforts to ensure all funds allocated each year are spent.
- b. Policies to ensure sufficient workforce and contractors to perform the IHWAP work.
- c. Policies to ensure sufficient training resources, effective and constructive oversight and coaching of trade ally work to ensure trade allies are able and willing to expand and continuously improve.
  - In central / southern IL, the CAAs are having difficulty with IHWAP program and braiding. Policies established by the state are more rigorous and detailed than in other states. Having difficulty recruiting contractors. Challenging relationship with auditors – nitpicky and critical relationship. Would like to see IHWAP modified in several ways so customers can access the funding allocated to them by state and federal governments. It’s a real struggle for the CAAs especially in the South.
  - **Discussion:**
    - Karen Lusson: DCEO needs to be part of that conversation.
    - Zach Ross: Is this IHWAP specific, or also a utility program?

- A: Focused on IHWAP, but related to the braided funding from the utilities – bottom line is that utilities don't have the influence to change the IHWAP rules. It's really the IHWAP rules that make it difficult to spend the money and do the braiding.

**5. Policy that IQ Programs and Related Services (e.g. LIHEAP and IHWAP) Should be Offered Through Local Community Centers (CBOs/CAAs) and Services Should be “Wrap-Around” (One-Stop Shop) (Presented by Sy Lewis)**

- Local CBOs/CAAs who wish to provide outreach, education and sign-up should be trained and supported by utilities and other partners (DCEO) through resources, effective contracting, coaching and other resources.
  - We want these orgs to provide education and sign-up, and they should be trained by utilities and other partners. People respond to the orgs in their community. Because of language, by knowing the people, etc. We think by doing this, we will get more sign ups, help with disconnections, inform people about everything available to them. A one stop shop means more programs are being provided to each resident.

**6. Policies to Ensure Use of Local and Diverse Contractors:** (Presented by Stephen Robinson) Policies to ensure that trade allies serving disadvantaged communities are based in those communities and represent residents of those communities. Programs and contracting models to ensure success and growth of local and diverse contractors in participating in both utility and state-funded programs.

- Trade allies serving communities should be based in those communities. We can empower those communities and create sustainability in those communities.

**7. Local CBOs/CAAs Considered “Non-financially interested parties”:** (Presented by Billy Davis) Policy indicating that, by definition, local CBOs/CAAs are included in definition of “non-financially interested parties” except in the narrow case that a contract with that organization is being considered by SAG or a SAG subcommittee.

- As alluded to earlier, proposal is that by definition CBOs and CAAs should be included as non-financially interested parties. There is an issue in competing for business that is unrelated to our work on the IQ Committee.
- **Discussion:**
  - Chris Neme: When you say they should be considered non-financially interested, what do you currently not have access to? How broad is this?
    - Annette Beitel: Essentially, this covers things like being able to be negotiating party on the negotiating team for stipulations. Things like upcoming solicitations, contract review. If someone has been selected as part of the solicitation, they shouldn't review the contract. But the perspective that has been shared is for example when discussing an upcoming RFP, the Committee should be able to weigh in on the construction of the RFP even if they ultimately intend to bid on it. Because they might get a contract at the end, isn't a good reason to keep them out of foundational discussions. There is a balance of interests. If a marketing contract keeps them out of policy discussions, there is a problem with that. This needs deeper, separate discussion. Non-profits, serving the community, are not there to make a profit.

8. **Policy on Primacy of LIEEAC Over SAG** (Presented by Billy Davis): Policy indicating the primacy of recommendations of LIEEAC over those from SAG or other stakeholder processes to ensure CBOs/CAAs have the “final say” in policies and practices that impact their communities.
- Leadership team recommendations should take precedence over SAG and other processes – so the CBOs and CAAs have the final say on the policies and practices, which we believe is the intent of legislation.
  - **Discussion:**
    - Karen Luson: The EE Plan stipulations focused a lot of attention on trying to ensure the points discussed today were part of the implementation of low-income programs. We need to be careful to the extent a proposal from LIEEAC / IQ Committee conflicts with a stipulation. For a hypothetical example, if the stipulation requires a utility to spend \$10k on weatherization and the LIEEAC recommends \$5k, that is a conflict. The notion that agreements developed through LIEEAC trumps the stipulation, that’s going to be difficult to support in instances where there is a specific conflict with the agreement.
9. **Primacy of IQ-TRM Working Group vs. TRM Working Group** (Presented by Sy Lewis): Policy Indicating that technical values for IQ get resolved through the IQ TRM Working group rather than the full TRM Working Group.
- Policy proposal that saying IQ TRM working group has more knowledge and more IQ parties involved, so they should resolve IQ TRM issues.
  - **Discussion:**
    - Phil Mosenthal: There are a number of things in the current TRM Manual that address issues around TRM working groups and how they function. Would those still apply to the IQ TRM Working Group? For example, procedures for resolving conflicts and around adjustable goals?
      - A: Yes, they would still apply.

## Discuss Proposed Policies: Utilities

*Molly Lunn, ComEd*

*Matt Armstrong, Ameren Illinois*

- **LIEEAC Facilitator Independence (ComEd):**  
[https://ilsag.s3.amazonaws.com/Proposed-Policy\\_LIEEAC-Facilitator-Independence\\_ComEd.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_LIEEAC-Facilitator-Independence_ComEd.pdf)
  - This is focused on facilitator independence for whatever the LIEEAC / IQ Committee. It’s a follow on to our stipulation, because the stipulation was finalized before the Committee was re-launched. The negotiating parties wanted language in the stipulation regarding the Committee. Several Committee Leadership Tema members reviewed the language. What is in the stipulation, we feel like we agree to it but it’s a long-term principal for the committee and should be codified beyond a document that just covers 4 years. ComEd’ stipulation said we would propose it in the Manual. We understand the committee may feel differently now and we’re open to feedback, also from other utilities. Open to feedback from everyone. The purpose of this is to codify something regarding IQ Committee facilitator independence.

- **Net-to-Gross (NTG) Policy for Disadvantaged Areas (Ameren Illinois):**  
[https://ilsag.s3.amazonaws.com/Proposed-Policy\\_NTG-Policy-Disadvantaged-Areas\\_Ameren-IL-1.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_NTG-Policy-Disadvantaged-Areas_Ameren-IL-1.pdf)
  - Recognizing that state policy has prioritized addressing continuing concerns, we want to propose enhancing the NTG policy for customers in areas facing significant disadvantages. This is a mechanism to identify and prioritize previously underserved areas. Develop a definition related to disadvantaged areas for EE. Opinion Dynamics has conducted research over the past year, a Low Income Needs Assessment that characterized customer segment and groups' outreach channels. Study found that IQ customers face higher energy burden and specific groups have disproportionately higher burdens. Customers who have disproportionately higher burdens live in geographically defined areas and stand to benefit the most.
  - We also designed and conducted a study called the Empower Communities Study to reach communities and institutions – findings that awareness is the largest barrier to participation. Small businesses and community serving orgs are unaware and have competing priorities. Those studies have been posted on the SAG website. We have scheduled time with SAG to provide more details on those studies [on Sept 8, joint with IQ Committees]. The studies show that additional marketing, education and outreach coordination are necessary and additional resources are required to engage those customers. Programs that successfully engage should get higher savings attribution compared to non-disadvantaged areas.
  - Proposal is for evaluators to use this research to assess any notable differences between geographic zones that correlate to barriers to participation. Propose that research would be presented to SAG and used to prioritize areas and validate NTG of 1.0 for those areas. In order for utility program administrators to more clearly target efforts to serve customers that haven't been served, that SAG would agree to an NTG of 1.0 similar to the current low income policy for NTG.
  - **Discussion:**
    - Karen Lusson: This is for residential. What about small businesses? No free ridership issues with large franchises and large industrial customers?
      - A: We think large customers have an impact in that community and the investment in the community as a whole benefits the entire community.
    - Chris Neme: Creative and innovative proposal. May make sense for residential and small businesses, not large businesses or chain stores that make decisions elsewhere. Free ridership likely would be lower for residential and small business.
    - Chris Neme: Are you anticipate the Manual itself would have a disadvantaged community definition for determining what programs get a 1.0?
      - A: Yes.
    - Chris Neme: You mentioned programs. Would assume there is a Small Business program and the portion of those customers in the disadvantaged community would get a 1.0 but outside would get the regular NTG ratio?
      - A: Currently is it on a program or channel basis. This proposal is geographic. Would need to work that out in the policy.

- Chris Neme: The NTG currently is a weighted average of what it looks like today. Is there a separate analysis of NTG ratios for customers so it isn't skewed by including customers that are in the group or out of the group?
      - A: Have not discussed with evaluators yet; think we can work out a framework.
    - Phil Mosenthal: There are probably distinctions between independent businesses in different communities. As I understand this proposal, it's evaluation based, data-driven outcomes in terms of what we really think the NTG is in disadvantaged and non-disadvantaged areas. Want to be clear that it is automatically 1.0 or we will be evaluating it depending on the customer type or measure?
      - A: We are proposing using a 1.0 NTG in geographic disadvantaged areas, to help drive EE investment.
- **Single Family IQ Eligibility Verification Guidelines (Ameren Illinois):**  
[https://ilsag.s3.amazonaws.com/Proposed-Policy\\_SF-IQ-Verification\\_Ameren-IL.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_SF-IQ-Verification_Ameren-IL.pdf)
  - The current Manual Sec. 4.3 provides income eligibility verification guidelines for low income multifamily customers. There is a list of verification pathways, recognizing that most customers who meet the alternate guidelines are IQ customers. This would apply a similar approach to single family to provide alternative verification pathways for single family customers to be deemed eligible to participate in programs. We put in some of the current proxies in the multifamily policy and are suggesting those. If a customer was participating in a WAP program, a utility EE program, a state or federal disaster relief program, participation in local gov't or community org programs, demonstration that most households are below 80% AMI.
  - **Discussion:**
    - Karen Lusson: Can you give an example of the federal or local disaster relief program?
      - A: Will consider a federal or local program example. We were also thinking of things like WIC where there is assistance with food purchases.
- **IL-TRM Lighting Policy Considerations (Ameren Illinois)**
  - Currently where things are headed with the lighting working group and the TRM TAC, we are comfortable moving on right now and leaving this as a potential later discussion in the Policy Manual if needed.

#### **Discuss Proposed Policies: Stakeholders**

*IQ/IE Impact Presenters: Courtney Hanson and Cheryl Johnson, People for Community Recovery; Katie Elmore, Community Investment Corp.; Chris Neme, Energy Futures Group, representing NRDC and Phil Mosenthal, Optimal Energy, representing IL AG and NCLC*

*IQ/IE Reporting Presenters: Joe Giamberdino, Citizens Utility Board; Katie Elmore, Community Investment Corp.; Cynthia Segura, Citizens Utility Board; and Karen Lusson, National Consumer Law Center / COFI*

- **New Income Qualified Accountability Committee Section (Presented by People for Community Recovery):** [https://ilsag.s3.amazonaws.com/Proposed-Policy\\_IQ-Accountability-Committee-Section\\_Joint-Stakeholders.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_IQ-Accountability-Committee-Section_Joint-Stakeholders.pdf)
  - There needs to be an IQ Committee section in the Policy Manual, similar to the SAG section (Section 3). Important for inclusion.
  
- **One-Stop Shop Program Design Definition for IQ Multifamily Retrofit (Presented by Community Investment Corp.):** [https://ilsag.s3.amazonaws.com/Proposed-Policy\\_Program-Design-MF-One-Stop-Shop\\_Joint-Stakeholders.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_Program-Design-MF-One-Stop-Shop_Joint-Stakeholders.pdf)
  - The multi-family one-stop shop – making sure customers are referred to the best program for them, regardless of where they are referred from. There might be a better fit program for them or their property. We don't think there is enough of a shared understanding of what a "one stop shop means" and there should be an agreed definition. For example, a single point of contact, a universal intake, and a comprehensive technical assistance assessment.
  
- **Statewide Potential Study (Presented by Energy Futures Group / NRDC):** [https://ilsag.s3.amazonaws.com/Proposed-Policy\\_Statewide-Potential-Study\\_NRDC-ICC-Staff-NCLC-COFI\\_Final-6-9-22.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_Statewide-Potential-Study_NRDC-ICC-Staff-NCLC-COFI_Final-6-9-22.pdf)
  - Historically, the utilities do their own potential studies. To support their assessment of how much EE could be acquired under statutory spending caps and to inform an assessment of where savings potential exists. Those are all independent and separate. In the past, stakeholders have shared RFP feedback and review of draft reports, but in many cases, comments were not adopted or addressed. Stakeholders feel we are reviewing things too late in the process to have any influence.
  - Proposal is to establish that there would be a statewide electric & gas potential study, with estimates each utility service territory. There are economies of scale on the statewide level, and consistency in the approach would make sure we don't have to parse out methodological differences. Another key aspect of the proposal is stakeholders providing input into how the studies are structured, feedback on data and assumptions and analyses, with all of the parties having an equal interest in the outcomes / an equal voice. This is consistent with agreements in the latest contract negotiations with the electric utilities, it makes sense to have it happen on the gas side as well. Proposed policy language comes from the Ameren stip.
  - Flagging during the IQ-focused kick-off meeting because of the low-income and disadvantaged community potential and the assessment needed in those markets.
  
- **Equity and Affordability Statewide Reporting Metrics (Presented by Citizens Utility Board):** [https://ilsag.s3.amazonaws.com/Proposed-Policy\\_Equity-and-Affordability-Statewide-Reporting-Metrics\\_Joint-Stakeholders.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_Equity-and-Affordability-Statewide-Reporting-Metrics_Joint-Stakeholders.pdf)
  - Stakeholders are looking for increased transparency on how portfolios are impacting individuals and are equitably distributed. Metrics help assess how the programs are performing, who is involved, that the benefits go to the people who need them most. Interested in statewide metrics. Would like to see best practices on these metrics as used in other states.
  - Propose two potential presenters (U of Michigan, ACEEE) to share information on metric development, followed by stakeholders proposing specific metrics /

discussion on specific metrics for IL. There is an increasing body of research to inform equity metrics. Some of the studies are granular and in-depth on specific demographics and cities, some are broad based. We think this educational series would be the best starting point.

- **Discussion:**
  - Celia Johnson: We have been working on meeting dates for presentations from U of Michigan and ACEEE; looking at the September Policy Manual meeting.
- **IQ Multi-Family Reporting Metrics (Presented by Community Investment Corp.):** [https://ilsag.s3.amazonaws.com/Proposed-Policy\\_IQ-Multifamily-Statewide-Reporting-Metrics\\_Joint-Stakeholders-1.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_IQ-Multifamily-Statewide-Reporting-Metrics_Joint-Stakeholders-1.pdf)
  - This dovetails with what Joe just spoke about, but is more of a traditional expansion of the section of the Manual. Statewide, consistent IQ MF metrics. We think these would fill the gap from what is currently in the Manual. Some of the metrics are participation by ZIP and apartment units, and actual services and measures in which buildings, which got only direct install, which had measures in units, which had major comprehensive measures. The 2022-2025 plans have expanded the reporting but each utility has agreed to different metrics, this would standardize it.
  - **Discussion:**
    - Matt Armstrong: Ameren Illinois agreed to metrics workshops; this could help inform the discussion relative to this proposal.
    - Celia Johnson: The Ameren Illinois Multifamily Workshop is scheduled September 15<sup>th</sup>.
- **Health and Safety Reporting (Presented by Citizens Utility Board):** [https://ilsag.s3.amazonaws.com/Proposed-Policy\\_Health-and-Safety-Metrics\\_Joint-Stakeholders.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_Health-and-Safety-Metrics_Joint-Stakeholders.pdf)
  - Proposal for consistent statewide guidelines and metrics – quarterly reporting for programs including number of IQ properties, number of H&S issues identified by SF and MF, type of issues identified and addressed, where locations are occurring, number of buildings not weatherized because of issues outside of spending caps, amount of project funds spent down. Every utility has agreed to metrics and discussion of them, several have agreed to report some metrics. A statewide guideline supports clear and consistent reporting across all utilities. Would impact both gas and electric. Has not been addressed previously by ICC. Consistent with CEJA.
- **Diverse Vendor Reporting (National Consumer Law Center / Community Organizing and Family Issues):** [https://ilsag.s3.amazonaws.com/Proposed-Policy\\_Diverse-Vendor-Reporting\\_NCLC-COFI.pdf](https://ilsag.s3.amazonaws.com/Proposed-Policy_Diverse-Vendor-Reporting_NCLC-COFI.pdf)
  - In the stipulations approved by the ICC for current utility EE plans, each utility has agreed to some kind of market development initiative that includes commitments to support the diverse vendor landscape. For example, increasing diverse contractor engagement & hiring. All parties should be interested in assessing the results of these initiatives and tracking how well the utilities are doing. That reporting should be consistent across the state.
  - Proposing specific reporting metrics so we can see transparent tracking of these goals. Proposal includes potential quarterly metrics – numbers and names, category breakdown, dollar value of contracts by category relative to total

program contract dollars available. Not just in IQ programs but in all portfolio programs. Public Utilities Act requires supplier diversity goals for the utilities but those are company-wide. We don't have a clear idea how it is going just in the EE programs. The commitments made in stipulations are a starting framework for the discussion.

## **Closing and Next Steps**

*Celia Johnson, SAG Facilitator*

### **Follow-up to August 3 Meeting:**

Feedback on three areas below is due by Wednesday, August 17<sup>th</sup>. Send feedback to [Celia@CeliaJohnsonConsulting.com](mailto:Celia@CeliaJohnsonConsulting.com). A summary of feedback will be circulated to the Policy Manual Subcommittee. The goal is to hold a follow-up discussion on feedback received during the Wednesday, August 31<sup>st</sup> meeting.

1. Comments or Proposed Edits to Policy Manual Subcommittee Plan and Updated Schedule
  - [Policy Manual Subcommittee Version 3.0 Plan \(7/26 Clean Version\)](#)
2. Whether policies addressed by SAG from 2019-2021 should be considered in the Policy Manual process
  - [Market Transformation Policy Issues \(Final Draft from 2020\)](#)
  - [Estimating Savings in Calendar Year 2020 and Calendar Year 2021 Due to COVID-19 Pandemic \(Final, March 2021\)](#)
  - [Income Eligibility Verification for Low Income Customers \(Final, July 2020\)](#)
  - [Evaluating Savings from Non-Qualified Equipment \(Final, Jan. 2020\)](#)
  - [Using the Project Application Date to Determine the IL-TRM Version Followed by the Affordable Housing New Construction Program \(Final, Dec. 2019\)](#)
  - Submit feedback via the [Proposed Policy Tracker](#) – see Rows 19-23, with feedback requested in Columns G, H and I
3. Identify policy proposals that may not be appropriate for the Policy Manual, or may belong in another forum
  - Consider – is each policy proposal appropriate for consideration in the Policy Manual process? Review the [Policy Principles](#) presented August 3<sup>rd</sup> to help inform feedback.
  - Submit feedback via the [Proposed Policy Tracker](#) – see Rows 26-93, with feedback requested in Columns G, H and I