

**Illinois EE Stakeholder Advisory Group
Policy Manual Subcommittee**

**Tuesday, July 19, 2023
9:30 am – 12:30 pm
Teleconference**

Attendees and Meeting Notes

Meeting Materials 1
Attendees 1
Opening & Introductions..... 2
Single Family IQ Eligibility Verification Guidelines Policy 3
LIEEAC Facilitator Independence Policy 6
IQ Reporting Policies 7
Closing and Next Steps 10

Meeting Materials

Posted on the [Policy Manual Subcommittee page](#).

Attendees

Celia Johnson, SAG Facilitator
Caty Lamadrid, Inova Energy Group (SAG Meeting Support)
Andrey Gribovich, DNV
Andy Vaughn, Leidos
Annette Beitel, Future Energy Enterprises (IQ South Committee Sr. Facilitator)
Becca McNish, ComEd
Briana Moore, Will County Land Use Department
Cassidy Kraimer, Community Investment Corp.
Charles Ampong, Guidehouse
Cheryl Watson, Equitable Resilience & Sustainability
Chris Vaughn, Nicor Gas
David Brightwell, ICC Staff
Elizabeth Horne, ICC Staff
Erin Dopfel, AIQUEOUS
Jarred Nordhus, Peoples Gas & North Shore Gas
Jean Gibson, Peoples Gas & North Shore Gas
Jonathan Skarzynski, Nicor Gas
Kalee Whitehouse, VEIC (IL-TRM Administrator)
Karen Lusson, National Consumer Law Center (NCLC)
Kevin Dick, 389nm
LaJuana Garret, Nicor Gas
Matt Armstrong, Ameren Illinois
Michael Brandt, Elevate
Michele McSwain, Sustainable Environmental and Economic Development Solutions
Molly Lunn, ComEd
Neil Curtis, Guidehouse
Nelson May, Future Energy Enterprises
Odette Hyatt-Watson, East Central Illinois Community Action Agency
Philip Mosenthal, Optimal Energy, representing IL AG's Office and NCLC

Ron Markus, BCMW Community Services
Ronna Abshure, ICC
Scott Eckel, ICC
Seth Craigo-Snell, SCS Analytics
Ted Weaver, First Tracks Consulting, representing Nicor Gas
Thomas Manjarres, Peoples Gas & North Shore Gas
Tina Grebner, Ameren Illinois
Travis Hinck, GDS Associates
Victoria Nielsen, Applied Energy Group (AEG)
Wade Morehead, Morehead Energy

Opening & Introductions

Celia Johnson, SAG Facilitator

- **Meeting Purpose:** To discuss comments received on income qualified (IQ) policies from the SAG Equity Subcommittee, IQ North EE Committee and IQ South EE Committee.
- **Materials:** [SAG Facilitator Presentation: Introduction to July 19 Meeting](#)
- **Background on July 19th Meeting:**
 - SAG Policy Manual Subcommittee requested feedback on income qualified (IQ) related policies following the June 26 the SAG Equity Subcommittee meeting, which was held jointly with the IQ North EE Committee and IQ South EE Committee
 - IQ related policies were developed over the past year by the Policy Manual Subcommittee
 - These IQ policies are intended to support Illinois utility IQ EE program offerings
 - Three weeks provided for feedback – comments were due Monday, July 17
 - SAG Facilitator consolidated feedback into one document and circulated it
 - Comments received from:
 - Briana Moore, Will County Land Use Department
 - Cheryl Watson, Equitable Resilience & Sustainability
 - IQ South Committee Facilitator (Annette Beitel), reflecting comments from the June 26 meeting
 - Katherine Elmore, Community Investment Corp.
 - Kevin Dick, 389nm
 - Michelle McSwain, Sustainable Environmental and Economic Development Solutions
 - Meeting Goals:
 1. To provide an opportunity to understand and discuss IQ feedback received; and
 2. To determine whether feedback will be incorporated into the Policy Manual, or in the alternative, discussed in another venue
 - Participants were asked to do the following during the meeting:
 - Listen to feedback on IQ policies with an open mind
 - Provide space for all participants to speak up
 - Consider the following questions:
 - Does this edit belong in the Policy Manual? If not, is there another venue where the feedback could be addressed?

- If the feedback raises a NEW policy issue, it needs to be addressed outside of this Policy Manual update – in what venue should a NEW issue be discussed?
- **Reminder:** Please do not raise any new edits that do not directly relate to the IQ feedback received.

Single Family IQ Eligibility Verification Guidelines Policy

- Briana Moore: Proposed edit about sharing information in other languages. Interested in information on how utilities are providing information on other languages right now, and if it is just for self-certification piece or other areas of the EE programs.

Becca McNish: Many of ComEd's program materials are in Spanish as well in English.

Matt Armstrong: Ameren also gives some materials in Spanish, but unsure how broad that is.

Karen Lusson: Supports Briana's suggestion.

Cheryl Watson: I support this.

Odette Hyatt-Watson – via chat: Yes. I believe that's important.

Matt Armstrong: Understand the need, but curious if edit is too-open ended. I don't know how many languages are in our service territory and how the policy gets implemented.

Becca McNish: Is English and Spanish enough?

Karen Lusson: I don't think this is enough.

Cheryl Watson: In Chicago you would need five languages as there is a large Asian and African population.

Phil Mosenthal: Utilities should talk to your Program Implementers to see if they have staff that can assist in these languages. Because even if materials are in the language, if they cannot communicate with the customers then it is a barrier.

Jean Gibson: Assuming that we are talking about having this language just for self-certification process?

Kevin Dick – via chat: I agree - any written documentation should have the ability to provide customer service, though perhaps this can be done with an English-speaking relative.

Karen Lusson: I am putting in chat rules used by credit and collections and disconnections departments for reference: "When there is a demonstrated need for second language notices in the service area of any utility, notices as set out in Appendices A and B sent to customers located within the area should contain the following warning in the appropriate second language: "Important – This notice affects your rights and obligations and should be translated immediately.""

Karen Lusson – via chat: I'm going to keep looking for other sources that have addressed this issue. I recall in the COVID-19 negotiations with the utilities, we discussed this issue. I'll check on that.

Karen Lusson: On the IL Attorney General's website there is language inviting customers that need a translation to enter their language, and there are many language options - <https://www.illinoisattorneygeneral.gov/>

Kevin Dick – via chat: DTE has/had a program that provided services to deaf customers. Should this include communication barriers beyond language?

Feedback from utilities: Will need to check internally on what language information is provided.

Celia Johnson: This discussion about language may be broader than Policy Manual edits; may require a separate conversation in the future.

Next Steps:

- *Proposed policy edit: For non-IHWAP braided, single-family whole building retrofit projects, a self-certification process “will include information in languages other than English when there is a demonstrated need...”*
 - *The utilities will check on which languages information is provided other than English.*
 - *If further understanding is needed, this topic of providing information in other languages can be discussed in the future. SAG Facilitator to add to SAG “parking lot” issue list.*
- *Annette Beitel: Edits (1) Suggesting that if resident lives in mobile home park that would be sufficient to determine they are low income and eligible for service. (2) For many of these customers, income varies over time; edit proposes that CAAs or CBOs have some discretion of whether the person qualifies for service. This edit came from a Community Action Agency, based on experience that income can fluctuate.*

Karen Lusson: For LIHEAP distribution, DCEO allowed people to provide income information for any month in past year that reflected their financial situation, and that was sufficient for eligibility determination. The DCEO-approved CAA (LIHEAP/PIPP) manual states: “The LAA should request the most recent 30-days of income, but if the customer provides 30-consecutive days of income any time during the Program Year, that income should be accepted.” Program Year refers to the LIHEAP program year. This year, that means October 1 through August 15.

Annette Beitel: This is a great suggestion. It recognizes that for a lot of low-income residents their work is not stable. Some months they might have a higher income, other months they might not. This is one approach; the other approach is to allow CAAs and CBOs to make the determination themselves. I think this approach is more flexible, but meets same intent.

Phil Mosenthal: Once IRA [federal] EE funds are available, hopefully they are integrated with our programs; we may need stricter criteria.

Elizabeth Horne: Comment about mobile park residents: would it be prudent to add that if they qualify for other low-income programs, they can provide that documentation in order to receive assistance?

Celia Johnson: That is already covered in the earlier policy bullets.

Matt Armstrong: Ameren agrees with concept that if you are mobile home resident you qualify for program. It seems like the suggestion is a departure from the policy in that we are now considering a group of customers based on circumstances. Just noting this, I don't have a problem with proposal. On the second piece about allowing CAAs flexibility, I thought this was intended for utility-programs only and I'm struggling to see where CAA involvement comes in.

Phil Mosenthal: Can we make this generic and make it say Program Implementers have discretion? That way CAA/CBOs are covered but others are too.

Annette Beitel: Based on my experience I believe that CAAs/CBOs really understand communities and customers whereas an implementer oftentimes comes into community but doesn't really understand the individuals. I have confidence in CAAs/CBOs and not so sure about regular implementer.

SAG Facilitator Note: Policy was edited to reference "Program Administrators, to the extent they utilities Community Action Agencies and Community-Based Organizations to establish eligibility for income qualified programs..."

Matt Armstrong: I want to discuss with Ameren's program team. My only concern is whether brings about some inequity within programs because one CAA allows discretion but not others.

Annette Beitel: Yes, that is a risk.

Kevin Dick: I want to flag this as well. "Reasonable discretion" is a loose term.

Next Steps:

- Proposed edit to policy: "Program Administrators, to the extent they utilize Community Action Agencies (CAAs) and Community-Based Organizations (CBOs) to establish eligibility for income qualified programs, shall permit those entities to use reasonable discretion to serve needy customers using low-income funds even if the customer cannot produce documentation of income and/or they do not meet any of the eligibility requirements above but shall document its decision to qualify the customer as eligible for low-income funds."
 - Ameren Illinois will review edit with programs team; other utilities will also review.
 - If this language is a concern, SAG Facilitator to follow-up with Odette Hyatt-Watson.
- Kevin Dick edits: Related to whether there needs to be another "means test" besides income. In a past project, we had to instantaneously identify if someone was eligible without having to send them to a location and do wet signature etc. What we found is that a lot of LIHEAP customers are retirees that are on fixed income and might have paid their house. One of our concerns was that a retiree with fixed income of \$30K is a different circumstance from a single mother with two kids on \$30K a year. We worked

with non-tradeline providers of information (subprime credit) that would be able to determine whether someone was a risky borrower. We used same system to determine if person needed subsidies and we found this was a very effective approach to get people that did not have time to go to intake center.

Phil Mosenthal: In an ideal world this would be great. But the statute is very clear if you only qualify as low income if you are 80% of AML or less, so not sure if this brings up a legal problem.

Kevin Dick: We used multiple systems and some have low-income info. I'm suggesting this provides an alternative approach, not that it replaces the current approach.

Phil Mosenthal: We are assuming that it is a proxy for income.

Kevin Dick: I'm suggesting we leave opening in this Policy Manual for other means/tests that look at income. I just don't want to close the door on it as programs grow.

Karen Lusson: Sounds like a topic for future SAG meeting on easing application process for customer and get them qualified when traditional methods prove difficult.

Next Steps: No edits needed; however, this may be a topic for discussion at a future meeting.

LIEEAC Facilitator Independence Policy

- Michelle McSwain: I think we need to define “fair and responsive” and “independent” because it feels subjective.

Becca McNish: We don't have an explicit definition and don't think there is one where the language is used elsewhere. That is because it is up to the individual's opinion and experience. That is why the language in the next paragraph gives some context. We didn't feel the need to include additional examples or definition in this language.

Cheryl Watson: What is this committee referring to?

SAG Facilitator: This is for IQ North EE Committee and IQ South EE Committee facilitator, also referred to as LIEEAC from CEJA.

Moly Lunn: Language is already in the stipulation and I think in ComEd's previous contract with the IQ Committee facilitator.

Karen Lusson: I believe the SAG facilitator contract already has language similar language?

Celia Johnson: Yes, correct. There is an existing “independence” policy in the Policy Manual for the SAG Facilitator, IL-TRM Administrators, and evaluators.

Elizabeth Horne: As far as “fair and responsive” the IQ Committees have their own separate process documents that would give rules of how “fair and responsive” can be determined.

Next Steps: No edits needed. In the future, “fair and responsive” and “independent” could be further described in the LIEEAC (IQ North EE Committee and/or IQ South EE Committee) process documents, if needed.

IQ Reporting Policies

- SAG Facilitator Introduction: There are four “IQ reporting policy principles” that were developed by the Policy Manual Subcommittee. After these “principles” are finalized, there will be a separate SAG Reporting Working Group to discuss metrics related to these principles, in the fall. For context, Illinois utilities report on a quarterly basis on progress of their EE portfolios. The current Policy Manual includes a list of quarterly and annual reporting requirements, so these “principles” will be added to that section of the Policy Manual. Similar commitments are referenced in EE Plan stipulated agreements.

1. IQ Multi-Family Reporting Principles Policy

- Annette Beitel: Edits recommended related to serving tenants. For properties where there is a tenants’ association, implementers come in and do projects without consulting them. They feel they are not active participants and they are not educated. The first edit is about engaging tenants, the second is about energy education for tenants. The third bullet is acknowledging importance of using local contractors to do work. There might be other ways to accomplish these objectives beyond reporting.

Chris Vaughn: Unsure how this component would be reported on either Quarterly or Annual reports. Are there ideas for quantitative metrics or is this qualitative?

Annette Beitel: I was thinking of leaving this at a qualitative level.

Next Steps:

- The only edit made references posting metrics on the SAG website and LIEEAC website(s). This edit appears in all four of the IQ reporting principle policies.
- There may need to be a separate / future discussion to better understand IQ MF program design; there is a need for direct engagement with MF tenants. SAG Facilitator to add to parking lot issues list if future discussion is needed.
- SAG Facilitator: Proposed edit about where metrics are posted – SAG website, and/or IQ Committee websites? A couple of suggestions from Briana Moore and Annette Beitel.

Annette Beitel: The concern about only leaving on SAG website is that there is a lot of information there and many industry-specific terms. I think the metrics need to be shared with the communities that are impacted in a digestible way. I would favor putting on IQ Committee websites. Some of the information will have to be contextualized to ensure the people that are affected can understand and relate to it.

Karen Lusson: Supports posting on IQ website.

- Annette Beitel: Proposal to add a similar “single family” IQ reporting principles policy. Single Family and Multi Family language should match. I copy/pasted from Multi Family and then edited out sections that are not applicable to Single Family.

Phil Mosenthal: The reason why we only focused on Multi Family is because there was no general concern about Single Family. The policy was intended to make sure MF gets more coverage and understanding.

Annette Beitel: That is helpful to understand. If the others think we are already reporting on SF properly I can take this proposal out.

Next Steps: The IQ SF reporting policy was removed.

2. IQ Health and Safety Reporting Principles Policy

- Annette Beitel: It would be useful to understand the types of health and safety measures that are being funded. There have been discussions on whether some measures are truly health and safety. An example is air conditioning, is this an appropriate use of health and safety funds? It would be useful to at a minimum report (or just have available) information on which measures the utilities consider health and safety and have input on whether those are important.

Molly Lunn: Concerned that adding this detailed of a requirement in the policy is a big ask.

Phil Mosenthal: The types of measures and how often they are found is already covered. But it is not referenced as measure-by-measure level data. I'm supportive of this.

Annette Beitel: I don't think that the actual measure themselves are necessarily covered by first two bullets. I think we need to know what measures we are funding.

Molly Lunn: If the edit is referencing measures, vs. each specific measure / count, we can agree.

Annette Beitel: I think that is fine. We can just say "measures."

SAG Facilitator Note: The policy was edited to reference "measures used." The policy was also edited to reference posting metrics on the SAG website and LIEEAC website(s).

Next Steps: None.

3. Equity and Affordability Reporting Principles Policy

- SAG Facilitator: Two edits were proposed from Community Investment Corp.
 - The first edit replaces "weatherization" with "retrofit" (no concerns raised about this edit).
 - The second edit adds a bullet to the second section of the policy, regarding the periodic analyses performed by the utilities. The new bullet: "The number or proportion of energy efficiency program participants that are payment troubled (e.g., customers at risk of being disconnected; with high arrears; participating in bill assistance programs)."

Karen Lusson: The third bullet is a great addition. This is similar language to the original proposal drafted.

Next Steps: Utilities will check internally with their program teams on whether/how this addition to the policy could be operationalized.

4. Diverse Contracting Reporting Principles Policy

- Annette Beitel comment: Added an extra bullet related to reporting information on diverse trade allies. Cheryl Watson shared concerns about using the phrase “environmental justice.” “Environmental justice” is not an inclusive term.

Annette Beitel: General principle is the repeated discussion about the need to increase diverse trade allies. It is helpful to understand where diverse trade allies are located in IL, what services they provide, and understand where we have gaps. It could be by county instead of zip code.

Karen Lusson: Agrees.

Matt Armstrong: Suggested edits pointing out that information is already referenced geographically in the policy.

SAG Facilitator Note: The policy was edited to reference “number of diverse trade allies and their specialtie(s).”

Next Steps:

- Celia Johnson followed up with Cheryl Watson. Cheryl suggested using “historically disadvantaged communities”, instead of “environmental justice.” Cheryl may propose an additional edit to clarify further.

5. One Stop Shop Program Design Definition for IQ Multifamily Retrofit Policy

- Annette Beitel edits: Added a bullet regarding “contact and engage/seek feedback from any tenant organization”; added a bullet regarding “energy education.” Also added a reference to solar measures, green financing, and other offerings / tools that can help tenants reduce energy bills. Also suggested a separate policy be added for single family One Stop Shop program design.
- Briana Moore comment: On the second bullet related to “program navigation support”, making this assistance available in multiple languages would likely help.

Elizabeth Horne: Including an energy education component is important.

Karen Lusson: Concerned about the reference to “green financing.” Any reference to financing needs to be carefully reviewed. Also, any information about financing needs to go to the building owner.

Celia Johnson: The separate single family policy addition seems like a new proposal that would need to be addressed outside of the Policy Manual process.

Next Steps:

- Karen Lusson will review and propose edits based on the 7/19 discussion; this policy will be finalized at the next meeting.

- The new “One Stop Shop” SF policy was removed. SAG Facilitator to add to parking lot issues list if future discussion is needed.

Closing and Next Steps

Celia Johnson, SAG Facilitator

- [Summary of Next Steps from July 19 Policy Manual Meeting](#)