

Illinois EE Stakeholder Advisory Group Policy Manual Subcommittee

Wednesday, March 15, 2023

9:30 am – 12:30 pm

Webinar

Attendees and Meeting Notes

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Meeting Materials

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

- [March 15, 2023 Policy Manual Subcommittee Agenda](#)
- **SAG Facilitator Introduction:**
 - [Policy Manual Process Reminder](#)
 - [Spring – Summer 2023 Policy Manual Planning Summary](#)
- **Income Qualified Policy Proposals:**
 - [Diverse Contracting Reporting \(Ameren Illinois Counterproposal\)](#)
 - [SAG Conflict of Interest Policy \(edits to follow-up on Feb. Policy Manual meeting\)](#)
 - [LIEEAC Facilitator Independence \(ComEd policy proposal\)](#)
- **Program Administration Policy Proposal:** [Cumulative Persisting Annual Savings \(CPAS\) Goal Setting \(ComEd\)](#)
- **Independence Policy Proposal:** [IL-TRM Administrator and Independent Evaluator Contract Review \(Ameren Illinois\)](#)

Attendees (by webinar)

Celia Johnson, SAG Facilitator
Caty Lamadrid, Inova Energy Group (SAG Meeting Support)
Andrew Cottrell, Applied Energy Group
Andrey Gribovich, DNV
Andy Vaughn, Leidos
Annette Beitel, Future Energy Enterprises (IQ Committee Facilitator)
Billy Davis, Bronzeville Community Development Partnership
Bobbie Tolson, ComEd
Cassidy Kraimer, Community Investment Corp.
Cheryl Watson, Equitable Resilience & Sustainability LLC
Chris Neme, Energy Futures Group, representing NRDC
Chris Vaughn, Nicor Gas

Christina Pagnusat, Peoples Gas & North Shore Gas
Christian Koch, MEEA
Deb Perry, Ameren Illinois
Diana Fuller, Walker-Miller Energy Services
Elizabeth Horne, ICC Staff
Erin Dopfel, Aiqueous
Gregory Norris, Aces 4 Youth
Hannah Howard, Opinion Dynamics
Jarred Nordhus, Peoples Gas & North Shore Gas
Jonathan Skarzynski, Nicor Gas
Jonathan Kleinman, Aiqueous
Kalee Whitehouse, VEIC (IL-TRM Administrator)
Karen Lusson, National Consumer Law Center (NCLC)
Katherine Elmore, Community Investment Corp.
Kyle Danko, ComEd
Laura Agapay-Read, Guidehouse
Leanne Jossund, ComEd
Matt Armstrong, Ameren Illinois
Matthew Ludwig, ComEd
Michael Brandt, Elevate
Mike King, Nicor Gas
Molly Lunn, ComEd
Omy Garcia, Peoples Gas & North Shore Gas
Philip Mosenthal, Optimal Energy, representing IL AG's Office and NCLC
Randy Opdyke, Nicor Gas
Rebecca McNish, ComEd
Ronna Abshure, ICC
Sam Dent, VEIC (IL-TRM Administrator)
Seth Craig-Snell, SCS Analytics
Stephen Robinson, Northwest Austin Council
Sy Lewis, Meadows Eastside Community Resource Org.
Tamika Cole, Walker-Miller Energy Services
Ted Weaver, First Tracks Consulting, representing Nicor Gas
Thomas Manjarres, Peoples Gas & North Shore Gas
Tim Dickison, Ameren Illinois
Tina Grebner, Ameren Illinois
Victoria Nielsen, Applied Energy Group
Wade Morehead, Morehead Energy

Opening & Introductions

Celia Johnson, SAG Facilitator

Purpose of meeting: Discuss proposed policies for consideration in the Policy Manual Version 3.0 update process; identify feedback and questions.

Policy Manual Process Reminder

Celia Johnson, SAG Facilitator

Purpose: For the SAG Facilitator to present an update on upcoming Policy Manual process steps.

Materials:

- [Policy Manual Process Reminder](#)
- [Spring – Summer 2023 Policy Manual Planning Summary \(this document will be updated as needed\)](#)
- This is the Policy Manual Subcommittee’s ninth monthly meeting.
- Schedule update: Two new dates on May 31st and June 21st due to the need to continue discussing policies.
- Coordination with IQ Committee
 - SAG Facilitator coordinates with IQ Committee Facilitator regularly on topics of mutual interest to both groups.
 - Coordination will occur through the SAG Equity Subcommittee (held jointly with IQ EE Committee).
 - SAG Equity Subcommittee meeting on May 10th will include presentation of final draft IQ-related policies, for input from the IQ Committee.
- [Policy Manual Subcommittee page](#) - there is a section with “Final Draft Policy Documents.” These are policies where participants have stated they are generally comfortable with language. These policies will be incorporated into the Policy Manual at the end of the process.
- Per the updated schedule, policy discussions will conclude in June, and in July an attorney review writing committee will review policy language to ensure consistency. The goal is to file the Policy Manual in mid-August for approval.

Follow-up Policy Discussion: Income Qualified Policies

Equity and Affordability Reporting

- **SAG Facilitator Introduction:**
 - The equity and affordability policy proposal submitted by joint stakeholders was presented at the February meeting
 - The utilities are presenting a response / counter-proposal today
 - Today’s Meeting:
 - Discuss utility response and stakeholder feedback
 - Determine whether additional discussion is needed
 - Next Steps:
 - The idea is that equity and affordability metrics will be further developed through the SAG in 2023
 - ACEEE and the University of Michigan Energy Equity Project are presenting at the March 22 Q1 SAG meeting (joint with the IQ Committee) about equity metrics research

Utility Response / Counter Proposal

Ted Weaver, First Tracks Consulting, representing Nicor Gas

- Utilities do not have a specific redline version to share, but the original proposal has been reviewed and main points will be presented today.
- For purposes of the Policy Manual, the first two paragraphs of the original joint stakeholder proposal can be shortened to remove the background.

Section 1 of Policy (Referencing Weatherization)

- The first two points discuss “how does that data overlap with other data utilities have available from customers”. Second point is about economic need, and third point is

about disadvantaged communities. In general, utilities agree on the reporting, it is just a matter of identifying out how to do it.

Karen Lusson: On Number 2 we need to identify what is meant by “greatest energy burden;” for disconnection and arrearage rates we need to figure out thresholds.

Cheryl Watson – via chat: “80% AMI is recommended in other programs across all sectors.”

Katie Elmore: Concerned about the word “weatherization” being the only program called out specifically. I think the reporting should cover all energy efficiency initiatives. In addition, this language is on the single-family/residential side and we also want to track metrics for multifamily properties.

- *Karen Lusson – via chat: I was focused on weatherization investments. Not so much the other programs, such as kits or smart thermostat giveaways.*
- *Chris Neme: We wanted to be careful that if utilities report for all programs there might be a distorted view to the degree that programs are providing meaningful support to address energy burdens. Weatherization programs include all measures (low cost and comprehensive envelope), but there are other programs where other “smaller measures” are done, and we thought it was more important to understand for the more meaningful programs.*
- *Karen Lusson: Perhaps replace the word “weatherization” with “whole-building.”*

The language should separate reporting and analysis. Reporting has a fixed timeline, but analysis can be recurring.

Celia Johnson: The stakeholder proposal suggested annual reporting.

Chris Neme: I agree with Ted’s presentations but there are some complexities. One of them is procedural. Just like multi-family reporting principles and Health & Safety principles where this group attempted to draft summary points for the Policy Manual about what we want reporting on, but we shied away from the details on addressing the interest on bullet number 6. I think the same applies here. My assumption is that this would be deferred to the SAG Reporting Working Group to figure out the details.

Katherine Elmore – via chat: Ted's point about reporting vs analysis. It would be ideal that stakeholders get this information via csv or excel format so that we could, for example, perform our own analysis.

- *Ted Weaver: Agree we need to think about the format. Is it just a website where we place data for transparency to customers? Or is it a report that utilities prepare? Is it a heat map? At a later date this needs to be clarified to determine level and frequency of reporting.*
- *Karen Lusson: A priority for the utility should be to perform analysis and have a good understanding of what is happening.*
- *Katie Elmore – via chat: agree with Ted & Karen - need to be clearer on the format and level of analysis (heat map, table, narrative with figures, etc.)*
- *Katie Elmore: Could we provide this data by savings?*
- *Chris Neme: One indicator for point #4 is the average percentage of bill savings forecast by customers in certain areas. But there might be an evaluation component, may want to defer this to evaluation planning.*

- *Ted Weaver: Point #2 would be reduced to language around economic needs. Point #3 would be reduced to language about disadvantaged communities. There are already some definitions in Illinois that can be used.*
- *Celia Johnson: Format discussion could occur later in the SAG Reporting Working Group.*

Section 2 of Policy (Referencing Low Income EE Programs)

- Point #1 is already addressed in the first group; will remove since it is duplicative.
- Points #2 and #3 attempt to discuss cross-referrals between bill assistance programs and energy efficiency programs. #2 is referrals from energy efficiency to bill assistance, and #3 is from bill assistance to energy efficiency. On point #2 we want to clarify that any customer that gets energy efficiency gets referred to bill assistance – this is something that is already in place. Utilities can report on this but it may not be as useful.

Karen Lusson: Can you clarify how this happens today?

- *Matt Armstrong: Ameren gives pamphlets and information to the customer when they take part of energy efficiency programs so they are aware there are bill assistance programs available to them if they want to take advantage of them. On point #3, if a customer calls to call center asking for bill assistance, we provide information on energy efficiency as a resource and if they show interest we transfer them to energy efficiency call center for next steps.*
- *Karen Lusson: We are looking for documentation that this actually takes place. We are trying to break down walls between collections and energy efficiency programs.*
- *Molly Lunn: ComEd already started reporting on referrals that are made from energy efficiency to customer assistance programs and vice versa in Q4 report.*
- *Omy Garcia: For Peoples Gas / North Shore Gas it is the same as Ameren. We have a script in credit and collection representatives who take calls from call center and also have that information scripted for call center representatives to soft transfer customers to energy efficiency programs so they can get more knowledge on it and schedule their home assessment.*
- *Ted Weaver: For some utilities, there are difficulties associated with tracking how many customers get referred. To clarify, this is currently happening, but it is not a metric that is being tracked because it is outside of the control of energy efficiency programs.*
- *Matt Armstrong: Agree. This would require credits and collections department to add fields to their database to track customers referred, and then once customer participates, we would need to send data back to credit and collections department. And this is administratively burdensome.*
- *Karen Lusson: The idea is for referrals to happen both ways and the only way to ensure this is happening is by tracking.*
- *Chris Neme: At the highest level, what is important here is metrics that track effectiveness of cross-referrals. This is what joint stakeholders that prepared this proposal are after.*
- *Matt Armstrong: I see this point, but we need to recognize that some customers will not take part on program regardless of being informed. Metrics may not provide what we are meeting for because of a subset of customers that choose not to participate.*
- *Molly Lunn: Adding this type of reporting is not a small lift. If this referral reporting is important to stakeholders, is there another type of reporting that could be removed in exchange?*

- *Katie Elmore – via chat: We could then assess the effectiveness of outreach and referral methods.*

Equity and Affordability Reporting Principle Next Steps:

- Ted Weaver will work on redline edits to incorporate feedback from the March 15th meeting; present edits at the April 19th meeting.
- Stakeholders will consider the utility feedback shared, regarding the challenge with reporting on referrals.
- This policy will be presented to the IQ Committee for input at the May 10 SAG Equity Subcommittee meeting (held jointly with the IQ Committee).

Diverse Contracting Reporting

Matt Armstrong, Ameren Illinois

- **SAG Facilitator Introduction:**
 - The diverse contracting policy proposal submitted by joint stakeholders' was presented at the February meeting
 - The utilities are presenting a response / counter-proposal today
 - Today's Meeting:
 - Discuss utility response and stakeholder feedback
 - Determine whether additional discussion is needed
 - Next Steps:
 - Will diverse contracting reporting metrics need to be further developed through SAG in 2023?

Utility Response / Counter Proposal

Matt Armstrong, Ameren Illinois

Material: [Diverse Contracting Reporting \(Ameren Illinois Counterproposal\)](#)

- There is language at the beginning of the original proposal that is for background purposes and utilities felt that was not necessary for the Policy Manual. We shortened and consolidated this language.
- As utilities looked at some of the metrics outlined, we recognized there are some backward-looking metrics. There was a recognition that utilities had already agreed to do potential studies, recognizing that by the time the Policy Manual goes in place the majority of the costs would have already been incurred. Our perspective is that doing this does not meet the intent of expanding diverse contracting.
- From a higher level, this policy proposal was broken out with duplicative details, broken out by program and then portfolio level. Ameren did not see value in seeing the spend broken out in these two levels, we believe looking at it at the whole portfolio spend would provide Ameren what they need to know, provide a baseline, and allow us to see progress.
- Ameren has consolidated the proposal into one set of metrics that would report at entire portfolio level.
- There were parts of the original proposal that wanted to call out specific contractors. Ameren does not see the value in this and furthermore believes there is sensitivity around providing that information publicly. Ameren's counterproposal is more high level.

Annette Beitel – via chat: I think it would be helpful to report also on spent with diverse Trade Allies (Program Allies) who are not technically "utility contractors" but still receive ratepayer funding.

- Chris Neme – via chat: In addition to adding a second primary bullet on diverse trade ally participation, the intro paragraph would also have to be edited to address not just utility contracting but also diverse trade allies.
- Annette Beitel – via chat: Also, I think it would be useful to report either on diverse trade allies by county as I believe collectively, we want to have a diverse trade ally pool throughout the state. There is research that has been done in IL that suggests that customers that are in EJ communities and disadvantaged communities are more comfortable working with contractors that represent their constituents, and we also know that there are parts of IL that don't have those contractors, so it would be helpful to see this by county so we can see the gaps.
- Omy Garcia: What are the data points that are being looked at? is it "certified" trade allies? Or some specific training? What is the qualification requirement?
- Chris Neme: I agree that need clarity eventually, and this can be worked through the SAG Reporting Working Group. But for purposes of the Policy Manual, we can keep it high level.
- Annette Beitel: In general, implementation contractors tend to have certifications. But for trade allies it is not as common because seeking certification can be a lengthy and cumbersome process. If utilities do require certification, we need to have a grace period for and maybe utilities need to support the process. I'm not sure certification is required, because generally trade allies are small businesses and it is easy to identify who the owner is.
- Molly Lunn: ComEd does have certified trade allies and we do support them in the process. But I agree that it is challenging and not all trade allies pursue certification. I think depending on the utility and metrics, often to qualify as diverse spend you have to be certified.
- Karen Lusson: When this is reported it is important to identify the program.

Diverse Contracting Reporting Principle Next Steps:

- Matt Armstrong will work on redline edits to incorporate feedback from the March 15th meeting; present edits at the April 19th meeting.
- This policy will be presented to the IQ Committee for input at the May 10 SAG Equity Subcommittee meeting (held jointly with the IQ Committee).

LIEEAC Facilitator Independence

Molly Lunn, ComEd

- **SAG Facilitator Introduction:**
 - This is the first discussion of the ComEd policy proposal regarding LIEEAC (IQ EE Committee) facilitator independence
 - Today's Meeting:
 - Discuss feedback
 - Determine whether additional discussion is needed

Materials: [LIEEAC Facilitator Independence \(ComEd policy proposal\)](#)

- The first item addresses submitting the LIEEAC facilitator contract to the Commission, which is what is done for the evaluation and SAG Facilitator contracts. ComEd also files these contracts in the Policy Manual docket.

- The second item is on the right to terminate. This gives Commission right to terminate.
- Initially Ameren had some concerns about including this in the Policy Manual, since it currently exists in the plan stipulation.

Matt Armstrong: Ameren has since reviewed and are comfortable with the language from a programmatic standpoint. Legal team is still reviewing.

- *Annette Beitel – via chat: Language looks good except I would delete the "or Regional Subcommittee Leadership" from 3rd bullet.*
- *Omy Garcia: What is the purpose of this?*
- *Molly Lunn: This language is in ComEd's stipulation, but because it is only for one plan, the rest is in the Policy Manual. We are suggesting than rather than going into stipulations that this goes into Policy Manual.*
- *Chris Neme: Question about second part of paragraph 1, where you note "in addition utility will submit any fully executed contract..." can you speak more about the purpose of this?*
- *Molly Lunn: This is a longstanding process done for other independent protocols. It is always filed in the docket so contracts are accessible to the public.*
- *Chris Neme: Would the next period for 2026-2029 would be submitted as part of your plan?*
- *Molly Lunn: Not necessarily. But the dockets for previous period remains open and public can look at the contracts for previous years.*
- *Chris Neme: Why name "Policy Manual v3" and instead just say "the most current version of Policy Manual."*
- *Matt Armstrong: On number 3: do we have a common understanding of what a "party" refers to. I didn't see a definition in the glossary of the Policy Manual.*
- *Molly Lunn: Because it is not a capital "p" it is meant to be someone beyond the Parties in the stipulation. I will look at glossary and see if there is a better term.*
- *Annette Beitel – via chat: Suggest using "Leadership Team" or "Committee Member."*

LIEEAC Facilitator Independence Policy Next Steps:

- **Molly Lunn will follow-up with Matt Armstrong and Annette Beitel on edits proposed during the meeting; present edits at the April 19th meeting.**
- **This policy will be presented to the IQ Committee for input at the May 10 SAG Equity Subcommittee meeting (held jointly with the IQ Committee).**

Follow-up on SAG Financial Conflict of Interest Policy

Celia Johnson, SAG Facilitator

- **SAG Facilitator Background:**
 - The SAG has a "Process Guidance" document describing various processes related to how the SAG operates and SAG participation
 - This document is updated annually, as needed
 - It includes a "SAG Conflict of Interest policy" that describes several situations where participation is limited to utilities and non-financially interested stakeholders
 - At the Feb. meeting, IQ EE Committee Sr. Facilitator (Annette Beitel) introduced a proposed change to non-financially interested party participation that was requested by the IQ North Committee Leadership Team, to include participation by community-based organizations

- Today's Meeting:
 - Discuss feedback – edits prepared by SAG Facilitator and IQ EE Committee Facilitator
 - Discuss whether this policy should be added to the Policy Manual, or remain in the SAG Process Guidance document
 - Determine whether additional discussion is needed

Materials: SAG Conflict of Interest Policy (edits to follow-up on Feb. Policy Manual meeting)

- Additions: Introductory language, and definitions of: Illinois utilities, non-financially interested party, and financially interested party, and CBO (straight from CEJA)
- Proposed policy, a CBO that receives <\$75K annual would be financially-interested. The policy requires that CBOs self-select prior to participation.

Annette Beitel: For context, the IQ North Committee leadership team proposed that CBOs be included in non-financially interested party discussions at SAG.

- *Chris Neme: In the table and above it says "receiving <\$75K from IL utility" is this from only one, or in combination?*
- *Annette Beitel: The general intent is to distinguish Implementation contractors vs CBOs. I think in keeping with that idea making it "contracts plural" makes most sense. This requires an edit.*
- *Chris Neme: Second question is about what is number 1 is on the table.*
- *Celia Johnson: Discussion of proprietary or confidential information. This is existing language. It attempts to identify that there might be a discussion with proprietary or confidential info that financially interested parties should not participate in.*
- *Chris Neme: 1 is more general, where the rest are situational. Maybe it needs to be clarified.*
- *Ted Weaver: Che current language in Conflict of Interest policy is that basically for every individual meeting, if there is somebody with a conflict then they should not be on that call. Then whomever is running the meeting decides. This is then contextual. I'm not opposed to having this table but have we maintained that language where the person running the meeting can ability to identify the conflict and flush them out.*
- *Celia Johnson: That language was preserved from the existing policy.*
- *Karen Lusson: I think we can use language to distinguish organizations that provide services to the utility that is not marketing.*
- *Annette Beitel: The challenge is in determining what constitutes implementation.*
- *Karen Lusson: I agree. Once a CBO becomes an implementer, then that excludes them from participating in some activities.*
- *Celia Johnson: Suggests we take a stab at defining "implementation" for this policy and we can follow-up at next meeting.*
- *Annette Beitel: If we define implementation as "installing measures" would that qualify and address the issue you are raising?*
- *Karen Lusson: Probably. Or alternatively we can exclude marketing from the definition.*
- *Molly Lunn: is it worth editing language to clarify that there is no interest if an organization does not plan to submit a bid or be part of a bidding team?*
- *Chris Neme: Agree with Molly's suggestion.*

SAG Financial Conflict of Interest Policy Next Steps:

- Celia Johnson will edit to include a definition of “implementation.” Follow-up at the April meeting, including discussing whether the policy should remain in the SAG Process Guidance Document, or be included in the Policy Manual.
- This policy will be presented to the IQ Committee for input at the May 10 SAG Equity Subcommittee meeting (held jointly with the IQ Committee).

Program Administrator Policy

Molly Lunn, ComEd

Follow-up on Cumulative Persisting Annual Savings (CPAS) Goal Setting from January meeting (ComEd proposal)

- **SAG Facilitator Introduction:**
 - ComEd presented at the January meeting; ComEd will share an updated version today
 - Today’s Meeting:
 - Discuss feedback
 - Determine whether follow-up discussion is needed.

Materials: [Cumulative Persisting Annual Savings \(CPAS\) Goal Setting \(ComEd\)](#)

- ComEd is proposing this because there are goals beyond 2030 in CEJA. The ICC ordered us to discuss a process to revisit those goals. The proposal is these goals would be revisited ahead of a planning process. It would be best to work towards agreement on a revised goal, before EE plan negotiations.

Chris Neme: Looking at the illustrative timeline – this is about longer term CPAS goals that would get revised before a future plan cycle begins?

- *Molly Lunn: Correct.*
- *Chris Neme: Do we need a reference to default values in the statute?*
- *Molly Lunn: Part of the issue is the goals need to be established so far out that a potential study is not that accurate. This isn’t changing the Commission process. The challenge is the default goals are unachievable.*
- *Chris Neme: How do we go through this process that ensures electric utilities are focusing on the longer term CPAS?*
- *Molly Lunn: The timing is such that it wouldn’t be in the utilities interest to focus on the short term.*
- *Chris Neme: There are no parameters around what could be adjusted. I see modified goals a bit differently.*

CPAS Goal Setting Policy Next Steps:

- Chris Neme will coordinate proposed edits with interested stakeholders. A small group meeting will be scheduled with Ameren Illinois, ComEd and interested stakeholders.

Independence Policy

Matt Armstrong, Ameren Illinois

IL-TRM Administrator and Independent Evaluator Contract Review (Ameren Illinois proposal)

Materials: [IL-TRM Administrator and Independent Evaluator Contract Review \(Ameren Illinois\)](#)

- This proposal provides certainty on timing of contract review by Commission Staff, for the TRM Administrator and independent evaluator contracts.
- ICC Staff has reviewed these policy edits and is comfortable with the edits.
- No other edits or concerns raised by Policy Manual participants.

IL-TRM Administrator and Independent Evaluator Contract Review Policy Next Steps:

- Participants comfortable with this policy. Celia Johnson will post as a “final draft” policy document.
- Several administrative edits were suggested, including:
 - Incorporating the same contract review language into other facilitator independence policies (SAG Facilitator independence, LIEEAC facilitator independence).
 - Consider whether the independence provisions should be grouped in one section of the Policy Manual, with common independence language at the front.
 - SAG Facilitator will review these suggestions when preparing administrative edits, to present in the May 31 meeting.

Closing and Next Steps

Celia Johnson, SAG Facilitator

- Next Policy Manual Subcommittee Meeting: Wednesday, April 19 (9:30 am – 12:30 pm) Teleconference