

Illinois EE Stakeholder Advisory Group Policy Manual Subcommittee

Wednesday, September 21, 2022 Meeting

9:30 am – 12:30 pm

Teleconference

Attendees and Meeting Notes

Meeting Materials

- Posted on the [Policy Manual Subcommittee page](#):
 - [September 21, 2022 Policy Manual Subcommittee Agenda](#)
 - [Policy Manual Feedback \(SAG Facilitator Presentation\)](#)
 - [Proposed Policy Tracker – Feedback Received on Policy Manual Proposals \(9/15/2022\)](#)
 - [Ameren Illinois Presentation: Single Family Income Qualified Eligibility Policy](#)
 - [ComEd Proposed Policy: IL-TRM Administrator Role](#)
 - 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
Andrew Cottrell, Applied Energy Group
Andy Vaughn, Leidos
Amanda Dewey, ACEEE
Allen Dusault, Franklin Energy
Andrey Gribovich, DNV
Annette Beitel, Future Energy Enterprises (IQ Committee Sr. Facilitator)
Billy Davis, Bronzeville Community Development Partnership
Brook Cranford, Ameren Illinois
Charles Ampong, Guidehouse
Christina Pagnusat, Peoples Gas & North Shore Gas
Chris Neme, NRDC
Chris Vaughn, Nicor Gas
David Brightwell, ICC Staff
Deb Perry, Ameren Illinois
Dalitso Sulamoyo, Champaign County Regional Planning Commission
Elizabeth Horne, ICC Staff
Erin Stitz, Applied Energy Group
Jim Fay, ComEd
Jonathan Skarzynski, Nicor Gas
Jonathan Kleinman, Aiqueous
Joe Reilly, Applied Energy Group
Keith Goerss, Ameren Illinois
Kalee Whitehouse, VEIC (IL-TRM Administrator)
LaJuana Garret, Nicor Gas
Laura Goldberg, NRDC
Molly Lunn, ComEd
Matt Armstrong, Ameren Illinois

Matthew Ludwig, ComEd
Martha White, Nicor Gas
Michael Brandt, Elevate
Mark Szczygiel, Nicor Gas
Stephen Robinson, Northwest Austin Council
Rebecca McNish, ComEd
Ronna Abshure, ICC
Randy Opdyke, Nicor Gas
Sam Dent, VEIC (IL-TRM Administrator)
Seth Craig-Snell, SCS Analytics
Sy Lewis, Meadows Eastside Community Resource Org
Taso Tsiganos, IL Attorney General's Office
Tim Dickison, Ameren Illinois
Tina Grebner, Ameren Illinois
Thomas Manjarres, Peoples Gas & North Shore Gas
Travis Hinck, GDS Associates
Tyler Sellner, Opinion Dynamics
Victoria Nielsen, Applied Energy Group
Wade Morehead, Morehead Energy
Ted Weaver, First Tracks Consulting, on behalf of Nicor Gas
Zachary Froio, Applied Energy Group
Zach Ross, Opinion Dynamics

Opening & Introductions

Celia Johnson, SAG Facilitator

Follow-up items indicated **in red**.

Purpose of meeting:

1. To follow-up on feedback submitted by interested Policy Manual Subcommittee participants and discuss next steps;
2. To discuss program challenges and next steps for the Single Family IQ Eligibility Policy Proposal; and
3. To discuss new proposed policies for consideration in the Policy Manual update process.

Policy Manual Subcommittee Process Reminder

Celia Johnson, SAG Facilitator

- Update Process
 - Creating an EE Policy Manual was a directive to SAG from the Commission in 2014.
 - 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.
 - 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.
 - 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 was due September 9th – feedback requested on:
 1. Policy Manual Subcommittee Plan and Updated Schedule
 2. Whether policies addressed by SAG from 2019-2021 should be considered in the Policy Manual process
 3. Interested participants were asked to consider whether a policy proposal may not be necessary, or appropriate for the Policy Manual, or may belong in another forum outside of this Subcommittee
- Policy Principles were discussed during August 3rd meeting, to help guide the request for feedback: [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?
- Purpose of today’s discussion is to understand where there is disagreement on whether a policy proposal should be considered – spreadsheet includes “No” answers in orange highlight. “Yes” responses mean agree it should be considered, not necessarily agreement with the proposal. Only will be talking about ones with disagreement on Yes/No responses. Feedback can also be provided after the meeting, if needed.
- Goal = to determine next steps
 1. Participant may withdraw a policy proposal
 2. A policy proposal may be raised in another forum
 3. What if a participant feeling strongly about a proposal being discussed in the Policy Manual process, or if there is significant disagreement on whether a proposal should be considered?
 - The proposal will be presented to the Subcommittee once, with opportunity for discussion and feedback
 - The proposal will then be moved to a “non-consensus list”, to be discussed at the end of the Policy Manual process
 - If disagreement remains at the end of this process, a comparison exhibit will be prepared to document various positions

Feedback Discussion on Policy Proposals

- During the September 21st meeting, Subcommittee participants discussed feedback submitted on policy proposals, specifically whether policy proposals may not be appropriate for the Policy Manual, or may belong in another forum.

Income Qualified / Income Eligible Policy Proposals:

- [Policy Proposals from IQ North Committee Leadership Team and IQ North Facilitator](#)
- SAG Facilitator recommended the majority of the IQ North Leadership Team policy proposals submitted will be raised for discussion outside the Policy Manual process, except for the following:
 - Policy Proposal: Local CBOs/CAAs Considered “Non-financially interested parties”
 - Policy Proposal: Create single section in Policy Manual for IQ Policies

- Policy Proposal: All IQ items discussed through SAG should be grouped together
- Suggestion discussed: Development of general IQ policy principles for inclusion in Policy Manual.
- Participants expressed support for this approach.

Income Qualified / Income Eligible Policy Proposals Submitted by Various:

- [Single Family IQ Eligibility Verification Guidelines \(Ameren Illinois\)](#)
 - Ameren Illinois requests interim resolution of this proposal, in addition to considering in the Policy Manual update process.
 - **Follow-up discussion on this interim proposal will be scheduled with a Policy Manual Small Group.**
- [Net-to-Gross Policy for Disadvantaged Areas \(Ameren Illinois\)](#)
 - No concerns raised about considering this proposal in the Policy Manual.
- [New Income Qualified Accountability Committee Section \(Joint Stakeholders*\)](#)
 - Several participants expressed concern that it may be premature or not necessary to include this procedural information about the IQ EE Committee since the launch post-CEJA is still in its beginning stages.
 - NRDC: Purpose is to memorialize or clarify the Committee role beyond what is in the statute, at a high level, working with Committee members.
 - Meadows Eastside CRO: Goal is to ensure Committee is not excluded from this process and has a voice.
 - **SAG Facilitator to follow-up with stakeholders about feedback discussed and next steps.**
- [One-Stop Shop Program Design Definition for IQ Multifamily Retrofit \(Joint Stakeholders*\)](#)
 - Nicor Gas, Peoples Gas & North Shore Gas shared concerns about locking in the definition of "one-stop shop" since the program design is in its early stages. Both support the concept of one stop shop.
 - Nicor Gas suggested there isn't enough data yet, and there may be a need for ongoing conversations about this approach with an opportunity for input.
 - NRDC suggested considering high-level principles on one-stop-shop that could be included in the Policy Manual. This is about also common definitions. The idea is to agree on a shared definition of the term.
 - **SAG Facilitator to follow-up with stakeholders about feedback discussed and next steps.**

Income Qualified / Income Eligible Reporting Proposals Submitted by Stakeholders:

- [Equity and Affordability Statewide Reporting Metrics \(Joint Stakeholders*\)](#)
- [IQ Multi-Family Reporting Metrics \(Joint Stakeholders*\)](#)
- [Health and Safety Reporting \(Joint Stakeholders*\)](#)
- [Diverse Vendor Reporting \(National Consumer Law Center / Community Organizing on Family Issues\)](#)
- Ameren Illinois shared concerns about locking in these metric proposals in the Policy Manual. Some of these metric proposals need further development. It could be useful to address outside of the Policy Manual process; a longer-term discussion may be needed. More time is needed to gather data once draft metrics are proposed. Suggestions for an alternative forum included the SAG Equity Subcommittee, SAG Reporting Working Group, and/or IQ EE Committee). Nicor Gas agreed.

- NRDC suggested considering an alternative approach, using the existing economic and impact reporting policy as an example. This type of policy approach could include a high-level policy with details to evolve over time.
- Note: Equity and Affordability proposal includes proposal to connect with ACEEE and University of Michigan's Energy Equity Project to help inform the development of these metrics in Illinois.
- **SAG Facilitator to follow-up with stakeholders about feedback discussed and next steps, including a potential alternative process for reporting discussion.**

Evaluation Proposals:

- [Allowing Renewable Measures Under EE Programs \(Guidehouse\)](#)
- [Heating Penalties Policies \(Opinion Dynamics and Guidehouse\)](#)
- [Net-to-Gross \(NTG\) Clarification \(ICC Staff\)](#)
- [Weighted Average Measure Life Clarification \(ICC Staff\)](#)

There were no concerns raised about considering these evaluation proposals in the Policy Manual process.

Independence Policy Proposals:

- [Independence Policy Clarification \(ICC Staff\)](#)
 - No concerns raised about considering this proposal in the Policy Manual.
- [LIEEAC Facilitator Independence \(ComEd\)](#)
 - Ameren Illinois: Concerned about using a stipulation as a policy.
 - ComEd: The policy language doesn't need to be exactly what is included in the stipulation. If this is not included in the Policy Manual, that means it needs to be negotiated again in the next Plan.
 - Next steps: ComEd prefers this be discussed in the Policy Manual process.
- [IL-TRM Administrator and Independent Evaluator Contract Review \(Ameren Illinois\)](#)
 - No concerns raised about considering this proposal in the Policy Manual.

Proposals that Relate to Program Administration:

- [CPAS Goal Setting \(ComEd\)](#)
 - No concerns raised about considering this proposal in the Policy Manual.
- [Framework for Claiming Savings from Co-Funded Programs \(ComEd\)](#)
 - No concerns raised about considering this proposal in the Policy Manual.
- [Statewide Potential Study \(Joint Stakeholders***\)](#)
 - Ameren Illinois: Concerned about using a stipulation as a policy.
 - Peoples Gas & North Shore Gas: A statewide study isn't needed to address stakeholder feedback on potential studies.
 - Nicor Gas: Note we agreed to discussion of this proposal, not the policy on its face.
 - NRDC: Since this is a policy issue that could impact all of the utilities, it should be on the table for discussion.
 - Next steps: Proposing stakeholders prefer this be discussed in the Policy Manual process.
- [Prohibited Expenses Expansion \(ICC Staff\)](#)
 - SAG Facilitator: When this was tee'd up at the June kick-off meeting, there were questions about why it was needed. ICC Staff responded even though this is included in statute, it keeps coming up in dockets. This is an issue in two currently open dockets, so we will not discuss the details today.

- Next steps: Discuss in the Policy Manual process after the open dockets close (timing TBD).

Proposals Addressed by SAG from 2019-2021:

- [Market Transformation Policy Issues \(Final Draft from 2020\)](#)
 - Agreement reached to remove from Policy Manual list – policy issues may need further discussion by SAG Market Transformation Savings Working Group.
- [Estimating Savings in Calendar Year 2020 and Calendar Year 2021 Due to COVID-19 Pandemic \(Final, March 2021\)](#)
 - Agreement reached to remove from Policy Manual list – resolution will remain posted on the Policy page of the SAG website.
- [Using the Project Application Date to Determine the IL-TRM Version Followed by the Affordable Housing New Construction Program \(Final, Dec. 2019\)](#)
 - Agreement reached to remove from Policy Manual list – resolution will remain posted on the Policy page of the SAG website.
 - Suggestion this may be more appropriate to include in the IL-TRM.
 - **SAG Facilitator will add to IL-TRM Version 12.0 tracker.**
- [Income Eligibility Verification for Low Income Customers \(Final, July 2020\)](#)
 - Agreement reached to remove from Policy Manual list because it relates to the Single Family Income Qualified (IQ) Eligibility Verification Proposal submitted by Ameren Illinois. Resolution will remain posted on the Policy page of the SAG website.
 - **NRDC and Nicor Gas interested in more information from Ameren Illinois in the future about the impact of this policy resolution.**
- [Evaluating Savings from Non-Qualified Equipment \(Final, Jan. 2020\)](#)
 - Keep on Policy Manual list – discuss with other proposals related to evaluation. Suggestion this may be more appropriate for the IL-TRM Policy Document.

Electrification Proposals:

- [Electrification Savings in Cost-Effectiveness \(Opinion Dynamics\)](#)
 - No concerns raised about considering this proposal in the Policy Manual.
- [Electrification Cost-Effectiveness \(Ameren Illinois\)](#)
 - Limited discussion in meeting. There is disagreement on addressing in Policy Manual. See comments in feedback tracker-> [Proposed Policy Tracker – Feedback Received on Policy Manual Proposals \(9/15/2022\)](#)
- [Interactions Between Electrification and Other Efficiency Measures \(Joint Stakeholders**\)](#)
 - No concerns raised about considering this proposal in the Policy Manual.
- [Interactive Effects \(VEIC\)](#)
 - Agreement reached to remove from Policy Manual list. Interactive effects will be discussed with the stakeholder proposal regarding “Interactions Between Electrification and Other Efficiency Measures.”
- [Fuel Switching Definition \(Peoples Gas & North Shore Gas\)](#)
 - Limited discussion in meeting. There is disagreement on addressing in Policy Manual. See comments in feedback tracker-> [Proposed Policy Tracker – Feedback Received on Policy Manual Proposals \(9/15/2022\)](#)
- [Assessments for Fuel Switching Measures Using HFCs \(Peoples Gas & North Shore Gas\)](#)

- Limited discussion in meeting. There is disagreement on addressing in Policy Manual. See comments in feedback tracker-> [Proposed Policy Tracker – Feedback Received on Policy Manual Proposals \(9/15/2022\)](#)
- [Electrification Bill Impacts \(Nicor Gas\)](#)
 - Limited discussion in meeting. There is disagreement on addressing in Policy Manual. See comments in feedback tracker-> [Proposed Policy Tracker – Feedback Received on Policy Manual Proposals \(9/15/2022\)](#)
- [Electrification Energy Consumption Reduction \(Nicor Gas\)](#)
 - Limited discussion in meeting. There is disagreement on addressing in Policy Manual. See comments in feedback tracker-> [Proposed Policy Tracker – Feedback Received on Policy Manual Proposals \(9/15/2022\)](#)
- [Electrification Savings Calculations \(Nicor Gas\)](#)
 - Proposal withdrawn by Nicor Gas – resolved in v11 TRM process.
- [Greenhouse Gas Savings Calculations \(Nicor Gas\)](#)
 - Proposal withdrawn by Nicor Gas. However, Nicor Gas suggests establishing a SAG Working Group in the future to resolve greenhouse gas savings calculation questions. This should be resolved before the next EE Plan filing.

Request for Interim Resolution of Proposed Policy (Ameren Illinois)

Matt Armstrong, Ameren Illinois

- There are barriers impacting Ameren’s EE programs. This proposal can help resolve current challenges.
- Eligibility for SF IQ customers
 - Program requires proof of income records. Hurdle is that the records are not easily accessible for customers. They don’t always have the ability to print and maintain records. If customer has the records, then they don’t have access to the tools or ability to get that information to Ameren – for example, they have a printed return but no computer or scanner at home. Customers don’t have the time and resources for the process and that prevents participation.
 - More specifics about the barrier – diagram of program operations. The online or paper application is received, then program team reaches out for documentation. That documentation is shown in the orange bubble. That barrier I spoke to, they have to go through the burdensome process to be able to email the documentation to the program. As an example, email directed customers to consider taking part in EE programs to control usage. We received almost 1200 applications, but at this point we have been able to verify only a little over 400. Still 787 customers we haven’t been able to reach and get documentation from. We have been working to put resources in place to do the best we can to contact those customers at different times of day. But even if we do contact them, there is still that barrier that they can’t overcome. We want to put forth a policy to help address this.
 - Rationale: aligns with current multifamily IQ eligibility policy in Policy Manual. Basic understanding that most customers in state or federal energy assistance should be expected to have an income that qualifies for those programs. The next piece parallels what is in the Policy Manual for MF. There are challenges for the customers and if we can use other pathways or proxies based on those state and federal programs, we can eliminate this barrier and bring customers into the program.
 - Ameren is also open to discussing other verification paths.
- Suggestions during meeting:

- Future Energy Enterprises: Add affidavit of “no income” as a qualifying path.
- Nicor Gas: Consider zip codes.
- **Next steps: Schedule a small group discussion in early October with the goal of an interim resolution of this issue.**

New Proposed Policy: IL-TRM Administrator Role (ComEd)

Rebecca McNish, ComEd

- Policy Proposal: [IL-TRM Administrator Role \(ComEd\)](#)
- Proposing TRM administrator primary role is facilitator, with technical support being only as-needed, rather than serving as a technical resource as a primary responsibility. While ComEd agrees administrator should be a resource as needed, facilitation should come first.
- Comments during meeting:
 - Aiqueous: Refer to “IL-TRM Administrator” in the policy, instead of a specific vendor. Is it possible to consider process facilitation and technical guidance and input as two separate roles and functions? Are they divisible?
 - Opinion Dynamics: There needs to be ‘starting point’ discussions about what the TRM is, and what it isn’t.
 - NRDC: Who can request a technical proposal in this scenario?
 - ComEd: Anyone who participate in the TAC can request technical guidance. Under this proposal, the TRM Administrator would retain the ability to make a decision in points of non-consensus.
 - Future Energy Enterprises: Several suggestions on including the right IQ EE Committee entities; ensuring discussions are easy to understand; documenting issues; etc. See follow-up document provided after the meeting: [Annette Beitel Comments on IL-TRM Administrator Role \(9/21/22\)](#)

Closing and Next Steps

Celia Johnson, SAG Facilitator

- SAG Facilitator to follow-up with stakeholders on proposals where further discussion on next steps is needed, and a potential alternative process for reporting discussion. Stakeholders will share a response to feedback at a future meeting this fall.
- A Policy Manual Small Group call will be scheduled in early October to discuss Ameren Illinois’ request of interim resolution of the Single Family Income Qualified Eligibility Policy Proposal. Reach out to Celia@CeliaJohnsonConsulting.com if you are interested in joining the Small Group meeting.
- Next Policy Manual Subcommittee meeting: Wednesday, October 19 (10:30 am – 3:30 pm); in-person in Chicago, with a webinar option