

Proposed Policy for Version 3.0: Equity and Affordability Statewide Reporting Metrics

Submitted By: The following Illinois Energy Efficiency for All (IL EEFA) Coalition Members and EE Settlement Groups: ACES 4 Youth, Blacks in Green/Green Power Alliance, City of Chicago, Community Investment Corporation (CIC), Citizens Utility Board (CUB), Natural Resources Defense Council (NRDC), People for Community Recovery (PCR), and National Consumer Law Center (NCLC) / Community Organizing on Family Issues (COFI)

Question 1: Proposed Policy and Rationale

Proposed policy: The adoption of statewide, consistent equity and affordability reporting metrics.

In order to develop the appropriate metrics, this proposal includes a request for educational opportunities/presentations over the summer/early fall for SAG participants to gain a better understanding of best practices and what other jurisdictions are reporting on related to equity and affordability. Proposed presenters include staffers from the University of Michigan's Energy Equity Project and ACEEE's Leading with Equity Initiative. After learning about best practices, SAG policy manual participants, including those involved in submitting this proposal, can collaborate to propose specific metrics that work best in the Illinois context for adoption in the policy manual.

Why/Rationale: To provide transparency and a shared understanding of the equity and affordability impacts of the Illinois gas and electric utilities' energy efficiency portfolios. Also, to ensure programs are being accessed and distributed equitably, and helping to reduce energy burdens and improve energy affordability. The Climate and Equitable Jobs Act (CEJA) extended the electric energy efficiency programs in Illinois past 2030 and included increases in minimum required spending on low-income energy efficiency programs. All of the utilities current 2022-2025 energy efficiency plans also include big expansions in low-income energy efficiency budgets, equitable workforce commitments, and other new elements that relate to equity. With these extensions and expansions, it's an important time to assess how programs are performing, including where the benefits are going, who is involved in influencing programs, and ensuring the benefits of energy efficiency in Illinois are realized by under-resourced communities. The utilities also agreed in their 2022-2025 stipulation agreements to further discuss equity and affordability metrics for potential inclusion in the policy manual.

Question 2: Utility Impact

Describe whether the proposed policy impacts Illinois gas utilities, electric utilities, or both.

Both - would apply to all utilities, gas and electric.

Question 3: Background Research

Provide any background research completed in preparing this template, including source references and links, as applicable.

There is growing research and applications in states, localities, and nationally starting to show why and how to assess the performance of energy efficiency programs from more than just an energy savings lens. That is why this policy

includes a proposal for educational opportunities, to fully understand the landscape of this type of tracking and reporting from experts.

Some examples:

- [Leading with Equity Initiative](#) - ACEEE
- [Energy Equity Project](#) - U of Michigan's Urban Energy Justice Lab
- [Utility Burden Mapping - Greenlink](#)
- [The State of Equity Measurement: A Review for Energy-Efficiency Programs](#) by Carlos Martin and Jamal Lewis.
- [VEIC. "The State of Equity Measurement: A Review of Practices in the Clean Energy Industry." VEIC, September 2019.](#)
- [Energy Equity Indicators Tracking Progress by California Energy Commission](#)

Optional Question 4: Commission Decision

Has the Illinois Commerce Commission previously addressed this policy or issue? If so, please provide language and specific citations, including the ICC docket number.

The ICC has been increasing its focus on affordability, including with its 2020 [Notice of Inquiry on Energy Affordability #20-NOI-01](#) and [response work related to the COVID pandemic](#).