

Illinois Energy Efficiency Stakeholder Advisory Group Policy Manual Subcommittee Version 3.0: Proposed Policy Template

Proposed Policy: IL-TRM Administrator Role Submitted By: ComEd

Question 1: Proposed Policy and Rationale

The proposal is to modify language within the Policy Document for the Illinois Statewide Technical Reference Manual for Energy Efficiency Version 3.1, section 2.1 Stakeholder Roles and Responsibilities, so that the IL TRM Administrator's primary role is serving as an independent facilitator, with technical support only provided on an as-needed basis upon stakeholder request, rather than serving as a "technical resource" being one of the primary responsibilities.

Policy Manual v2.1 does not mention the role of "technical resource" and instead says, "As described in more detail in the IL-TRM Policy Document, the IL-TRM Administrator is an independent entity who has primary responsibility for managing the update process to the IL-TRM." (p.30)

VEIC's current contract also does not mention the role of "technical resource" and instead emphasizes its role as a facilitator within multiple tasks, bolded in the examples below. There are limited references to technical support/input, shown in red below.

- Task 1: TRM Administration – TAC Coordination and Project Management: "VEIC will coordinate and participate in TAC and other collaborative meetings as required for the development of the TRM; maintain the TRM SharePoint site and other document management processes; **facilitate** discussions of process improvements and implement into the on-going process; and undertake other necessary project management activities."
- Task 3: Measure Requests – Review, Analyze, and Develop Requested Measures: "VEIC will work with stakeholders to **facilitate** and compel the early identification of issues to be included in the update, including outreach to stakeholders likely to have concerns and those who historically have not participated fully in the process." ... "VEIC will address written and verbal comments from stakeholders using the SharePoint tracker and document-sharing software, and TAC meetings, and **facilitate** working groups for in-depth discussion when appropriate." ... "VEIC will provide this measure review, research, **technical input**, and development for up to 65 tracker items, including up to 15 new measures."
- Task 4: Income-Qualified Working Group: "VEIC will provide **facilitation** services and **technical support** to the TRM Income Qualified Working Group."
- Task 6: TAC Support between Formal TRM Cycles: "VEIC will also work with evaluators, as requested, to discuss recommendations made in VEIC memos outlining items that would benefit from additional primary research, and will **facilitate** discussions of preliminary results of evaluations undertaken to inform TRM content as appropriate during this period." ... "VEIC will coordinate with the TAC to identify and prioritize any items that would benefit from additional research, analysis, and discussion during this time, and will **facilitate** up to an additional five (5) two (2)-hour TAC-related stakeholder engagement meetings to provide a forum to address such issues."

Proposed modifications to the language within the Policy Document for the Illinois Statewide Technical Reference Manual for Energy Efficiency Version 3.1, section 2.1 Stakeholder Roles and Responsibilities, are in red below:

*“TRM Administrator (Independent Consultant) – The TRM Administrator has primary responsibilities to **serve as an independent facilitator**, manage updates to the TRM document, present TRM Updates to the SAG and the TAC, coordinate with the SAG, **serve as an independent technical resource**, provide technical support on an as-needed basis upon stakeholder request, and—if desired by the SAG—manage a publicly accessible TRM website that contains TRM-related documents such as references, recommendations, responses, and versions of the TRM.” P.6, IL TRM Policy Document v3.0*

In collaboration with the other utilities during the preparation of VEIC’s 2023 contract, we would additionally propose modifying VEIC’s contract to clarify technical support/input would only be provided on an as-needed basis upon stakeholder request, consistent with the proposed TRM Policy Document language above.

Question 2: Utility Impact

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

The proposed policy indirectly impacts all Illinois utilities by impacting the independent IL TRM Administrator.

Question 3: Background Research

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

Questions to consider:

- 1. Are you aware of other jurisdictions or utilities that address this policy issue?*
- 2. Have any national or regional energy efficiency organizations addressed this policy topic? If so, please provide reports and any other relevant sources.*

N/A

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 approved and adopted the current Policy Document for the Illinois Statewide Technical Reference Manual for Energy Efficiency Version 3.1 in Docket No. 22-0005.

Optional Question 5: Statutory Consistency

Have you reviewed your proposed policy against applicable Illinois law? Are there any possible conflicts? If so, please explain and provide statutory citation(s).

We have reviewed the proposed policy against applicable Illinois law and currently have not identified a conflict.

Optional Question 6: Additional Information

Provide additional information, as needed, to assist with understanding the proposed policy issue and your request to include it in the Policy Manual Version 3.0. For example, have any memos been drafted to the SAG related to this policy proposal?

N/A