

Proposed Policy for Version 3.0: Income Qualified Program Policies
Submitted By: IQ North Committee Leadership Team and IQ North
Facilitator

Submitters: IQ-N Leadership Team

Question 1: Proposed Policy and Rationale

Briefly describe the policy proposed to be included in Policy Manual Version 3.0, including rationale for why this policy is necessary in Illinois.

Multiple proposed policies for the IQ programs identified below for discussion and review:

- **Policies to Ensure Non-For-Profits are Implementing Energy Efficiency Programs and Measures, per statutory requirement set forth below,** including, but not limited to:
 - IQ Funding Expenditure Review: Review of expenditures from 2018 – 2021 to assess how much IQ funding was implemented by non-for-profits, and if non-for-profits not used to implement energy efficiency programs and measures “not practicable” – how utility decided standard “not practicable” met.
 - CBO/CAA Contract and Program Oversight: The LIEEAC Leadership Teams should have ability to review/comment/affirm all contracts (including Market Development Initiative contracts) for Income Qualified (IQ) energy efficiency programs and measures, prior to such contracts being executed by the utility to ensure all statutory and community issues are addressed.
 - CBO/CAA Capacity Building: Ensure utilities provide support to enable local non-for-profits to develop skills, capabilities and knowledge to effectively serve their communities implementing low-income energy efficiency programs and measures.
 - CBO/CAA Energy Efficiency Program and Measure Proposals: Ensure ability for CBOs/CAAs to receive fair consideration and support for energy efficiency program and measures they would like to design and implement.
 - Standard Form Contract for CBOs/CAAs: Policy for utilities in collaboration with the LIEEAC Leadership Team statewide, standard-

form contract for CBOs/CAAs to implement energy efficiency programs and measures that contain reasonable and appropriate terms for CBOs/CAAs that is mutually agreeable to CBOs/CAAs.

- Comment: The utilities now have very restrictive cyber security/PII provisions. CBOs/CAAs will not be able to meet them. It will be important to have “form,” standardized cyber, insurance and other key general terms and conditions that will apply to CBOs/CAAs, non-profits and small businesses (ideally).
- Standard, Appropriate, Mutually Agreeable Metrics for Evaluating CBO/CAA Programmatic Success: Common, CBO/CAA-approved metrics for programmatic success and data requirements to demonstrate success.
- Protection of CBO/CAA Relationships/Intellectual Property: Policies to ensure that CBO/CAA relationships and program designs/other intellectual property not used by large implementing companies and/or utilities.
- Access to Tools: CBOs/CAAs must have free and equal access to tools needed to design, track and evaluate CBO/CAA programs, including the cost-effectiveness calculator.
- Evaluation: CBOs/CAAs must be given equal access (equal to the utilities) to evaluators who will be evaluating their programs, including review of evaluator contract, evaluation design, any early, ongoing, draft and/or final memos, white papers, reports, etc.
- Independent Oversight: Policies to ensure CBOs/CAAs have independent recourse if disagreements arise during contract negotiation, implementation and/or evaluation of CBO/CAA-developed and implemented programs, and/or any input that CBOs/CAAs have regarding income qualified contracts and/or programs that are implemented and/or evaluated by entities that are not local CBOs/CAAs.
- **Policies to Minimize Disconnections**
 - Policy to ensure all customers who have been identified as a disconnection risk, including those behind on bills, are affirmatively reached out to educate them about all services available to them to help them reduce and pay their bills, including utility energy efficiency programs, state-funded programs such as IHWAP and LIHEAP, etc.

- Policies to ensure customers facing disconnection risk receive energy education on how to read their bills, understand greatest energy using equipment and practices and how to manage their energy use.
- **Policy to Ensure and Facilitate IQ Energy Assistance Program Cross-Referrals**
 - “Policy Rule” that cross-referral must occur, identify the IQ Programs and Initiatives that should be subject to cross-referral, ensure customers get assistance/coaching from the program in accessing the other programs/initiatives that could help them, then have EM&V do some spot checking to make sure the referral is occurring consistently and customers are able to take advantage of other programs available to them.
 - “One-Stop Shop” for Customer Sign-Ups for ALL bill assistance and IQ energy programs so that customers do not have to repeatedly sign-up and/or gather different documentation for multiple assistance programs, including those offered through federal and state funds (such as LIHEAP, LIWAP and IHWAP).
 - “Customer Journey Map” and “Customer Feedback Survey” for IQ customers to ensure that their experience is as seamless and positive as possible; customer feedback from all IQ customers after they have engaged in programs to ensure they are being treated with dignity, respect and the same speed and efficiency that a “market-rate” customer might receive.
- **Policies to Track and Report on Illinois Home Weatherization Program (IHWAP), including Braided Efforts**
 - Policies that require tracking and reporting of IHWAP program funds and braiding efforts to ensure all funds allocated each year are spent.
 - Policies to ensure sufficient workforce and contractors to perform the IHWAP work
 - Policies to ensure sufficient training resources, effective and constructive oversight and coaching of trade ally work to ensure trade allies are able and willing to expand and continuously improve.
- **Policy that IQ Programs and Related Services (e.g. LIHEAP and IHWAP) Should be Offered Through Local Community Centers (CBOs/CAAs) and Services Should be “Wrap-Around” (One-Stop Shop)**

- Local CBOs/CAAs who wish to provide outreach, education and sign-up should be trained and supported by utilities and other partners (DCEO) through resources, effective contracting, coaching and other resources.
- **Policies to Ensure Use of Local and Diverse Contractors:** Policies to ensure that trade allies serving disadvantaged communities are based in those communities and represent residents of those communities. Programs and contracting models to ensure success and growth of local and diverse contractors in participating in both utility and state-funded programs.
- **Local CBOs/CAAs Considered “Non-financially interested parties”:** Policy indicating that, by definition, local CBOs/CAAs are included in definition of “non-financially interested parties” except in the narrow case that a contract with that organization is being considered by SAG or a SAG subcommittee.
- **Policy on Primacy of LIEEAC Over SAG:** Policy indicating the primacy of recommendations of LIEEAC over those from SAG or other stakeholder processes to ensure CBOs/CAAs have the “final say” in policies and practices that impact their communities.
- **Primacy of IQ-TRM Working Group vs. TRM Working Group:** Policy Indicating that technical values for IQ get resolved through the IQ TRM Working group rather than the full TRM Working Group (exchange I had with VEIC earlier). I’ll provide support for this position, but I’ve socialized the idea and at least a few others agree with me.

Policy Proposals from IQ-N Facilitator

- Form: Create single section in EE Policy Manual for IQ Policies
- Form: Policy that all IQ items discuss through SAG and/or SAG subcommittees should be grouped so that interested IQ participants can participate in targeted way.

Question 2: Utility Impact

Positive Utility Impact as follows:

1. Policies above will ensure utilities are complying with statutory provision to use CBOs/CAAs for energy efficiency program and measures.
2. Utilities will be more effective and trusted in their communities if programs are offered through CBOs/CAAs
3. Utilities will achieve local economic development if majority of programs and funding flows through local communities.

Question 3: Background Research

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

The IQ Leadership Team has performed extensive research by direct organizational experience and extensive conversations with CBO/CAA implementer experience during prior and current portfolio to inform development of the above policies and recommendations.

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 had limited input from CBOs/CAAs on IQ program design, implementation and evaluation. The important Policy Manual recommendations, above, will start ensuring CBOs/CAAs have an effective voice in ICC proceedings and IQ program design, implementation and evaluation.

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).

The statutory authority for the proposed policies, above, is:

*Implementation of energy efficiency measures and programs targeted at low-income households should be contracted, when it is practicable, to independent third parties that have demonstrated capabilities to serve such households, **with a preference for not-for-profit entities and government agencies that have existing relationships with or experience serving low-income communities in the State.***

The above recommendations are fully consistent with the legislative intent and several provisions contained in the Clean Energy Jobs Act (CEJA).

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?

