

Proposed Policy for Version 3.0: Single Family IQ Eligibility Verification Guidelines
Submitted By: Ameren Illinois

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.

Questions to consider:

- 1. Why does this policy require inclusion in Policy Manual Version 3.0?*

Current Illinois policy in Section 4.3 provides income eligibility verification guidelines for low-income customers in multifamily properties. The verification guidelines provide flexibility in qualification to minimize time, paperwork and hassle; recognizing that the majority of customers meeting alternative verification guidelines are income eligible. The majority of customers participating in federal, local government, and/or community organization programs or located in a low-income census tract should be expected to have incomes at or below 80% of Area Median Income. Allowing the same verification pathways for single family programs would also minimize time, paperwork and hassle for the program administrator and participants.

- 2. What unresolved policy issue(s) will be resolved by inclusion in the Policy Manual Version 3.0?*

Current Illinois policy provides multiple verification pathways for multifamily programs but does not provide the same pathways for single family programs. The current verification pathway of requiring proof of income documentation can be overly burdensome on both the customer and program administrator. Allowing multiple eligibility pathways assists program administrators in serving the single-family IQ sector more effectively by maximizing the time spent serving the customer.

Proposed Policy

The majority of customers participating in the weatherization assistance program or located in a low-income census tract should be expected to have incomes at or below 80% of Area Median Income in order to provide energy efficiency measures and services to the customer under program administrator income qualified energy efficiency programs in Illinois. Because income verification for low-income single-family homes can be challenging, expensive and time-consuming, and in order to ensure that such challenges, costs and or impositions on customers do not adversely affect a program administrators ability to serve low-income single-family customers, there should be multiple pathways to establishing income eligibility for purposes of program participation and spend tracking.

This policy would establish pathways to identifying customers by their participation in other income eligible programs. For example, the following pathways would be acceptable ways to demonstrate income eligibility for single family customer participation in program administrator income qualified single-family programs:

- Participation in a weatherization assistance program
- Participation in a utility funded energy assistance programs with like income eligibility
- Participation in federal or local government disaster relief programs where the Program Administrator can demonstrate that the majority of households are expected to have incomes at or below 80% AMI

- Participation in programs administered by local governments or community organizations where the Program Administrator can demonstrate that the majority of households are expected to have incomes at or below 80% AMI

Question 2: Utility Impact

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

This policy affects both electric and gas utilities.

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.*

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.

See Policy Manual Version 2.1

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).

This proposal would facilitate the intentions of Section 8-103B(c), as well as other utility objectives targeted at serving income eligible customers.

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?