

Questions Submitted to Inform the Nicor Gas Draft Revised EE Plan Presentation to SAG

The Large Group SAG will meet on Tuesday, March 17 by teleconference. Nicor Gas has the option to re-file an updated EE Plan by June 1, 2026 for the program years 2027-2029 due to the Clean and Reliability Grid Affordability (CRGA) Act. If Nicor Gas decides to re-file, Nicor Gas anticipates presenting a draft EE Plan to SAG on March 17.

- [Click here](#) to review a presentation describing legislative changes to EE due to CRGA, from the [November 12 SAG meeting](#).
- SAG participants had an opportunity to raise questions for Nicor Gas to consider in preparing the March 17 presentation to SAG. Questions were due February 24, 2026. Nicor Gas will not respond in writing to questions. Questions will be shared with Nicor Gas and posted on the SAG website.

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Community Investment Corp. Questions

Submitted by: Cassidy Kraimer (cassidy.kraimer@icccchicago.com)

1. Boiler Replacement Incentives:

- a. Is there an opportunity to create an emergency replacement pathway for gas HVAC equipment, including boilers, to support property owners, particularly affordable housing providers (both NOAH and subsidized) when equipment fails unexpectedly?
- b. Does the program incentivize boiler replacement through the joint program offerings? Can the utility share more publicly the level of incentives and the process to access boiler replacement, particularly for multifamily property owners and income-eligible multifamily property owners? If boiler replacement isn't offered via joint programming, but a building owner is already participating in the joint program, how might they access the gas utilities' boiler replacement offering?

2. Program Spending and Savings Transparency:

- a. Can gas utilities provide a breakdown of program spending and net therm savings at the individual program level, with income-eligible spending and savings shown separately from non-IE residential?

3. Alignment with Rehab and Acquisition Financing:

- a. Would it be possible to explore how gas programs and joint programs can better align with clients pursuing financing in rehab and acquisition projects? Can the utilities outline how this process works today and where opportunities for improvement exist, including flexibility for pre-approval, extended reservation periods, or phased incentive delivery that aligns with LIHTC, IHDA, and HUD

financing timelines as well as traditional lenders, including Community Development Financial Institutions (CDFIs)?

- b. Is there an opportunity for gas utilities to coordinate more extensively with the Illinois Housing Development Authority (IHDA), including its Preservation 2.0 program, to support affordable housing developers in need of both capital repair and energy efficiency investment? Is there also room to incorporate more intentional climate resiliency planning, including support for retrofits that have the potential to reduce insurance costs and improve habitability during extreme weather events? Could the gas utilities more explicitly explore rising insurance costs and how that could be remediated or reduced by EE offerings?
- 4. Innovative Programming and Technologies:**
 - a. Are there innovative programs or technologies that utilities are hoping to deploy in the next plan particularly those with meaningful applicability for multifamily and affordable housing?
 - 5. Connecting Multifamily Customers to the Affordable Housing Special Assessment:**
 - a. Through the multifamily program, would it be possible to incorporate information about complementary programs, including the Affordable Housing Special Assessment, available statewide and implemented county-by-county, into outreach and program delivery for multifamily property owners? We encourage gas and electric utilities to coordinate with Assessor's Offices in each county where multifamily incentives are delivered to increase awareness of and access to this program, which can add significant financial value for customers, particularly those served through the IE multifamily and public housing programs.
 - 6. 80% Whole Building Requirement:**
 - a. How will the statutory requirement for 80% of IE spending on whole-building programs be met in the next plan period? What mix of programs will count toward this threshold, and which IE offerings does the utility consider "whole building" for this purpose?

Elevate Questions

Submitted by: Amy Jewel (amy.jewel@elevatenp.org)

1. Will Nicor Gas consider funding boiler replacements in the future? The currently policy only allows for funding replacements in the case of emergency situations, but some income-eligible properties in particular have needs for this measure in non-emergency situations.
2. How will Nicor Gas prioritize weatherization in the re-filed plan?
3. What portion of the residential budget will be earmarked for income-eligible properties?
4. Does Nicor Gas plan to incentivize dual fuel or hybrid heat pump systems in partnership with ComEd?

Illinois Industrial Energy Consumers (IIEC) Questions

Submitted by: Scott Mallory, Brubaker & Associates (smallory@consultbai.com)

1. If total updated EE plan costs are proposed to increase, please explain what, how and why such an increase is needed.
2. If updated EE plan costs are proposed to change by program category, please explain what, how and why such changes are being proposed.

National Consumer Law Center (NCLC) Questions

Submitted by: Karen Lusson (klusson@nclc.org)

Income Qualified Spending:

1. What is the total annual budget and 2027-2029 plan total budget in light of the new statutory minimum for IQ budget (no less than the greater of: (A) 25% or (B) five percentage points more than the proportion of total annual gas sales to non-opt-out retail customers that are consumed by low-income households.) and the provision allowing for lower annual goals for increased spending up to 35% of total budget, what % and dollar amount does ComEd propose will be spent annually on IQ programs? (NCLC's ask is for a 35% minimum spend assuming (A) applies, particularly in light of increased rates associated with main replacement plans, nearly annual rate increases and affordability concerns.) Please provide stakeholders all workpapers justifying this level.
2. What percentage and dollar amount of annual IQ spending will be dedicated to:
 - a. Braided (IHWAP) SF weatherization
 - b. Braided (IHWAP) MF weatherization
 - c. Joint gas/electric SF weatherization (Have you contacted ComEd to determine what increased level of IQ spending they will be proposing? How did that enter into your proposed IE budgeted amounts?)
 - d. Joint gas/electric MF weatherization (Have you contacted ComEd to determine what increased level of IQ spending they will be proposing? If not, why not? What is that amount? How did that enter into your proposed budgeted amount?)
 - e. Market-rate Residential programs, with a breakout by program
3. What percentage of gas efficiency savings are assumed for each of these program spending levels?

Implementation Contracts:

1. Will you be entering into new implementation contracts for the programs in light of the CRGA amendment that recognizes additional points for IL-based companies? If so, which programs? If not, why not?

Natural Resources Defense Council (NRDC) Questions

Submitted by: Kari Ross (kröss@nrđc.org)

1. **Program spending and btu savings claimed by sector and program.** We'd like to see a breakdown at the individual program level, with IE shown separately from non- IE residential.
2. **Breakdown of btu savings for each program (IE and non-IE res split out) and for the portfolio as a whole.**
3. **Level of IE spending.** There is a statutory minimum equal to at least the greater of 25% of program spend or 5% above the % of eligible sales to IQ customers.
 - a. What level of IE spending is Nicor Gas proposing? Annually, by program channel, and inclusive of braided funds with IHWAP single-family and multifamily initiatives.
 - b. How did it arrive at that level?
4. **Breakdown of IE program spending.**
 - a. How will the new statutory requirement for 80% on whole building programs be met? What IE programs are considered "whole building"?
 - b. For whole building weatherization, separately for single-family and multi-family, what fraction of spending and savings are from:

- i. Weatherization of gas-heated buildings by Nicor Gas alone
 - ii. Weatherization of gas-heated buildings through joint delivery with ComEd
 - iii. Weatherization of already electrically heated buildings through joint delivery with ComEd
 - c. New statute allows up to 15% of IQ spend on health and safety measures necessary to facilitate weatherization. What % of H&S funding is Nicor Gas budgeting by year and program channel?
- 5. **Income eligibility verification.** Can the Company share a breakdown of how they plan to verify income for program qualification purposes by program channel? Specifically, how does the Company plan to utilize “disadvantaged community”/DAC qualification for IE programs in the amended plan?
- 6. **Assumptions about joint delivery with ComEd.** CRGA allows northern gas utilities to voluntarily significantly increase their level of spending and savings – at least a 250% increase is required if the gas utilities want to ask for a shareholder incentive mechanism.
 - a. What has Nicor Gas assumed about opportunities for joint delivery with ComEd in its initial plan? What was that based on?
 - b. What would happen if Nicor Gas assumes less opportunity for joint delivery with ComEd than becomes possible once ComEd’s plan is filed?
- 7. **Large C&I customers.** New law allows formerly exempted large commercial and industrial customers the ability to opt-out of EE programs. “Large C&I” is any business customer who uses 4 million therms/year. What assumptions are made on opt-outs in the new 2027-29 plan?
- 8. **Business portfolio shifts.** Tied to voluntary program increase starting in 2027, at least 30% of business portfolio budget to be spent on public sector buildings (i.e. municipal buildings, school districts, community college districts, etc.). How does Nicor Gas plan to achieve this? Will the company budget for over 30%? If not, what is the company’s calculations in making that decision?
- 9. **Integrating marketing of EE and new low-income discount rates (LIDR).** How does Nicor Gas plan to market IE EE programs to new LIDR customers (whose income falls below 300% FPL) and vice versa?
- 10. **Focus of R&D funding.** What initiatives, if any, does Nicor Gas plan to fund?
- 11. **Summary of major differences in program offerings relative to currently approved 2026-29 plan.** Any new programs or measures? Programs or measures with significant increases or decreases in budget?

Office of the Illinois Attorney General Questions

Submitted by: Abby Miner (abigail.miner@ilag.gov)

Budget Shifts:

1. Identify all budget shifts between the 2026-29 plan and the draft revised 2027-29 plan and represent each shift both in absolute dollars as well as in terms of percentage of total budget so that the 2026-29 plan and the draft revised 2027-29 plan may be meaningfully compared.
2. Specifically, identify and explain each budget shift Nicor proposes to each component of its portfolio level spend (MDI, R&D, portfolio administration, etc.) and represent each shift both in absolute dollars as well as in terms of percentage of total budget so that the portfolio level budgets of the 2026-29 plan and the draft revised 2027-29 plan may be meaningfully compared.