

IL EE Stakeholder Advisory Group (SAG) Request for Comments on Reporting Policy Proposal

Instructions:

- Using this template, send written comments to the SAG Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com by **Friday, August 15**.
- Include “Reporting Policy Feedback” in the subject line of the email.
- All comments will be posted on the [SAG website](#), and circulated to SAG.

Background Information:

- At the [July 23, 2025](#) Q3 Large Group SAG meeting, Ameren Illinois presented a proposed policy to change utility EE narrative reporting from quarterly to semi-annual: [Ameren Illinois Policy Proposal Presentation](#).
- Following the July 23rd meeting, Ameren shared redline edits to several policy documents, linked in the questions below.
- A follow-up meeting will be scheduled in late August or early September to discuss feedback on Ameren’s proposed changes. The proposed effective date for these policy changes is September 30, 2025.

Comments Submitted By:

Name: Cassidy Kraimer

Company or Organization: Community Investment Corp. (CIC)

Company or Organization Website (if applicable):

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Question 1: Please describe comments and /or questions on proposed changes to Section 6 of the Policy Manual, *Program Administration and Reporting*:

- [IL EE Policy Manual Section 6, Program Administration and Reporting \(redline 7/29/25\)](#)

Response: We support the proposed change as outlined.

Question 2: Please describe comments and /or questions on proposed changes to Equity and Affordability Reporting Metrics, finalized by the SAG Reporting Working Group in June 2024:

- [Equity and Affordability Reporting Metrics \(redline 7/29/25\)](#)

Response: We support the proposed change as outlined.

Question 3: Please describe comments and /or questions on proposed changes to Diverse Contracting Reporting Metrics, finalized by the SAG Reporting Working Group in June 2024:

- [Diverse Contracting Reporting Metrics \(redline 7/29/25\)](#)

Response: We support the proposed change as outlined.

Question 4: Please describe comments and /or questions on proposed changes to Income Qualified Health and Safety Reporting Metrics, finalized by the SAG Reporting Working Group in June 2024:

- [Income Qualified Health and Safety Reporting Metrics \(redline 7/29/25\)](#)

Response: We support the proposed change as outlined.

Question 5: Please describe comments and /or questions on proposed changes to Income Qualified Multi-Family Reporting Metrics, finalized by the SAG Reporting Working Group in June 2024:

- [Income Qualified Multi-Family Reporting Metrics \(redline 7/29/25\)](#)

Response:

We support the proposed change to move from quarterly to semi-annual reporting for the Income Qualified Health and Safety metrics. However, we do not support the proposal to have independent evaluators complete the housing-type and size breakdowns instead of the currently outlined program administrators (proposed language italicized below).

Including this data in the semi-annual reports will ensure it remains consistently available, regardless of changes to each utility's Evaluation Plan or differences in reporting approaches between utilities. Semi-annual reporting also provides a streamlined, centralized format and location on the SAG website with other reporting metrics where stakeholders can reliably access the information. While independent evaluators can play an important role in deeper analysis, such as identifying strategies to better reach specific customer groups, or exploring differences in program success and savings across building types and sizes, the baseline data should still be provided in the semi-annual reports. This approach balances timely access to essential information with the opportunity for evaluators to conduct more detailed, value-added analysis.

Annual Reporting Metrics for (i):

Excerpt from policy: *The mix of buildings being treated. This could include breakdowns between public housing, subsidized housing and unsubsidized housing; the type/size of buildings.*

Utilizing a spreadsheet – [IQ Multi-Family Reporting Metrics Spreadsheet \(Final 6/5/2024\)](#) – [Independent Evaluators for Program Administrators](#)¹ will report [in Annual Evaluation Reports](#) the number of buildings and units participating in IQ multi-family EE programs in the following building categories: