

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:

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Company or Organization: Illinois Commerce Commission

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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:

Based on the proposed revisions set forth in Ameren Illinois’ July 23, 2025 policy update, it is clear that the proposal to reduce the reporting frequency for several subsections of Section 6.5 from quarterly to semi-annual directly conflicts with the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission’s Final Order in Docket 23-0761. Under Policy Manual Version 3.0, all subsections of Section 6.5 are required to be reported on a quarterly basis, and there is no provision in the Final Order or the Policy Manual that approves a unilateral reduction in reporting frequency or selective reassignment of language to a semi-annual narrative. Accordingly, unless and until the Commission formally amends the Policy Manual through a subsequent proceeding, Ameren and all Program Administrators are encouraged to submit their quarterly reports, ensuring they include all the elements outlined in Section 6.5. Any modifications to reporting requirements, including changes in frequency or language, cannot be implemented unilaterally under the **current** Final Order.

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:

Based on Ameren Illinois' July 23, 2025 proposed revisions, any reduction in the reporting frequency or reassignment of required reporting elements—including Equity and Affordability metrics—from quarterly to semi-annual directly diverges from the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission's Final Order in Docket 23-0761. Unilateral modifications are not approved under the **current** Order.

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:

Based on Ameren Illinois' July 23, 2025 proposed revisions, any reduction in the reporting frequency or reassignment of required reporting elements—including Diverse Contracting metrics—from quarterly to semi-annual directly diverges from the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission's Final Order in Docket 23-0761. Unilateral modifications are not approved under the **current** Order.

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:

Based on Ameren Illinois' July 23, 2025 proposed revisions, any reduction in the reporting frequency or reassignment of required reporting elements—including Income Qualified Health and Safety metrics—from quarterly to semi-annual directly diverges from the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission's Final Order in Docket 23-0761. Unilateral modifications are not approved under the **current** Order.

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:

Based on Ameren Illinois' July 23, 2025 proposed revisions, any reduction in the reporting frequency or reassignment of required reporting elements—including Income Qualified Multi-Family metrics—from quarterly to semi-annual directly diverges from the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission's Final Order in Docket 23-0761. Unilateral modifications are not approved under the **current** Order.