

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: [Kari Ross and Chris Neme](#)

Company or Organization: [NRDC](#)

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: NRDC is supportive of the Ameren-proposed redlines, except for the proposal to make it optional to report significant program budget shifts in just semi-annual narrative reports and not in quarterly template reports. Quarterly templates include budgeted spending by program so any shifts in budgets should be reflected in those numbers. Under 6.5, vii. b should be included in the list of quarterly template report criteria.

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: NRDC supports Ameren’s proposed redline edits to this document.

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: Given both (1) the comment from Ameren that electric utilities are required by statute to report on workforce equity at least quarterly; and (2) that list of reporting items for contractors and subcontractors are all numbers (no narrative discussion), NRDC believes it would be appropriate for such information to be reported in Excel templates on a quarterly basis. We suggest the same applies to trade ally diversity reporting.

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: NRDC supports Ameren’s proposed redline edits to the IQ H&S reporting requirements.

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: NRDC supports Ameren’s proposed redline edits to the IQ MF reporting metrics requirements.