

# Illinois EE Stakeholder Advisory Group (SAG) Equity Subcommittee Meeting

**Monday, October 20, 2025**

1:30 – 3:00 pm

Teleconference

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### **Meeting Materials**

Posted on the [October 20 meeting page](#) of the SAG website:

- [Monday, October 20 SAG Equity Subcommittee Meeting Agenda](#)
- [SAG Facilitator Presentation: Introduction to October 20 Equity Subcommittee Meeting](#)
- [Joint Utility Presentation \(ComEd, Nicor Gas, Peoples Gas & North Shore Gas\): Home Energy Savings 2026 Retrofits Prioritization Plan](#)

### **Attendees**

Name	Company or Organization
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Abigail Miner	IL Attorney General's Office
Amy Jewel	Elevate
Ashley Palladino	Inova Energy Group
Cassidy Kraimer	Community Investment Corp.
Channel Turbides	ComEd
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Courtney Golino	Guidehouse
Danish Murtaza	Peoples Gas and North Shore Gas
Darnell Johnson	Urban Efficiency group
Elder Calderon	ComEd
Elizabeth Horne	ICC Staff
Jarred Nordhus	Peoples Gas and North Shore Gas
John Carroll	Leidos
John Dakarian	Nicor Gas
John Mansfield	Nicor Gas
Julie Hollensbe	Walker-Miller Energy Services
Kara Jonas	ComEd

<b>Name</b>	<b>Company or Organization</b>
Karen Lusson	National Consumer Law Center
Kari Ross	NRDC
Kristen Kalaman	Resource Innovations
Leanna McKeon	ComEd
Lee Ringo	Energy Infrastructure Partners
Liz Connolly	ComEd
Mary Johnson	Resource Innovations
Matt Armstrong	Ameren Illinois
Nathan Baer	Staples Energy
Nick Horras	CEDA
Patrice McFarlin	Encolor Consulting
Philip Halliburton	ComEd
Randy Opdyke	Nicor Gas
Salina Colon	CEDA
Shawn Haas	Peoples Gas and North Shore Gas
Ted Weaver	Dunsky Climate + Energy Advisors
Tina Grebner	Ameren Illinois
Valencia Roner	Energy Infrastructure Partners

### **Meeting Notes**

See **red text** for follow-up items.

### **Introduction to SAG Equity Subcommittee Meeting**

*Celia Johnson, SAG Facilitator*

Purpose of October 20<sup>th</sup> Meeting:

- To follow-up on the September 18 SAG Equity Subcommittee meeting, regarding minimum participation criteria that determines whether a home is weatherized and customer prioritization for major measures for the northern Illinois utilities' jointly implemented Home Energy Savings (HES) Income Eligible Single Family Upgrades Program.

Stipulated Agreement Language

- ComEd
  - “The minimum attic insulation criterion that determines whether a home is weatherized in its HES program is R19, with the ability to bring the insulation level up to R49- R50. ComEd commits to working with stakeholders and related utilities, in 2025, to adjust the minimum participation criteria that determines whether a home is weatherized and customer prioritization for major measures in its Home Energy Savings (HES) aka IE Single Family Upgrades program. ComEd will not consider HVAC efficiency or lack of duct sealing opportunity (E&F Within 2025 Retrofits Prioritization Criteria Proposed changes) when prioritizing customers for HES weatherization services.”
- Nicor Gas
  - “Nicor Gas commits to engage in conversations with stakeholders, implementers, subcontractors, ComEd and Peoples Gas/North Shore Gas in the Equity

Subcommittee regarding the existing minimum SF Retrofits Prioritization Criteria, including whether HVAC efficiency or lack of duct sealing opportunity (E&F within 2025 Retrofits prioritization Criteria Proposed changes) should impact the prioritization of customers for or ability to receive weatherization services.”

- Peoples Gas and North Shore Gas
  - “The Companies commit to discussing IE SF retrofit prioritization criteria in the SAG Equity Subcommittee.”
- Excerpted from ComEd 2026-2029 EE Plan stipulation; Nicor Gas 2026-2029 EE Plan stipulation; and Peoples Gas/North Shore Gas 2026-2029 EE Plan stipulation

#### Feedback and Follow-up

- Written comments submitted after the September 18 meeting:
  - Joint Comments from National Consumer Law Center (NCLC), Community and Economic Development Association of Cook County (CEDA), and Urban Efficiency Group (10/6/25)
  - Appendix A to Joint Comments: NCLC, CEDA, and Urban Efficiency Group September 18, 2025 Presentation
  - NRDC Comments (10/9/25)
- October 20<sup>th</sup> Follow-up Meeting
  - Joint follow-up presentation from northern Illinois utilities focuses on feedback that is directly related to prioritization criteria:
    - IHWAP pathway and options
    - Minimum insulation criteria
    - Health and safety structure

#### **Joint Presentation: Home Energy Savings 2026 Retrofits Prioritization Plan**

*Elder Calderon, ComEd; Jarred Nordhus, Peoples Gas and North Shore Gas; Chris Vaughn, Nicor Gas*

#### **Introduction**

*Elder Calderon, ComEd*

- Thank you to those that submitted comments. The utilities are focusing a response on the comments that are directly related to prioritization criteria.

## Proposed Changes: 2026 Prioritization Criteria – SF

Home must have:

**A. SF-type configuration.**

In-unit mechanical equipment  
Customer has decision-making power over building envelope (building envelope can be addressed comprehensively); the attic and/or basement of the unit can be served without impacting any other units.

**B. No obvious deferrable conditions.**

No blatantly obvious issues that would likely exceed the per home health and safety funding available  
Current list is roof leaks, vermiculite, hoarding, active water damage/bulk moisture, cracked ceilings that prohibit attic insulation, knob and tube wiring, or severe disrepair of access points (e.g., lack of railings, deteriorating porch).

**C. Attic air sealing and insulation opportunity.**

Attic insulation must be less than **5 inches** on average across the entire attic.  
If attic does not have a hatch, criterion is marked "yes" if the customer is willing to let a contractor cut a hatch in the future.  
If the home does not have an attic, this criterion is waived (marked n/a).  
If customer refuses access to space, criterion is marked "no."

**D. Basement/crawlspace air sealing opportunity.**

At least 20% of rim joist is accessible and not air sealed.  
If the home does not have a basement, this criterion is waived (marked n/a).  
If basement is finished (i.e., rim joist and ducts are not accessible) and home does not have a crawlspace, criterion is marked "no."  
If basement is finished and home has a crawlspace, criterion is marked "yes."  
If there is only a crawlspace, criterion is marked "yes."

**And at least one of the following:**

- E. Duct sealing opportunity:  
Ducts located in semi-or unconditioned spaces:
- F. HVAC equipment is inefficient:  
Existing furnace or boiler is < or = 80% efficient and/or AC is < or = SEER 13

OR home must have:

- G. An electric resistance heating system and the customer meets A and B

**equivalent to R-19, per ComEd Plan 7 Stipulation Agreement**

**\*Estimate 24% referral rate to Retrofits based upon historic data.**

## Revised 2026 Retrofits Prioritization Criteria:

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**C. Attic air sealing and insulation opportunity.**

Attic insulation must be less than 6 inches on average across the entire attic.  
If attic does not have a hatch, criterion is marked "yes" if the customer is willing to let a contractor cut a hatch in the future.  
If the home does not have an attic, this criterion is waived (marked n/a).  
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**D. Basement/crawlspace air sealing opportunity.**

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### 2026 Retrofits Prioritization Criteria

- Maintaining R-19.
- This is the criteria that will be used for 2026.

## Electric Resistance Space Heat

- ComEd clarified that in 2026, weatherization services and heat pump upgrades to Single Family Income Eligible Customers with Electric Space Heating will be provided through the Whole Home Electric (WHE) offering.

*Chris Neme: When you are treating electric resistance heated homes through the whole home electric offering, what requirements do you have in that offering for homes to qualify for weatherization? Are qualifications for Whole Home Electric (WHE) offerings different than weatherization?*

- *Elder Calderon: They are different. Our implementation team could speak on specifics.*
- *Kara Jonas: We anticipate that prioritization criteria for electric resistance space heated homes will remain the same in 2026. We look for heat pump viability and deferrable conditions when evaluating a home.*
- *Chris Neme: One of our comments on this was, while I understand the absence of a deferrable condition would be necessary for weatherization, I'm not sure that is the case for a heat pump replacement. You might consider whether you need to worry about deferrable conditions. I'm curious whether you have considered that.*
- *Kara Jonas: I can think of a potential example of a deferrable condition, if there were inadequate panel upgrades that were providing insufficient electric to support that system, that would be a health and safety expense. We would review that because we have a health and safety budget.*
- *Chris Neme: There may be exceptional cases where there might be deferrable conditions for a heat pump. I think it's a much shorter list than it would be for weatherization. I want to make sure it's not set up that a deferrable condition (like a rooftop) would not mean someone could not get a heat pump.*
- *Kara Jonas: Agreed. We have done some training with our service provider network, and are identifying deferrable conditions specific to non-weatherization measures.*

*Karen Lusson: When you evaluate a home's heat pump viability, are you looking for insulation upgrade opportunities?*

- *Kara Jonas: There are some nuances. We also review for viable electrification candidates. There are other requirements to determine if an income-eligible single-family or multifamily property is a good candidate for electrification. We use modeled bill impacts, fuel switch savings calculations, and there is overall a more complex review. This is specific to electric resistance customers.*
- *Karen Lusson: Stakeholders would be interested in seeing a list of these criteria. Does the entire home need to meet R19 standards?*
- *Kara Jonas: ComEd will follow up with the Whole Home Electric eligibility criteria.*
- *Karen Lusson: When you conduct a walkthrough in the HES program and identify candidates for free weatherization services, do you evaluate WHE potential?*
- *Kara Jonas: Yes.*
- *Chris Neme: I understand the whole home electric program has two components – electric resistance heat, and electrification.*
- *Kara Jonas: It will in 2026.*
- *Chris Neme: If you evaluate a home with electric resistance heat, you will insulate and seal that house if it has no deferrable conditions, correct?*
- *Kara Jonas: Yes.*
- *Chris Neme: This is the same for heat pumps as well, but the deferrable conditions are different?*
- *Kara Jonas: You are asking if a home is prioritized, what is the baseline?*

- *Chris Neme: Historically, gas homes seeking upgrades only had to meet one of the prioritization criteria. Detailed protocol for IHWAP may be different. Could you evaluate an electric resistance home that has no deferrable conditions, but doesn't meet all prioritization criteria?*
- *Kara Jonas: ComEd will follow-up on whether there are separate baseline criteria for electric resistance single-family properties.*

*Karen Lusson: Are you referring to deferrable conditions as they relate to health and safety issues?*

- *Kara Jonas: Yes, health and safety. The definition is seen under item B.*
- *Karen Lusson: Understanding the prerequisites is important for stakeholders, including HES and the whole home electric program. This is a conversation about not walking away from opportunities in general. Hopefully this is an ongoing conversation where we are trying to better understand what is actually happening.*

### **Minimum Roof Attic Insulation Criteria**

*Jarred Nordhus, Peoples Gas & North Shore Gas*

- Stakeholders proposed raising minimum attic insulation to R30 or R38
  - Reference: current average project has an insulation value equivalent to R6
- Northern Illinois utilities are finding a significant amount of customers that have low to no R-value in the attic. Our current average is about R6 for insulation, which yields about 114 therms per year going to R49.
- Analysis of current projects shows diminishing returns with baselines above R30:
  - R30 to R49 yields 12 therms/year
  - R38 to R49 yields 5 therms/year
- Northern Illinois utilities are comfortable keeping R19. This helps focus on customers that need it most. Insulation has a 30-year lifetime. Income Eligible projects aren't required to be cost-effective, but spending \$1,790 for savings equivalent to low-cost water measures is neither prudent nor equitable. With limited budget, it is equitable and prudent to prioritize homes with low insulation levels where upgrades will deliver the greatest impact for customers.

*Chris Neme: Is the \$1,790 the estimated cost for insulating an attic from R30 to R49? That seems a bit high. Is this the average cost for all insulation projects?*

- *Jarred Nordhus: That cost also includes labor. This is the average cost for gas utilities. If there is a joint project, the cost increases to just under \$2,400.*
- *Chris Neme: I understand some of the costs are fixed. There are also time savings to go from R30-R49. You are not only reducing gas consumption but are receiving air sealing benefits. An R30 upgrade could facilitate other treatments, where R19 would not. I think this overstates the relative added cost.*
- *Jared Nordhus: The time saving piece might be questionable too. If you are in an attic with R30, it's harder to move around due to additional insulation. This impacts the labor – that is the feedback we heard from our contractors. I think the cost will be relatively similar.*
- *Chris Neme: The challenge is you are using that screening to do anything, not just insulation. I understand the conceptual point that the bang for the buck will be less compared to R19 as a cutoff.*

*Nick Horras: Do you have data on therms/year saved with an R19 to R49 upgrade?*

- *Jarred Nordhus: I can have our team pull that data and follow up. We will see a significant drop from 114 therms if upgraded from R19.*
- *Chris Neme (via chat): With rough calculations, if you get 144 therm savings from going from R6 to R49, you'd get 25-30 therms from going from R19 to R49.*
- *Karen Lusson: I want to support what Chris Neme and Nick Horras have referenced here. The IQ weatherization program is a different kind of program in that it doesn't need to have cost-effective individual measures. Weatherization is also about comfort and health and safety. The recommendation that the minimum be higher also go to that goal. I think we want to do the best possible job. Once you get in the home, you want to do as much as you can because you have the single opportunity to make a difference in the home, which may never happen again or may not again for decades.*
- *Jarred Nordhus: Within stipulation and the Policy Manual under income-eligible program design, comprehensive energy efficiency is a whole-building approach that identifies cost-effective improvements and missed energy savings. This verbiage points out cost-effectiveness in income-eligible program designs.*

### IHWAP and Retrofits Customer Choice Timeline

Chris Vaughn, Nicor Gas

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
HEAs												
Per Plan 7 Stip												
Minimal screening												
First-come, first-served												

- This is a diagram of channel funding throughout the year based on customer choice. Previously, stakeholders and utilities convened and decided to prioritize customers through the comprehensive IHWAP channel. The retrofits channel was made to supplement IHWAP. We try to utilize customer choice where we can.
- As illustrated in this graph, if we prioritized first-come first-served, retrofit funding would deplete by April. Minimal screening would exhaust funds by mid-year. Every year we do capacity planning for the community action agencies (CAAs). This allows us to keep a steady approach and not cause inaccessible wait times. Customer choice would be untethered to any policy and would create a backlog. This is something that should be controlled. There is a segment of customers that do not qualify through IHWAP and still need to be served.

*Karen Lusson: I do not recall a stipulation saying that if someone has income below 20% AMI, they are served by the IHWAP channel.*

- *Chris Vaughn: It was not interpreted as that, but the language was similar.*
- *Karen Lusson: Customers are paying for access to all programs. This is not a good way to serve the customer; we think they need to have a choice. You should be able to evaluate a home and tell the customer which measures they will receive.*
- *Chris Vaughn: I agree, but we are working with limited funds. This is not about being against customer choice. If we do not take this approach, we will eliminate customer choice come April or June. This is a more controlled approach.*
- *Karen Lusson: I hear you, but you are not giving a choice. I'm concerned that someone will be sent to IHWAP and not be able to access the program due to a waiting list. This*

*issue should be communicated to the legislature. It is important for the General Assembly to know we lack sufficient funds for income-eligible weatherization, especially when negotiations are taking place.*

*Darnell Johnson: I appreciate all of the thought that has gone into this, and this discussion about customer choice. There is a lingering question if we are looking at total customer choice where we exhaust resources earlier in the year, vs. a more controlled approach. The Community Action Agencies use their own factors. If we send a customer to IHWAP and they are placed in the queue a year out, but could get served more quickly with the utility weatherization program, how is that providing the best service to a customer? If there are more conversations that are needed between the utilities and agencies, maybe that is another step that should be considered. I'm struggling with understanding how do we best serve customers.*

- *Chris Vaughn: This is a function of pipelines and funding at any given time. There may be some instances where customers have availability to exercise their choice, but we cannot commit to that 100% of the time.*
- *Elder Calderon: By having this option open for customers to have an IHWAP choice. You have to leave some room for customers that are not eligible for IHWAP to be able to participate. The question is how do you equitably serve customers that are eligible. We risk becoming a program that serves as a backlog to IHWAP.*
- *Darnell Johnson: Thank you, I appreciate it that. If we go back many plans ago, we understand there is not an unlimited amount of money. I think limiting customer choice creates issues / concerns about the programs. I don't think there is one silver bullet that resolves this. The issue is resources... customers are paying into these programs.*

*Nick Horras: Previously, a discussion was held with utilities and implementers on whether IHWAP eligible customers were being served by the utility retrofit program. To address that, a matrix was developed about the differences between the programs. The limits on resources are real – ideally, we need more resources. That would be the simple answer, but it is never that simple. It's important to recognize IHWAP gives significant resources. It may be worth it to remind people it may be worth the wait. There are also people that will not want to wait for IHWAP. There are probably avenues to strike a better balance. People should be aware of the differences of the programs. We also have limited capacity. Because of prioritization, some people will sit longer and may not be served. I appreciate the utilities and implementers working with us... there was a gap there and we have helped to fill that gap.*

*Karen Lusson (via chat): Can utilities confirm that the matrix is still being shared with clients and will continue to be when the next plan starts?*

- *Nick Horras: Confirmed in the previous meeting it is included in literature.*
- *Elder Calderon: This is shared in cases where the customer has a choice between the utility program and IHWAP; it is not shared with every customer.*

## **Health & Safety**

*Elder Calderon, ComEd*

- In 2026 the plan is for utilities to share health & safety (H&S) costs between ComEd and the gas utility.
- To support field operations, H&S costs thresholds will be established to provide field guidance. This will help identify potential deferrals on-site, streamlining communication and reducing delays for customers.
- Stakeholder feedback favoring flexibility over rigid limits will be considered as H&S costs thresholds are finalized.

- Final details of the H&S cost thresholds will be informed by the measure build-up currently underway for the Home Energy Savings (HES) offering.

*Darnell Johnson: I want to personally express my appreciation to the teams that are considering this middle ground.*

### **Additional Discussion**

*Chris Neme: NRDC raised a few questions and comments about air sealing and insulation. Where are those items going to be addressed?*

- *Elder Calderon: The intent of this is not to address measure-specific items.*
- *Chris Neme: NRDC's comments are about what measures people are eligible to get. That doesn't seem that different from weatherization protocols. I understand concerns regarding program delivery, but NRDC's comments related to eligibility.*

**SAG Facilitator will follow-up with the utilities on NRDC's comments about air sealing and insulation.**

*Karen Lusson: We provided the recommendations noted below, as well as other recommendations that were not provided in the utility response. Stakeholders are interested in a conversation about what are best practices, and what is the best way to provide holistic weatherization services through this program. That is a conversation that we always want to have. This should not be about "this is what we have to talk about due to the stipulation." SAG is about listening to stakeholders. I am trying to get the utilities to engage. Also, some of these are pretty basic questions. If the utilities can't answer, the implementers should be on this call.*

- *Professionals performing assessments or walk-throughs that directly impact program participation, scope of work development or installation of Energy Efficiency Measures (EEM) should hold necessary industry-respected credentials. (This is a critical part of the Wx process.)*
- *The initial walkthrough should be performed by the contractor and not a third party. (Saves time and program cost.) This will reduce the number of visits to the customer's home, reduce the fallout percentage (currently averaging 60% as reported by some contractors) of projects advanced for Wx, and provide a better savings value for both the utility and ratepayers.*

**SAG Facilitator will follow-up with the utilities on NCLC, CEDA and Urban Efficiency Group's comments that were not addressed Oct. 20<sup>th</sup>.**

### **Closing and Next Steps**

Follow-up items:

1. ComEd will follow up regarding the Whole Home Electric eligibility criteria.
2. ComEd will follow-up on whether there are separate baseline criteria for electric resistance single-family properties, for the Home Energy Savings program.
3. Peoples Gas and North Shore Gas will follow-up on therms/year saved with an R19 to R49 upgrade.
4. SAG Facilitator will follow-up with the utilities on NRDC's comments about air sealing and insulation.
5. SAG Facilitator will follow-up with the utilities on NCLC, CEDA and Urban Efficiency Group's comments that were not addressed Oct. 20<sup>th</sup>.