

Illinois EE Stakeholder Advisory Group (SAG) Equity Subcommittee Meeting

Thursday, September 18, 2025

1:00 – 4:00 pm

Teleconference

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Meeting Materials

Meeting materials are posted on the [September 18 Equity Subcommittee meeting page](#):

- [SAG Facilitator Presentation: Introduction to September 18 Equity Subcommittee Meeting](#)
- [Joint Utility Presentation \(ComEd, Nicor Gas, Peoples Gas and North Shore Gas\): Home Energy Savings 2026 Retrofits Prioritization Plan](#)
- [Response to Northern Illinois Utilities' Income Qualified Weatherization Protocols: Presented by CEDA, National Consumer Law Center, and Urban Efficiency Group](#)
- [Excerpted EE Plan Stipulation Language for ComEd, Nicor Gas, Peoples Gas and North Shore Gas](#)
- [2025 Home Energy Savings Retrofits Prioritization Criteria](#)
- [Home Energy Savings Retrofits Operations Manual Section 4.1](#)

Attendees

Name	Company or Organization
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Briana Moore	Will County Land Use Dept.
Cassidy Kraimer	Community Investment Corp.
Channel Turbides	ComEd
Cheryl Watson	Equitable Resilience & Sustainability
Chris Vaughn	Nicor Gas
Daniel Gonzalez	ComEd
Danish Murtaza	Peoples Gas and North Shore Gas
Darnell Johnson	Urban Efficiency Group
Delmar Gillus Jr	Elevate
Edith Makra	Metropolitan Mayors Caucus
Elder Calderon	ComEd

Name	Company or Organization
Elizabeth Horne	ICC Staff
Elli Arzbaecher	Future Energy Enterprises (IQ South Facilitation)
Jarred Nordhus	Peoples Gas and North Shore Gas
Jean Gibson	Peoples Gas and North Shore Gas
Johanna Strohschein	Will County Land Use Dept.
John Dakarian	Nicor Gas
John Mansfield	Nicor Gas
Karen Lusson	National Consumer Law Center
Kim Swan	ComEd
Kristen Kalaman	Resource Innovations
Lee Ringo	Energy Infrastructure Partners
Mary Ellen Guest	Chicago Bungalow Association
Matt Armstrong	Ameren Illinois
Mike King	Nicor Gas
Natasha Herring	Guidehouse
Nathan Baer	Staples
Nick Horras	CEDA
Omayra Garcia	Peoples Gas and North Shore Gas
Patrice McFarlin	Encolor
Peter Wirtshafter	Assured Energy Solutions
Philip Halliburton	ComEd
Salina Colon	CEDA
Sarah Amspacher	Resource Innovations
Shawn Haas	Peoples Gas and North Shore Gas
Tim Dickison	Ameren Illinois
Tina Grebner	Ameren Illinois
Tisha Burnside	Resource Innovations
Tori Woolbright	Metropolitan Mayors Caucus
Valencia Roner	Energy Infrastructure Partners
Wade Morehead	Morehead Energy

Meeting Notes

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

Introduction to SAG Equity Subcommittee Meeting

Celia Johnson, SAG Facilitator

Purpose of September 18th SAG Equity Subcommittee Meeting:

- To discuss 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.

Excerpted 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](#).

September 18th Presenters:

- Joint Northern Illinois Utilities Presentation – ComEd, Nicor Gas, Peoples Gas and North Shore Gas
- Initial Feedback - coordinated by National Consumer Law Center

Joint Utility Presentation: Home Energy Savings 2026 Retrofits Prioritization Plan
 ComEd, Nicor Gas, People’s Gas and North Shore Gas

Home Energy Savings Customer Journey – High Level Overview
Objective of Retrofit Prioritization



- Maximize customer benefit.
 - Maximize the number of customers who can be served comprehensively by directing eligible customers to IHWAP.
 - HES shares customer’s contact information with agencies (CAA) willing to receive leads from the program. The CAA manages the intake process from there.
 - Equitably determine, based upon baseline home conditions, which customers should be served with the limited number of available Retrofits.
 - Homes with more significant energy efficiency needs are prioritized for deeper services.
 - Identify customers who will *not* ultimately be eligible for a Retrofit early in the customer journey to avoid timely- and cost-intensive comprehensive assessments for those customers.
 - This improves both the customer and contractor experience.
 - Manage the participation funnel, ensuring volume of customers referred for Retrofits aligns with available budget.
 - This prevents long wait times or waitlists for services.
 - It also allows us to better balance service across contractors and utility territories.

Karen Lusson: Concerned about automatically assigning customers with income at or below the federal poverty level directly to the Illinois Home Weatherization Assistance Program (IHWAP). Does ComEd keep track of Community Action Agencies (CAAs) waiting lists to compare IHWAP and utility programs? Can the customer choose the utility program if they don’t want to join IHWAP waiting list?

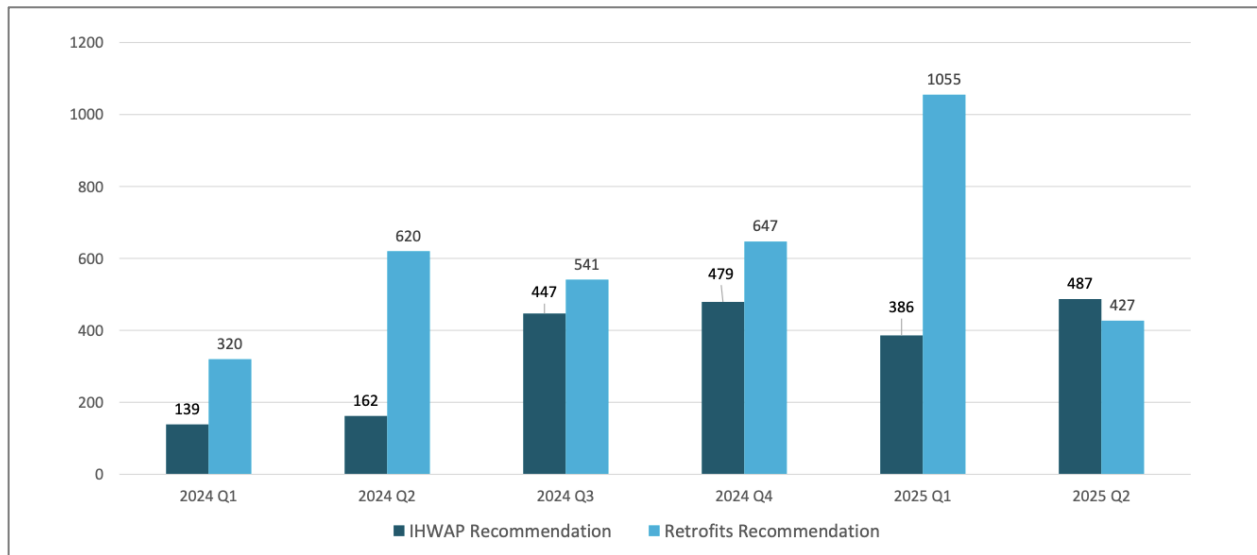
- *John Dakarian: Yes, we explain the available measures and benefits for each program. Mid-year when our pipeline is full and funding has been allocated, IHWAP customers are then passed to an agency. We observe the length of waitlists to ensure agencies are not reaching capacity.*
- *Karen Lusson: You offer a choice according to budget?*
- *John Dakarian: Yes, utilities make this choice jointly.*
- *Karen Lusson: Are CAAs, like CEDA, included in these conversations?*
- *John Dakarian: Yes, we touch base with all agencies to check capacity and funding.*

Nick Horras: In early 2024, we developed a matrix of IHWAP retrofit program measures highlighting content and time involved with each. Is this still being shared directly with the customer?

- *John Dakarian: When we can provide customers with a choice, we provide documentation including this matrix. At the point of assessment, benefits and measures are explained.*
- *Nick Horras: Thanks. Regarding previous slides, I want to note nuance for income-eligible (IE) customers. Eligibility is not immediately determined, and it takes time to reach the home.*

Karen Lusson (via chat): Can utilities share via email the information pamphlets/literature that is handed to the customer?

How have customers been referred after their Residential Property Home Energy Assessment (HEA) since January 2024?



“No Recommendation” (not shown in chart) ~ of 4,168 customers who did not receive a recommendation, the top reasons were: no opportunity (58%), housing type (21%), health and safety (9%), no consent (3%), and Home Owners Associations (HOAs) (3%). Other reasons include not having access to parts of the home necessary to evaluate prioritization.

Darnell Johnson: At one point, \$1,500 was allocated for health and safety. Has that been reduced? Customers are deferred maintenance due to economic hardship. Moving forward, we should consider an average dollar model to ensure homes that need more attention and funding receive it, and that customers are equitably served.

- *John Dakarian: In the 2026 cycle, all utilities no longer have a health and safety cap, only a budget, which provides flexibility.*
- *Darnell Johnson: That is encouraging. Caps increase the rate of deferrals.*
- *Kara Jonas: There is nuance to how it is split across the utilities. The \$1,000 for health and safety is split between ComEd and the partner gas utility due to stipulated caps. ComEd has an additional \$500 available, which aligns with the previously available \$1,500.*

Retrofits Prioritization Criteria – 2025

2025 Retrofits Prioritization Criteria

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 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).
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

Karen Lusson: Are homes still required to be built prior to 1970?

- *Elder Calderon: That is not currently on the prioritization list.*

Per Plan 7 Stipulations – 2026 Proposal

Per Plan 7 Stipulations: 2026 Proposal

Home must have:

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In-unit mechanical equipment
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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.**

Cheryl Watson: Vulnerable communities in Chicago are experiencing rehab and repair issues due to extreme weather and flooding. Do these upgrades disqualify them? Do you have a recommendation?

- Elder Calderon: We have a limited budget to correct deferrable conditions, so when it is reached, those homes would be not viable.
- Kara Jonas: When this happens, we look for alternative funding resources that can address those conditions and stack incentives, such as the affordable housing program.
- Cheryl Watson: Comprehensive information should be provided so that these communities know where to allocate funds to avoid future upgrade barriers when the Federal Emergency Management Agency (FEMA) aid is given.
- Nick Horras: In recent years, IHWAP has added additional resources such as WAP plus to serve homes' foundational needs. We work with insurance, so it does not affect customer ability to get a fair assessment. After remediation is done and if they are eligible for IHWAP, utility assessors will look at the home's needs and address foundations, roofs, etc.

Cheryl Watson: Who can I contact to discuss equitable home restoration?

- Elder Calderon: The utilities will discuss and follow-up.

Karen Lusson (via chat): From the Plan 7 (2026-2029) stipulation: "The minimum attic insulation criterion that determines whether a home is weatherized in its Home Energy Savings (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." Given this commitment to discuss this minimum criterion, we have a slide that requests this R-19 designation be changed.

Karen Lusson: If there is no air sealing opportunity in the house, is it the utilities' position that they do not qualify?

- Elder Calderon: Not necessarily. If the home does not have a basement, this criterion is waived.
- Karen Lusson: Does the initial home assessment require a potential energy savings threshold to qualify? Does a forecasted calculation of savings affect someone's ability to be served?
- Elder Calderon: The criteria shown is what we follow, and they were developed around a set of assumptions that already promote energy savings.
- Karen Lusson: If a larger home has more potential for energy savings, it is not prioritized?
- Edler: No, it is not.

Minimal Screening Option

- Focus on:
 - SF home type
 - No deferrable conditions
 - Referrals to IHWAP
- Exclude:
 - Anything related to energy savings opportunity
- The utilities estimate this option would result in a 48% referral rate to Retrofits based upon historic data .

What if this was just first-come, first-served?

- Customer Journey

- Do customers have to be aware of the offering January 1 so they can rush for a spot?
- How long do customers have to wait for service if we establish a long line in Q1?
- How do we manage expectations/make clear what's available?
 - Marketing overhaul in Q1 after Retrofits are fully allocated
 - This will cause customer confusion, particularly for customers who hear of the offering through word of mouth.
 - This will cause partner confusion, requiring retraining when available services change
- Contractors
 - Rather than having level production across the year, this will require staffing fluctuations and potentially layoffs.
 - We assume Retrofits will be complete by July given historic production volume and demand.

Karen Lusson: The demand for robust weatherization services in income-qualified communities is immense. As we collaborate, we need to figure out a way to pour funds into weatherization programs. The budget for weatherization programs is skewed. As the budget is negotiated, insight could be provided from vendors or others on this call today.

How long can we serve customers with Retrofits*?

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

*Estimates based on modeled referral rates informed by historical data.

Decision Timeline

- Comment period through October 3rd, 2025.
- Retrofits Prioritization criteria must be finalized by October 21st meeting in order to implement on January 1, 2026.

Darnell Johnson: Has there been an impact assessment on the experience between customers who choose to be on an agency waiting list, versus those who had no choice?

- *Liz Connelly: The program has begun collecting data from CAAs to evaluate and understand the differences between the customers' experiences.*

Karen Lusson: Is it currently being studied?

- *Kara Jonas: We have started to work with agencies to collect data and make informed decisions moving forward.*
- *Nick Horras: We are working with Resource Innovations to help ComEd answer this question. It is difficult to identify the referral process. Clarity will emerge as we look at the data.*

Darnell Johnson: Note that referrals to CAAs have internal prioritization processes to determine when they are serviced. It is not equitable to assume utilities know these processes and communicate waitlist timelines to the customers. Health and safety referrals are typically in greater need but could live with issues like poor indoor air quality for longer than 12 months. We need to understand how we are causing customers to live with direct threats to their health.

Response to Northern Illinois Utility Income-Qualified Weatherization Protocols

Karen Lusson, National Consumer Law Center; Nick Horras, CEDA; and Darnell Johnson, Urban Efficiency Group

Attic Insulation

- RI/Utility Protocol: Attic insulation should be installed when existing attic insulation is rated at R-19 or lower. Existing insulation levels should be brought up to R-49.
- CEDA Response: This is a missed opportunity. Energy Star recommends a minimum R-38 level.
 - IHWAP standard is R-49, which is in alignment with most building codes.

Gas Furnace Replacement

- RI/Utility Protocol: Emergency replacement only. See Mechanical Replacement Decision Trees (Appendix H) for baseline conditions that allow for repair vs replacement. Efficiency of new furnace must be $\geq 95\%$
- CEDA Response: Missed opportunity. IHWAP will typically upgrade 80% or less efficient units with 95% plus. There are a lot of savings to be gained at the source. However, not all gas furnaces can be replaced with 95% if condensate drainage is not practicable.
- NCLC: Emergency-replacement-only criterion was part of stipulation in light of state's clean energy goals
 - "Emergency defined as "ComEd will not provide incentives for early replacements of single-family central A/Cs, gas furnaces, gas boilers or gas water heaters in its utility-only IE programs (including utility-only CAA) except in cases of
 - emergency, health and safety needs
 - when the measure requires significant annual maintenance costs, and/or
 - opportunities for heat pumps or electrification exist."

Boiler Replacement

- RI/Utility Protocol: Emergency replacement only. See Mechanical Replacement Decision Trees (Appendix H) for baseline conditions that allow for repair vs replacement. New boiler efficiency should be $\geq 95\%$.
- CEDA Response: This standard of 95% or greater does not allow for Steam boiler replacement which cannot achieve more than $\sim 82\%$ EFE.
- NCLC: Emergency-replacement-only criterion was part of stipulation in light of state's clean energy goals
 - "Emergency defined as "ComEd will not provide incentives for early replacements of single-family central A/Cs, gas furnaces, gas boilers or gas water heaters in its utility-only IE programs (including utility-only CAA) except in cases of
 - emergency, health and safety needs
 - when the measure requires significant annual maintenance costs, and/or
 - opportunities for heat pumps or electrification exist."

Electric Resistance Base Board Replacement

- RI/Utility Protocol: Electric resistance base board can be replaced with ductless mini splits, regardless of age or condition. Please ensure the home's heating load can be served by the ductless mini splits. New ductless mini splits must meet NEEP Cold Climate specifications:
 - HSPF2 \geq 8.5 (10 HSPF equivalent)
 - COP @ 50 F \geq 1.75
 - SEER2 \geq 15 (15 SEER equivalent)
- CEDA Response: Without comprehensive attic / wall / crawl insulation and air-sealing, this may not have positive results for the client from a comfort perspective. Comprehensive building envelope measures installation in conjunction with heat pump installation is critical.

Electric Resistance Water Heaters Replacement

- RI/Utility Protocol: Existing electric resistance water heaters can be replaced with Heat Pump Water Heaters regardless of age or condition. New Heat Pump Water Heater must be Energy Star Rated. Please consult with homeowner, and gain their approval, about replacement of water heater if existing water heater has been replaced recently.
- CEDA Response: Okay, depending on appropriate site conditions to accommodate a heat pump hot water tank (e.g. sufficient room sizing, ambient heat availability), and may result in reductions in ambient air temperature.

Central Air Conditioner Replacement

- RI/Utility Protocol: Emergency replacement only. CAC must be \leq SEER 10 and manufactured before 2000 to qualify for replacement. The efficiency of the new CAC must have SEER 2 \geq 15.2 (16 SEER equivalent). See Mechanical Replacement Decision Trees (Appendix H) for baseline conditions that allow for repair vs replacement.
- CEDA Response: Before 2000 seems to be an arbitrary year. Higher SEER enforcement began in 2006. Refrigerant compatibility (422 vs 410A) is also a variable for replacement since 410A is no longer available. Refrigerant type and cost considerations (e.g., line flushing) should be part of the decision tree.

Gas Furnace Tune-Up

- RI/Utility Protocol: Furnaces must not have received a tune-up within the last 3 years. Note: Electric furnace tune-ups are not allowed as the furnace should be replaced with a heat pump.
- CEDA Response: An annual tune up is recommended. Every three years is not standard industry guidance—particularly in light of stipulation criteria. Safety considerations important here, too.

Boiler Tune-Up

- RI/Utility Protocol: Boilers must not have received a tune-up within the last 3 years.
- CEDA Response: An annual tune up is recommended. Every three years is not standard industry guidance (See previous slide).

Room Air Conditioner

- Utility/RI Protocol: Emergency replacement only (i.e., room A/C is nonfunctional). Replace with Energy Star efficiency.

- CEDA Response: Missed opportunity to not upgrade less efficient room A/C's with higher efficiency, even if operational. Safety considerations support upgrade. Incorporate decision tree criteria for eligibility.
- NCLC: This protocol is inconsistent with the stipulation, which lists installation of window/room ACs as a major measure that should be incorporated into the utility-only program, with no stated restrictions.

Karen Lusson: Does the utility-only program install new, efficient room ACs when no cooling exists in the home?

- *Elder Calderon: We can get back to you with an answer.*
- *Karen Lusson: Thanks. Given increasing extreme weather events, treating homes and vulnerable populations is important.*
- *Salina Colon: If homes have a certain amount of window Acs that exceed two tons, then it might be more CE for the homeowner and program for central AC to be installed Better for the home as well.*

EC Motors

- Utility/RI Protocol: When furnace or HVAC system is older but running well; Static pressure should be taken to ensure system is functioning as specified.
- CEDA Response: This comment should be more defined; "older but running well" is highly subjective. Guidance and measure installation criteria is unclear.

Inform Customers of their Wx Choices

- Issue: The current practice of the utility implementer is to not offer service under the utility-only retrofit program to individuals w/ household income under 200% FPL. These customers are currently being referred to the CAAs' (IHWAP) program only.
- Best Practices Recommendation: The customer that qualifies for IHWAP should be informed of both programs, with the differences in services offered detailed and the estimated wait period and prioritization criteria, if any, explained.
- Bottom line: The customer should have the option to choose which program they want to participate in as long as they meet program requirements.

HES Initial Assessment Quality

- Issue: Quality and Necessity of HES Initial Assessments (Home Visits)
- Recommendations:
 - 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.

Peter Wirtshafter: We encounter these challenges. Difference in assessment expectations and training complicates the customer experience. We strongly agree with this recommendation both for the end user and the contractor, we have seen this from a customer perspective for a long time.

- *Darnell Johnson: Thank you, these are observations from customers. I do not think enough attention is given to the contractor's perspective.*
- *Peter Wirtshafter: RI has been great at facilitating customer feedback. We have received bad reviews because of this issue.*

IL-Based Contractor Opportunities

- CEJA's Emphasis on IL Job Creation: While CEJA does not mandate that energy efficiency projects must use Illinois-based firms, its funding, incubator, and training programs are designed to build and sustain local Illinois businesses so that public clean energy investments directly benefit Illinois communities.
- Issue: The opportunities provided to firms outside of Illinois to procure contracts while ignoring local talent that possess the knowledge, skills, and capabilities is misaligned with CEJA goals.
- Recommendation: Utilities should provide procurement opportunities to local contractors through an equitable procurement process, giving preference to IL-based firms. If local talent is unable to be sourced, then expand the opportunity to non-Illinois based firms.

Other Issues

- Issue: Various vendors have created their own data portals at significant cost, ultimately picked up by ratepayers. These portals are inconsistent between vendors. This creates inefficiencies in the delivery of the programs.
- Recommendation: Use of this "proprietary" methodology is inefficient and gives certain entities an edge in winning Tier 1, Tier 2 contracts from the utilities. Illinois utility programs should create and use an Open Access Data Portal that "lives" with the utility. In a sense, it creates a monopoly on Tier 1 contracts for those vendors that have used ratepayer funds to construct the data portal.

Wx Mission vs. Savings Goals

- Issue: Stipulation provides for "[a]nnually budgeting for an income eligible health and safety fund of at least 15% of the total IE whole building programs weatherization budget, as defined and described in footnote 4 above."
- Recommendation: Be flexible on H&S spend for individual homes to ensure that we minimize walk-aways. (E.g., an average cost basis could be used.) The utility's search for savings goals achievement should not be focused on the IQ weatherization programs. In addition, IQ programs do not need to be technically "cost-effective," as defined under Section 8-103B of the Public Utilities Act.

Karen Lusson: These is a significant need for weatherization. We need to work together to increase weatherization budgets in current legislative discussions.

Closing and Next Steps

Celia Johnson, SAG Facilitator

Friday, October 3: Written feedback deadline

- Send comments to Celia Johnson, SAG Facilitator: Celia@CeliaJohnsonConsulting.com
- Feedback received will be posted on the SAG website and circulated to the SAG Equity Subcommittee.

Tuesday, October 21 (9:30 am – 12:20 pm)*: SAG Equity Subcommittee Meeting

- Follow-up discussion from September 18th meeting, including northern Illinois utility response to written feedback – Retrofits Prioritization criteria must be finalized by October 21 in order to implement on January 1, 2026
- Peoples Gas and North Shore Gas Market Development Initiative (MDI) assessment results

*The October 21st meeting is being rescheduled due to a presenter conflict.