

**Illinois EE Stakeholder Advisory Group (SAG)
Large Group Meeting**

Tuesday, January 13, 2026
9:30 am – 12:30 pm
Teleconference

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Meeting Materials

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- [ICC Staff and ICC Office of General Counsel Feedback to ComEd](#)
- [Illinois Office of the Attorney General Feedback to ComEd](#)
- [Natural Resources Defense Council Feedback to ComEd](#)
- [National Consumer Law Center Feedback to ComEd](#)
- [Illinois EPA Presentation: IRA Home Energy Rebate Program Update](#)
- [DCEO Presentation \(verbal update\)](#)
- [Joint Utility Presentation: Inflation Reduction Act \(IRA\) Savings Attribution Discussion](#)

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
Adam Roche	Cascade Energy
Alyssa Latuchie	Franklin Energy
Andrew Braatz	Franklin Energy
Andrew Cottrell	ScottMadden
Andrew Plenge	ComEd
Andrey Gribovich	DNV

Name	Company or Organization
Andy Gorecki	Franklin Energy
Andy Vaughn	Leidos
Ashley Bukowski	ICC Office of General Counsel (OGC)
Ashley Palladino	Inova Energy Group
Billy Davis	Bronzeville Community Development Partnership
Bobbi Fey	ICF
Brad A Warrenburg	CMC Energy
Brad Fortson	ICF
Bradley Ryba	City of Chicago
Caleb Simpson	ComEd
Carl Samuelson	Michaels Energy
Caroline Johnstone	Graphet Data Mining
Cassidy Kraimer	Community Investment Corp.
Caty Lamadrid	Inova Energy Group
Channel Turbides	ComEd
Charles Ampong	Guidehouse
Charles Schreier	Go Sustainable Energy, representing IL AG
Cheryl Watson	Equitable Resilience Sustainability
Chris Neme	Energy Futures Group, representing NRDC
Chris Townsend	CJT Energy Law
Chris Vaughn	Nicor Gas
Christina Frank	Peoples Gas & North Shore Gas
Colin Santel	Ameren Illinois
Courtney Golino	Guidehouse
Crystal Warner	Michaels Energy
Dan Merchant	CLEAResult
Danish Murtaza	Peoples Gas & North Shore Gas
David Salmonson	CLEAResult
Deb Dynako	Energy Infrastructure Partners
Dena Jefferson	Franklin Energy
Denise Munoz	DMT Consulting
Diana Dorman	Energy Solutions
Elder Calderon	ComEd
Elena Savona	ES Consulting
Eljona Fiorita	CLEAResult
Emily Pauli	ComEd
Eric O'Neill	Michaels Energy
Erin Kempster	Power TakeOff
Eve Pytel	Franklin Energy
Fernando Morales	Ameren Illinois
Heidi Gorrill	Slipstream

Name	Company or Organization
Jaleesa Scott	ComEd
Jane Anderson	Inova Energy Group
Jarred Nordhus	Peoples Gas & North Shore Gas
Jason Fegley	Leidos
Jean Gibson	Peoples Gas & North Shore Gas
Jeff Erickson	Guidehouse
Jeff Ihnen	Michaels Energy
Jeffrey Carroll	DNV
Jenae Batt	Center for Energy and Environment
Jill Rolstone	Franklin Energy
Jim Dillon	Willdan
Jim Heffron	Walker-Miller Energy Services
Joe Mays	Cascade Energy
Joel Freehling	Aptim
Joel McManus	TRC Companies
John Carroll	Ameren Illinois
John Carroll	Ameren Illinois
John DeRosa	Illinois Environmental Protection Agency
John Lavallee	Leidos
John Mascarenhas	CLEAResult
Jonathan Skarzynski	Nicor Gas
Julia Friedman	Opower
Julie Hollensbe	Walker-Miller Energy Services
Kanchan Swaroop	Resource Innovations
Kara Jonas	ComEd
Karen Lusson	National Consumer Law Center
Kari McCue	Nicor Gas
Kari Ross	NRDC
Kate Moore	AnnDyl Policy Group
Kate Agasie	Cook County DES
Kegan Daugherty	Resource Innovations
Ken Parker	Community Investment Corp.
Keyla Ward	Ameren Illinois
Kit White	Midwest Energy Efficiency Alliance (MEEA)
Kourtney Lynch	CLEAResult
Kristen Kalaman	Resource Innovations
Laura Agapay-Read	Guidehouse
Lauren Gage	Apex Analytics
Lisa Obear	BrightLine Group
Liz Connolly	ComEd
Liz Cote	Utility Energy Services
Louis Bartlett	Energy Solutions

Name	Company or Organization
Madhu Bhargava	ComEd
Mark Hamann	ComEd
Mark Milby	Elevate
Matt Armstrong	Ameren Illinois
Michele McSwain	SEEDS
Mick Prince	DCEO-IHWAP
Mike King	Nicor Gas
Minya Coleman	ComEd
Molly Graham	MEEA
Monique Leonard	Ameren Illinois
Nathan Baer	Staples Energy
Nic Crowder	Ameren Illinois
Nick Burstein	CMC Energy Services
Nick Horras	CEDA
Nick Moshage	Walker-Miller Energy Services
Nick Warnecke	Ameren Illinois
Nicole Popejoy	IL Association of Community Action Agencies
Nikki Pacific	Ameren Illinois
Nishant Mehta	Guidehouse
Omy Garcia	Peoples Gas & North Shore Gas
Patrice McFarlin	Encolor Consulting
Paul Grimyser	ComEd
Philip Halliburton	ComEd
Philip Roy	ComEd
Randy Opdyke	Nicor Gas
Rashaan Keeton	Center for Energy and Environment
Sanjyot Varade	Resource Innovations
Sarah Evans	DNV
Scott Bernstein	No Organization Identified
Scott Mallory	Brubaker & Associates, representing IIEC
Selena Worster Walde	Erthe Energy Solutions
Seth Craigo-Snell	SCS Analytics
Shawn Haas	Peoples Gas & North Shore Gas
Shelby Smith	IL Attorney General's Office
Shivana Shrestha	Walker-Miller Energy Services
Shonda Biddle	Center for Energy and Environment
Stephen Linkous	Bellawatt
Steve Baab	DNV
Steven LaBarge	ComEd
Sue Hanson	EMC Insights
Sushi Ramakrishnan	ComEd
Tara Cunningham	Rinnai

Name	Company or Organization
Taylin Humphrey	DNV
Ted Weaver	Dunsky Climate + Energy Advisors, representing Nicor Gas
Teri Lewand - ComEd	ComEd
Thomas Ketchum	No Organization Identified
Tori Woolbright	Metropolitan Mayors Caucus
Victoria Nielsen	ScottMadden
Zach Ross	Opinion Dynamics

Meeting Notes

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

Introduction to January 13 Large Group SAG Meeting

Celia Johnson, SAG Facilitator

Purpose of January 13th meeting:

- For interested SAG participants to present feedback on the draft ComEd 2027-2029 EE plan presented to SAG on December 18
 - ComEd presented an updated draft EE Plan to SAG due to the passage of the Clean and Reliable Grid Affordability (CRGA) Act in October 2025
 - [ComEd Presentation: Revised EE Plan 7 \(2027-2029\)](#)
 - [ComEd Revised Draft EE Plan for 2027-2029 \(1/8/26, with spend and savings\)](#)
 - All SAG participants had an opportunity to request time on the January 13 agenda to present feedback to ComEd
 - The following SAG participants are presenting feedback to ComEd:
 - ICC Staff and the ICC Office of General Counsel
 - Illinois Office of the Attorney General
 - Natural Resources Defense Council (NRDC)
 - National Consumer Law Center (NCLC)
- To discuss Inflation Reduction Act (IRA attribution with Illinois utility EE programs
 - The last update on the state of Illinois' IRA program was at a [July 2025 SAG meeting](#)
 - Illinois Environmental Protection Agency, DCEO, and Ameren Illinois will present
 - Illinois utilities are jointly sharing an IRA savings attribution proposal
 - Next Steps:
 - Written feedback is requested on the attribution proposal – due Wednesday, January 28
 - A SAG Small Group Meeting to discuss feedback is anticipated on Friday, February 6 (9:30 – 11:00 am)
 - If you plan to share written feedback, please reach out if February 6 does not work for you

Next Steps for ComEd EE Plan

- Before ComEd files the updated 2027-2029 EE Plan with the ICC for approval, there will be negotiations between ComEd and non-financially interested stakeholders
 - The deadline for non-financially interested stakeholders to request to participate in ComEd EE Plan negotiations was Monday, January 5

- The goal is to reach consensus before ComEd files its updated EE Plan with the ICC
- If consensus is reached, it will be documented in a stipulated agreement
- ComEd EE Plan negotiation meetings begin on Friday, January 23, and require signing a Non-Disclosure Agreement (NDA)

Next Steps for Other Illinois Utilities

- SAG Facilitator is meeting with individual utilities to discuss potential timeline for updated 2027-29 EE Plans:
 - Ameren Illinois will re-file + present a draft EE Plan to SAG in March
 - Nicor Gas – no final decision on re-filing
 - Peoples Gas and North Shore Gas will re-file + present a draft EE Plan to SAG in March

ICC Staff and ICC Office of General Counsel (OGC) Feedback to ComEd

Celia Johnson, SAG Facilitator, reviewed comments submitted by ICC Staff and ICC OGC

1. To facilitate an efficient review, ComEd (the Company) is requested to provide the following materials as part of its initial filing:
 - a. A redlined version of the stipulation reflecting any proposed changes, detailed budget requirements, all relevant batch files
 - b. A clear outline of spending requirements
 - c. Explicit documentation of attribution practices for joint programs, including identification of whether such documentation will appear in the stipulation, or a statewide policy
 - d. Additionally, we note that certain aspects of the spending plan will remain under review until the Company supplies further information
2. As a condition of agreeing to an expedited negotiation schedule, we ask that the Company commit to file the plan early to that parties who will be participating in the EE dockets stagger filing in the proceedings more easily; and
3. The Company should propose a spending plan that complies with the TRM. The Company confirmed at a recent hearing in Docket 25-1066 that it intends to incorporate solar as an EE measure in its EE Plan. Staff was not made aware of this intention for purposes of EE negotiations and requests that the Company affirmatively indicate whether it intends to incorporate solar as an EE measure in its EE Plan to the parties in this proceeding. Given that the Company has proposed to expedite the negotiations in this proceeding so that they will end in March and is not anticipated to have a decision in Docket 25-1066 prior to April of 2026 at the earliest, Staff is concerned that the schedule appears to have been designed so as to prevent the parties from being able to substantively discuss the Company’s proposed spending plan, to the extent the Company is not basing its spending plan on the current version of the TRM. If the Company intends to incorporate solar as an EE measure in its EE Plan, Staff recommends the Company provide a version of the spending plan that does comply with the TRM for the parties to negotiate, so as to make effective use of the negotiation schedule proposed by the Company, especially in the event the Company is unsuccessful in adopting changes to the TRM.

No Q&A on the ICC Staff and OGC feedback.

Office of the Illinois Attorney General Feedback to ComEd

Abigail Miner, Office of the Illinois Attorney General

AG Priorities for ComEd's 2027-29 EE Plan:

1. Do not increase portfolio-level budget or individual components of portfolio-level budget (R&D, administration, marketing) beyond what the Company originally budgeted for 2026-29.
2. Focus on measures with greatest customer bill impacts. Exclusively allocate additional budget to incentivize spending (customer-facing programs), prioritizing programs and specific measures with greatest customer bill impacts.
3. Include total number of participating customers, including the deduplicated number of unique participants, in quarterly spreadsheets and annual reports.

AG Priority for 2027-29 Negotiation with ComEd

- Parties agree that negotiations are exclusively to make conforming changes with CRGA and not to re-negotiate elements of initial 2026-29 plan unaffected by CRGA

More information needed, specifically

- All information presented in comparison to approved 2026-29 Plan
 - Redline copy preferred
- Explanation and calculation of savings goals post-CRGA
 - 1,543 CWh Annual Incremental Savings v. 1, 747 GWh Portfolio Total? (p14 and p32 of ComEd Revised Plan 7)
- Budget breakdowns
 - Explain allocation and use of additional budget
 - Include all overhead (non-program) costs as portfolio-level costs rather than program costs
- More detail of C&I programs compared to past negotiations

Chris Neme: Historically, non-program costs have been shown at the portfolio-level because marketing and administration costs can be sector-specific. Is your request focused on transparency and magnitude of costs?

- *Abigail Miner: A primary plan goal is to have a portfolio budget that is not higher than the 2026-29 agreement. All additional budget from CRGA (90 million) should go towards incentive spending. We need to understand how much overhead is in the budget to understand cost efficiencies.*
- *Chris Neme: Then non-rebate spending could be compared to the previous plan, correct?*
- *Abigail Miner: Yes, it matters where costs are. I would like to see the overhead cost in the 2026-29 side by side.*

Initial Response to ComEd Proposed Income Eligible Budget Numbers

Karen Lusson, National Consumer Law Center

Income Eligible Budget Changes

- ComEd has not provided a breakdown of Residential vs. IE budgets on its Home Energy savings program – this is critical to understanding what IE investment in whole building weatherization is being proposed.
- New Draft Plan Compared to Just-Approved Plan

- Multifamily Home Energy Savings (HES): \$37M, \$38M, \$36M (+10M); was \$27M in just-approved Plan
- Single Family HES: \$29M, \$29M, \$30M (+22M), was \$7.6M in just-approved Plan
- Whole Home Electric: \$40M, \$38M, \$38M (-1M), was \$41M in just-approved Plan
- Need better understanding of the basis for and breakdown of these numbers
- Need more information about increases coming from gas utilities given they are joint programs
- Need information on additional budget for braided weatherization program (implemented with Community Action Agencies via state weatherization program)

Other Income-Eligible Programs

- 2027-2029
 - Home Energy Products: \$35M, \$36M, \$37M
 - Behavioral: \$7M, \$6M, \$6M
- Former Plan (2027-2029)
 - Home Energy Products: \$18.4M, \$13.7M, \$13.8M
 - Behavioral: \$Zero
- Near doubling of IE kits is concerning... why? (Easy savings?)
- Significant increase from zero spend on Behavioral programs, which no SAG advocate has championed...why? (Easy savings?)

Bottom Line Takeaways/Questions

- Increase in IE spending now required under law.
- New IE number (25% of total budget) represents statutory minimum.
- Can you increase IE whole building (MF and SF) weatherization and still hit savings targets?
- Need more information on breakdown of programs and gas spending for joint weatherization programs
- How much will be allocated to the braided weatherization program?
- Why the increases in kits and behavioral programs given prior stakeholder feedback?
- What does ComEd's interest in declaring solar as EE mean for the overall portfolio?

Elder Calderon: I want to clarify some figures. The draft plan included \$6 million per year for behavioral; and Home Energy Products was about \$30 million per year.

- *Karen Lusson: Thanks, Elder. I pulled these numbers from the stipulation.*
- *Chris Neme: The behavioral programs are non-IQ, and Elder is referencing the total numbers. I believe the 6 million figure is the IQ portion.*
- *Elder Calderon: Yes, that is correct.*
- *Chris Neme: This speaks to the fact that we only have combined market rate and residential numbers. Can you share the breakdown between market rate and income eligible?*
- *Elder Calderon: That is a good point, Chris. We plan on providing more breakdowns before negotiations that will have those numbers.*
- *Karen Lusson: Thank you, that should be public information and not limited to those who negotiate.*

Abigail Miner: Elder, you stated that ComEd included \$6 million per year to behavioral programs and \$30 million per year to Home Energy Products?

- *Elder Calderon: Yes, that is combined income-eligible and market rate.*

NRDC Feedback on ComEd's Revised 2027-29 EE Plan

Kari Ross and Chris Neme, NRDC

Market Rate Residential Programs

- Encourage ComEd to deliver Market Rate electric-only retrofits – at the very least for multi-family condos and apartments. At minimum, could be a direct to consumer offering for cold climate heat pumps to displace electric resistance heat.
- Encourage ComEd to re-engage on Market Rate weatherization (joint with gas utilities).
- Encourage ComEd to plan for a segment of the Whole Home Electrification channel to be offered to Market Rate. Not only to support a diverse portfolio, but to also help expand the market in IL for cold climate heat pumps.

Misc. Feedback

- Appreciate that Portfolio Level Costs efficiencies where there's only 2% growth in said costs.
- Concerned about the potential amount of Home Energy Report and Kits investment above status quo levels.
- Encourage a robust All-Electric New Construction offering
- Would like more detail on the new Stretch Code offering and how it differs in terms of energy savings from status quo.

Outstanding Questions on Revised Plan 7: Need More Detail on Savings

- Program spending and kWh savings claimed by sector and program. We'd like to see a breakdown at the individual program, level, with IE shown separately from non-IE residential.
- Breakdown of kWh savings for each program (IE and non-IE res split out) and for the portfolio as a whole by:
 - Electric efficiency
 - Gas therm conversions
 - Electrification conversions
- Estimated annual peak demand savings. While ComEd does not have statutory peak demand savings goals, we would like to understand how peak demand savings are expected to change, relative to the currently approved 2026-29 plan, under the new plan. We'd like to see forecast savings by program year in MW.

Karen Lusson: It's important that all residential customers be made aware of the low income discount rate program.

- *Karen Lusson (via chat): Regarding IE whole home electrification program, it will be important for ComEd to ensure that customers are on the new ComEd Low-Income discount rate as part of its promotion and implementation of the program. Is that a part of the plan for this program? (In fact, it should incorporate marketing of the new LI discount in all of its residential programs, not just LI. This is crucial to expand the pool of customers enrolled in the program.*
- *Kari Ross: In addition to the low income discount rate, ComEd also has an electric heating rate that should be offered to electrification.*

Need more detail on: IE Programs

- How will the statutory requirement for 80% on whole building programs be met? What mix of programs?
- What IE programs are considered “whole building”?
- For whole building weatherization, separately for single-family and multifamily, what fraction of spending and savings are from:
 - Weatherization of already electrically heated buildings
 - Weatherization of buildings that are also electrified under EE
 - Weatherization of gas-heated buildings through joint delivery with gas utilities
 - Weatherization of gas-heated buildings by ComEd alone
- Income eligibility verification. Can the Company share a breakdown of how they plan to verify income for program qualification purposes by program channel? Specifically, how does the Company plan to utilize “disadvantaged community”/DAC qualification for IE programs in the amended plan?

Karen Lusson (via chat): Agreed on the requested breakdown.

Abigail Miner (via chat): What is DAC?

- *Kari Ross: Disadvantaged Community.*

Need more detail on: Electrification

- In addition to portion of savings expected from electrification and programs in which it will be concentrated, we are interested in the following:
 - What program designs will ComEd use to promote electrification measures? IE whole building assessments? Target marketing to communities with high propane use? Midstream rebates? Custom C&I offers? Etc.
 - Regarding heat pumps, will ComEd limit its promotions to cold climate models (whether full electrification or hybrid electrification)? If not, why not?
 - Does ComEd plan to support any industrial electrification? What will that initiative look like?
 - Does ComEd plan to include ground-source heat pumps in its measure mix?

Need more detail on: Program Integration

- Integration with delivery of other non-EE offerings. How does ComEd plan to integrate delivery of EE with promotion of demand response (DR), solar PV, and other demand-energy resources (DERs) like the new Storage for All program? How will such integration work? How will costs be shared or allocated between EE and other initiatives? (e.g. between smart t-stats as EE and leveraging of smart t-stats for DR)?
- Integrating marketing of EE and new low-income discount rates (LIDR). How does ComEd plan to market IE EE programs to new LIDR customers (whose income falls below 300% FPL) and vice versa?

Karen Lusson (via chat): Regarding the IE whole home electrification program, it's important for ComEd to ensure that customers are enrolled in the new low-income discount rate as part of program implementation. The discount should be marketed in all residential programs, which is crucial to increasing awareness and expanding the pool of customers served, especially in electrification. Need to include information on how to enroll for all programs, only about 21-30% of the eligible population in Illinois participates in LIHEAP.

- *Kari Ross (via chat): ComEd also has an electric heating rate that should be offered for electrification customers.*

Additional Feedback to ComEd

Comment from Cheryl Watson, Equitable Resilience & Sustainability:

Cheryl Watson (via chat): Thinking about communities that flood and the electrical systems that are impacted. Would there be an option to convert systems when flood damage impacts the home? Are there any options? We are approaching flood season with intense storms and flooding. We have minimal understanding of the impacts on utilities. We have an opportunity to evaluate them and upgrade. *How can we educate and advance electrification? Who can this concern of electrification updates in flood prone low-income qualifying properties in vulnerable communities?*

- Karen Lusson (via chat): This is an important opportunity for marketing electrification.
- Kari Ross (via chat): I agree! There is great work like this happening in downstate flood-prone communities like Centerville that could serve as a model.

Comments from Scott Bernstein:

I'm Scott Bernstein, independent consultant, founder and allegedly retired president of the Center for Neighborhood Technology in Chicago; a current board member of Elevate and of the American Council for an Energy Efficient Economy, appearing today on my own behalf.

First a +1 to Kari Ross and Chris Neme's, NRDC, request to present the program targets in resource units, such as MW, in addition to energy units, e.g. MWH

Second, three Illinois agencies: the ICC, IEPA and IPA, released their consultant's study of Resource Adequacy in Illinois on December 15, not long after the passage of CRGA. The report, by E3 consulting, narratively endorsed energy efficiency and demand response as a resource. The modeling performed was described in that report, and a few days later, the outputs of various scenarios in the form of accessible spreadsheets detailing baseline energy resources, and what percentages of these are creditable, for the model years 2030, 2035, 2040 and 2045. Those include a flat figure of just under 2GW of demand response capacity being achieved by 2030, and then not changing after that year; and, they do not include a row for the intended capacity provided by your energy efficiency commitments. CRGA requires the preparation and submission of Integrated Resource Plans by each regulated utility. I've been studying these in states where they have been in force. What's "integrated" includes what is sometimes called "energy efficiency as a resource," meaning that both demand reduction and supply increases are scored using the same metrics, in the same plan. They're not just an enabling exercise, rather, they are the result of understanding both the potential demand side resources available and set targets to be achieved. This includes both traditional and novel approaches to "non-wires" approaches, which soften the lines between the company, the community and customers, making the latter 2 categories active participants or co-creators of solutions.

Since the company will be filing by the statutory date of November 15, it makes sense that both energy efficiency and demand response as resources be included in that plan. While your December 18 presentation acknowledges some parts of CRGA requirements, it doesn't appear to speak to how these resources, both EE and DR, will be addressed in that plan, nor how they will be scored.

In the Resource Adequacy study, E3 was also charged with conducting a realistic and unbiased review of the potential for demand through electrification and growth to continue outpacing supply, in both Ameren and ComEd territories, and for both PJM and MISO. In the report, they

carefully state that under current conditions and commitments, they could not rule out the potential for "rotating blackouts."

I understand that the three Illinois agencies will shortly be conducting workshops to collect feedback and recommendations on this report.

Can you please share with us the Company's commitment to (a) scoring the estimated impact measure for the EE and DR investment portfolio in both watts and watt-hours, and (b) engaging with stakeholders to "integrate" existing and potential resources in the new IRP?

Comments from Chris Neme, NRDC:

Chris Neme: Will the assumptions ComEd uses for cost-effectiveness be different or updated from the last Plan?

- Elder Calderon: Yes, there will be adjusted assumptions in the updated plan, based on previous year results and CRGA guidelines.*
- Chris Neme: Thank you, we would like to see updated numbers for these analyses.*
- Ted Weaver: Does your updated plan align with CRGA's updated social cost of carbon?*
- Elder Calderon: Yes, that will be updated in our cost. We previously used different numbers for the cost of carbon.*
- Chris Neme: The previous plan filing was consistent with CRGA requirements, as CRGA was designed in part to reflect our decisions.*
- Elder Calderon: I do not remember using a higher number than that. We will get back to you.*
- Ted Weaver: Thanks, there are two steps to the calculation: intensity and cost. If we come to an agreement, there is a lot to do in a little bit of time.*
- Elder Calderon: Agreed.*
- Chris Neme (via chat): Just looked at Appendix A of ComEd's currently approved plan and it looks like Elder was correct in stating that the Company previously used the old \$16.50/MWh value (adjusted for inflation) for the cost of carbon rather than the revised numbers we worked up together. It does suggest the new filing will be different in that regard.*
- Elder Calderon: Thanks for clarifying.*

Comments from Karen Lusson, NCLC:

Karen Lusson (via chat): For northern Illinois gas companies: Can you confirm whether you will be amending your approved plans and budgets? If so, how much will the budgets increase? One problem is weatherization allocations. If joint programs aren't solidified, stakeholders cannot negotiate properly. It is unacceptable to have to wait until March to understand if gas spending is increasing in weatherization programs.

- Celia Johnson: Peoples Gas and North Shore Gas recently decided to re-file and Nicor Gas has not decided yet.*
- Karen Lusson: What does that mean for ComEd? How can we negotiate these figures without an understanding of gas contributions?*
- Elder Calderon: We have had conversations with the gas utilities and we have used the best available information.*
- Karen Lusson: I would like to flag that as a problem.*
- Chris Neme: Elder, can you share the assumptions made for Peoples Gas and Nicor programs while putting together a budget and projecting savings?*

- *Elder Calderon: Our numbers assume Nicor will be ramping up and refiling under a higher capacity. Peoples Gas is not figured in our projections because we received their decision very recently. Our assumptions will be updated.*

Comments from Cassidy Kraimer, Community Investment Corp.:

Cassidy Kraimer (via chat): Will the follow up from this meeting (requested redlined plans, budget breakdowns, etc.) be shared with everyone? Or just in closed doors negotiations?

- *Cassidy Kraimer (via chat): Will there be an opportunity to share feedback on more extensive documentation, if it's available to everyone? Could the breakdowns be outlined also include assumptions with gas utilities taking advantage of CRGA changes or not?*
- *Celia Johnson: I will discuss with ComEd and follow-up with SAG.*
- *Karen Lusson: I want to emphasize how important it is for a full cost breakdown to be provided to the SAG. This is a transparent process, and others might want to join negotiations once they learn about the breakdowns. Allowing members of the public to understand what ComEd is proposing is critical.*

Inflation Reduction Act (IRA) Home Energy Rebate Program Update

John DeRosa, Illinois Environmental Protection Agency

50121 – Home Efficiency Rebate Program

- Status: Received full award in January 2025
- Total Award: \$131,952,374
- Launch: TBD
- Partnering Agency: Illinois DCEO
- Funding Amounts: \$8,000 to \$16,000 + \$1,500 for ventilation

Items Completed and Pending

- 50121 requirements integrated in IWx software system – Completed
- Multifamily energy auditor training – Completed
- BPI 2400 energy audit software approval – Pending
- Implementation Blueprints – 3 of 5 approved, Pending
- Finalize agreements with two pilot local administering agencies – Pending
- Receive launch approval from DOE – Pending

Karen Lusson (via chat): John, can you elaborate on whether the utility programs will be integrated in the Home Efficiency Rebate Program? My understanding is that the dollars and savings from the utility contributions would help the state hit the required federal savings target for the program. Is that still the case?

- *John DeRosa: The program would operate the same as traditional programs that are in place, like the existing braided programs.*

Caroline Johnstone (via chat): Any word from DOE on when launch approval may be received?

- *John DeRosa: No, they have not provided dates. We got an encouraging phone call before 2026. Hopeful in the new year that there will be new information.*

Molly Graham (via chat): Were those 3 already approved blueprints prior to the new administration? My understanding is that states are not getting blueprints approved right now.

- *John DeRosa: No, those were approved in May or July of this year through written emails.*
- *Karen Lusson (via chat): That is encouraging.*

Karen Lusson (via chat): To Molly's point, is IEPA worried that DOE will drag its feet or even withhold approval on your blueprints for the Home Efficiency Rebate Program? Any sense from DOE of when and if approvals are coming?

- *John DeRosa: There is concern. It is hard to know, but there is no urgency to get these approved and out the door. The biggest issue is that DOE staff has been reduced, so they are facing slower processes. We have not received updates on what stage they are at.*

50122 – Home Electrification and Appliance Rebate Program

- Status; Received conditional full award in January 2025 and early admin award July 2024
- Partnering Agency: Illinois DCEO
- Updates: Measures and requirements built into IWx system using early administration funding; pending US DOE full award approval

50123 – Training for Residential Energy Contractors

- Status: Received conditional full award in January 2025
- Partnering Agency: Illinois DCEO
- Updates: Pending U.S. DOE full award approval

Cassidy Kraimer (via chat): Is it possible to share if there has been any advocacy or outreach from IL congresspeople to DOE about this stall?

- *John DeRosa: Yes, there are groups actively reaching out. We are trying to figure out what the best approach is.*

DCEO Presentation (Verbal Update)

Mick Prince, DCEO

Savings Attribution Methodology

- Current savings attribution methodology used between DCEO and IL utilities for the Illinois Home Weatherization Assistance Program (IHWAP) should be continued for IRA-funded HOMES and HEAR grants. It's important to continue using the same methodology.
- Under current IHWAP braiding approach, utilities claim 100% of ICC-reported savings and contribute 50% of funding (measure-level or project-level costs), including admin and program support.
 - Existing methodology is applied to all braided IHWAP and utility projects regardless of federal funding sources. DCEO receives funding from several grants. In the future, we will also get funding through IRA (HOMES and HEER programs).
 - It's important that the methodology for savings attribution stays the same. It would not make sense to have different savings attribution methodologies for the exact same measures only because there are different federal funding sources.
 - Current methodology was developed with SAG following passage of the Future Energy Jobs Act (FEJA).
 - There is no double counting because DCEO reports savings to the U.S. Department of Energy (DOE), not the ICC. There are separate compliance and evaluation frameworks between federal funds and utility EE funds.
 - Utilities claim all savings, even if the dollar amount is not a 100% investment.
 - Not all EE programs are 100% funded, such as lighting and HVAC programs. The utilities fund portions of those programs.
 - Low-income client base does not have the upfront capital to invest in these programs. Under IHWAP, the utilities and DCEO both contribute.
 - Supports full savings claims based on verified performance and installation.

- HOMES/HEAR funding through IRA is larger than current funding levels, however the scale should not change the methodology. Previous precedents have aligned with this.
 - DCEO received a large influx of funding in 2022 - \$156 million from DOE through the Weatherization Assistance Program. The braided methodology for IHWAP did not change, and there were no ICC or SAG concerns raised.
 - Low-income programs or customers should not be penalized. The current [savings attribution] methodology used for IHWAP should also be used for IRA funding, whether for market rate or low-income customers.
 - There needs to be an incentive for the utilities to partner. We do not want utilities to shift to a parallel or competing program.
 - Lack of utility partnerships could lead to grant funds not being leveraged and serving less people.
 - Existing approach is fair and maximizes impact for low-income communities.

Karen Lusson: In the last stipulation, ComEd committed to braiding funds with the state weatherization program, contingent on joint funds available from the gas utilities. Would understanding ComEd's cost breakdowns be helpful for your 2027-2029 planning?

- *Mick Prince: Absolutely, we need to know the amount available for braiding for forecasting.*

Inflation Reduction Act (IRA) Savings Attribution Proposal

Matt Armstrong, Ameren Illinois, on behalf of all Illinois utilities (ComEd, Nicor Gas, Peoples Gas and North Shore Gas)

IRA Savings Attribution Context

- Illinois utilities have been coordinating with the Illinois Environmental Protection Agency (IEPA) and the Department of Commerce and Economic Opportunity (DCEO) since 2024 to support utility braiding with Inflation Reduction act (IRA) funds. Ameren Illinois has also partnered with Inova Energy Group regarding IRA coordination.
- Illinois utilities seek to reaffirm previous agreements established for braiding with IHWAP funds, allowing utilities to continue to claim full savings attribution in exchange for their participation in braiding with IRA funds.
- IRA braiding has been a point of discussion for utility plans, with significant stakeholder interest and support.

Illinois Home Weatherization Assistance Program (IHWAP) Savings Attribution Background and Precedence

- Utility funding of IHWAP projects began in the 2018-2021 cycle.
- In 2018, the utilities coordinated with DCEO and the Community Action Agencies (CAAs) to establish all operations to facilitate the new braiding arrangement.
- This included ICC approval and negotiating stakeholder engagement and support on how the utilities would claim savings for their contributions.
- IHWAP braiding agreement – 50% utility cost share with 100% savings attribution. Stipulated agreement in place since 2018.
- This has resulted in a highly successful partnership with a methodology that supports all partes.

IRA Savings Attribution Proposal

- The proposal is to replicate the existing approach and methodology used with IHWAP.

- A 50% cost contribution for eligible measures by funding utility or utilities (based on fuel type-savings) for full (100%) savings attribution to the funding utility or utilities for funded measures.
 - Utility/utilities fund 50% of the total cost for eligible measures, as calculated by the CAA; includes material, labor, and CAA administration and implementation fees.

Rationale and Benefits of the Proposal

- Customer Benefits
 - Enables braiding funds with utilities; thus, stretching the program services to income eligible customers further than what utilities and CAAs could otherwise accomplish on their own.
- Operational benefits
 - IRA and CAA operations:
 - Maintaining consistent program design allows the state and CAAs to navigate the complexities of IRA operations and requirements
 - Consistency in planning, implementation and evaluation:
 - “DOE will not calculate, claim, or track attribution of energy savings for the Home Energy Rebates programs.” There are no concerns of “double counting” results
 - This methodology is consistent with how each utility budgeted and planned for savings within ICC-approved plans.
 - Allows for most efficient administrative approach for utilities.

Abigail Miner: On the IHWAP savings and precedence slide you mention a highly successful partnership. How is that defined?

- *Matt Armstrong: It means that we have been able to deliver energy savings to our customers. There have been challenges with the partnership, but we have still been serving customers well with decent production levels from Ameren’s standpoint.*
- *Abigail Miner: Is it fair to say the program enables you to get the money out the door to the targeted population.*
- *Matt Armstrong: Yes, that’s a good way to put it.*

Karen Lusson: Do the utilities regularly communicate to DCEO, not only during planning but throughout the year to see if they can increase spending on braiding? Given that the braided DCEO programs will include utility funding, it is not clear why electric utility companies need 50% gas contributions for braided programs. Is that ComEd’s position? If the gas programs run out, could ComEd still contribute 50% to an IHWAP program?

- *Matt Armstrong: On behalf of Ameren, we work with CAAs in our service territory. We regularly communicate with the CAAs and DCEO to ensure we are delivering and ensuring service to the greatest number of people possible. There is a lot of oversight given the number of parties involved.*
- *Elder Calderon: ComEd also communicates with DCEO throughout the year.*
- *Kari McCue: Nicor Gas has a similar approach.*
- *Omayra Garcia (via chat): Peoples / North Shore also checks in regularly with DCEO and the CAAs to ensure capacity.*
- *Mick Prince: DCEO meets every other week with representatives of the utilities. We do everything we can to brainstorm and work on ways to increase production. We have a very collaborative relationship.*

Karen Lusson: Given that the braided programs will include funding of various amounts, it's not clear to me why the electric companies need 50% contribution. If the gas utilities run out of funding, couldn't ComEd continue to contribute to funding? Of course, we want the gas utilities to contribute as much as possible.

- *Elder Calderon: That was a position that we had under previous legislation because we were achieving the cap of 10% savings, that is not a position that we have under the revised plan.*
- *Karen Lusson: ComEd should consider increasing funding.*

Cassidy Kraimer (via chat): This question is focused on program delivery. Will the rebates be incorporated seamlessly into existing braided programming/how will customers apply? Will customers receive rebates or will the funding from rebates be incorporated into the funding enabling retrofits/upgrades? Will all HOMES and HEAR funding be braided with utility programs?

- *Karen Lusson (via chat): Great question, Cassidy. Hopefully, the customers won't have to take any action.*
- *Matt Armstrong: My understanding is the intent is IRA dollars would be delivered to our customers in a manner similar to how IHWAP is delivered now. It wouldn't be a standalone incentive, it would be delivered seamlessly in a braided fashion.*
- *Mick Prince: We have an online application. If the client falls below 200% of federal poverty level, it will be completely seamless. We will have the ability to do a comprehensive retrofit of their home. We will look at it site specifically, and utilize the funding that makes sense for that home. There are so many rules, it's hard to get into the weeds on what funding is used on what measures. We have built those rules into the IHWAP system. For over 200% to 80% AMI, we only have the HOMES and HEER funding available. It's really important on those homes that we have the utility contribution so we are able to stretch the program dollars and provide comprehensive services for those clients. From the client lens, they apply for weatherization and we apply the funding. It is site specific – it depends on the home and the modeled savings for the project, which also dictates the budget levels for the IRA funds.*
- *Karen Lusson (via chat): That's good to hear. No required rebate form processing for customers. Is that what we hear you saying, Mick?*
- *Mick Prince: Yes, a customer will fill out the same application that they would for any other IHWAP grant.*

Chris Neme: Mick Prince made an important point about the fact that WAP funding only goes up to 200% of Federal Poverty Level (FPL), and IRA funding would address up to 80% of AMI. Do you have a sense of what portion of the customer base that comes to CAAs falls under that gap?

- *Mick Prince: I do not, for us it is an untapped market. The utility low income programs have always gone up to 80% of AMI. I don't have the data of denied applications for over income, but it is something we can probably look at in the IHWAP system. Right now, we have 6,500 people on the waiting list for IHWAP. We know there is a great need. We haven't even marketed the program for people above 200% of FLP (yet). We have plans to, but we want to make sure we have the funding in-hand before we do any marketing.*
- *Chris Neme: With this added influx of funding, and serving a somewhat broader income range of customer, can you speak to the capacity of the agencies to increase their workload or the number of customers served?*
- *Mick Prince: We have a lot of agencies that are doing 50 homes per year and spending out their funds; we will continue to do outreach to bring on new contractors. Agencies outside of Chicago haven't done much MF. We are doing a big push right now to get*

agencies comfortable to do MF weatherization. There is training happening right now. In 2026, agencies have to do at least 25% of their production in MF. We looked at census data to come up with that. Statewide, 32% of the low income population lives in MF housing. The data was census data from SNAP recipients.

- Chris Neme: That's great to hear.
- Karen Lusson: Did you say 31% of the state is LI MF?
- Mick Prince: The best data we can provide is from Illinois SNAP recipients, which is about 32% of the state.

Kari Ross (via chat): Can we ask for a customer participation flow chart, specifically for braided state and utility funding?

- Elder Calderon: There was a similar flow chart provided in the October conversation on customer prioritization.
 - See October 20, 2025 SAG Equity Subcommittee meeting page: <https://www.ilsag.info/event/monday-october-20-sag-equity-subcommittee-meeting/>
- Matt Armstrong (via chat): <https://www.ilsag.info/wp-content/uploads/SAG-Presentation-AIC-Income-Qualified-Initiative.pdf> - this is a flowchart for Ameren's IHWAP channel, see slide 10.

Closing and Next Steps

Request for Feedback – IRA Savings Attribution Proposal: Comments on the IRA savings attribution proposal are due **Wednesday, January 28**.

- The comment template was circulated to SAG, and posted on the [January 13 meeting page: Click here to download the IRA Savings Attribution Proposal Request for Comments template](#).
- **Next Steps:** A follow-up SAG Small Group meeting will be held on **Friday, February 6 (9:30 – 11:00 am)** to discuss comments received.

ComEd Follow-up:

1. Several SAG participants requested an Income Eligible (IE) breakout. ComEd provided an updated 2027-2029 EE Plan presentation, with updated spend/savings tables including a breakout of IE spend. See the appendix beginning on slide 29: [ComEd Revised Draft EE Plan for 2027-2029 \(1/14/26\)](#)
2. NRDC requested customer journey mapping for the joint residential Home Energy Savings offering. See the northern Illinois utilities' [September 18, 2025 SAG Equity Subcommittee presentation \(slide 2\): SAG-Retrofits-Prioritization_9.18-Joint-Utility-Presentation_updated.pdf](#)
3. **Opportunity for Additional Feedback:** Following the January 13 meeting, SAG participants had an opportunity to submit additional feedback to ComEd in writing. Feedback was due by Wednesday, January 21. The following feedback was received:
 - [Comments from The Preservation Compact \(1/21/26\)](#)

Next Steps for ComEd 2027-2029 Re-Filed EE Plan:

- ComEd will share additional follow-up responses with negotiating parties participating in confidential discussions. There will not be an additional Large Group SAG meeting to discuss feedback on ComEd's draft EE Plan. Further discussion about ComEd's draft EE Plan will occur during confidential negotiations between ComEd and non-financially interested stakeholders.
- The statutory filing deadline for ComEd's 2027-2029 re-filed EE Plan is June 1, 2026.