

**Illinois EE Stakeholder Advisory Group (SAG)  
Large Group Meeting (Q3)**

**Wednesday, July 23, 2025**  
1:00 – 3:00 pm  
Teleconference

**Attendees and Meeting Notes**

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**Meeting Materials**

- [July 23, 2025 Large Group SAG Agenda](#)
- [Illinois EPA Presentation: Inflation Reduction Act Home Energy Rebate Program Update](#)
- [SAG Process for Addressing Policy Issues – July 23 Meeting](#)
- [Ameren Illinois Policy Proposal Presentation](#)
- [ComEd Policy Proposal Presentation](#)

**Attendees**

<b>Name</b>	<b>Company or Organization</b>
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Abby Brokaw	Illinois EPA
Abigail Miner	IL Attorney General's Office
AJ Young	Greenlink
Amy Jewel	Elevate
Andrey Gribovich	DNV
Andy Vaughn	Leidos
Anna Lydia Marrero	CEDA
Arvind Singh	DNV
Baera Bischoff	No Organization Identified
Ben Campbell	Energy Resources Center, UIC
Cassidy Kraimer	Community Investment Corp. (CIC)
Caty Lamadrid	Inova Energy Group
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Colin Santel	Ameren Illinois

<b>Name</b>	<b>Company or Organization</b>
Courtney Golino	Guidehouse
Daniel Gonzalez	ComEd
Danish Murtaza	Peoples Gas & North Shore Gas
Deb Dynako	Slipstream
Dena Jefferson	Franklin Energy
Diana Dorman	Energy Solutions
Dylan Royalty	ScottMadden
Ebony Buchanan	CEDA
Elder Calderon	ComEd
Elizabeth Horne	ICC Staff
Elli Arzbaeher	Future Energy Enterprises
Evan Tincknell	Opinion Dynamics
Hannah Howard	Opinion Dynamics
Houston Dowen	Frontier Energy
Jaleesa Scott	ComEd
Jamey Neal	Ameren Illinois
Jared Policicchio	City of Chicago
Jason Fegley	Leidos
Jeff Erickson	Guidehouse
Jill Rolstone	Franklin Energy
John Carroll	Ameren Illinois
John Carroll	Leidos
John DeRosa	Illinois EPA
John Lavallee	Leidos
Jonathan Skarzynski	Nicor Gas
Julie Hollensbe	Walker-Miller Energy Services
Kanchan Swaroop	Resource Innovations
Kara Jonas	ComEd
Karen Lusson	National Consumer Law Center
Keely Hughes	The JPI Group
Kit White	MEEA
Lance Escue	Ameren Illinois
Larry Kotewa	Elevate
Lauren Bates	Opinion Dynamics
Lisa Obear	Brightline Group
Lloyd Kass	Franklin Energy
Maria Onesto Moran	Green Home Experts
Mark Milby	Elevate
Matt Armstrong	Ameren Illinois
Melissa Helpingstine	Primera Engineers
Mike King	Nicor Gas
Nate Baer	i3 Energy

<b>Name</b>	<b>Company or Organization</b>
Nelson May	Future Energy Enterprises
Nick Lovier	Ameren Illinois
Omayra Garcia	Peoples Gas & North Shore Gas
Parini Shah	Guidehouse
Pat Justis	Ameren Illinois
Patrice McFarlin	Encolor Consulting
Philip Halliburton	ComEd
Randy Opdyke	Nicor Gas
Rashaan Keeton	Center for Energy & Environment
Rose Williamson	Opinion Dynamics
Salina Colon	CEDA
Sam Stahl	Ameren Illinois
Sara Castleberry	Resource Innovations
Sarah Evans	DNV
Selena Worster Walde	Erthe Energy Solutions
Shawn Haas	Peoples Gas & North Shore Gas
Sushmitha Ramakrishnan	ComEd
Ted Weaver	Dunsky Climate Advisors, representing Nicor Gas
Tina Grebner	Ameren Illinois
Tori Woolbright	Metropolitan Mayors Caucus
Travis Hinck	GDS Associates
Valencia Roner	Energy Infrastructure Partners
Wade Morehead	Morehead Energy
Zoe Huspen	Citizens Utility Board

### **Introduction to Q3 Large Group SAG Meeting**

*Celia Johnson, SAG Facilitator*

#### **Purpose of the July 23 meeting:**

1. To educate SAG on federal Inflation Reduction Act program updates for Illinois; and
2. For Ameren Illinois and ComEd to propose policy updates.

### **Inflation Reduction Act Update**

*John DeRosa, Illinois Environmental Protection Agency (Illinois EPA)*

#### **50121 – Home Efficiency Rebate Program**

- The program provides energy efficiency rebates to low-income households, defined as those earning less than 80% Area Median Income (AMI) or those that are categorically eligible. Rebates are available for both single-family and multifamily residential properties.
- Rebate Tiers:
  - Up to \$8,000 for homes achieving 20%-34% modeled energy savings
  - Up to \$16,000 for homes achieving 35% or greater modeled energy savings
- In addition, households may receive \$1,500 to cover the cost of exhaust and ventilation system upgrades, if required to meet health and safety standards.

- Status: Received Full Award in January 2025
- Total Award: \$131, 952,374
- Launch TBD: Aiming to launch a pilot in Q3 2025 with two local Administering Agencies, one in the northern region and one in the southern region of Illinois.
- IWx Software Updates – IRA Integration
  - IRA Program Requirements are currently being integrated into the IWx system, with completion targeted for mid-August.
  - A testing period of several weeks will follow to ensure functionality and compliance before the release to LAAs participating in the pilot.
  - The application interface will closely mirror the existing IHWAP program application, ensuring a familiar user experience.
  - Energy Audit Software Enhancements
  - A menu of measures will be available on the backend to support braiding of funds to ensure compliance with federal requirements and that funding is correctly allocated across eligible measures.
- Requirements to Launch: 1) DOE Approved Implementation Blueprints
  - Outreach and Education Plan – *Submitted; pending DOE approval*
  - Consumer Protection Plan – *Submitted; evaluating comments*
  - Utility Data Access Plan – *Submitted; evaluating comments*
  - Evaluation Plan – *Submitted; awaiting DOE feedback*
  - Privacy and Security Risk Assessment (State Systems) – *In progress*
- Requirements to Launch: 2) Energy Audit Software Approval
  - Must meet BPI 2400 requirements for Single-Family Residential
  - Illinois is working with NREL on software approval
    - Received a waiver to test in 2 of the 6 required nationwide locations
    - Illinois audit tool is state-specific, but DOE requires testing in 6 distinct states (not including Illinois)
- Requirements to Launch: 3) Budget Justifications
  - Submit budget justifications for two Pilot Local Administering Agencies (LAAs) to DOE for approval
  - Note: The program may initially launch with Multifamily-only availability if Energy Audit Software approval for single-family homes is delayed.
- Potential Factors that could delay 50121 Program Launch
  - Limited DOE staffing, potentially slowing review and approval timelines
  - Delays in receiving official launch approval from DOE
    - Other states, such as Florida and Pennsylvania, have reported waiting for approval since May 2025
  - IWx system integration delays, which may impact application readiness and pilot deployment
- 50121 Tranche 1 Rebate Allocation
  - Total Allocation: \$19,787,390
  - Funding Period: Through December 31, 2026
  - Local Allocations: Amounts allocated to Local Administering Agencies will be shared once finalized by DCEO
- The program will provide rebates in the following amounts and will primarily serve low-income households earning less than 80% of Area Median Income (AMI) or categorically eligible.
  - Illinois will allocate a limited portion of funds to low- to moderate-income households, but this group will not be prioritized at program launch

## 50122 – Home Electrification and Appliance Rebate Program

- Program Status
  - Early Administrative Funds Awarded:
    - July 2024 – \$2,500,000 awarded for program/IWX development and blueprint preparation
  - Full Application Submitted:
    - December 2024
  - Conditional Award Received:
    - January 2025 – Funds are obligated, but cannot be spent until federal negotiations are finalized
    - Total Program Award: \$131,452,470
  - Launch TBD: No timeline on when negotiations will pick back up.
- Requirements to Launch
  - DOE Approved Implementation Blueprints
    - Five blueprints are required
    - Currently in draft form and closely aligned with the 50121 blueprints
  - Submit Budget Justifications
    - Budget justifications for Local Administering Agencies must be submitted and approved by DOE prior to launch
- Braiding of IRA Rebate Programs and Other Funding Sources
  - IRA Rebate funds may be used on the same project, but not on the same measure
  - IRA Rebate funds may be used on the same project as DOE or HHS, but again not on the same measure
  - IRA Rebate funds can be braided with Utility or State funds on the same measure, provided all program requirements are met
- Contractor Training Programs
  - 50123 – Training for Residential Energy Contractors (TREC)
    - Conditional Award received – *January 2025*
    - Award Amount: \$5,000,000
    - Interagency collaboration with DCEO, formula funding
  - Energy Auditor Training (EAT) Grant
    - In final negotiations as of *January 2025*
    - Estimated Award: \$2,000,000
    - Train 120 LAA Energy Auditors in multifamily assessments & recruit and train an additional 15
    - Competitive application with DCEO

*Karen Lusson (via chat): Is the 35% percent energy savings requirement for the larger grant award in the 50121 program proving difficult to achieve from an implementer's point of view, understanding that the program has not started yet?*

- *John DeRosa: Depending on how things work with the new energy audit model, the DCEO team has seen historically with WAP energy audit tools that 35% and over is possible.*

*Karen Lusson (via chat): Are you worried about DOE staff being in place to approve plans for the various requirements to launch, given all the terminations at the federal level?*

- *John DeRosa: Yes, there is some concern. As of our recent update, the funding is still there. For us, there is more of a concern of how long something could take. But, for the 50121 program they have been very responsive.*

*Catalina Lamadrid (via chat): For the energy assessment tool, what happens if it does not get approval or if it is delayed?*

- *John DeRosa: We think that we can get there. If that were to happen, we would consider a third party for single-family residential assessments. The DCEO team is determined.*

*John Carroll (via chat): Would it be possible to see examples of HOMES work scopes or a have walkthrough of the construction of a HOMES work scope? I think this would help everyone understand what percentage of incentives from the utility would be required (since these HOMES rules/incentives are not aligned with the existing CAA braided program).*

- *John DeRosa: I will ask the DCEO team to follow up with this. You are referring to a final scope of work (SOW) with funding and allocation details, correct?*
- *John: Yes, that is correct. I would like to see the maximum amount for incentives versus what we currently allocate. This would help us understand what additional funding needs to come from utilities.*

*Karen Lusson (via chat): Why not prioritize low- to moderate-income for the electrification program?*

- *John DeRosa: We did not want to tackle too many components and risk any program delay. We would need to build out different rules, application processes, and infrastructure. We do plan on offering this eventually.*

*Catalina Lamadrid (via chat): Can you confirm that for HEAR, there is no plan to do point of sale instant discounts?*

- *John DeRosa: Correct, we do not plan to offer this. There are a lot of unknowns.*

*Deb Dynako (via chat): John, thanks for the hard work on this and moving through the uncertainty. When was the last time the state heard from DOE?*

- *John DeRosa: We met with our project officer last week, with an update on 50121. We have regular communication on 50121.*

*Kit White (via chat): How will savings attribution work when program funds are braided with utility funds?*

- *John DeRosa: They will work the same as they have previously, so whatever the approved attribution level is, it will operate the same.*

*Cassidy Kraimer (via chat): Would it be possible to reiterate how savings from the measures will be allocated when braided with utility programs?*

- *John DeRosa: I believe my answer to the previous question answers this.*
- *Cassidy Kraimer: Yes, thank you.*

*Deb Dynako (via chat): Illinois is not alone in this. Many states that were awarded conditional contracts have not received the funding yet.*

*Travis Hinck (via chat) Have you explored partnering with existing utility implementation infrastructure (contractor networks, energy advisors, outreach channels, customer relationships, etc.)? Especially if the funding is in question.*

- *John DeRosa: We would consider this. We have not considered partnerships outside of the CAAs. We need to work together to build up infrastructure in Illinois, we are willing to discuss this more.*

Lloyd Kass (via chat): Do you know the planned funding breakdown between single family and multifamily for HER and HEAR?

- John DeRosa: I do not know the exact breakdown, but we need to meet a 10% goal of multifamily funding. We are willing to increase that percentage, especially as we hit our low-income funding goals. After we launch the program, we can do better forecasting.

Lloyd Kass (via chat): Are the state's HEAR applications publicly available?

- John DeRosa: No, not at this time.

Cassidy Kraimer (via chat): Would it be possible to outline how the 50121 pilot program would be implemented on the ground for interested clients? How will utility program implementers coordinate with implementing organizations? Is there a cap for multifamily housing in the program, and are the outlined limits for 50121 per unit for multifamily housing?

- John DeRosa: The program will run through applications, LAAs will procure contractors, who will also be reaching out to other CAAs to get involved. A list of local entities will be available with funds.
- Celia Johnson: Consider this topic for a future SAG presentation.

### **SAG Process for Addressing Policy Issues**

Celia Johnson, SAG Facilitator

- Background
  - Policy issues are typically resolved through the SAG Policy Manual Subcommittee update process
  - Policy Manual is updated every 3-4 years
  - Policy questions may arise that require discussion and resolution while the Policy Manual Subcommittee is inactive
- SAG Process for Addressing Policy Issues
  - Included in the SAG Process Guidance 2025 Update (Final 6/4/2025)– see pages 6-7
  - Referenced on the Policy page of the SAG website
  - Policy Manual Subcommittee is currently inactive, since Policy Manual Version 3.0 and IL-TRM Policy Document Version 4.0 were approved by the Commission in December 2023

### **SAG Process for Addressing Policy Issues**

1. The SAG Facilitator will review policy requests and schedule for SAG discussion as needed.
  2. Background on the policy request will be presented to interested SAG participants.
  3. Proposed policy resolution will be circulated to SAG for review, including a request for edits or questions, with a minimum of ten (10) Business Days provided for review.
  4. If the SAG Facilitator receives substantive edits, questions or concerns regarding proposed resolution of an open policy issue, a follow-up SAG discussion will be held with interested SAG participants.
  5. Final resolution will be documented on the Policy page of the SAG website.
  6. The SAG Facilitator will maintain a "Policy Tracker" describing any policies to be considered in a future update to the Policy Manual or IL-TRM Policy Document.
- Policy resolution may require a Stipulated Agreement. Whether or not a stipulated agreement is required will be determined by utilities and non-financially interested stakeholders.

## **July 23 Policy Proposal Presentations**

- Reporting Policy
  - Ameren Illinois is proposing a change to existing reporting policy for all Illinois utilities
- Income Eligible Qualification for New Construction EE Programs
  - ComEd is proposing a new policy to establish eligibility verification pathways for income eligible new construction EE programs
- There will be an opportunity for written feedback following the July 23<sup>rd</sup> meeting. A follow-up meeting will be scheduled to discuss.

## **Ameren Illinois Policy Proposal**

*Matt Armstrong, Ameren Illinois*

### **Reporting Policy Proposal: Background**

- State Law
  - Electric (8-103B)
    - Implement reporting procedures to assist in determining how low-income procurement and expenditure requirements are met
    - Communicate progress toward ensuring implementation contractors and installation vendors promote workforce equity and quality jobs
  - Gas (8-104)
    - Report status of implementation and expenditures
- State Policy
  - Illinois Energy Efficiency Policy Manual
    - Purpose of reporting is to share info on successes and challenges such that others can learn from successes, and stakeholders can provide recommendations on addressing challenges
    - Section 6 contains extensive reporting required of program administrators, which includes quarterly reports

### **Rationale for Change**

- Reporting data that adds value, limiting administrative burden, informing others so they can provide input + commitment in stipulation to enact policy change, freeing up resources for incentive delivery = Best for the customer.

### **EE Policy Manual Section 6.5 – Language Revisions**

- Language revisions described on slide 4 of the presentation. Ameren Illinois will prepare redline edits for review following the meeting.
- Ameren explained the subsections in the Policy Manual that will continue to be included in the quarterly template.
- Ameren explained the subsections in the Policy manual that will be reported in the semi-annual narrative report (previously provided quarterly).

### **EE Policy Manual Sections 6.8 through 6.11 Reporting Principles**

- Ameren proposes that Reporting Working Group updates reporting metrics documents to:
  - Change frequency from Quarterly to Semi-Annual (as applicable)
  - Specify Delivery Method (Quarterly Template or Semi-Annual Narrative)

Reporting Principle	Type of Reporting	Current Frequency	Current Delivery Method
Diverse Contracting	# of Diverse Contractors and spending	Bi-Annual	Q2 and Q4 Reports
Diverse Contracting	# of Diverse Trade Allies by specialty	Annual	Q2 Report
Equity and Affordability	IQSF participants by zip code	Annual	Q2 Report
Equity and Affordability	IQSF participants and measures adopted	Annual	Impact Report
Equity and Affordability	Cross referral study	Once	SAG
Health and Safety	H&S spending by channel and narrative	Quarterly	All Quarterly Reports
Health and Safety	Projects with H&S remediation	Annual	Q2 Report
Multifamily	Mix of buildings treated	Annual	Q2 Report
Multifamily	Joint program delivery	Quarterly	All Quarterly Reports
Multifamily	Funding leveraging	Annual	Q2 Report
Multifamily	Comprehensiveness spreadsheet	Annual	Impact Report
Multifamily	Geographic distribution of projects	Annual	Q2 Report

### Considerations and Next Steps

- Path Forward – if consensus is reached, can this be an interim policy without opening the Policy Manual? Commission notification?
- Effective Date – Can we work toward an effective date of **September 30, 2025**, so that only Q3 templates (no narrative report) is required?
- Ameren to draft redlines o Policy Manual and Reporting Metrics Documents for circulation
- Celia to request comments on proposed redlines and Considerations
- Comments to be reviewed by Reporting Working Group

*Chris Neme: Could this be resolved in time so Ameren would not have to conduct Q3 reporting? For the reports due September 30<sup>th</sup>, when would you need to know whether this has been resolved to avoid conducting the work?*

- *Matt Armstrong: Ameren’s data is received 20 days after the closing of our quarter. If we have an answer shortly after September 30<sup>th</sup>, then we can decide.*
- *Chris Neme: Celia – if there is an agreement on changes, how does that get operationalized?*
- *Celia Johnson: Typically, new policies agreed to outside of a Policy Manual update process are posted on the Policy page of the SAG website. The group can consider what they are comfortable with. Notifying the Commission is also an option.*
- *Chris Neme: I imagine if this is a long process, Ameren may not feel comfortable proceeding until they get commission approval, potentially in mid-October. What do you need for coverage?*
- *Matt Armstrong: Yes, I agree. Our decision hinges on the path forward, and we have consulted our legal team. We encourage others to ask the same questions of their legal support and consider their coverage.*

*Chris Neme: What are you proposing to change in the multifamily reporting agreements?*

- *Matt Armstrong: The items highlighted as quarterly reporting are being pushed to semi-annual. Because they are more numeric, they can be added with the quarterly templates.*
- *Chris Neme: How is it addressed currently? Within the quarterly [narrative] PDF?*
- *Matt Armstrong: Yes, that is correct for Ameren.*
- *Chris Neme: So, these are the only two things that would be switched?*
- *Matt Armstrong: Yes, that is what we are proposing.*

- *Chris Neme: We have talked about this, and the stakeholders are generally supportive. However, we need to see the redline edits.*

*Abigail Miner: Can you clarify that if/when these changes are adopted, they will be available to all utilities?*

- *Matt Armstrong: Yes, this is our intent.*

### **ComEd Policy Proposal: Income Eligible Qualification for Electric Homes New Construction Program**

*Elder Calderon, ComEd*

#### **Program Overview: IE Allocation for Electric Homes New Construction (EHNC)**

- ComEd EHNC Program focuses on promoting high efficiency, all-electric new homes and all-electric gut rehab/renovations by offering builders of new construction (single-family homes, duplexes, townhomes and 2-4 flats) financial incentives for achieving best practice energy efficiency.
- The effort began as an EE R&D concept; the R&D team conducted a market analysis, designed a new incentive and outreach strategy, and then tested the concept's viability as a new program offering during 2020-2022.
- Customer Identification Challenges:
  - Incentives are tied to the energy-efficient product being built, not the eventual sale or occupancy.
  - The final buyer's income or whether the home qualifies as "affordable" (housing + utilities < 30% of household income) is typically unknown.
  - Builders in this category generally do not adhere to affordability standards unless required by another program.

#### **EHNC Insights: Program Growth and Direction**

- 2020-2022 pilot participation summary
  - 57 homes
- 2023 full core program
  - 68 homes
  - First all-electric 15-unit small multifamily project
- 2024 full core program
  - 79 homes
  - Increase of multifamily projects (12-unit and 6-unit) and 2-4 flat projects
  - ~71% homes in DAC zip codes (64 homes)
- Future program Opportunities: Reclaim Chicago
  - 2,000 Homes on The South and West side of Chicago
  - 500 in Back of Yards, North Lawndale, and Roseland
  - As much as 125 homes per year
  - All in income eligible areas

#### **Policy Proposal: Income Eligible Qualification for EHNC**

- Purpose of Policy: Establish Income Eligibility Verification process that reduces administrative burdens and ensure broad participation in income-qualified new construction energy efficiency programs by offering the following pathways to verify income eligibility:
  - Affordable Housing Program Participation
  - Qualified Development Pipeline

- Location in Low-Income Area
- Planned Rent Structure
- Targeted Tenant Income Levels
- Alternative Verification Approaches

### **Exploring Verification Pathways**

- Pathway 1: Affordable Housing Program Participation
  - Automatic qualification for projects receiving funding or designation through:
    - LIHTC
    - HUD Programs
    - USDA Rural Development
    - State HFA programs
    - Local affordable housing incentives
- Pathway 2: Location in Low-Income Area
  - Projects sited in Census Tracts identified as low-income using:
    - HUD's Qualified Census Tracts
    - Program Administrator-defined criteria
    - Adjustments allowed to ensure majority of future residents meet income thresholds
- Pathway 3: Planned Rent Structure
  - Projects sited in Census Tracts identified as low-income using:
    - HUD's Qualified Census Tracts
    - Program Administrator-defined criteria
    - Adjustments allowed to ensure majority of future residents meet income thresholds
- Pathway 4: Targeted Tenant Income Levels
  - Developer commitment showing at least 50% of units will be leased to households:
    - At or below 200% of the Federal Poverty Level, or
    - At or below 80% of AMI
- Pathway 5: Qualified Development Pipeline
  - Projects listed in a recognized pipeline of affordable housing developments, such as:
    - State Qualified Allocation Plan pipeline
    - Local housing authority development lists
- Pathway 6: Alternative Verification Approaches
  - Program Administrators may approve other methods that demonstrate income eligibility, such as:
    - Participation in disaster recovery or resilience housing programs
    - Partnerships with local governments or nonprofits serving low-income populations

### **Policy Proposal: Summary & Customer Benefits**

- Income eligibility pathways for EHNC ensures that there are multiple pathways to make energy-efficient homes accessible to those who benefit most, offering financial relief through lower utility costs and rent, while promoting healthier, safer, and more stable living environments.
- This eligibility approach not only supports household well-being but also strengthens program effectiveness by targeting resources where they have the greatest impact and allows for further impactful program design by:

- Increase program flexibility to develop and grow impactful Income Eligible offerings
- Increase participation by removing barriers of burdensome eligibility requirements
- Decrease program administration costs by Prioritizing least burdensome and most efficient methods
- Supports program cooperation and braiding with state and federal efforts

*Chris Neme: What would you use this designation for? Higher incentives for low-income construction?*

- *Elder Calderon: This opens the door for that kind of program design – differentiating the incentives between low-income and non-low-income. Challenges between the two arise via stringent requirements. These pathways would allow higher incentives to target more income-eligible customers and projects.*
- *Chris Neme: Is this the only thing you would use it for, or does this count as electrification?*
- *Elder Calderon: Yes, it does.*
- *Chris Neme: So, you could use this towards the minimum amount of savings towards 25% low-income?*
- *Elder Calderon: Yes.*
- *Chris Neme: Do you assume that all savings coming from this program are not counted as low-income?*
- *Elder Calderon: Yes, only electrification savings from our low-income program are counted.*

*Karen Lusson: I am unsure what the program entry point is. When developers/prospective tenants are being marketed, do you provide bill impact analyses?*

- *Elder Calderon: The entry points are different. Both programs are looking at energy savings with minimum criteria for building codes. The difference is that electric homes does not qualify for income-eligible based on technical criteria for energy savings fuel switching. The entry point is technical; the addition of income-eligible criteria could change that.*
- *Karen Lusson: So, this is marketed to individuals and developers who are starting a development of a new home?*
- *Elder Calderon: Yes, it is not marketed as a specific segment, such as market rate or income-eligible.*
- *Karen Lusson: Thanks. How is it marketed? How do you know people are looking for a program like this?*
- *Elder Calderon: The program works with developers, I can provide more information on marketing channels.*

*Abigail Miner: I would appreciate clarity on the income threshold, as income-eligible, low-income, and income-qualified are all used. Some of these have statutory definitions.*

- *Elder: Sure, these are all different income-eligible thresholds, confirmed by verification. They are all slightly different, but we will be sure to make nomenclature consistent.*
- *Abigail Miner: That would be helpful, thank you.*

*Cassidy Kraimer (via chat): Does this program offer other benefits that AHNC doesn't offer?*

- *Elder Calderon: I would not say that. It has a different approach to electrification of development. It focuses on developers with special construction as opposed to housing construction. Affordable new construction focusing on income-eligible customers.*

*Chris Neme: In Pathway 2, your focus is on HUD's census tract, which is AMI 60% or less, correct?*

- *Elder Calderon: Yes. Similarly to the multifamily pathway, there is flexibility in lowering that with the program administrator. Can reach 50% in some cases.*
- *Chris Neme: When this is written, the program administrator can make it more stringent?*
- *Elder Calderon: Yes.*

*Chris Neme: How are Pathway 2 and 3 different?*

- *Elder Calderon: The rent structure has similar criteria in terms of location. The focus is ideally on low-income rent structures that reflect low-income qualification. More focus on rent structure and tenant targeting.*
- *Chris Neme: Why is HUD referenced, if they do not report on location?*
- *Elder Calderon: There are relations between rent structures and development location. This is reflected in other average structures.*
- *Chris Neme: It would be helpful to spell out how something would be determined.*

*Chris Neme: What does the developer commitment to showing 50% of houses mean?*

- *Elder Calderon: It could mean a variety of things. Submission of tenant income verification, allocating a number of units to income-qualified tenants, etc. Identify the tenant structure and enforcing majority low-income within the building.*
- *Chris Neme: How does Pathway 5 differ from Pathway 1?*
- *Elder Calderon: They open the door to different pipelines, to other qualified development pipelines, such as reclaim Chicago, local municipalities, rather than federal or state-run programs.*
- *Chris Neme: You listed local incentives under Pathway 1. I am still unclear on the distinction. Is this more about what is in a pipeline and not formally approved?*
- *Elder Calderon: That is partially correct, it is establishing a pipeline but different than policies that have been approved.*
- *Chris Neme: This is so you can get to them earlier, the difference between when they apply and when they get their funds.*
- *Elder Calderon: Yes, it establishes a pipeline.*

*Cassidy Kraimer (via chat): Is the EHNC the Whole Home Electric Program?*

- *Elder Calderon: It is not. Whole-Home is retrofits.*

*Karen Lusson (via chat): If these new eligibility methods are confirmed, do you anticipate increasing the budget for this program, and if so, where would dollars come from?*

- *Elder Calderon: We would explore this further in program design and potentially expand the budget.*
- *Karen Lusson: Is this program in the residential or income-qualified channel?*
- *Elder Calderon: Market rate residential.*

*Cassidy Kraimer: In the current program, are there guidelines for renting to low-income households?*

- *Elder Calderon: There is no requirement within the current program that a housing development targets low-income households with pre-verification that the development is targeted. The verification would have been targeted all-electric developments.*
- *Cassidy Kraimer: This is accessible for income-eligible buyers and renters?*
- *Elder Calderon: Yes, and developers.*

*Elder Calderon: Renting relates to red roll documentation recording median rent charged by a property. Needs to be at 80% or below fair market rent (HUD) definition.*

- *Chris Neme: Because this is new construction, there would not be historic rents, but a commitment to charge at those levels.*
- *Elder Calderon: Yes.*
- *Chris Neme: Are the next steps to take this out of bullets and put it into actual detailed language so that we can get these questions answered?*
- *Elder Calderon: Yes, we will release a report with concise summaries and verification pathways in a similar format.*
- *Celia Johnson: Elder, will this report be released soon?*
- *Elder Calderon: It should be released within the next four or five days.*

*Abigail Miner: I am still confused on pathways that involve developer commitments.*

- *Elder Calderon: The purpose of including these pathways is to cover all possibilities and entry points into the program. A developer and a landlord will not always be the same, but sometimes they are.*
- *Abigail Miner: What would prevent a potential developer from selling the building?*
- *Elder Calderon: I can see what protections are in place in similar programs to better answer that question, but I cannot answer now.*

## **Closing and Next Steps**

### **Follow-up items from Illinois EPA presentation:**

- SAG Facilitator will consider scheduling an update on IRA-leveraged Illinois programs at a future SAG meeting.

### **Follow-up items from Ameren Illinois presentation:**

- Written comments on Ameren's proposed reporting policy edits are due Friday, August 15.

### **Follow-up items from ComEd presentation:**

- Questions raised during the presentation:
  1. How is EHNC marketed?
  2. What protections are in place if a developer turns around and sells the building.
  3. What are the Low-Income Terminologies used?
- Written comments on ComEd's proposed Income Eligibility Verification Guidelines for Electric Homes New Construction (EHNC) Program are due Wednesday, August 20.