

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

**Monday, June 23, 2025**

9:00 – 11:00 am

Teleconference

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### Meeting Materials

- [Facilitator Introduction to June 23 SAG Meeting](#)
- [ComEd Presentation](#)
- [Discussion Slides for June 23 SAG Meeting](#)
- Additional background materials are posted on the [June 23 meeting page](#).

### Attendees

Name	Company or Organization
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Abbigail Penk	ICC Office of General Counsel
Abigail Golitz	VEIC (IL-TRM Administrator)
Abigail Miner	IL Attorney General's Office
Adam Roche	Cascade Energy
AJ Young	Greenlink Energy Solutions
Andrey Gribovich	DNV
Andy Vaughn	Leidos
Angie Ziech-Malek	DNV
Bryan Haney	ERTHE Energy Solutions
Cassidy Kraimer	Community Investment Corp.
Charles Schreier	Go Sustainable Energy, representing IL AG
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Clayton Schroeder	Resource Innovations
Colin Santel	Ameren Illinois
Courtney Golino	Guidehouse

<b>Name</b>	<b>Company or Organization</b>
Danish Murtaza	Peoples Gas & North Shore Gas
Dena Jefferson	Franklin Energy
Denise Munoz	ComEd
Ebony Buchanan	CEDA
Elder Calderon	ComEd
Elie Touma	Energy Sciences
Elizabeth Horne	ICC Staff
Emily Pauli	ComEd
Emma Schuster	PSG Energy Group
Erin Daughton	ComEd
Erin Kempster	Power Takeoff
Greg Ehrendreich	MEEA
Hannah Howard	Opinion Dynamics
Isaac Duah	ComEd
Jaleesa Scott	ComEd
Jason Fegley	Ameren Illinois
Jean Gibson	Peoples Gas & North Shore Gas
Jeff Erickson	Guidehouse
Jim Heffron	Energy Solution
John DeRosa	Illinois EPA
Jonathan Skarzynski	Nicor Gas
Josh Raebel	PSG Energy Group
Kanchan Swaroop	Resource Innovations
Karen Lusson	National Consumer Law Center
Kari Ross	NRDC
Kate Agasie	Cook County DES
Katherine Dowis	ICC Office of General Counsel
Keely Hughes	The JPI Group
Keith Cronin	VEIC (IL-TRM Administrator)
Kelly Mulder	Equinox Creative
Kim Janas	IL Attorney General's Office
Kim Swan	ComEd
Kit White	MEEA
Larry Kotewa	Elevate
Lisa Obear	BrightLine Group
Lloyd Kass	Franklin Energy
Louis Bartlett	Energy Solution
Mark Mandolini	Honeywell
Mark Szczygiel	Nicor Gas
Mary-Hall Johnson	BrightLine Group
Mike Chimack	Energy Sciences
Minya Coleman	ComEd

Name	Company or Organization
Nic Crowder	Ameren Illinois
Nick Burnstein	CMC Energy
Nick Warnecke	Ameren Illinois
Nicole Popejoy	IACAA
Parini Shah	Guidehouse
Rashaan Keeton	Center for Energy and Environment
Sagar Phalke	Guidehouse
Salina Colon	CEDA
Sam Dent	VEIC (IL-TRM Administrator)
Sanjyot Varade	Resource Innovations
Sara Castleberry	Resource Innovations
Selena Worster Walde	ERTHE Energy Solutions
Seth Craig-Snell	SCS Analytics
Tamika J. Cole	Walker-Miller Energy Services
Thomas Manjarres	Peoples Gas & North Shore Gas
Tori Woolbright	Metropolitan Mayors Caucus
Wade Morehead	Morehead Energy
Will Wilson	Leidos
Wisit Kumchai	Resource Innovations
Zach Obert	Franklin Energy
Zach Ross	Opinion Dynamics

## **Meeting Notes**

Follow-up items are indicated in red, and summarized at the end of meeting notes.

## **Introduction to June 23 Meeting**

*Celia Johnson, SAG Facilitator*

## **Purpose of the June 23 meeting**

- To hold a follow-up discussion on the IL-TRM solar policy issue.

## **Background**

- June 9 SAG meeting focused on introducing IL-TRM policy issues with a request for feedback on four policy issues:
  1. Review and potential update of stakeholder compromise on general service lamps
  2. New measures involving renewable/solar generation
  3. Energy efficiency upgrade at a site with significant on-site generation
  4. Revisiting the Electric Vehicle as an efficiency measure issue
- The focus of the June 23 meeting is to follow-up on policy issue #2.

The following materials were circulated to SAG in advance of the June 23 meeting:

- [ComEd Presentation \(June 9 SAG meeting\): Solar as Energy Efficiency](#)
- [ComEd Follow-up: Solar as EE in Other States](#)
- [ComEd Follow-up: Position on the grouping of solar PV and solar thermal technologies/measures](#)

- [Solar as Energy Efficiency – Residential New Measure \(ComEd – updated following June 9 meeting\)](#)
- [Solar as Energy Efficiency – Commercial & Industrial New Measure \(ComEd – updated following June 9 meeting\)](#)

Spreadsheets that support the solar as EE workpapers:

- [EE Residential Solar](#)
- [PV Watts ETDF Calculations](#)
- [Simultaneous Adjustment Factor Analysis – Residential](#)

Additional IL-TRM workpaper related to renewable policy issue:

- [Residential Solar Water Heater New Measure \(Ameren Illinois\)](#)

### Plan for June 23 Meeting

- ComEd presentation: Follow-up from June 9 SAG meeting, followed by discussion and Q&A.
- Discussion Question #1: Whether the statutory definition of “energy efficiency” allows a solar as energy efficiency measure (i.e. rooftop solar generation) in the TRM
- Discussion Question #2: Whether the statutory definition of “energy efficiency” allows a solar thermal measure (i.e. solar hot water and solar air heaters) in the TRM

### Next Steps for Policy Issue #2

- Written comments from interested SAG participants due Friday, July 11
  - Template for comments will be shared following the June 23 meeting
  - Comments received will be circulated to the SAG list
  - Small group meeting options will be reviewed following the deadline
- Goal is to resolve policy issues before the IL-TRM August 1 deliverable

### Process if Consensus is Not Reached

- If this policy issue is not resolved, the Illinois Energy Efficiency Policy Manual Section 3.12 process for Consensus Decision-Making will be followed. Policy excerpt:
  - *If, after a reasonable period of time, as determined by the SAG Facilitator, consensus is not reached, the SAG Facilitator will produce a Comparison Exhibit that identifies the issue, different opinions, and the basis for those opinions. Where practicable, the parties supporting each position will be identified. For consensus decision-making, SAG participants shall provide one position on a particular issue, per company or organization. The SAG Facilitator will share information with SAG participants unable to attend a consensus decision-making meeting, including an opportunity to review and comment on the proposed agreement.*
- If this policy issue is not resolved, VEIC (IL-TRM Administrator) will not include the proposed solar measure(s) in the TRM Version 14.0
  - There will be an opportunity for comments and feedback on the Comparison Exhibit
  - Final Comparison Exhibit will be posted on the SAG website
  - Options:
    - Agree to disagree – discussions are documents with no further action OR
    - SAG participant(s) that requested the measure seek resolution with the ICC

### **Reminder: Next Steps for Policy Issues #1, #3, and #4**

- Written comments from interested SAG participants due Monday, June 30
  - A template was circulated to SAG - [Request for Comments on IL-TRM Policy Issues 1, 3, and 4](#)
    - Comments received will be circulated to the SAG list
    - Everyone who participated in the June 9 SAG meeting will be included on the July small group invites
- Wednesday, July 9 (9:00 – 11:00): Small group SAG meeting to discuss feedback received
- Thursday, July 24 (9:00 – 11:00): Small group SAG meeting to discuss feedback (if needed)
- Goal is to resolve policy issues before the IL-TRM August 1 deliverable
  - SAG will follow the process described on slide 8 if issue(s) are not resolved

### **ComEd Presentation on IL-TRM Policy Issue: New Measures Involving Renewable / Solar Generation**

*Elder Calderon, ComEd*

#### **Presentation Agenda**

- ComEd follow-up presentation
  - Present information on solar TRM references in other states.
  - Present information on studies related to the “solar as EE” measure proposal.
  - What are the EE portfolio impacts for ComEd if they are able to offer the “solar as EE” measure?
- Discuss perspective from interested SAG participants on whether the statutory definition of “energy efficiency” allows a solar as energy efficiency measure (i.e. rooftop solar generation) in the TRM
- Discuss perspective from interested SAG participants on whether the statutory definition of “energy efficiency” allowed a solar thermal measure (i.e. solar hot water and solar air heaters) in the TRM

#### **Solar as Energy Efficiency – TRM References from Other States**

- Solar PV in other jurisdictions
  - Pennsylvania
    - 2.8.3 Photovoltaic (PV) Solar Generation – Residential. Pg 224. [TECHNICAL REFERENCE MANUAL Volume 2: Residential Measures Sept 2024](#)
    - 3.11.6 Photovoltaic (PV) Solar Generation – Commercial and Industrial. Pg 347. [TECHNICAL REFERENCE MANUAL Volume 3: Commercial & Industrial Measures. Sept 2024](#)
  - Texas
    - 2.4.1 Residential Solar Photovoltaics (PV) Measure. Pg 79. [PY2025 TRM 12.0 Volume 4 Nov142024](#)
    - 2.4.2 Nonresidential Solar Photovoltaics (PV) Measure. Pg 95. [PY2025 TRM 12.0 Volume 4 Nov142024](#)
  - Massachusetts (limited to CVEO)
    - 1.17 HVAC – CVEO Solar PV – Residential. Pg 78. [2025-2027 Three-Year Plan TRM FINAL.pdf](#)
    - 2.16 HVAC – CVEO Solar PV – Low-Income. Pg 260. [2025-2027 Three-Year Plan TRM FINAL.pdf](#)

- California
  - Self-generation incorporated through the Integrated Demand Side Management (IDSM) framework and the Total System Benefit (TSB) metric, where it qualifies if it reduces grid demand or GHG emissions.
  - [IDSM](#)
- Solar Thermal in other jurisdictions
  - Pennsylvania
    - 2.3.2 Solar Water Heater – Residential. Pg 77. [TECHNICAL REFERENCE MANUAL Volume 2: Residential Measures Sept 2024](#)
  - Texas
    - 2.4.3 ENERGY STAR® Solar Water Heaters. Pg 271. [PY2025 TRM 12.0 Volume 4 Nov142024](#)
  - Massachusetts
    - 2.38 Hot Water – Solar Water Heater – Low-Income. Pg 336. [2025-2027 Three-Year Plan TRM FINAL.pdf](#)
  - New York
    - Solar Pool Heater. Pg. 435. [New York Standard Approach for Estimating Energy Savings from Energy Efficiency Programs - Version 12](#)

*Abigail Miner: What does CVEO stand for?*

- *Mary Hall, BrightLine: CV stands for “Cape Vineyard”, and the offering is limited to that specific territory. EO stands for “Electric Offering”.*
- *Kim Janas (via chat): Can you talk about your organization, Brightline?*
- *Mary Hall, BrightLine: We are a subcontractor serving in a planning role for ComEd. Our company is a planning, evaluation, and research firm based in Boulder, CO.*
- *Karen Lusson: Were you contracted for a specific program or solely for this research?*
- *Mary Hall, BrightLine: We support ComEd in ongoing planning activities.*

### **Solar as EE: Workpaper & Self-Consumption Factor**

- For residential customers, ComEd estimates that approximately 50% of solar generation is self-consumed
- ComEd used net metering data for all residential net metering customers to analyze their exports
  - Current SF households with PV Solar have larger demand profiles than average SF household in territory
  - Average residential system size is 7 kW
  - Adjusting consumption profiles, estimated a 50% Self-Consumption Factor
- Self-Consumption factor may vary depending on system size with respect to household annual usage
- 50% self-consumption factor best applies when system is sized as:
  - $\text{System Size (kW-AC)} = \text{Annual Usage} / (\text{Capacity Factor} * 8760)$
  - Average Residential Capacity Factor is 16.9%

*Abigail Miner: ComEd, can you clarify the difference between a self-consumption factor and capacity?*

- *Elder Calderon: Capacity is a converting factor between a typical resident load profile and their load consumed. Peak demand \* 8760 / energy usage is the load factor ratio of a residential profile load.*
- *Abigail Miner: What is the average residential capacity?*
- *Elder Calderon: 16%.*

- *Abigail Miner: What does that represent?*
- *Elder Calderon: This is used to size residential and commercial solar systems. It is the ratio of peak demand over 8760 hours / annual consumption, which is the percentage of peak potential consumption their lot can handle.*

*Chris Neme: The suggestion is that on average, half of residential solar consumption is customer consumption, and the other half is exported onto the grid, correct? Given that, if a customer installs a battery with solar so that all or more of their energy is being used to reduce consumption onsite rather than exported to the grid, would ComEd run a program for batteries due to the increased customer side savings?*

- *Elder Calderon: Yes, but they would be tied together. We would consider an application with solar storage and ensure the power is on-premise and offsetting usage.*
- *Chris Neme: Was solar storage considered in this measure? Could battery storage be incentivized?*
- *Elder Calderon: There is room in the workpaper for storage to be factored in, into the self consumption factor.*
- *Chris Neme: So we are also talking about storage as a potential energy efficiency factor?*
- *Elder Calderon: Yes.*

*Karen Lusson: What measure exactly is ComEd proposing be included in the TRM? Community solar, panels on individuals' roofs/businesses, or solar water heaters?*

- *Elder Calderon: ComEd is proposing rooftop solar on a customer premise. We are not proposing community solar. We did not propose the solar thermal measure [the solar thermal measure was proposed by Ameren].*
- *Karen Lusson: From the IPA Act, looking at the definitions of energy efficiency and a solar device, this would be an interesting conversation to have with the General Assembly. I do not see how this measure could work with these definitions. The energy efficiency definition refers to measures that reduce the amount of electricity used to achieve a given end use within a home or building, apart from voltage optimization and other qualified measures. It is clear that a solar device is a generation device and is not reducing individual use of a particular end use. These definitions make ComEd's proposal challenging. This conversation should take place in the rewrite of statutes, not the TRM.*
  - *Karen Lusson (via chat): "Energy efficiency" means measures that reduce the amount of electricity or natural gas consumed to achieve a given end use. "Energy efficiency" includes voltage optimization measures that optimize the voltage at points on the electric distribution voltage system and thereby reduce electricity consumption by electric customers' end use devices. "Energy efficiency" also includes measures that reduce the total Btus of electricity, natural gas, and other fuels needed to meet the end use or uses." Per the IPA statute:*
  - *Karen Lusson (via chat): "Distributed renewable energy generation device" means a device that is: (1) powered by wind, solar thermal energy, photovoltaic cells or panels, biodiesel, crops and untreated and unadulterated organic waste biomass, tree waste, and hydropower that does not involve new construction of dams, waste heat to power systems, or qualified combined heat and power systems; (2) interconnected at the distribution system level of either an electric utility as defined in this Section, a municipal utility as defined in this Section that owns or operates electric distribution facilities, or a rural electric cooperative as defined in Section 3-119 of the Public Utilities Act; (3) located on the customer*

side of the customer's electric meter and is primarily used to offset that customer's electricity load; and (4) (blank)."

- Karen Lusson (via chat): There are other citations within Section 8-103B that point to solar as being part of "other programs." I can highlight those during the Q&A portion of the meeting.

Karen Lusson: The exception they talk about [in the statute] is voltage optimization. They indicate what other measures qualify as energy efficiency – that reduce total BTUs, natural gas, and other fuels. When you look at the second definition, it's clear that a solar device is a generation device. It is not reducing use. It is interconnected at the distribution system level, rather than the customer premise level. These are definitions that make ComEd's proposal challenging. This conversation should happen at General Assembly.

Chris Neme: I am not sure if this is applicable, but the rationale that ComEd has offered for photovoltaics (PV) in response to Karen's question could be offered for all onsite generation. If a customer put a diesel generator that reduced meter speed on their property, would that be considered? Would any other onsite generation be allowed? If not, why not?

- Elder Calderon: I don't think so. There are specific criteria whether to allow something as an EE measure. There are references to onsite diesel generators in the TRM using combustion fuel with combined heat and power (CHP).
- Chris Neme: That is the way the CHP measure is written, but it is not clear as to why this PV system will qualify, and would not be applicable to a generator on-site.

Karen Lusson: Does ComEd have any response to the fact that ratepayers are already subsidizing solar through renewable energy surcharges and net metering subsidies? This measure suggests that we would be subsidizing solar through another mechanism separate from existing EE programs. Also, if solar as EE is incorporated within ComEd's portfolio, how does that change the company's ability to earn profit? The current four-year plan does not have solar as a measure and neither does the new four-year plan. If this measure was added to the TRM, is ComEd suggesting they will revise their current and new plans to incorporate solar as EE and identify savings, goals, and budget impacts attributed to solar?

- Elder Calderon: With respect to subsidizing in other areas, there is no concern due to several other existing measures that have multiple points of subsidized funding. We braid measures and funding sources for EE at a wide scale. Providing joint offerings with utilities and other state offerings does not impact to how solar can be applied to EE with these sources. Self-consumption on the premise is being explored because of state generation goals. In terms of impacts, changes to the TRM happen every year and new measures could be formed into potential programs or offerings into portfolios. We believe that solar as EE fits the definitions, but solar is not a competitive EE measure in our portfolio. It will be solely an added value especially in places we see support needed.
- Kim Swan: It is important to not conflate the attributes of solar with the other resources you mentioned. The suggestion of double compensation or payment is not a concern.
- Karen Lusson (via chat): Re: Kim's and Elder's response: The fact that the General Assembly identified different cost recovery mechanisms, paid for by ratepayers, points to different definitions of solar and EE measures. Also, braiding from other programs is different from the point I've raised: the ability of ComEd (and Ameren) to blow past goals due to the identification of a brand new EE measure (solar) unless it adjusted its budget and goals for the new 4-year plan. This is akin to identifying new EE potential that hasn't previously been identified in the (existing) and new 4-year plan. Solar is generation tied to the electric distribution system. It is not EE tied to a customer's particular end use.



- *Karen Lusson: The fact that ComEd is subsidizing solar through two other riders suggests this is something separate and apart from EE. Also, what would this type of solar measure do to ComEd's ability to meet goals and earn a return on investment? The recently filed EE Plan does not include solar as a measure. Is ComEd suggesting they would go back to the Commission to revise both the current plan and the newly filed plan? To identify savings attributed to solar, and indicate how that impacts budget and achievement of goals.*

*Abigail Penk (via chat): Can we please refrain from discussing the open EE Plan docket? Staff and OGC are on the call here, and discussing an open docket proceeding is an issue for us.*

- *Karen Lusson: We are not talking about open dockets, just the impact on energy savings and ratepayers if the measure changes trajectory of energy savings goals.*
- *Abigail Penk (via chat): The open docket was briefly brought up, and I am just making sure we're on the same page here.*

*Chris Neme: The TRM tells you gross savings before adjusting for free riders in net-to-gross (NTG) calculations. Since this is a policy discussion, it would be helpful to understand the NTG conversation given Karen's point that there are other incentives in the market for rooftop PV. Conceptually, the approach of NTG would have to account for the customers who took the EE rebate and would have already taken the other existing rebates for rooftop PV.*

- *Elder Calderon: I think that is accurate. That is how other measures with multiple funding sources are treated in our portfolio.*

*Andrey Gribovich: Are we talking about all kinds of solar? Grid connected, or not grid connected?*

- *Elder Calderon: Yes, unless a customer has storage with interconnected requirements.*

*Chris Neme: This would only apply to solar installed on an individual's site, not community solar, correct?*

- *Elder Calderon: Correct. Community solar adds a few complexities that are not accounted for in our measure.*
- *Chris Neme: So a customer would get an EE rebate for the portion of the generation that is used at the consumer side of the meter, and still get a different incentive for the portion that is exported onto the grid?*
- *Elder Calderon: Yes, potentially. There are many other offerings with requirements to receive a recommendation or funding for solar where you cannot double count.*
- *Chris Neme: Does the rebate represent a portion of the customer's consumption or the whole thing?*
- *Elder Calderon: Potentially, there is no conflict between streams of income. It is primarily self-consumption.*

*Chris Neme: If the customer has multiple sources of revenue, is there a risk that the customer can now have incentives for rooftop PV rather than community solar? There is a risk of creating a focus in the market.*

- *Elder Calderon: We run that risk with several measures that have multiple funding sources. Program design needs to be considered carefully.*
- *Karen Lusson: How would this measure be delivered to the customer? Is it a rebate?*
- *Elder Calderon: We have explored several scenarios of delivering but we are limited without knowing how the offer will be provided. We cannot share exactly without knowing*

*the infrastructure or savings claims yet. Incentive amounts will be decided later in program design.*

*Abigail Miner: At the [June 9] SAG meeting, I asked about incentives [for the EV measure proposal]. The incentives (what the customers will get out of this program) are an important thing to be considered.*

- Elder Calderon: One thing to keep in mind with incentives is that our portfolio must be cost-effective. We do not have an unlimited amount of funds within our portfolio, and we have cost-effectiveness requirements. The incentives would need to fit within these requirements.*
- Abigail Miner: Individual programs and measures are not required to be cost-effective.*
- Elder Calderon: Correct, the whole portfolio needs to be cost-effective.*
- Karen Lusson (via chat): Agree with Chris Neme and Abby Miner. Also, what an incentive looks like in terms of type and amount, matters, and to Chris's point, how it impacts customer decisions to participate in different programs. Solar panels are NOT the best investment decision for many customers.*

*Charles Schreier: The current statute talks about lessening environmental impacts. Are there SRECs<sup>1</sup> for this measure?*

- Kim Swan: For context, SRECs are certificates that represent renewable entities different than EE or consumption. SRECs are different than what we're talking about here.*
- Charles Schreier: I am wondering more about the statute and pursuing environmental impacts that are tied to that component.*

### **Discussion Question #1**

**Does the statutory definition of Energy efficiency allow a solar as energy efficiency measure (i.e. rooftop solar generation) in the Illinois TRM?**

### **ComEd Presentation – Energy Efficiency Definition, Solar as EE**

#### **Portfolio Impacts**

- PV Solar supplements and amplifies the benefit of existing Energy Efficiency offerings, it does not replace them.
- Mass adoption of rooftop solar using equivalent incentive structures to existing offerings is too costly within EE structure. On an acquisition-cost basis with first-year savings, PV Solar is less competitive than majority of current EE measures.
- PV Solar supports comprehensive energy solutions by reducing electricity costs, easing Electrification adoption, and mitigating bill concerns. This integration strengthens energy efficiency efforts while making Electrification more accessible and cost-effective.
- The portfolio currently supplements about \$140M annually in lighting measure offerings, expected to shrink in next 5 years. ComEd will need to find new and comprehensive offerings to help fill in that gap.

The Public Utilities Act (220 ILCS) and the Illinois Power Agency Act (20 ILCS) define Energy Efficiency as:

- 220 ILCS 5/8-103B

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<sup>1</sup> Solar Renewable Energy Credits (SRECs) are a type of performance-based incentive that allows homeowners with solar panels to earn income based on the amount of electricity their solar system generates.

- (a) It is the policy of the State that electric utilities are required to use cost-effective energy efficiency and demand-response measures to reduce delivery load. Requiring investment in cost-effective energy efficiency and demand-response measures will reduce direct and indirect costs to consumers by decreasing environmental impacts and by avoiding or delaying the need for new generation, transmission, and distribution infrastructure
- 20 ILCS 3855/1-10
  - – "energy efficiency" means measures that reduce the amount of energy required to achieve a given end use. "Energy efficiency" also includes measures that reduce the total Btus of electricity and natural gas needed to meet the end use or uses.
- Impacts of PV Solar
  - Reduces Delivery Load
  - Reduces Direct and indirect costs to consumers
  - Decreases environmental impacts
  - Avoids/delays the need for new generation, transmission and distribution infrastructure
  - Achieves End use: Generate electricity near premise through localized lower production, reducing line loss
  - Reduces the total Btus of natural gas generation needed to meet an end use

#### **Measures of Energy Efficiency: CHP, VO & Solar**

- Voltage Optimization is the only Energy Efficiency measure specifically defined within the statute:
  - (220 ILCS 5/8-103B)
  - "(b-20) Each electric utility subject to this Section may include cost-effective voltage optimization measures in its plans..."
- Combined Heat & Power (CHP) is not defined as an Energy Efficiency measure in statute, instead the Illinois Power Agency Act (20 ILCS) defines CHP as a "Distributed renewable energy generation system" that is eligible for RECS.
  - – (20 ILCS 3855/1-10)
    - "Distributed renewable energy generation device" means a device that is: (1) powered by wind, solar thermal energy, photovoltaic cells or panels, biodiesel, crops and untreated and unadulterated organic waste biomass, tree waste, and hydropower that does not involve new construction of dams, waste heat to power systems, or qualified combined heat and power systems
    - Qualified combined heat and power systems" means systems that, either simultaneously or sequentially, produce electricity and useful thermal energy from a single fuel source.
  - Neither CHP nor Photo-Voltaic (PV) Solar are explicitly defined as Energy Efficiency measures within statute. However, CHP is included in the TRM as an Energy Efficiency measure because it meets the criteria of energy efficiency as defined by statute.
- PV Solar, by definition, meets the criteria but is not yet included in the TRM

*Charles Schreier: I am not as familiar with combined heat and power applications in Illinois, given you cite here it is eligible for SRECs. When there is a rebate given for CHP, are the SRECs transferred to the utility or the industrial customer?*

- *Elder Calderon: Will look into this and follow-up with examples. This is a measure that we have incentivized in our portfolios.*

*Karen Lusson (via chat): Note the reference to "other programs" in the EE statute, 8-103B(c):*

*"The utilities shall work to bundle low-income energy efficiency offerings with other programs that serve low-income households to maximize the benefits going to these households. The utilities shall market and implement low-income energy efficiency programs in coordination with low-income assistance programs, the Illinois Solar for All Program, and weatherization whenever practicable." More references to "other programs" in 8-103B(g)(3.5): (3.5) Demonstrate that the utility's plan integrates the delivery of energy efficiency programs with natural gas efficiency programs, programs promoting distributed solar, programs promoting demand response and other efforts to address bill payment issues, including, but not limited to, LIHEAP and the Percentage of Income Payment Plan, to the extent such integration is practical and has the potential to enhance customer engagement, minimize market confusion, or reduce administrative costs."*

*Karen Lusson (via chat): More references to "other programs" in 8-103B(g)(3.5):*

*"(3.5) Demonstrate that the utility's plan integrates the delivery of energy efficiency programs with natural gas efficiency programs, programs promoting distributed solar, programs promoting demand response and other efforts to address bill payment issues, including, but not limited to, LIHEAP and the Percentage of Income Payment Plan, to the extent such integration is practical and has the potential to enhance customer engagement, minimize market confusion, or reduce administrative costs."*

*Karen Lusson: These are specific references from electric energy statute that reference other programs promoting distributed solar. Specific reference to another program financed through another surcharge. If ComEd wants to pursue this, it is a legal question that will go outside of the TRM process and interpreted by the Commission. I recall the facilitator of the Illinois TRM will decide what prevails. This decision needs to be decided by the Commission.*

- *Kim Swan: IL Solar for All is a RECs program. The TRM process is an appropriate venue to talk about this measure. Certainly, there are other venues this could be addressed in, but the SAG has established procedures.*
- *Sam Dent, VEIC (via chat): VEIC does not have a position on this policy/legal issue. If the SAG cannot reach consensus on this and the only (or best) way to progress this issue and pose the questions to the commission, we are happy to include it in the TRM and develop a non-consensus exhibit documenting the stakeholders' positions.*

*Chris Neme: Looking at the definition of EE, it seems clear from the first sentence that distributed PV does not qualify. It does not reduce the amount of electricity consumed. It does not address an individual end use, and it seems like you are relying on the last sentence of the definition. Can you shed some light on how you see PV meeting the last requirement? It eliminates line losses but does not reduce natural gas for end uses.*

- *Kim Swan: Your interpretation of the first sentence is different than ours. We do think that PV reduces the amount of electricity consumed by a customer to achieve a given end use. We understand your position, but we think that when a solar customer is reducing consumption while they are consuming solar, then this definition is being met. Similar to the June 9 meeting, we agree to disagree.*

- *Chris Neme: The disagreement on the first sentence is that you think solar reduces the amount of electricity consumed from the grid as opposed to the amount of energy consumed, correct?*
- *Kim Swan: Yes, that is our interpretation. Energy-efficient consumption from the grid is reducing the load on the grid, not just consumption overall.*
- *Chris Neme: Do you have any information on previous legislative records that could speak to that?*
- *Elder Calderon: Not at the moment. In the Public Utilities Act, it does not define where that load is reduced, it references the EE definition in the IPA. Reducing energy to a given end use is reducing delivery load, which reduces load at the meter.*
- *Chris Neme: I disagree with that interpretation. [The statute] specifically says it is the policy to use efficiency and demand response.*

*Karen Lusson: I would like ComEd to address the point related to how adding this measure without identifying it in its existing or filed new four-year plan does not allow them to blow past goals.*

- *Kim Swan: This question is in the open docket, so we won't address that.*
- *Karen Lusson: That is a critical question – what impact does permitting solar panels as a new EE measure do to the company's estimation of how it can achieve its annual goals?*
- *Kim Janas: Karen is asking about a docket that doesn't exist. I think asking about goals is a fair and valid one. There are significant incentives involved in this program that are paid for by ratepayers. That is a valid discussion to be had. It's about something that could happen in the future.*
- *Kim Swan: The Plan 7 proceeding that Karen is talking about is an open docket.*
- *Kim Janas: I think the question is about a separate proceeding.*
- *Abby Penk: I agree with Kim Swan. To the extent Karen is asking about a future docket I think that's fine, but the discussion was leaning towards Plan 7 that is where ICC OGC is concerned.*
- *Karen Lusson, National Consumer Law Center (via chat): We're not talking about the open docket. We're talking about ComEd's future actions relative to solar impacting its ability to achieving annual energy savings goals. The pending docket does NOT assume the existence of solar as a measure.*

*Chris Neme: If we do not reach agreement and the IL TRM facilitator does not feel comfortable making a decision, how would this proceed?*

- *Celia Johnson: With no agreement on this policy issue, a non-consensus comparison exhibit would prepared. There are two options: 1) Agree to disagree, post the non-consensus comparison exhibit on the SAG website and no further action is taken; or 2) The comparison exhibit can be included with the TRM Version 14.0 filing with the Commission (required to be filed by October 1), with a request for the Commission to decide.*

*Karen Lusson (via chat): What specific "end use" is being reduced? The stove? The air conditioner? Lighting? Solar is generation that supplies energy from the sun to reduce the customer bill, but it does not reduce end use usage of the measure, technically. It supplies energy to address the usage needed to run the measure. That is different. Additionally, to the extent that the panels generate more energy than used by the household, it sends energy (generates energy) to the grid, hence its definition as a generation source in the IPA Act.*

- *Elder Calderon: Not specific, but any given end use. Many other measures in the TRM have energy savings over general energy changes for multiple energy uses.*

- Karen Lusson: Would you agree that use of solar does not specifically reduce energy needed to run a particular measure? It simply supplies energy that lessens ComEd distribution, technically not reducing end usage. This still requires the same amount of kW to run the appliance. The energy used to run the measure is something other than the power that we pay for.
- Elder Calderon: We do not agree with that interpretation Karen, specifically reducing energy is not how EE is defined.

Charles Schreier: I am not a lawyer, but I wanted to follow up on Abbigail Penk's comment on plan 7. My impression from what she said is to conclude that TRM measures being made now would not apply to that open case, correct?

- Elder Calderon: The program and portfolio design is a separate discussion as applicable to the TRM.
- Kim Janas: If this is a measure that is going to apply to Plan 7, is it off limits? If it will apply to plan 7, maybe it shouldn't be talked about at all. This process of what types of measures can be contemplated in EE is separate from questions on impacts on plan 7.
- Celia Johnson: This year's TRM update process is for the TRM that will apply January 1, 2026, the same year that plan 7 begins. Discussing measures that apply to an open EE Plan docket has not been an issue in the past.
- Kim Swan: I ask for ICC OGC to weigh in. From my perspective, this process for what types of measures can be contemplated for energy efficiency is separate from impacts to an EE Plan in a proceeding that is open.
- Abbigail Penk: Agree with Kim Swan.

Karen Lusson: The reality is that the stipulation that stakeholders signed with ComEd regarding the four-year plan did not explore the impact on the company's ability to reach goals if this were added. This is a whole new ball game. This would have significant impacts on the company's ability to reach goals, more than other new measures. New TRM measures are not subsidized by ratepayers through tariffs. Has the company or any material supplied by the company prior to today's meeting give any SAG members or stakeholders any indication of how including this would impact the company's ability to achieve goals?

- Kim Swan: We do not know how this will impact our goals until we know if it is approved. Other questions impact the question 7 plan proceeding.

Charles Schreier: If solar as EE is affirmed, could it then be incorporated into plans whether now or later without a resubmission into breakdown of budgets, or would it need to be proposed in a planning process?

- Kim Swan: Our understanding is that TRM Version 14 is set to be effective in January of 2026. The TRM in effect at the time governs what measures utilities can have in their portfolio. The plans we submit to the Commission are separate than the portfolio, the plans always have potential to be different than what is initially submitted.
- Charles Schreier: If this is approved, within the constraints, the utility then could leverage this to realign their plan with this addition?
- Kim Swan: Yes.
- Karen Lusson (via chat): With all due respect, it is difficult to imagine that ComEd has not created some sort of assumptions and workpapers about the impact of adding solar panels on its ability to meet goals.

### **Discussion Question #2:**

**Does the statutory definition of “energy efficiency” allow a solar thermal measure (i.e. solar hot water and solar air heaters) in the Illinois TRM?**

### **ComEd Presentation: Solar as EE: PV vs Thermal**

- Solar Photovoltaics (PV)
  - Converts solar energy into electricity via the photovoltaic effect
  - Electricity generated can directly serve on-site electrical loads (e.g., lighting, appliances), offsetting grid consumption.
  - Supports a wide range of end uses across residential and commercial buildings.
- Solar Thermal (Water and Space Heating)
  - Captures solar energy as heat using a thermal absorber.
  - Transfers this heat to a working fluid, which is then used for on-site thermal applications.
  - Directly offsets conventional energy used for domestic hot water, space heating, and pool heating.
- Parallels between PV and Thermal Solar
  - Convert solar energy into functional end uses
  - Offset need for grid-supplied energy
  - From BTU’s perspective, both reduce total energy required to meet an end use
  - Self-Consumed energy is central to both systems (without storage, PV thermal systems vent excess heat)
  - Resulting impact delays or avoids infrastructure investments for the Grid
  - Does not introduce new demand
  - Provide equal environmental benefits

*Chris Neme: Solar thermal and solar PV are fundamentally different. Solar thermal reduces the amount of energy that is needed for any given end use, in a way it is no different than a heat pump or fridge. We have no concerns around solar thermal as an EE measure.*

- *Zach Ross: Concur with Chris. Heat pumps and solar light tubes already in the TRM are similarly using solar energy to directly offset an end use. No concerns with these. In other discussions, solar thermal has been included. Every time, other measures get brought into the same discussion. It is a poor use of everyone’s time to tag measures that have differences together. It has been proposed that we try to separate these measures.*
- *Chris Neme (via chat): Daylighting is another example.*
- *Kim Swan: ComEd sees a lot of similarities between solar as EE and solar thermal.*
- *Chris Neme (via chat): So is passive solar design for new construction. Taking advantage of solar heat gain through windows is fundamentally different than using PV panels to generate electricity to meet all electricity demand from all end uses in a home.*

### **Closing and Next Steps**

**Follow-up Item:** When there is a rebate given for CHP, are the SRECs transferred to the utility or the industrial customer? ComEd will look into this and follow-up with example(s).

### **Next Steps:**

- Using the comment template ([Request for Comments on IL-TRM Policy Issue 2](#)) send written comments on IL-TRM Policy Issue #2 to the SAG Facilitator, Celia Johnson: [Celia@CeliaJohnsonConsulting.com](mailto:Celia@CeliaJohnsonConsulting.com) by Friday, July 11.

- Following the July 11 written comment deadline:
  - All comments will be posted on the [SAG website](#), and circulated to SAG.
  - Next steps will be reviewed following the comment deadline, including whether a follow-up meeting is needed, or whether a non-consensus comparison exhibit should be prepared.
- Deadline Reminder:
  - The goal is to resolve IL-TRM policy issues before the August 1, 2025 IL-TRM deliverable.