

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

**Monday, June 8, 2026**  
1:30 – 3:30pm  
Teleconference

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**Meeting Materials**

- [June 8, 2026 Large Group SAG Agenda](#)
- [SAG Facilitator Introduction to June 8 Meeting](#)
- [SAG Facilitator Presentation: Introduction to NTG for Disadvantaged Areas Policy Discussion](#)
- [E Source Presentation: Consideration of Trade Ally Location in Application of the NTGR for Disadvantaged Areas Policy for Ameren Illinois](#)
- [Guidehouse Presentation: Disadvantaged Areas Policy Approach \(for ComEd, Nicor Gas, Peoples Gas and North Shore Gas\)](#)

**Attendees**

<b>Name</b>	<b>Company or Organization</b>
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Abigail Miner	Office of the Illinois Attorney General
Adam Roche	Cascade Energy
Andrew Cottrell	ScottMadden
Andrey Gribovich	DNV
Andy Vaughn	Leidos
Anthony Albano	Resource Innovations
Ben Campbell	Energy Resources Center, UIC
Bobbi Fey	ICF
Brad Fortson	Office of the Illinois Attorney General
Cameron Seeley	Walker-Miller Energy Services
Channel Turbides	ComEd
Charles Ampong	Guidehouse

<b>Name</b>	<b>Company or Organization</b>
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Colin Santel	Leidos
Courtney Golino	Guidehouse
Danish Murtaza	Peoples Gas and North Shore Gas
Dave Bluestein	Guidehouse
David Salmonson	CLEAResult
Deb Dynako	Energy Infrastructure Partners
Diana Dorman	Energy Solutions
Elder Calderon	ComEd
Elena Savona	ES Consulting
Elizabeth Bullard	Verdant Associates
Elizabeth Horne	ICC Staff
Erin Kempster	Power TakeOff
Evan Tincknell	E Source
Fernando Morales	Ameren Illinois
Hannah Howard	E Source
Jaleesa Scott	ComEd
Jarred Nordhus	Peoples Gas and North Shore Gas
Jason Fegley	Leidos
Jim Heffron	Walker-Miller Energy Services
Joe Mays	Cascade Energy
Joel McManus	TRC Companies
John Carroll	Leidos
John Lavallee	Leidos
Jonathan Kleinman	CAMI Energy
Jonathan Skarzynski	Nicor Gas
Julie Soderna	Energy Solutions
Kanchan Swaroop	Resource Innovations
Kara Jonas	ComEd
Keely Hughes	The JPI Group
Kevin Johnson	DNV
Kim Swan	ComEd
Kit White	Midwest Energy Efficiency Alliance (MEEA)
Kristen Kalaman	Resource Innovations
LaJuana Garrett	Nicor Gas
Larry Kotewa	Elevate
Lil Florez Monroy	Peoples Gas and North Shore Gas
Lily Taylor	Guidehouse
Mark Mandolini	Honeywell International Inc.
Melissa Helphingstine	Primera Engineering
Mike King	Nicor Gas

<b>Name</b>	<b>Company or Organization</b>
Minya Coleman	ComEd
Molly Graham	MEEA
Monique Leonard	Ameren Illinois
Naveed Khan	Leidos
Neil Curtis	Guidehouse
Nick Burstein	CMC Energy Services
Nick Horras	CEDA
Nick Warnecke	Ameren Illinois
Nicole Popejoy	Illinois Association of Community Action Agencies (IACAA)
Nikki Pacific	Ameren Illinois
Parini Shah	Guidehouse
Rashaan Keeton	Center for Energy & Environment
Rose Williamson	E Source
Ryan Kroll	Driftless Energy
Sagar Phalke	Guidehouse
Sara Castleberry	Resource Innovations
Sarah Evans	DNV
Scott Mallory	Brubaker & Associates, representing Illinois Industrial Energy Consumers (IIEC)
Selena Worster Walde	ERTHE Energy Solutions
Steven LaBarge	ComEd
Sushi Ramakrishnan	ComEd
Teri Lewand	ComEd
Tina Grebner	Ameren Illinois
Travis Hinck	GDS Associates
Tyler Schaub	Slipstream
Tyler Sellner	E Source
Vitaliy Vladimirov	Resource Innovations
Wade Morehead	Morehead Energy
Zach Obert	Franklin Energy
Zach Ross	E Source

### **Meeting Notes**

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

### **Introduction to June 8 Large Group SAG Meeting**

*Celia Johnson, SAG Facilitator*

Purpose of June 8 Meeting:

- To discuss interpretation of the Net-to-Gross (NTG) Ratio for Disadvantaged Areas policy (see Illinois Energy Efficiency Policy Manual Section 7.4), regarding how Trade Allies are considered in application of the policy
  - Introduction to Policy Issue

- Illinois evaluators explain how Trade Allies are considered when applying the NTG Ratio for Disadvantaged Areas policy
  - Ameren Illinois Evaluator – E Source (formerly known as Opinion Dynamics)
  - ComEd, Nicor Gas, Peoples Gas and North Shore Gas Evaluator – Guidehouse
- Opportunity for initial feedback from interested SAG participants
- Written feedback due Friday, June 26

### **Introduction to NTG for Disadvantaged Areas Policy Discussion**

*Celia Johnson, SAG Facilitator*

#### Presentation Agenda

- SAG Process for Addressing Policy Issues
- Background on Net-to-Gross (NTG) for Disadvantaged Areas Policy
- Brief Overview of Policy Language
- Previous SAG Discussion on NTG for Disadvantaged Areas Policy
- Issue for Discussion on June 8
- June 8 Agenda and Next Steps

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

- 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 Policy Manual Subcommittee is inactive
  - Policy Manual Subcommittee is currently inactive – the next comprehensive update process is anticipated in 2027
- 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

#### **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

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

## Background on Net-to-Gross (NTG) for Disadvantaged Areas Policy

- IL EE Policy Manual Version 3.0 was approved by the ICC in December 2023
  - The SAG Policy Manual Subcommittee developed Version 3.0 through a consensus update process that began in June 2022
  - See Summary of Final 2023 Policy Updates (Excel)
  - Current Policy Manual: Illinois Energy Efficiency Policy Manual Version 3.1 (effective January 1, 2026)
- During the Version 3.0 update, a new policy was added that established a 100% (1.0) NTG ratio for certain types of customers in economically-disadvantaged areas of Illinois
  - NTG ratio means a factor representing net savings divided by gross savings that is applied to gross impacts to convert them to net impacts
  - NTG ratios are produced annually by independent evaluators for Illinois utilities, with review and consensus by interested SAG participants
- Policy Rationale
  - The participation rate for smaller customers in economically-disadvantaged areas has historically been much lower than for similar customers in communities that are not as economically challenged

## Policy Language

- From slide 6

### Section 7.4, NTG Ratio for Disadvantaged Areas

Free ridership for certain types of Customers in economically-disadvantaged areas is highly likely to be very low. That assumption is supported by data indicating that the participation rate for smaller Customers in economically-disadvantaged areas has historically been much lower than for similar Customers in communities that are not as economically challenged. To reflect that reality, the net to gross (NTG) ratio for such customers will be set to one-hundred percent (100%). This will have the added advantage of creating greater incentives for Program Administrators to target delivery of their Energy Efficiency programs to economically disadvantaged areas.

The economically-disadvantaged areas designated by this policy\* are:

- i. Areas identified as “income-eligible households” by Illinois Solar for All (“disadvantaged neighborhood”); and
- ii. The entire area of certain municipalities where at least fifty percent (50%) of the municipality is identified as income-eligible through Illinois Solar for All\*\* (“disadvantaged municipality”).

The policy will apply to all Program activity involving the following Customer segments within disadvantaged areas:

- i. Residential Customers in disadvantaged neighborhoods; and
- ii. Business Customers in disadvantaged neighborhoods with rate class designations or energy consumption levels below annual thresholds in the table below.

## Policy Language

- From slide 7

### Section 7.4, NTG Ratio for Disadvantaged Areas

Program Administrator	Criteria for Eligibility (either/or)	
	Rate Class	Annual Consumption Threshold
Ameren Illinois	Electric: DS-2 (<150 kW) Gas: GDS-2 (<200 therms/day in any month)	Electric: <750,000 kWh/year Gas: <35,000 therms/year
ComEd	Small Load Delivery Class (<100 kW)	<750,000 kWh/year
Nicor Gas	N/A	<35,000 therms/year
Peoples Gas and North Shore Gas	N/A	<35,000 therms/year

For projects jointly delivered by a gas and electric utility, eligibility for either the electric or gas thresholds in the table above would trigger the application of a one-hundred percent (100%) percent NTG ratio for both fuel savings.

- iii. Any general delivery service municipal, public school and local government customers in a disadvantaged municipality

## Policy Language

- From slide 8

### Section 7.4, NTG Ratio for Disadvantaged Areas

It is expected that, though Customers in disadvantaged areas are currently underrepresented in evaluation research due to lower participation levels, going forward, this policy will require that research to establish NTG ratios for Program activity explicitly sample Customers in non-disadvantaged areas. Any NTG research targeting Customers in disadvantaged areas will fall under Section 7.3 of the Policy Manual.

*This policy is applicable beginning with the 2023 Program Year.*

#### Policy Footnotes:

\*Program Implementation Contractors and Evaluators may convert from the two (2) geographies listed (census tracts and municipal boundaries) to zip code tabulation areas for operational purposes (especially with program ally driven initiatives). The method for used for this conversion should comply with industry standards. See <https://www.huduser.gov/portal/periodicals/cityscpe/vol20num2/ch16.pdf> for more information on this type of conversion.

\*\*See <https://www.illinoissfa.com/programs/non-profit-and-public-facilities/> for more information and an interactive map identifying these communities.

*Zach Ross: My recollection is that the table [on slide 7] was added largely due to concerns that the policy as developed would lead to applying a 1.0 NTG ratio to very large or chain businesses that happen to be in disadvantaged communities which would not align with original intentions; to focus the policy on smaller customers.*

## Previous SAG Discussion

- July 17, Large Group SAG Meeting
  - Illinois evaluators presented on the approach to tracking the NTG for Disadvantaged Areas policy, to educate SAG participants:
    - Guidehouse Presentation: Impact of the Disadvantaged Areas Net-to-Gross Policy on ComEd, Nicor Gas, Peoples Gas and North Shore Gas
    - Opinion Dynamics Presentation: Overview of Disadvantaged Areas Net-to-Gross Tracking for Ameren Illinois

## Issue for Today's Discussion

- Background
  - December 2025 Large Group SAG Meeting: Questions were raised about how Illinois evaluators are interpreting the NTG for Disadvantaged Areas Policy
  - Utility EE Plan Presentations in Early 2026: Several stakeholders requested further discussion/understanding of how the policy is being applied
- Difference in Interpretation
  - Guidehouse (current evaluator for ComEd, Nicor Gas, Peoples Gas & North Shore Gas) and E Source (current evaluator for Ameren Illinois) are interpreting the policy application differently
    - The two evaluators differ on whether the location of a Trade Ally should be considered when applying the policy
  - ICC Staff requested the SAG discuss this policy issue, with an opportunity for stakeholder input

## Agenda and Next Steps

- June 8 SAG Meeting
  - Ameren Illinois evaluator will present their approach (E Source)
  - ComEd, Nicor Gas, Peoples Gas & North Shore Gas evaluator will present their approach (Guidehouse)
  - Opportunity for questions and initial feedback from interested SAG participants
- Next Steps
  - Written feedback is requested from interested SAG participants
    - Should the location of a Trade Ally in a utility's service territory be considered when applying the NTG for Disadvantaged Areas policy?
  - Feedback is **due Friday, June 26**
    - A comment template will be circulated to SAG
    - If needed, a follow-up discussion with interested parties will be scheduled
  - Goal is to document the interpretation and post it on the Policy page of the SAG website
    - If policy clarification(s) are needed, those can be proposed during the 2027 comprehensive Policy Manual update process

## **Consideration of Trade Ally Location in Application of the NTGR for Disadvantaged Areas Policy for Ameren Illinois**

*Zach Ross, ESource*

Opinion Dynamics is now E Source

- Opinion Dynamics has been the independent evaluator for Ameren Illinois

- Opinion Dynamics was wholly acquired by E Source in August 2025 and as of the beginning of the 2026 evaluation, we are now operating under the E Source name and brand
- Our evaluation team remains the same and has not changed
- Our email addresses have changed but our @opiniondynamics.com email addresses will forward to our new inboxes

Consideration of Trade Ally Location in Application of the NTGR for Disadvantaged Areas Policy for Ameren Illinois

- E Source does not consider the location of trade allies when applying the NTGR for Disadvantaged Areas policy for Ameren Illinois.

No Q&A.

**Disadvantaged Areas Policy Approach (for ComEd, Nicor Gas, Peoples Gas and North Shore Gas)**

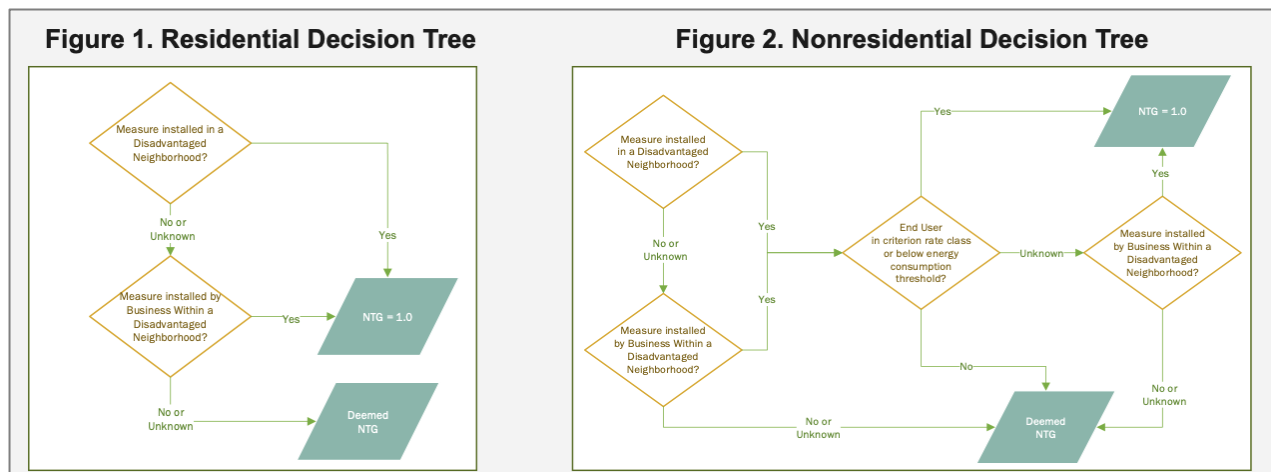
*Parini Shah, Guidehouse*

Guidehouse DAC Policy Approach Remains the Same

- Guidehouse continues to follow the DAC approach previously shared in July 2024 and our subsequent February 2025 DAC Policy memo.

General Guidehouse Approach

- For contractors and distributors selling products or services through a business midstream or upstream program, if either the contractor or distributor is located in a DAC-designated area, all resulting projects will get a NTG of 1.0\*.
- Application:



## Summary of Guidehouse Approach

Sector	PREMISE LOCATION OF INSTALLED MEASURE		
	Within a DAC	Outside a DAC	Unknown
<b>Residential Customers</b>			
Measure supplied by business <b>located inside</b> a disadvantaged neighborhood	NTG 1.0	NTG 1.0	NTG 1.0
Measure supplied by business <b>located outside</b> a disadvantaged neighborhood or 'unknown'	NTG 1.0	Deemed NTG	Deemed NTG
<b>Non-Residential Customers †</b>			
End-user meets eligibility criteria ‡	NTG 1.0	See next rows	See next rows
Measure supplied by business <b>located within</b> a disadvantaged neighborhood AND end-user meets eligibility criteria ‡	NTG 1.0	NTG 1.0	NTG 1.0
Measure supplied by business <b>located within</b> a disadvantaged neighborhood AND do not have end user's rate class	NTG 1.0	NTG 1.0	NTG 1.0
Otherwise	Deemed NTG	Deemed NTG	Deemed NTG

† Includes public and private customers.  
‡ ComEd: Either Small Load Delivery Class (<100 kW) or Annual Consumption of <750,000 kWh/year; Nicor Gas and Peoples Gas/North Shore Gas: Annual Consumption of <35,000 therms/year. Jointly utility delivery, eligibility based on meeting either electric or gas thresholds. For non-residential new construction programs, we use the area threshold for the criteria of eligibility detailed in App. E.

### Policy Interpretation

- The policy states an advantage of “creating greater incentives for Program Administrators to target delivery of their Energy Efficiency programs to economically disadvantaged areas”
- Recognizing a utility’s investment in DAC-based businesses that provide energy-efficient products to customers is a reasonable and practical way to reflect the policy’s intent in cases where end-use locations are not fully observable.

*Jonathan Kleinman: On slide three, does “located in” refer to any branch of the business, or the headquarters?*

- *Parini Shah: The location of the business that offers the program. We measure if that business is within a DAC.*

*Elizabeth Horne: Are business customers included in the nonresidential decision tree?*

- *Parini Shah: Yes, figure 2 includes commercial and industrial customers.*
- *Elizabeth Horne: How is the location of a non-residential trade ally defined?*
- *Parini Shah: We look at the zip code or census tract, and see if that aligns with the DAC areas. If it does, we consider it to be in the DAC. If it does not, they would not be in the DAC.*

### SAG Discussion on Policy Issue

- Should the location of a Trade Ally in a utility’s service territory be considered when applying the NTG for Disadvantaged Areas policy?
  - This is an opportunity for initial feedback
  - Written feedback is due Friday, June 26. A written comment template will be circulated to SAG.

*Chris Neme: I’m struggling with Guidehouse’s interpretation. The policy references free ridership for customers. If a Trade Ally in a certain zip code is installing an air conditioner in a wealthy home, I don’t see why that would apply. I thought the whole premise was that households in economically disadvantaged areas (and small business) are less likely able to*

*participate in programs. That is fundamentally different than the question of who is delivering the service or the measure. How did Guidehouse come to that interpretation?*

- *Parini Shah: If we are trying to incentivize people to participate in these programs, looking at businesses in those areas seems appropriate, because they would be providing individuals who reside in those areas access to those programs.*
- *Neil Curtis: From our perspective, the policy does not explicitly define these customers. There are instances where trade allies and businesses are distributing to customers without a clear end use. We have determined that they should receive a NTG ratio of 1.0 through discussion internally and with the ICC in July 2024.*
- *Chris Neme: Thanks, that is a helpful clarification. You apply this rule if you know a) who the end use customer is and they are living in an economically disadvantaged area, or b) if you don't know who they are but the measure is being delivered by a Trade Ally in the economically disadvantaged area. The Trade Ally only counts if you don't know who the customer is.*
- *Neil Curtis: Yes. In aggregate savings, this is a very small percentage (1%).*
- *Chris Neme: This is only for midstream programs when you don't know who the customer is?*
- *Neil Curtis: Yes.*
- *Facilitator's Note: There was a clarification from Guidehouse after this Q&A, as noted below: If we do or do not know where a customer is located, but the business is located in a disadvantaged neighborhood, there is a 1.0 NTG.*

*Jonathan Klein: Is there any leakage analysis? If a distributor is located within a DAC serving an unknown customer, how do you know what utility they are served by?*

- *Neil Curtis: In some instances, we do know the location of these end users. But location is not captured in all cases. This is a small percentage of overall portfolio savings.*
- *Chris Neme: It is too small to track for midstream, but for equipment, you are ultimately getting addresses. Only for those you do not know, you will default to where the contractor is located? How do you know whether to indicate savings for ComEd or Ameren when you pay the distributor?*
- *Andrey Gribovich: I do not think this conversation is representative of the flow chart. Figure one states that if a measure is installed in a DAC, we look at the location of the business.*
- *Chris Neme: That is different than what we were discussing.*
- *Zach Ross: I had understood until today that measures supplied by businesses in DACs to customers outside a DAC are given a ratio of 1.0.*
- *Neil Curtis: That is my error, I misspoke. If we do or do not know where a customer is located, but the business is located in a disadvantaged neighborhood, there is a 1.0 NTG. With that being said, the result remains the same; there are minor portfolio savings implications.*
- *Elder Calderon: My understanding is that the Policy Manual focused more on investments in DACs, as well as a strong reference towards program investment and opportunity in these areas. The policy also notes how this is applicable to incentives distributed through participating DACs. Guidehouse's application fits the investment spirit.*
- *Chris Neme: I respectfully disagree. The reference to customers in disadvantaged neighborhoods is for business customers receiving EE measures, not distributing EE measures. I don't understand the "outside a DAC."*
- *Elizabeth Horne: I think that is the part that needs to be clarified – the Policy Manual references "all program activity."*

- *Chris Neme: The policy involves residential and business customer segments. My interpretation is that it is intended to discuss where measures are installed.*
- *Elizabeth Horne: I agree.*
- *Elder Calderon: The language is clear on focusing investments in DACs, not where the measures are installed themselves. There is very strong language surrounding investment in DACs. Is the policy intended for programs at large, or individual customer information?*
- *Chris Neme: The beginning language references low free ridership, and investment only as an added advantage. The primary focus of a NTG ratio of 1.0 is low free ridership customers, not who delivers the measures.*
- *Elder Calderon: The policy is open enough in referencing program activity. There is strong reference on both community and customer level for contractors that serve DACs.*
- *Chris Neme: It references program activity, including the participants.*

*Elizabeth Horne: If there is a modification to the Policy Manual, will it be added this year or in 2027?*

- *Celia Johnson: There will be a comprehensive Policy Manual update process in 2027, and a change/update to this policy could be proposed during that process. The Policy Manual needs to be updated this year to correct errors solely due to new legislation.*
- *Elizabeth Horne: It wouldn't go into effect until 2028?*
- *Celia Johnson: Based on historical Policy Manual update processes, it would not be in effect until the next program year. However, the effective date of policies is negotiated in the Policy Manual update process.*

*Zach Ross: Given the final paragraph in the policy, which directs evaluators to remove customers in disadvantaged areas moving forward in NTG research, given Guidehouse's interpretation of the policy, does Guidehouse remove distributors or trade allies from their NTG samples when they are in disadvantaged areas?*

- *Parini Shah: I will confirm.*

*Chris Neme: I think we are obligated to come up with our best estimate of actual savings that are being produced with NTG ratios. NRDC was willing to agree to this policy because we thought it was reasonable to assume customers in DACs have zero free ridership. I do not think we should use this as a way to promote work by certain contractors. We should still be using NTG estimates to come up with reasonable estimates of what is happening. If there is a reason to think installations would have a NTG ratio of one, I'm happy to hear that, but I do not think it is likely.*

- *Parini Shah: We did analyze the specific scenario in which we include the location of the businesses, and it represents a fraction of the savings.*
- *Chris Neme: I appreciate that the difference is small, but it is still problematic if it advances other goals.*

*Elizabeth Horne: Zach, if a trade ally that is located in a DAC area [in Ameren's service territory], however the measure is also in a DAC area, in that case it doesn't matter where the trade ally is?*

- *Zach Ross: Correct, the Ameren team does not consider the location of the trade ally at all. The only information we are taking into account is, do we know for sure that the customer receiving the measure is located in a disadvantaged area and meets the rate class criteria?*

*Elder Calderon: I think the difference in savings is an important point. There seems to be an assumption that businesses located in DAC communities are exclusively serving wealthy customers. The vast majority are still customers that would fit within the DAC criteria.*

- *Chris Neme (via chat): To be clear, I was not intending to suggest contractors in disadvantaged areas would primarily be serving wealthy customers. I expect that is not the case. I was suggesting that it is not appropriate to give an NTG of 1.0 for any wealthy (or non-disadvantaged) customers that they do serve.*

### **Closing and Next Steps**

*Celia Johnson, SAG Facilitator*

#### **Follow-up Item for Guidehouse:**

- Does Guidehouse remove distributors or trade allies from their NTG samples when they are in disadvantaged areas?

#### **Request for Feedback on NTG Ratio for Disadvantaged Areas Policy Interpretation Issue**

- **Question:** *Should the location of a Trade Ally in a utility's service territory be considered when applying the NTG for Disadvantaged Areas policy?*
- [Click here to download the NTG Ratio for Disadvantaged Areas Policy Issue Template.](#)  
The comment template is also attached.
- **Comment Deadline:** Friday, June 26, 2026

#### **Next Steps:**

- If needed, a follow-up discussion with interested parties will be scheduled.
- The goal is to document the interpretation and post it on the [Policy page](#) of the SAG website. If policy clarification(s) are needed, those can be proposed during the 2027 comprehensive Policy Manual update process.