

Illinois Energy Efficiency Stakeholder Advisory Group Policy Resolution – 2020 Program Year

Policy Issue: Income Eligibility Verification for Low Income Customers Due to the COVID-19 Pandemic

Policy Request:

Ameren Illinois proposed consideration by the Commission and stakeholders; a policy that allows Illinois utilities the ability to better serve customers impacted by the COVID-19 pandemic. The pandemic has impacted Illinois utility customers in a sudden manner, significantly reducing or eliminating household income for many customers. Illinois utilities offer energy efficiency programs through channels targeted to Low Income Customers. Customers who fit within the definition of Low Income Customers are identified in the Illinois Energy Efficiency Policy Manual Version 2.0, Section 1 (“Low Incomer Customer means a residential customer of a participating utility with a household income at or below one hundred fifty percent (150%) of the poverty level or households at or below eighty percent (80%) of the area median income.”) (citing to 220 ILCS 5/8-103B(c), 5/8-104(f)(4).)

Utility programs have traditionally followed eligibility pathways including but not limited to, participation in an affordable housing program, participation in a weatherization assistance program, housing location within a low income census tract and submission of income information. Customers impacted by the pandemic may not meet Low Income Customer eligibility guidelines through traditional verification pathways, hindering their ability to participate in income qualified energy efficiency programs. The policy provision being proposed would allow customers affected by the pandemic to participate in energy efficiency programs at a time of great need.

Policy language was proposed as an eligibility pathway for customer participation in energy efficiency programs targeted to income qualified households, which would be adopted immediately pursuant to the IL SAG Policy Resolution Process.

Process:

- SAG held a meeting with utilities and non-financially interested stakeholders on May 22, 2020 to discuss challenges and potential regulatory next steps due to the COVID-19 pandemic. Ameren Illinois raised the income qualified eligibility verification policy idea during this meeting. Ameren Illinois drafted proposed policy language as a follow-up to the May 22nd meeting.
- SAG held a joint meeting with the Income Qualified EE Advisory Committees on [June 17, 2020](#). Ameren Illinois presented background and proposed policy language during this meeting. Questions and feedback on the policy was discussed.
- SAG held a follow-up meeting with utilities and non-financially interested stakeholders on July 2, 2020. Additional edits to policy language were discussed.
- The SAG Facilitator circulated the policy for final review to utilities and non-financially interested stakeholders on July 6, 2020, with final comments due on July 14, 2020. The SAG Facilitator received no questions or concerns about the policy language circulated for final review.
- The SAG Facilitator circulated the final resolution to SAG on July 20, 2020.

Final Resolution (July 2020):

Oral or Written Income Qualified Eligibility Verification in Response to Economic Hardship

In order to facilitate the delivery of Illinois energy efficiency programs for the time period of June 1, 2020, through December 31, 2021, it is acceptable for a Program Administrator, at its discretion, to verify the income eligibility of customers who reside in single family or multi-family residences for income qualified programs or pilots through oral or written self-verification by the residential customer so long as that customer verifies verbally or in writing that the customer is experiencing economic hardship due to the impacts of the COVID-19 pandemic or is part of a household that meets the eligibility requirements for the utility program. This policy will not be used to verify eligibility for building envelope, heating equipment, central air conditioners, water heaters, or any kitchen appliances.