**SAG Reporting Working Group Plan**

**Fall 2023 and Early 2024 (DRAFT – updated 10/5/23)**

1. **Background and Purpose**

From June 2022 to August 2023, the SAG Policy Manual Subcommittee developed new and updated policies for Policy Manual Version 3.0. The final Policy Manual is anticipated to be submitted in early October to the Illinois Commerce Commission (ICC) by ICC Staff, requesting approval of the updated Policy Manual.

The purpose of the SAG Reporting Working Group discussions in fall 2023 and early 2024 is for Illinois utilities and interested stakeholders to reach consensus on specific reporting metrics to address the new reporting principles added to Policy Manual Version 3.0, including:

* Income Qualified Multi-Family Reporting Principles
* Income Qualified Health and Safety Reporting Principles
* Equity and Affordability Reporting Principles
* Diverse Contracting Reporting Principles

The Reporting Working Group will discuss consensus on the reporting metrics referenced above in two phases:

* Phase 1 (Oct. – Nov. 2023): Income Qualified Multi-Family Reporting and Income Qualified Health and Safety Reporting
* Phase 2: (Dec. 2023 – Jan. 2024): Equity and Affordability Reporting Principles and Diverse Contracting Reporting Principles

The reporting metrics will be finalized by end of January 2024.

1. **Participation**

Participation in the SAG Reporting Working Group is open to all interested participants. The SAG Facilitator will coordinate with representatives of the IQ North EE Committee and IQ South EE Committee, groups that are separate from SAG, on the best way to coordinate with each Committee.

To join the SAG Reporting Working Group, reach out to the SAG Facilitator, Celia Johnson (Celia@CeliaJohnsonConsulting.com).

1. **Effective Date for New Reporting Policies**

The new “reporting principle” policies are effective ninety (90) days after conclusion of the SAG Reporting / Metrics Working Group, but no later than April 1, 2024, unless consensus is reached for a later date within the Working Group. Utilities remain bound by provisions of settlement agreements regarding reporting metrics – including for 2022 and 2023. Any new metrics approved through the SAG Working Group will be supplemental to specific metrics that were agreed-upon and referenced in a utility's stipulation.

1. **Website**

There is a dedicated page on the SAG website for the SAG Reporting Working Group: <https://www.ilsag.info/reporting-working-group/>

1. **Final Reporting Principles**

For reference, the final reporting principle policies from Policy Manual Version 3.0 are posted on the [SAG Reporting Working Group page](https://www.ilsag.info/reporting-working-group/):

[Reporting Principles Added to Policy Manual Version 3.0 (Final 9/25/2023)](https://www.ilsag.info/wp-content/uploads/Reporting-Principle-Policies-from-Policy-Manual-Version-3_FINAL-9-25-2023.pdf)

The final reporting principle policies can also be found in this Working Group Plan, in Sections H – K.

1. **Meeting Schedule**

| **SAG Reporting Working Group Schedule** |
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| **Date / Time** | **Agenda** | **Next Steps** |
| Tues. Oct. 109:00 – 11:00 am | \*SAG Facilitator presents Working Group Purpose, Background and Draft Plan (first phase of Working Group will be finalizing IQ Multifamily and IQ Health & Safety Metrics)\*Stakeholder Proposal for Tracking Final Consensus Metrics + Introduction to IQ Multifamily and Health & Safety Reporting Policies (Chris Neme and Karen Lusson)\*IQ Multifamily Reporting Principles Policy: Discuss clarifying questions, discuss the type of metrics needed\*IQ Health & Safety Reporting Principles Policy: Discuss clarifying questions, discuss the type of metrics needed | Written feedback on draft Working Group Plan due by Tues. Oct. 24 (send to Celia@ CeliaJohnson Consulting.com)  |
| Mon. Oct. 309:00 – 11:00 am | \*Overview of proposed IQ Multifamily Metrics, discuss feedback\*Overview of proposed IQ Health & Safety Metrics, discuss feedback | Additional written feedback on IQ Multifamily and IQ Health & Safety Metrics due by Mon. Nov. 13 |
| Tues. Nov. 2810:00 am – 12:00 pm | \*Finalize IQ Multifamily Metrics and IQ Health & Safety Metrics - discuss additional feedback, if needed\*Introduce Equity and Affordability Reporting Principles: Discuss clarifying questions, discuss the type of metrics needed\*Introduce Diverse Contracting Reporting Principles: Discuss clarifying questions, discuss the type of metrics needed | TBD |
| Tues. Dec. 191:00 – 3:00 pm) | \*Overview of proposed Equity and Affordability Metrics, discuss feedback\*Overview of proposed Diverse Contracting Reporting Metrics, discuss feedback\*Discuss proposal for how metrics will be referenced and/or incorporated into subsequent 4-year EE Plan filings | Additional written feedback on Equity and Affordability Metrics and Diverse Contracting Metrics due by Mon. Jan. 8 |
| Tues. Jan. 1610:00 am – 12:00 pm) | \*Finalize Equity and Affordability Metrics and Diverse Contracting Metrics - discuss additional feedback, if needed\*Finalize where final consensus will be posted | SAG Facilitator to share document summarizing final metrics by Fri. Jan. 26 |

1. **Cross-Cutting Questions**

The following cross-cutting questions need to be addressed for each of the reporting principle policies:

1. What is the objective of each of the new reporting metrics?
2. How does the new metric inform program delivery?
3. Will metrics be reported in quarterly reports or annual reports?
4. Which metrics belong in the narrative report, vs. shared via a table or map?

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## **Income Qualified Multi-Family Reporting Policy**

The red text below represents initial discussion questions and suggestions to inform the development of income qualified multi-family reporting metrics.

**Final “Income Qualified Multi-Family Reporting Principles Policy” from Policy Manual Version 3.0:**

*Each Program Administrator will report on the effectiveness of its efforts to deliver efficiency improvements to the income qualified multi-family housing sector. In addition to standard Program reporting on spending and savings, Program Administrators will report on a statewide set of metrics designed to provide insight into a variety of other Program and policy objectives including:*

1. *The mix of buildings being treated. This could include breakdowns between public housing, subsidized housing and unsubsidized housing; the type/size of buildings.*

What is the goal of tracking the “mix of buildings being treated”?

* How do the utilities currently track their mix of IQ MF buildings?
* What mix of buildings are stakeholders most interested in being tracked?

Confirm definition of “subsidized housing” and “unsubsidized housing”

What does the “type/size of buildings” mean?

* Does this mean the number of units in the building?
* Would there be separate reporting on each building type? If so, what types of buildings?

Include how each utility defines multi-family

1. *Levels of joint delivery and/or coordinated delivery between gas and electric utilities.*

What does “levels of delivery” mean? Suggestion to add this update to the narrative section of a utility quarterly report.

Confirm definition of “joint” and “coordinated” delivery

* Joint = EE program that is jointly funded by more than one utility
* Coordinated = EE programs where utilities work together on program delivery, but program is not joint
1. *The comprehensiveness of efficiency upgrade opportunities being addressed in participating buildings. This would include a particular emphasis on understanding the level of uptake of building envelope, HVAC equipment, water heating equipment and other major Measures (vs. just lower cost measures through direct installation and/or other delivery mechanisms) and barriers encountered in increasing uptake of such major Measures.*

Define “comprehensiveness of efficiency upgrade opportunities” – specifically, which categories or measures are stakeholders interested in?

This principle references “buildings.” Is this reporting at the building level, vs. units?

Some of the existing Ameren Illinois metrics might meet this principle. Ameren is working on updated IQ MF reporting, to follow-up on the September 12, 2023 Reporting Working Group / Ameren MF Metrics Workshop. Ameren will share an illustration of this updated IQ MF reporting when it’s available.

Initial Suggestions from Community Investment Corp., ICC Staff, IL AG, NCLC and NRDC:

* Report on the % of multifamily buildings, and the associated housing units they compromise that adopt any common area measures, and the % that get each of the major measure categories, including (but not limited to) building envelope measures, HVAC measures, DHW measures, and common area lighting measures.
* Include a breakdown of the reasons why a customer did not install the measure. For example: 72% of MF residences received attic insulation updates. 10% didn’t get this because of a structural issue; 3% didn’t get this because a customer refused; etc.

ComEd started reporting on EE program participation, including avg. income by zip code, in their Annual Report. Adding a column on “average income” for IQ MF reporting may be something to consider. Link to the ComEd 2022 annual report spreadsheet: [ComEd 2022 Equity Affordability Metrics Spreadsheet - EE Program Participation and Avg Income by Zip Code](https://www.ilsag.info/wp-content/uploads/Equity-Affordability-Metrics-EE-Program-Participation-and-Avg-Income-by-Zip-Code.xlsx)

1. *Uptake of new technologies. This would include, but not be limited to, cold climate heat pumps and heat pump water heaters.*

What is considered a “new technology”? Is that anything added to the IQ MF program? Or is there a specific list of technologies that are of interest?

Is the reporting on “uptake of new technologies” duplicative to similar reporting in current utility reports? Ameren is interested in feedback from stakeholders. Below is an example of reporting on new measures from the [Ameren Illinois 2023 Q2 report](https://www.ilsag.info/wp-content/uploads/PY23-Q2-Ameren-Illinois-Quarterly-Report.pdf) (see page 28).

Initial Suggestions from Community Investment Corp., ICC Staff, IL AG, NCLC and NRDC:

* Uptake is the number of units – stakeholders are interested in adding another column with the measures installed
* Consider adding the month/year the measure was added, for notification purposes
* How long is an addition to the program considered a “new measure”?



1. *Leveraging of other funding sources to support income qualified multi-family retrofits.*

Should this update be added to the narrative section of a utility quarterly report? This could also be a table – source of funding, amount of funding, EE programs?

Initial Suggestions from Community Investment Corp., ICC Staff, IL AG, NCLC and NRDC:

* Report on the $ amount if that could be included in the narrative, and the specific funding sources being leveraged.
1. *Geographic distribution. This would include where buildings are served, which could be provided by zip code and/or census tract.*

When geographic distribution is referenced, should information be shared in a table or heat map?

Initial Suggestions from Community Investment Corp., ICC Staff, IL AG, NCLC and NRDC:

* If by zip codes, including information about the communities within that zip code.
* Stakeholders are interested in an interactive heat map, if possible.
* Stakeholders are interested in a map with an overlay of disadvantaged communities, if possible.
* NOTE: Stakeholders suggest the geographic reporting metrics for IQ health & safety should be consistent with IQ multi-family.

*Program Administrators shall work with interested stakeholders to reach consensus in developing the specific metrics to address these reporting needs. The metrics may evolve over time.*

*The list of metrics will be posted on the SAG and LIEEAC website(s). The metrics will be referenced in, and lessons learned from reported metric data will be referenced in, the Program Administrators’ quarterly and/or annual reports and discussed in SAG and LIEEAC with the goal of improving Program delivery and outcomes.*

**Additional Questions:**

Ameren Illinois has a commitment in the 2022-2025 Revised Stipulated Agreement regarding income qualified multi-family reporting, including holding SAG workshops with interested stakeholders. Three potential new metrics were suggested in a September 2022 Ameren Illinois workshop that could be discussed by the Reporting Working Group, including:

* + 1. % of buildings and units that have electric resistance heat that choose to install heat pumps
		2. % of commercially rated properties moving forward with common area projects
		3. % of residentially rated properties moving forward with recommended cross channel measures

## **Income Qualified Health and Safety Reporting Policy**

The red text below represents initial discussion questions and suggestions to inform the development of income qualified health and safety reporting metrics.

**Final “Income Qualified Health and Safety Reporting Principles Policy” from Policy Manual Version 3.0:**

*Health and safety issues can sometimes be impediments to weatherizing homes. When that is the case, income qualified households not only lose the potential for realizing energy bill reductions, but also are left with underlying structural and/or other problems in their home that they typically do not have the financial or technical resources to remedy. This policy is intended to provide transparency on how Program Administrators are addressing health and safety issues encountered through their income qualified weatherization Programs, to enable understanding of similarities and differences in opportunities and challenges experienced by each Program Administrator, as well as to make available data that can shed light on both successes and future opportunities for improvement in addressing such issues. Specifically, it requires that each Program Administrator report on the effectiveness of its efforts to address health and safety improvements necessary to enable Energy Efficiency retrofits – particularly building envelop upgrades, HVAC equipment upgrades and other major Measures – in income qualified single family and multi-family buildings. The reporting will be on a statewide set of metrics designed to provide insight into the following issues for both single family and multi-family buildings:*

1. *How often health and safety concerns are found.*
2. *The types of health and safety concerns that are found and the Measures used to address those concerns.*

ComEd currently provides the type of health and safety issues identified, but not the measures used to address the issue. ComEd is open to including the most common health & safety measures.

1. *How often the Programs are able to address (vs. unable to address) any health and safety concerns that are found and why.*

ComEd currently includes the number of deferrals and the types of issues identified in the quarterly report. See pages 25 of the 2023 Q2 ComEd report: <https://www.ilsag.info/wp-content/uploads/CY2023-Q2-ComEd-EE-Report.pdf>

1. *Levels of spending to address health and safety concerns.*

ComEd currently includes health and safety spending in the quarterly report. See pages 25 of the 2023 Q2 ComEd report: <https://www.ilsag.info/wp-content/uploads/CY2023-Q2-ComEd-EE-Report.pdf>

1. *Geographic and building type distribution of health and safety data.*

ComEd interested in confirming what is meant by “building type.” ComEd could add this to the quarterly or annual reports of health and safety spend and building type, if building type is limited to multifamily and single family.

1. *The types of materials used for air sealing and insulation.*

Ameren is working on the “types of materials” reporting; however, it is not available yet.

ComEd is currently tracking this information. This is a CEJA requirement: “Utilities shall track types and quantities of insulation materials and their associated savings within low-income households” (CEL p.606 – Sec 8-103.B.c).

*Program Administrators shall work with interested stakeholders to reach consensus in developing the specific metrics to address these reporting needs. The metrics may evolve over time.*

*The list of metrics will be posted on the SAG and LIEEAC website(s). The metrics will be referenced in, and lessons learned from reported metric data will be referenced in, the Program Administrators’ quarterly and/or annual reports and discussed in SAG and LIEEAC with the goal of improving Program delivery and outcomes.*

**Suggestion for Working Group Review:**

In Ameren’s Q4 report for 2022, there are health & safety metrics already reported on. Ameren suggested the Reporting Working Group consider Ameren’s current health & safety reporting as a starting point.

* Question for Discussion: Does Ameren’s 2022 Q4 reporting meet the IQ health and safety principles policy?
* See pages 31-34 of the Ameren 2022 Q4 report: <https://www.ilsag.info/wp-content/uploads/PY22-Q4-Ameren-Illinois-Quarterly-Report-Final.pdf>

Initial Suggestions from Community Investment Corp., ICC Staff, IL AG, NCLC and NRDC:

Add level of spending reporting:

As a dollar amount per issue and

Aggregate percent of health & safety budget per program/channel

As an example, ComEd currently includes year-to-date spend on health and safety. See the below table from the 2023 Q2 ComEd report: <https://www.ilsag.info/wp-content/uploads/CY2023-Q2-ComEd-EE-Report.pdf>



Add geographic reporting:

Zip code level reporting, with names of the towns included in that zip code, or census tract – the format should be the same as used for IQ multifamily reporting

A heat map showing remediated health & safety projects, and if possible, where there are health & safety issues present that were not able to be remediated

NOTE: Stakeholders suggest the geographic reporting metrics for IQ health & safety should be consistent with IQ multi-family.

Add a similar pie chart for the health & safety projects that were remediated (see the pie chart in Ameren’s Q4 report, page 31)

For cases where the health & safety issue was not able to remediated, understanding “why” would be helpful. Was it beyond the cost threshold, not possible without structural updates, etc.?

Can the utilities describe or define the health & safety issue that is being reported on? For example: Is there a definition for vermiculite?

Questions about the Ameren health & safety reporting from Community Investment Corp., ICC Staff, IL AG, NCLC and NRDC:

What programs are included under “IQ Single Family”? Does that include mobile homes, and moderate income offerings?

 For IHWAP-braided programs, how many projects, if any, are not treated because of health & safety issues?

 If there are multiple issues in a home, is each issue reported on in each row of the tables?

## **Equity and Affordability Reporting Policy Questions**

The red text below represents initial discussion questions and suggestions to inform the development of equity and affordability reporting metrics. Discussion questions will be further developed before the November 28th Working Group meeting.

**Final “Equity and Affordability Reporting Principles Policy” from Policy Manual Version 3.0:**

*Each Program Administrator will report on the delivery of its Energy Efficiency Programs to disadvantaged communities. In addition to standard reporting of disconnection and other credit and collections data by zip code already required by Section 8.201.10 of the Public Utilities Act, Program Administrators will report on a statewide set of metrics designed to provide insight into a variety of other Program and policy objectives, which shall include:*

1. *How participation in Program Administrator whole building retrofit Programs overlaps with geographic areas with economic need;*
2. *How participation in Program Administrator whole building retrofit Programs overlaps with the Low Income Home Energy Assistance Program (LIHEAP) and Percentage of Income Payment Plan (PIPP) participation; and*
3. *How participation in Program Administrator whole building retrofit Programs overlaps with disadvantaged communities or other indicators of equity.*

*Each Program Administrator will also perform periodic analyses to provide insight into additional Program and policy objectives, which may include:*

1. *The effectiveness of whole building retrofit Programs and other Program Administrator-sponsored assistance and efficiency programs in reducing Low Income Customer energy burdens.*
2. *The number of and effectiveness of cross referrals between Energy Efficiency and credit/collections departments in enrolling Low Income Customers.*
3. *The number or proportion of Energy Efficiency Program Participants that are payment troubled (e.g., Customers at risk of being disconnected; with high arrears; participating in bill assistance programs).*

*Program Administrators shall work with interested stakeholders to reach consensus in developing the specific metrics to address these reporting needs. The metrics may evolve over time.*

*The list of metrics will be posted on the SAG and LIEEAC website(s). The metrics will be referenced in, and lessons learned from reported metric data will be referenced in, the Program Administrators’ quarterly and/or annual reports and discussed in SAG and LIEEAC with the goal of improving Program delivery and outcomes.*

**Initial Discussion Questions:**

1. Regarding the “periodic analysis” referenced in the policy, does the Working Group need to discuss how often this analysis s completed? Is this work the evaluators will do, or another vendor?
2. Define “energy burden”
3. Define “payment troubled customer”[[1]](#footnote-1)

## **Diverse Contracting Reporting Principles Policy Questions**

The red text below represents initial discussion questions and suggestions to inform the development of diverse contracting reporting metrics. Discussion questions will be further developed before the November 28th Working Group meeting.

**Final “Diverse Contracting Reporting Principles Policy” from Policy Manual Version 3.0:**

*Each Program Administrator will report on its efforts to enable and provide increases in diverse contracting within the Program Administrators’ Energy Efficiency Portfolios. In addition to any standard diverse contractor reporting already undertaken by Program Administrators pursuant to Section 5-117 of the Public Utilities Act, and for electric utilities, as ordered by the Commission in the electric utility performance-based ratemaking dockets (ICC Docket Nos. 22- 0063 and 22-0067), Program Administrators will report on a statewide set of metrics designed to provide insight into the policy objective of increasing opportunities for diverse contractors and Trade Allies to engage in Energy Efficiency and other policy objectives. The following metrics will be reported by diverse category, including but not limited to woman-owned, minority-owned, and veteran-owned businesses:*

1. *The number of diverse contractors and/or proportion of spending on diverse contracts for the Energy Efficiency Portfolio, by tiered contract level (primary contract (direct with a Program Administrator) or secondary contract (subcontract to a primary), as applicable). If a Program Administrator has two (2) or less diverse contractors in a tier level and/or diverse category, this reporting requirement will be waived to protect the confidentiality of contract values. This waiver will not supersede a Program Administrator’s obligation to provide expense detail in any ICC proceeding in which the reasonableness and prudence of a Program Administrator’s spending is being assessed.*
2. *Percent of or amount of Portfolio dollars, excluding pass-through incentives, for diverse contractor spend.*
3. *Spending with diverse Trade Allies, relative to total Trade Ally spending.*

*The set of metrics designed to provide insight into the policy objective of increasing opportunities for diverse contractors and Trade Allies to engage in Energy Efficiency and other policy objectives may include:*

1. *Number of diverse Trade Allies and their specialties.*
2. *How diverse Trade Allies are distributed geographically by Program.*
3. *Location of diverse Trade Allies relative to historically disadvantaged communities and Environmental Justice communities, whichever is more inclusive of low and moderate income communities.*

*Program Administrators shall work with interested stakeholders to reach consensus in developing the specific metrics to address these reporting needs. The metrics may evolve over time.*

*The list of metrics will be posted on the SAG and LIEEAC website(s). The metrics will be referenced in, and lessons learned from reported metric data will be referenced in, the Program Administrators’ quarterly and/or annual reports and discussed in SAG and LIEEAC with the goal of improving Program delivery and outcomes.*

**Initial Discussion Questions:**

1. For diverse Trade Allies, is there a list of “specialties” that should be reported on?
2. For geographic distribution of diverse Trade Allies, should information be shared in a table or heat map?
3. Define “historically disadvantaged communities” and “Environmental Justice communities”
4. At the July 10, 2023 Policy Manual meeting, it was suggested ideally there would be a public list developed of all diverse Trade Allies and where they work
1. Stakeholders suggested the following defines “payment troubled” at 8/28 Policy Manual Meeting: 30+ days behind on bill payments; participating in bill assistance programs, and/or customers on low-income discount rates. [↑](#footnote-ref-1)