

# Illinois EE Stakeholder Advisory Group (SAG) Reporting Working Group Meeting

**Monday, September 8, 2025**

2:30 – 4:30 pm

Teleconference

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### Meeting Materials

- [Monday, September 8 SAG Reporting Working Group Agenda](#)
- [SAG Facilitator Presentation: Introduction to September 8 Reporting Working Group Meeting](#)
- [Ameren Illinois Presentation: Stakeholder Feedback on Reporting Policy Changes](#)
- [Summary of Changes to Proposed EHNC Income Eligibility Verification Policy](#)
- [Updated Draft EHNC Income Eligibility Verification Policy \(Clean\)](#)
- [Updated Draft EHNC Income Eligibility Verification Policy \(Redline\)](#)

### Attendees

Name	Company or Organization
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Abigail Miner	IL Attorney General's Office
Andy Vaughn	Leidos
Channel Turbides	ComEd
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Daniel Gonzalez	ComEd
Danish Murtaza	Peoples Gas & North Shore Gas
Dena Jefferson	Franklin Energy
Elder Calderon	ComEd
Elizabeth Horne	ICC Staff
Fernando Morales	Ameren Illinois
Jarred Nordhus	Peoples Gas & North Shore Gas
Jason Fegley	Leidos
Kari Ross	NRDC
Katherine Elmore	Community Investment Corp.

Name	Company or Organization
Matt Armstrong	Ameren Illinois
Nicole Popejoy	IL Association of Community Action Agencies
Randy Opdyke	Nicor Gas
Sara Castleberry	Resource Innovations
Tina Grebner	Ameren Illinois

### **Meeting Notes**

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

### **Introduction to SAG Reporting Working Group Meeting**

*Celia Johnson, SAG Facilitator*

#### **Purpose of September 8 Meeting:**

1. To discuss follow-up on Ameren Illinois' reporting policy proposal; and
2. To discuss follow-up on ComEd's New Construction Eligibility Policy Proposal

Reminder: The September 8 meeting is a follow-up discussion on two policy proposals – compromise may be needed from participants to reach agreement on final policy language

#### **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 the Policy Manual Subcommittee is inactive.
    - Policy Manual Subcommittee is currently inactive, since Policy Manual Version 3.0 and IL-TRM Policy Document Version 4.0 were approved by the Commission in December 2023.
  - 1. While the Policy Manual Subcommittee is inactive, open policy issues will be resolved in the following manner:
  - 2. The SAG Facilitator will review policy requests and schedule for SAG discussion as needed.
  - 3. Background on the policy request will be presented to interested SAG participants.
  - 4. 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.
  - 5. 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.
  - 6. Final resolution will be documented on this Policy page.
  - 7. The SAG Facilitator will maintain a "Policy Tracker" describing any policies to be considered in a future update to the Policy Manual or IL-TRM Policy Document.
- This process is included in the [SAG Process Guidance 2025 Update \(Final 6/4/2025\)](#) – see pages 6-7 and referenced on the [Policy page](#) of the SAG website.
  - 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.

## Reporting Policy Proposal

- Ameren Illinois is proposing a change to existing reporting policy for all Illinois utilities – introduced at the July 23 Large Group SAG meeting
- To follow-up on the July 23 discussion, Ameren Illinois prepared redline edits to the following documents:
  - [IL EE Policy Manual Section 6, Program Administration and Reporting \(redline 7/29/25\)](#)
  - [Equity and Affordability Reporting Metrics \(redline 7/29/25\)](#)
  - [Diverse Contracting Reporting Metrics \(redline 7/29/25\)](#)
  - [Income Qualified Health and Safety Reporting Metrics \(redline 7/29/25\)](#)
  - [Income Qualified Multi-Family Reporting Metrics \(redline 7/29/25\)](#)
- Comments received on proposed policy edits (due August 15, 2025):
  - [Community Investment Corp.](#)
  - [ICC Staff](#)
  - [NRDC](#)
  - [Peoples Gas and North Shore Gas](#)
- September 8<sup>th</sup> meeting: Ameren is presenting an overview of and responses to feedback received
  - Updated redline policy documents will be circulated for review Tuesday, September 9
  - Additional comments due Tuesday, September 23
  - Ameren will follow-up directly with stakeholder(s) regarding additional feedback submitted. If needed, a follow-up SAG meeting will be scheduled with interested parties.

## New Construction Eligibility Policy Proposal

- ComEd is proposing eligibility verification pathways for income eligible new construction EE programs – introduced at the July 23 Large Group SAG meeting
- To follow-up on the July 23 discussion, ComEd prepared proposed policy language:
  - [Income Eligibility Verification Guidelines for Electric Homes New Construction \(EHNC\) Program](#)
- Comments received on proposed policy edits (due August 20, 2025):
  - [Ameren Illinois](#)
  - [ICC Staff](#)
  - [Illinois Office of the Attorney General](#)
  - [Joint Comments from Community Investment Corp., Natural Resources Defense Council, and People for Community Recovery](#)
- September 8<sup>th</sup> meeting: ComEd is presenting an overview of and responses to feedback received
  - ComEd will prepare an updated redline with a request for comments after the September 8<sup>th</sup> meeting.
  - ComEd will follow-up directly with stakeholder(s) regarding additional feedback submitted. If needed, a follow-up SAG meeting will be scheduled with interested parties.

## **Ameren Illinois Reporting Policy Proposal**

*Matt Armstrong, Ameren Illinois*

## Reporting Policy Comments

- NRDC: Policy Manual Budget Shifts

- NRDC: NRDC is supportive of the Ameren-proposed redlines, except for the proposal to make it optional to report significant program budget shifts in just semi-annual narrative reports and not in quarterly template reports. Quarterly template reports include budgeted spending by program so any shifts in budgets should be reflected in those numbers. Under Policy Manual Section 6.5, item vii. b (Budget Shifts) should be included in the list of quarterly template report criteria.
- Ameren Response: Ameren proposes that Program Administrators report significant budget shifts, as defined under Policy Manual Section 6.1 Program Flexibility and Budgetary Shift Rules, in quarterly template reports, and that redlines in Section 6.1 providing the option to report in semi-annual narrative reports be removed. For consistency with Section 6.1, Ameren proposes that under Policy Manual Section 6.5, item vii. b (Budget Shifts) be included in the list of quarterly template report criteria and not the list of semi-annual report criteria.
- NRDC: Diverse Contracting Reporting Metrics
  - NRDC: Given both (1) the comment from Ameren that electric utilities are required by statute to report on workforce equity at least quarterly and (2) the list of reporting items for contractors and subcontractors are all numbers (no narrative discussion), NRDC believes it would be appropriate for such information to be reported in Excel templates on a quarterly basis. NRDC suggests the same applies to trade ally diversity reporting.
  - Ameren Response: Ameren proposes that all Program Administrators report Diverse Contracting Reporting Metrics in the quarterly template reports. For supplier metrics, Ameren proposes (1) electric Program Administrators report quarterly and (2) gas Program Administrators report bi-annually in Q2 and Q4 reports, consistent with the frequencies agreed to by the Reporting Working Group. For trade ally metrics, Ameren proposes no change to the annual reporting frequency agreed to by the Reporting Working Group, in Q2 reports for the previous year.

*Chris Neme: I understand bi-annual reporting for narratives as it takes effort to write them up. The two reasons for our comment include the statutory concern, but these sound like easy numbers to put together. Why not report these numbers on a quarterly basis in the spreadsheet?*

- *Matt Armstrong: We were trying not to go back on the policy we agreed to in the metrics process. I wouldn't necessarily characterize pulling numbers together as simple – but definitely simpler than the written portion. Also, some of the utilities have obligations that are more stringent in our stipulated agreements. On Ameren's portion, I think we are already reporting some of these numbers every quarter, at least to some level. The trade ally metrics on an annual basis were going a step further, to report out on a locational / zip code basis. That information is pretty lengthy, that's why we are suggesting keeping this annual.*
- *Chris Neme: The questions we are asking for contractors vs. trade allies are different – but why not report quarterly for both electric and gas?*
- *Matt Armstrong: We are trying to stick with the agreed-upon frequencies [from the 2024 Reporting Working Group metrics process] to limit administrative burden on the utilities. Quarterly is not necessary to see a good picture of progress.*
- *Chris Neme: Aren't the contracts the same for electric and gas?*

- *Matt Armstrong: We are planning to report across our entire program, whether they are electric-only, gas-only or both. We were trying to stick to what was agreed upon before.*
- *Chris Neme: I would be interested in what others have to say.*
- *Chris Vaughn: Some of the program write-ups and required us to track trends and things that were a lot more cumbersome on our end. We are looking to ensure there is no other qualitative attachment to the metric itself that would be required to report on quarterly. We are interested in more meaningful report-outs. Reporting at a lower level makes it harder to notice patterns.*
- *Chris Neme: The issue is whether it makes sense for gas utilities to report numerical supplier metrics as part of the quarterly reporting template.*
- *Chris Vaughn: If it is numbers, we are agnostic about the cadence. We didn't want to assume any additional burden from a qualitative perspective. We are neutral and would defer to other parties.*

*Elder Calderon: The only change is moving the qualitative reporting to annual, correct?*

- *Chris Neme: I cannot recall if they are bi-annual or annual. At least to bi-annual.*
  - *Matt Armstrong: We started at semi-annual, this would move it to quarterly.*
  - *Chris Neme: The original redlines required quarterly reporting, correct?*
  - *Matt Armstrong: I believe it was semi-annual.*
  - *Kari Ross: It was bi-annual, and the change is to semi-annual.*
  - *Matt Armstrong: Yes, that's correct. Reporting is twice a year, but we are suggesting quarterly templates.*
  - *Chris Neme: Is this just for supplier metrics for gas and electric utilities?*
  - *Matt Armstrong: Supplier reporting will stay annual.*
  - *Danish Murtaza: Peoples Gas and North Shore Gas will consider this.*
- **Community Investment Corp (CIC) and People's Gas & North Shore Gas (PGNS): Multi-Family Reporting Metrics**
    - **CIC:** CIC supports the proposed change to move from quarterly to semi-annual reporting but does not support the proposal to have independent evaluators complete the housing-type and size breakdowns instead of program administrators. Including this data in the semi-annual reports will ensure it remains consistently available, regardless of changes to each utility's Evaluation Plan or differences in reporting approaches between utilities.
    - **PGNS:** Peoples Gas and North Shore recommends that reporting be allowed to come from the Program Administrator or the Evaluator, in either the Annual Evaluation Reports or the semi-annual narrative reports.
    - **Ameren Response;** Ameren proposes no change to the annual reporting frequency agreed to by the Reporting Working Group. Ameren proposes reporting by Program Administrators in Q2 semi-annual narrative reports for the previous program year (as agreed to by the Reporting Working Group) unless reported by Evaluators in Annual Evaluation Reports, to avoid duplicative reporting.

*Katherine Elmore: I understand the distinction. We were asking for the breakdown of affordable housing types to be included in the regular reports and shown semi-annually. We would like to see this in a timely manner throughout the year.*

- *Matt Armstrong: We agreed to annual reporting through impact report templates, so we are trying to stay on that reporting basis.*
- *Katherine Elmore: Have you already released the annual report for this?*

- *Matt Armstrong: Yes, our independent evaluator is including it in our impact report.*
- *Katherine Elmore: And this is an annual report?*
- *Matt Armstrong: Yes, this is correct.*
- *Chris Neme: We initially agreed to annual evaluations, mirroring what Ameren had been doing already.*
- *Katherine Elmore: We will still be seeing the data annually, correct?*
- *Matt Armstrong: Yes. If we send quarterly versus bi-annually to our administrator, you will still see the data annually.*
  
- Commission Staff: Policy Manual Proceeding
  - Staff: The proposal to reduce the reporting frequency for several subsections of Section 6.5 from quarterly to semi-annual directly conflicts with the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission’s Final Order in Docket 23-0761. Under Policy Manual Version 3.0, all subsections of Section 6.5 are required to be reported on a quarterly basis, and there is no provision in the Final Order or the Policy Manual that approves a unilateral reduction in reporting frequency or selective reassignment of language to a semi-annual narrative. Any reduction in the reporting frequency or reassignment of required reporting elements—including metrics—from quarterly to semi-annual directly diverges from the requirements of the IL EE Policy Manual Version 3.0, as adopted by the Commission’s Final Order in Docket 23-0761.
  - Ameren Response: Ameren proposes that Staff requests the Commission to initiate a proceeding to consider adoption of Policy Manual Version 3.1 to update Section 6 and references in other sections to reporting, as needed for consistency. Ameren proposes that changes to reporting metrics documents not be effective unless and until Version 3.1 is approved.

*Elizabeth Horne: The initial question was if we could have an effective date for this reporting policy change in September. We would not be able to get it approved that fast. In the next couple of weeks, we could start initiating a proceeding for approval of an updated Policy Manual.*

- *Matt Armstrong: Our intention is to ask the Commission to consider reporting policy changes to the Policy Manual. We are proposing redlines that will not be effective until the updated Policy Manual is approved by the Commission [proposed effective date is January 2026].*
- *Celia Johnson: What would be filed with the Commission is only the updated Policy Manual. The reporting metrics documents that were finalized by the Reporting Working Group in June 2024 live on the SAG website and any updates would be posted there.*
- *Matt Armstrong: Yes, important distinction.*

### **Reporting Policy Comments**

- Policy Manual Proceeding
  - Ameren envisions the following schedule to adopt Policy Manual Version 3.1 which generally follows the cadence for adoption of Version 2.1 in 2022
    - SAG comments on redlines due: September 23
    - Staff report to the ICC (\*): October 7
    - Commission initiates proceeding: October 30
    - Staff testimony due: November 14
    - Response testimony due: December 1
    - Draft Order: December 15

- Final Order: First ICC meeting in 2026
- (\*) Draft available from Ameren using the report for Version 2.1 as a template

*Elizabeth Horne: This schedule may be hard because of Commissioners on holiday in November. Between now and the end of the year, there are five or so open meetings to get this on schedule. It is not impossible, but there are only a few meetings available. Testimony in December would likely happen closer to November, somewhere in the second week. Given that, the draft order might be getting approval in mid-December.*

- *Matt Armstrong: Thanks. I recognize how that is not an ideal time of year. Feel free to get back to us and suggest anything, we are open and understand the holidays are tough. It is a priority to get the revision in place for 2026.*

### Next Steps:

- Ameren to provide updated redlines of the Policy Manual and Reporting Metrics documents on September 9.
- Comment deadline – September 23.

## **ComEd New Construction Eligibility Policy Proposal**

*Elder Calderon, ComEd*

Policy Resolution: Income Eligibility Verification Guidelines for Electric Homes New Construction (EHNC) Program

- ComEd shared the following documents for discussion:
  - [Summary of Changes to Proposed EHNC Income Eligibility Verification Policy](#)
  - [Updated Draft EHNC Income Eligibility Verification Policy \(Clean\)](#)
  - [Updated Draft EHNC Income Eligibility Verification Policy \(Redline\)](#)

### Changes to Proposal

- Income verification challenges addressed, aiming to avoid administrative burden
- Pathway One:
  - Received comments regarding clarification on rental versus property and issues surrounding rental-based pathways.
  - Change in language to apply specifically to property-based programs.
- Pathway Two:
  - Changed language to apply specifically to existing rehab properties.
- Pathway Three:
  - Added language to encourage stronger guarantees for projects in low-income census tracts.
- Pathway Four:
  - Limiting applicability to rehab projects.
  - Encouraging inclusion of long-term affordability units, added price caps similarly to pathway #3.
- Pathway Five:
  - Need tenant income information in cases of existing rehab.
  - Requirement to commit to building price cap if sold, or stabilizing rent for a certain length of time.

*Chris Neme: If a building participated in the weatherization program (IHWAP) five years ago and is now undergoing gut rehab, what kind of protections would be in place to ensure that it would continue to serve low-income tenants?*

- *Elder Calderon: While we cannot enforce commitment to a price cap or stabilized rent from developers, pathway three eligibility is based on specific items. We need to familiarize ourselves with IHWAP eligibility for future guarantees.*
- *Chris Neme: Just because a building participated in IHWAP prior, that may not be an indication that it will stay that way. Pathway three guidelines may need to apply to pathway two as well as others.*
- *Elder Calderon: We will update the draft.*

*Katherine Elmore: That makes sense to me. In our comments, we talk about how a targeted IQ program needs well-designed and strong incentives to move the market. Without strong incentives, participation will not increase. If you are having trouble with IQ participation now and make it easy to qualify for this pathway but do not address IQ concerns, no one will take advantage. Also, if a new construction program is applying for this pathway and other programs, they may need funding from one to qualify for the other. You may have documentation issues.*

- *Elder Calderon: Thank you. I had not considered the nuances of the application process.*
- *Katherine Elmore: Yes, there could be a flexible approval with a letter of interest.*
- *Elder Calderon: There are restrictions to how much participation we can have. The number of projects that are already serving IE is a small number, but this could open the door to adjust design and increase participation. We need the pathway to verify income eligibility to verify incentives.*
- *Katherine Elmore: Yes, geographical location is the first choice. We want to avoid a situation where numbers are examined, and you cannot get a seller.*

*Elder Calderon: Comments received on pathway three emphasized that we need to ensure additional low-income guarantees, as we do not want to add to gentrification.*

- *Katherine Elmore: Make sure the program does not incentivize losing rental units, such as a rental conversion. This should focus on major rehab of existing units and ground-up construction without limiting rentals.*
- *Elder Calderon: I did see that in the comments. We will investigate that and provide an update in the draft.*
- *Chris Vaughn: I think this would come with policy nuance. Depending on marketing or county assessors, there may be illegal studio units, or units not up to living standards. There should be attention to the nuance of rental conversions.*
- *Katherine Elmore: Great point. Overall, we want legally conforming units.*
- *Elder Calderon: Yes, thank you. We will include legal exceptions.*
- *Katherine Elmore: They could receive an incentive based on units.*
- *Elder Calderon: The incentives would be savings-based.*

*Chris Neme: You say 'encourage' in pathway four but should say 'require'.*

- *Elder Calderon: Yes, I will correct this.*

*Elder Calderon: Comments from the AG office expressed hesitancy around IE verification. Some of our additions add guarantees or commitments from builders to verify income. Is there hesitancy or more thoughts?*

- *Abigail Miner: I will take the redline back, but did you mention you cannot enforce these commitments from builders?*
- *Elder Calderon: Yes, not by ComEd. There are terms and conditions for long-term commitments, but we cannot enforce them as a utility.*

*Matt Armstrong: Is the intention of this policy to apply to any new home construction project, or just electric homes?*

- *Elder Calderon: Focused on electric homes for now but we can discuss broadening our reach to any developer-based new construction residential project.*
- *Matt Armstrong: Thanks. We have provided comments to that effect. If we consider this policy proposal, we should include any type of project, not just electric.*
- *Elder Calderon: Agreed.*
- *Katherine Elmore: What distinguishes this policy is new construction versus a rehab project. These criteria would make sense for non-electric projects.*
- *Elder Calderon: We will make amendments in our new edits.*
- *Katherine Elmore: Incentives should encourage analysis of projects coming in. Some varying dynamics limit programs. Happy to converse.*
- *Elder Calderon: Absolutely. Happy to take feedback from partners and encourage effort to adjust to market needs.*

#### Next Steps:

- Comd to provide an updated redline policy that will be circulated for feedback.

#### Closing and Next Steps

- **Ameren Illinois Reporting Policy Proposal**
  - To follow-up on the September 8<sup>th</sup> discussion, Ameren Illinois prepared updated redline edits to the following documents for final review:
    - [IL EE Policy Manual Section 6, Program Administration and Reporting \(redline 9/8/25\)](#)
    - [Equity and Affordability Reporting Metrics \(redline 9/8/25\)](#)
    - [Diverse Contracting Reporting Metrics \(redline 9/8/25\)](#)
    - [Income Qualified Health and Safety Reporting Metrics \(redline 9/8/25\)](#)
    - [Income Qualified Multi-Family Reporting Metrics \(redline 9/8/25\)](#)
  - **Comments on the updated reporting edits are due Tuesday, September 23:** [Reporting Policy Request for Comments Template](#).
  - **Next Steps:**
    - Following the September 23<sup>rd</sup> deadline, Ameren will follow-up directly with stakeholder(s) regarding additional feedback submitted. If needed, a follow-up SAG meeting will be scheduled with interested parties.
    - See [slide 6 of Ameren's presentation](#) for a suggested schedule for a proceeding to approval the updated Policy Manual.
- **ComEd New Construction Eligibility Policy Proposal**
  - To follow-up on the September 8<sup>th</sup> discussion, ComEd prepared an updated redline proposed policy document for final review, which has been re-named:
    - [Income Eligibility Verification Guidelines for Residential New Construction \(RNC\) Program \(Redline 9/16/25\)](#)
    - [Income Eligibility Verification Guidelines for Residential New Construction \(RNC\) Program \(Clean 9/16/25\)](#)
  - **Comments on the updated reporting edits are due Wednesday, October 1:** [RNC Policy Request for Comments Template](#)
  - **Next Steps:**
    - Following the comment deadline, ComEd will follow-up directly with stakeholder(s) regarding additional feedback submitted. If needed, a follow-up SAG meeting will be scheduled with interested parties.