Illinois EE Stakeholder Advisory Group
Reporting Working Group Meeting

Tuesday, November 28, 2023
10:00 am – 12:00 pm (Teleconference)

Attendees and Meeting Notes

Meeting Materials

Posted on the November 28th meeting of the SAG website:

- Income Qualified Multi-Family Proposed Reporting Metrics
- Income Qualified Multi-Family Reporting Tables (Excel)
- Income Qualified Health and Safety Proposed Reporting Metrics (updated 11/28)
- Equity and Affordability Proposed Reporting Metrics (updated 11/28)
- Diverse Contracting Proposed Reporting Metrics

Attendees

Celia Johnson, SAG Facilitator
Caty Lamadrid, Inova Energy Group
Abby Miner, IL Attorney General's Office
Alan Elliott, Opinion Dynamics
Andy Vaughn, Leidos
Ashley Pride, Nicor Gas
Becca McNish, ComEd
Bruce Liu, Nicor Gas
Cassidy Kraimer, Community Investment Corp.
Cheryl Johnson, People for Community Recovery
Chester Kolodziej, EE / Solar System Advisor
Chris Neme, Energy Futures Group, representing NRDC
Chris Vaughn, Nicor Gas
Darnell Johnson, Urban Efficiency Group
David Brightwell, ICC Staff
Elizabeth Horne, ICC Staff
Erin Stitz, Applied Energy Group
Henry Tieman, Nicor Gas
Jarred Nordhus, Peoples Gas & North Shore Gas
Jason Fegley, Ameren Illinois
Jean Gibson, Peoples Gas & North Shore Gas
John Carroll, Ameren Illinois

John Dakarian, Nicor Gas
Jonathan Skarzynski, Nicor Gas
Karen Lusson, National Consumer Law Center
Kari Ross, NRDC
Kate Shonk, Citizens Utility Board
Katherine Elmore, Community Investment Corp.
Kim Janas, IL Attorney General's Office
LaJuana Garrett, Nicor Gas
Laura Goldberg, NRDC
Lorraine Renta, Guidehouse
Matt Armstrong, Ameren Illinois
Miritza Thorpe, Ameren Illinois
Molly Lunn, ComEd
Neil Curtis, Guidehouse
Omy Garcia, Peoples Gas & North Shore Gas
Philip Mosenthal, Optimal Energy, representing IL AG and NCLC
Randy Opdyke, Nicor Gas
Ted Weaver, First Tracks Consulting, representing Nicor Gas
Tina Grebner, Ameren Illinois
Zach Ross, Opinion Dynamics

Meeting Notes

See red text for follow-up items. Initial feedback on metrics is also summarized within the notes.

Opening & Introductions

Celia Johnson, SAG Facilitator

Purpose of the Nov. 28th meeting: To discuss stakeholder proposed reporting metrics and initial feedback.

- SAG Facilitator Presentation: Introduction to November 28 Meeting

Income Qualified Health and Safety (H&S) Reporting

Phil Mosenthal, Optimal Energy, representing IL Attorney General and National Consumer Law Center

Introduction to Proposed Metrics

- Proposed metrics are in red font within the document.
- The stakeholder proposal is for utilities to provide quarterly reporting.
- Stakeholders are interested in understanding the types of health & safety issues that are identified, if they were remediated or not, and if not, then why (some categorization would be required).
- Other metrics of interest are how many participants were both weatherized and received health & safety updates, and how many did not have any issues identified.

Karen Lusson: Why did stakeholders conclude that geographic location was not needed in the reporting?

- *Phil Mosenthal: Stakeholders decided that for H&S issues, they might to occur at random and therefore the information would not be useful. For other reporting metrics we do want* *geographic because we want to make sure we are aligning with an understanding of where the need is occurring and then being addressed.*

- *Darnell Johnson: I disagree and suggest that utilities should also report geographic information of where the H&S issues are identified. I think it is important to tie incidence to location because it may demonstrate disparity and prevalence, or specific needs of certain areas that may have older housing stock.*
- *Karen Lusson: This should not be a difficult ask of utilities because addresses are tracked.*

Cheryl Johnson: Once someone receives funding to do H&S and the job is done incorrectly, where in this document is that explained. When H&S fails, what can that customer do? I have an example of a customer with a H&S roof issue that was incorrectly fixed.

- *Molly Lunn: The utilities are best equipped to share how issues with contractors are dealt. Molly Lunn will follow-up with Cheryl Johnson.*
- *Karen Lusson – via chat: To Cheryl's point, perhaps in the SF and MF general reporting requirements there should be a listing of number of Quality Control complaints, number resolved, etc.*

Katherine Elmore – via chat: We are still requesting the geographic data for multifamily metrics, which should align with program participation overall. I thought we had taken it out of this section because the geographic location was requested in other places. No opinion either way.

- *Phil Mosenthal: Yes, we have it in the other reporting metrics.*

Laura Goldberg – via chat: Aren't all the H&S dollars exclusively dedicated to Income Qualified programs? Although agree there are greater areas of need within certain IQ communities.

- *Phil Mosenthal: Yes, this is correct.*

Chris Vaughn: On number 5 and 6, would utilities need to refine issues over a certain number of categories? We would not want to have the data distort our opinions of whomever is interpreting it. Perhaps we can use some categorization for most common issues instead of every single item.

- *Phil Mosenthal: Yes, utilities should recommend this categorization of H&S issues.*

Matt Armstrong: The data that we are collecting under the equity piece might overlap with some of this. We can discuss this next. One clarifying question: are you asking only for IQ SF as part of this metrics?

- *Phil Mosenthal: Yes, I think the reason for that is that the MF reporting metrics has been established and already covers same data.*
- *Laura Goldberg: This is not only SF; this policy should cover both MF and SF. [SAG Facilitator comment: MF reference added during meeting]*

Matt Armstrong: We are ok with metrics 1-6 but struggle with frequency of quarterly reporting. We would prefer an annual report-out to occur in the Q4 report.

- *Phil Mosenthal: While the Q4 report is "annual" it is laid out by quarters, so it seems it may be possible to release this information every quarter as it is available. My concern is that if there is a problem, and it is not being addressed, that we would not want to go a full year without recognizing and addressing it.*
- *Matt Armstrong: Reporting quarterly sounds simple, but it is not. Utilities need to QC and clean up data for presentation. It does take time to prepare this. We are filing these reports*

with Illinois Commerce Commission and we have to make sure that the data is accurate and complete, and that takes significant resources.

- *Molly Lunn: ComEd agrees with Ameren. Understand what stakeholders are saying about recognizing issues and wanting to course correct. In the current quarterly report utilities do report the spend and how many homes are having to be deferred, and at a high level we described the issues that are being tackled. Would that be sufficient information that would allow satisfying this need and for problems to surface on a quarterly cadence? And then on an annual basis, we can present detail that allows us to see trends. Is this a fair compromise?*
- *Laura Goldberg – via chat: Which utilities are already reporting on some of this? I thought some of the previous settlements had some of this data. Per Molly's points understanding this is more granular.*
- *Matt Armstrong – via chat: Thanks Molly, same for Ameren. We are reporting H&S spend each quarter. Note that we are seeing greater need for H&S than we have budget for, as noted in our most recent presentation to the SAG.*
- *Karen Lusson: I don't understand how this reporting would take significant resources.*
- *Molly Lunn: Ameren's point is that it takes time and energy and that costs money that gets diverted from projects. At ComEd we have a dedicated reporting team but every time we add more metrics, we think about whether we need to add more staff to support these efforts. We are trying to strike a balance of what data is useful on a quarterly basis vs annual basis so we allocate the adequate resources.*
- *Phil Mosenthal: It is important to remember that we spent a lot of time negotiating the text in black. It did not feel like this was adding more burden, and the text in black says that utilities had agreed to reporting on quarterly already.*
- *Laura Goldberg: I like the suggestion to have the utility go through and say which ones they can do quarterly vs annual so we can have that discussion.*

Summary of Initial Suggestions on IQ Health and Safety Proposed Metrics:

- ***Stakeholder Suggestions:***
  - Add geographic reporting as a metric.
  - Add number of Quality Control complaints, number resolved, etc.
- ***Utility Suggestions:***
  - Concerned about quarterly reporting. Reporting should be annual, in the Q4 report.
  - Potential compromise could be reporting budget and high-level information quarterly, and other information annually.

<u>Equity and Affordability Reporting</u>

Phil Mosenthal, Optimal Energy, representing IL Attorney General and National Consumer Law Center

First Set of Proposed Metrics

- This policy is only SF.
- Stakeholders heard from utilities that it would be hard to report by census tract, so we limited metrics to zip code. We thought the evaluator could then do analysis on census tract at a later time.
- On number 3, stakeholders envisioned this is an analysis done by evaluators, but ComEd had a concern about evaluator budgets being allocated, so we wrote it out as being either the evaluator or some other entity.

Karen Lusson: Suggests adding language about residents "that are on a payment plan, discount rate, and/or LIHEAP/PIPP heat map. [SAG Facilitator comment: Edits were added during the meeting]

Molly Lunn: ComEd committed to a one-time analysis with our evaluator. We can do this once in a four-year planning period.

Matt Armstrong: Are we talking all SF Whole Building Programs?

- *Phil Mosenthal: This is only focused on IQ SF whole building programs.*
- *Matt Armstrong: Are stakeholders satisfied with current report out? Or is there a need for additional information? Concern with frequency of reporting and whether the data would be indicative of issues.*
- *Phil Mosenthal: I have to go back and take a look.*

Karen Lusson: Are you asking if there is a pattern as to whether customers consistently asked for deferred payment plans?

- *Matt Armstrong: I'm thinking they have to reapply annually.*
- *Karen Lusson: Not necessarily, sometimes it is possible to get longer than 12 months. The rules allow for that.*
- *Matt Armstrong: If this reporting is quarterly, there might be inconsistency with a customer applying annually, so the data might not show a clear picture of customers in LIHEAP and other programs. I suggest metric number 3 looks sense looking backwards over a longer period (2 year) but it may not give any actionable information on a quarterly basis because there is the potential that customer took part in a program one year and LIHEAP, but not this quarter. This does not seem like the best indicator; reporting should be retrospective.*
- *Karen Lusson: I think a conversation is needed between utilities' energy efficiency and credits and collections departments.*
- *Matt Armstrong: Will investigate this further with our customer service department.*

Jean Gibson: What is the objective of number 2? Looking at geographic participation by zip code and the potential universe of participants?

- *Phil Mosenthal: It is specifically IQ SF Whole Building participants.*
- *Jean Gibson: If Peoples Gas and North Shore Gas has the ability to do census tract for number 3, do you prefer it that way?*
- *Phil Mosenthal: I think other utilities might not be able to report by census tract.*
- *Chris Neme: The key for number 2 is that if you show participation by census tract, that you also show bill payment assistance by census tract.*
- *Jean Gibson: We will look into the possibility of reporting by census tract.*
- *Cheryl Johnson: There are instances where two or more communities share zip codes, so using census tract data would identify the neediest within those communities. Personal preference is to use census tract.*
- *Chris Vaughn: I don't think at Nicor Gas we can do census tract reporting.*
- *Matt Armstrong: Same for Ameren, we cannot do census tract.*
- *Karen Lusson: Stakeholders want to understand whether the programs are serving customers who need it the most.*

Any Vaughn: There is a crosswalk document that HUD has that is referenced in the Policy Manual. This can be used to cross-reference.

Phil Mosenthal: I want understand why utilities cannot do the mapping for census tract?

Andy Vaughn: On the non-residential side is difficult to tract to census tract due to where meters are located which is often not by street address, and finding references to map between the two is extremely difficult. In addition, when getting contractors to serve disadvantaged communities more, it is harder to have a contractor focus on a "census tract" than to communicate their efforts should be by zip code.

Karen Lusson: The Policy Manual allows utilities to demonstrate Income Eligibility for MF program participation in IQ programs by looking at location in low-income census tract. This is specifically called out. If utilities are doing this, it suggests that they have the ability to make that connection and track it.

Second Set of Proposed Equity Metrics

Matt Armstrong: Do you have any issues with the way this is being currently reported out? Metric 1 is provided in quarterly report, 2-3 are provided in evaluation reports, and 4-7 are related to electrification and required to be reported out under another statute. This type of reporting should be annual, except #1 which is already being reported quarterly.

- *Molly Lunn: Agree with what Matt is saying, this is already reported elsewhere and adding other reporting requirements would add administrative burden.*
- *Zach Ross – via chat: Item 4 is reported in evaluation reports for Ameren, though perhaps not in precisely the format stakeholders are requesting here.*
- *Jean Gibson: Agree with ComEd and Ameren, I encourage the leveraging of existing reporting. Most of this is already reported in evaluation reports. Therefore, unless there is something different, we should take this out.*
- *Chris Neme: I don't think that this information is included in evaluation reports other than for Ameren. The reason this information is included in Ameren's evaluation report is due to my previous request for it to be added.*

Karen Lusson – via chat: Each utility's IQ SF and IQ MF are evaluated annually?

- *Molly Lunn: Yes, annually for ComEd.*
- *Matt Armstrong: Yes, annually for Ameren.*
- *Jean Gibson: I'll need to check for PGL/NSG and will provide feedback.*
- *Chris Vaughn: I'll have to get back after I talk with our Nicor Gas planning team.*

Kari Ross – via chat: Interested in the utilities sharing how many staff work on your quarterly and annual reports? Or how much budget you spend on their creation? It would be helpful to understand, even generally, what exactly the utilities' administrative "burden" is.

Summary of Initial Suggestions on Equity and Affordability Proposed Metrics:

- ***Utility Suggestions:***
  - ComEd: An evaluation analysis is ok if it's once in the 4-year EE Plan cycle.
  - PG/NSG: Will look into whether it's possible to report by census tract.
  - Ameren IL and Nicor Gas: Not able to report by census tract.

- Ameren IL: Concerned about number inconsistencies in reporting quarterly overlap with LIHEAP/PIPP. Will follow-up with customer service department.
- Concerned about moving reporting that exists in evaluation reports, into utility reports.
- Concerned about reporting this information quarterly.

Diverse Contracting Reporting

Phil Mosenthal, Optimal Energy, representing IL Attorney General and National Consumer Law Center

Introduction to Proposed Metrics

- Stakeholder proposed metrics are consistent with what the utilities are doing. Breaking down by contractor amounts and different categories. A caveat was added about not having to share details when there is only one contractor, so as to prevent disclosing of proprietary information.
- One addition is reporting – added the number of Community Based Organizations (CBOs), Community Action Agencies (CAAs), and nonprofits.
- Second piece of metrics is setup the same as IQ, geographically and by census tract.

Darnell Johnson: When we look at how it is written in CEJA legislation, the intent is to empower more local vendors, both tier 1 and tier 2 tracts. It is my understanding that a disparity study was performed about local contractors vs out of state and I don't see how this reporting metric would help identify that.

- *Celia Johnson: That was a northern-IL specific study, to inform the development of the utility market development initiatives. SAG Facilitator will follow-up with Darnell to share additional background.*

Karen Lusson: Interested on hearing from utilities on number one because this is a very important breakdown to make sure people are getting opportunities in various areas of expertise. One complaint I've heard in the past is that a diverse contracting is only called for certain things like outreach when companies/individuals have a variety of skills.

- *Molly Lunn: Subcontractors can be different than service providers. Service providers [or trade allies] typically do not have contracts with the utility depending on program. Depending on service provider network, we let the implementor contractor drive the network but we engage in conversations and set targets for diversity. We also have a diverse service provider incubator.*

Molly Lunn: ComEd thinks they can do what is being requested in (i), agree that breaking out by Trade Ally specialty would be helpful.

Andy Vaughn: Thinking about reporting, we typically just track one office location and not all of them, how do we report the one that we are using? What if their main office is in Chicago? It would result in be misrepresentation it if shows many Chicago-based contractors… I have a lot of questions on this one, do we report main office, satellite office, where the projects are taking place?

- *Phil Mosenthal: Open to suggestions.*
- *Chris Neme: Are utilities able identify the location of where the office location for most work was taking place? Where the individuals who did the work are located?*
- *Andy Vaughn: Generally, no, we usually track the main branch.*
- *Phil Mosenthal: You may have to report office of record and then just add a written caveat on the report-out.*

Darnell Johnson: I understand there is one aspect of this report that is specific of where workers are coming from and another one where folks are concerned about economic stimulation for local areas. And so, where we firms are from matters. We need to know satellite and operational offices. For transparency in reporting, we need to know where they are incorporated at (even if it is in another state) and where they have deployed other offices that are localized.

Zach Ross via chat: clarifying question: This metric is about trade allies, not implementation contractors, correct?

- *Celia Johnson: Correct, this is a trade ally metric.*

Summary of Initial Suggestions on Diverse Contracting Proposed Metrics:

- ***Utility Suggestions:***
  - Location of Trade Allies is challenging to report, especially if they have multiple office locations.
  - ComEd: We think we can do what is requested in (i); agree that breaking out by Trade Ally specialty would be helpful.

IQ Multifamily Reporting

- The Working Group was not able to discuss due to time constraints.

Closing and Next Steps

Celia Johnson, SAG Facilitator

- Written feedback on proposed metrics is due by Tuesday, December 12th. Send feedback to Phil Mosenthal (Philip.Mosenthal@nv5.com) and CC Celia@CeliaJohnsonConsulting.com
- Since the Working Group was not able to discuss IQ Multifamily metrics, please reach out to Chris Neme (cneme@energyfuturesgroup.com) with any questions or feedback on proposed IQ Multifamily metrics before the comment deadline
- The next Reporting Working Group meeting is on Tuesday, December 19th. Stakeholders will consider feedback received, with the goal of sharing a compromise metrics proposal.