**IL EE Stakeholder Advisory Group (SAG)  
Request for Comments on IL-TRM Policy Issue #2:**

**Renewable / Solar Generation**

**Instructions:**

* Using this template, send written comments on IL-TRM Policy Issue #2 to the SAG Facilitator, Celia Johnson: [Celia@CeliaJohnsonConsulting.com](mailto:Celia@CeliaJohnsonConsulting.com) **by Friday, July 11**.
* Include “TRM Policy Issue Feedback” in the subject line of the email.
* Following the July 11 written comment deadline:
  + All comments will be posted on the [SAG website](https://www.ilsag.info/), and circulated to SAG.
  + Next steps will be reviewed following the comment deadline, including whether a follow-up meeting is needed, or whether a non-consensus comparison exhibit should be prepared.
* Deadline Reminder:
  + The goal is to resolve IL-TRM policy issues before the August 1, 2025 IL-TRM deliverable.

**Comments Submitted By:**

Name:

Company or Organization:

Company or Organization Website (if applicable):

Email:

Phone:

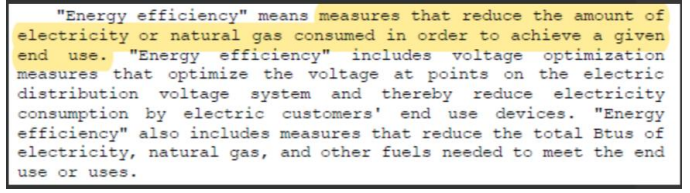
**Policy Issue #2: New Measures Involving Renewable / Solar Generation**

**Policy Issue #2, Question 1:** Does the statutory definition of “energy efficiency” allow a solar as energy efficiency measure (i.e. rooftop solar generation) in the Illinois TRM?

**Policy Issue #2, Question 2:** Does the statutory definition of “energy efficiency” allow a solar thermal measure (i.e. solar hot water and solar air heaters) in the Illinois TRM?

**Background Information**

See the statutory definition of “energy efficiency”- excerpted from Illinois Power Agency Act (20 ILCS 3855/1-10) and Public Utilities Act (220 ILCS 5/8-104(b)):

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**June 23 Large Group SAG meeting materials:**

* [Facilitator Introduction to June 23 SAG Meeting](https://www.ilsag.info/wp-content/uploads/Facilitator-Intro-to-June-23-2025-SAG-Meeting_FINAL.pdf)
* [ComEd Presentation](https://www.ilsag.info/wp-content/uploads/ComEd-Presentation_June-23-2025-SAG-Meeting.pdf)
* [Discussion Slides for June 23 SAG Meeting](https://www.ilsag.info/wp-content/uploads/June-23-2025-SAG-Meeting-Discussion-Question-Slides.pdf)

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**Additional SAG meeting materials related to the “Solar as EE” policy issue:**

* [ComEd Presentation (June 9 SAG meeting): Solar as Energy Efficiency](https://www.ilsag.info/wp-content/uploads/ComEd-SAG_TRM_Policy_Solar-as-EE_June-2025-FINAL.pdf)
* [ComEd Follow-up: Solar as EE in Other States](https://www.ilsag.info/wp-content/uploads/ComEd-Follow-up-Sources_Solar-As-EE_6-11-25.pdf)
* [ComEd Follow-up: Position on the grouping of solar PV and solar thermal technologies/measures](https://www.ilsag.info/wp-content/uploads/ComEd-Follow-up_Position-on-Grouping-Solar-Measures_6-11-25.pdf)
* [Solar as Energy Efficiency – Residential New Measure (ComEd – updated following June 9 meeting)](https://www.ilsag.info/wp-content/uploads/Illinois_Statewide_TRM_Workpaper_Solar_2025_Residential-v2.docx)
* [Solar as Energy Efficiency – Commercial & Industrial New Measure (ComEd – updated following June 9 meeting)](https://www.ilsag.info/wp-content/uploads/Illinois_Statewide_TRM_Workpaper_Solar_2025_CI-v2.docx)
* Spreadsheets that support the solar as EE workpapers:
  + [EE Residential Solar](https://www.ilsag.info/wp-content/uploads/EE-Residential-Solar.xlsx)
  + [PV Watts ETDF Calculations](https://www.ilsag.info/wp-content/uploads/PV-Watts-ETDF-calcs_IL.xlsx)
  + [Simultaneous Adjustment Factor Analysis – Residential](https://www.ilsag.info/wp-content/uploads/Simultaneous-Adj-Factor-Analysis-Residential.xlsx)

**Additional IL-TRM workpaper related to renewable policy issue:**

* [Residential Solar Water Heater New Measure (Ameren Illinois)](https://www.ilsag.info/wp-content/uploads/Illinois_Statewide_TRM_Workpaper_Format_2025_Solar-Water-Heater-RES.docx)