

IL EE Stakeholder Advisory Group (SAG) Request for Comments on IL-TRM Policy Issue #3:

Energy Efficiency Upgrades at a Site with Significant On-Site Generation

Instructions:

- Using this template, send written comments on IL-TRM Policy Issues #3 to the SAG Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com by **Friday, August 8**.
- Include “TRM Policy Issue Feedback” in the subject line of the email.
- All comments will be posted on the [SAG website](#), and circulated to SAG.
- A follow-up discussion will be scheduled, if needed.
- **Please Note:** This is the second comment deadline for IL-TRM Policy Issue #3. Initial comments were due June 30.

Comments Submitted By:

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Policy Issue #3: Energy Efficiency Upgrades at a Site with Significant On-Site Generation

Policy Issue #3, Question 1: If a utility energy efficiency program implements a measure in a building that has on-site renewable energy supply, can the program claim energy efficiency savings from that measure? Please explain.

Policy Issue #3, Question 2: If a utility claims savings from an energy efficiency measure in a building that has on-site renewable energy supply, should there be any limits to those savings? Please explain.

Policy Issues 3 should be studied more thoroughly before deciding these questions and making any change to the Technical Reference Manual. As noted in our June 30, 2025 response, the Office of the Illinois Attorney General (IL OAG) submitted several follow-up questions about this policy issue. IL OAG also stated in this June 30 response that there was not sufficient time available in SAG meetings to fully explore this policy issue. IL OAG appreciates Guidehouse’s responses to the questions submitted by IL OAG, which were discussed in the SAG meeting held on July 24, 2025. However, that discussion revealed that there are still several outstanding issues about Policy Issue #3 and potentially further research to be performed.

Background Information

- Materials from June 9, 2025 Large Group SAG Meeting:
 - [IL-TRM Administrator Presentation: Overview of Policy Issues](#) – see slide 8

- [Guidehouse Memo: Energy Efficiency Measures in Net Zero Buildings \(June 3, 2025\)](#)
- Initial Comments Received on IL-TRM Policy Issue #3 (due June 30, 2025):
 - [ICC Staff](#)
 - [Illinois Office of the Attorney General](#)
 - [NRDC](#)
- Materials from July 24, 2025 SAG Small Group Meeting:
 - [Facilitator Introduction to EE with On-Site Generation Policy Issue](#)