

**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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Company or Organization: [NRDC](#)

Company or Organization Website (if applicable):

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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.

NRDC Response:

- Yes. The fact that there may be on-site supply of electricity does not change the fact that the efficiency measure will reduce electricity consumption by the measure, which is the statutory goal. To the extent that the result of the reduced consumption is that the on-site generation simply provides more power to the grid, the efficiency measure is having the same impact on the amount electricity that the grid is required to produce.
- In recognition that this question isn’t specifically a TRM issue, NRDC proposes an interim agreement to treat 100% of EE savings from such sites as counting towards goals for 2025 and 2026 program years, while the SAG dives deeper into the subject in future meetings to determine whether to keep or adjust that approach for subsequent years. Our intuition is that utilities have been counting 100% of such savings to date, so this approach would be a continuation of past and current practice in the interim. Our reservation about the idea that this issue gets resolved between utilities and their evaluators is that the answer could be different between the two utilities, which we find problematic for the consistency of energy savings policy statewide.

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.

- No. See response to question #1.

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](#)