**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](mailto: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](https://www.ilsag.info/), 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:**

Name:

Company or Organization:

Company or Organization Website (if applicable):

Email:

Phone:

**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.

**Background Information**

* Materials from June 9, 2025 Large Group SAG Meeting:
  + [IL-TRM Administrator Presentation: Overview of Policy Issues](https://www.ilsag.info/wp-content/uploads/VEIC-SAG-Presentation_TRM-Policy-Issues_Final-v2.pdf) – see slide 8
  + [Guidehouse Memo: Energy Efficiency Measures in Net Zero Buildings (June 3, 2025)](https://www.ilsag.info/wp-content/uploads/Guidehouse-Memo_-EE-Measures-in-Net-Zero-Buildings-2023-06-03_SAG-website.pdf)
* Initial Comments Received on IL-TRM Policy Issue #3 (due June 30, 2025):
  + [ICC Staff](https://www.ilsag.info/wp-content/uploads/ICC-Staff-Comments-on-TRM-Policy-Issues-1-3-and-4_FINAL_v2.pdf)
  + [Illinois Office of the Attorney General](https://www.ilsag.info/wp-content/uploads/IL-OAG-Comments-on-TRM-Policy-Issues-1-3-and-4_6.30.25.pdf)
  + [NRDC](https://www.ilsag.info/wp-content/uploads/NRDC-Comments-on-TRM-Policy-Issues-1-3-and-4_6.30.25.pdf)
* Materials from July 24, 2025 SAG Small Group Meeting:
  + [Facilitator Introduction to EE with On-Site Generation Policy Issue](https://www.ilsag.info/wp-content/uploads/Facilitator-Intro-to-On-Site-Generation-Policy-Issue_FINAL.pdf)