**IL EE Stakeholder Advisory Group (SAG)  
Request for Comments on IL-TRM Policy Issues**

**Instructions:**

* Using this template, send written comments on IL-TRM Policy Issues[[1]](#footnote-1) #1, #3, and #4 to the SAG Facilitator, Celia Johnson: [Celia@CeliaJohnsonConsulting.com](mailto:Celia@CeliaJohnsonConsulting.com) **by Monday, June 30**.
* 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.
* Small group follow-up meetings are planned on July 9 and July 24. 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 #1: Review Stakeholder Compromise on General Service Lamps**

**Policy Issue #1, Question 1:** Ameren Illinois proposed to align IL-TRM Version 14.0 with Ameren’s 2026-2029 EE Plan stipulation, to continue to offer lighting via direct install in the Income Qualified (IQ) Single Family and Multifamily channels. Do you have comments or feedback on this Ameren Illinois proposal? Please explain.

See excerpt from Ameren Illinois 2026-2029 EE Plan stipulation (page 9):

* *As reflected in the batch files, Ameren Illinois will continue to offer lighting via direct install in its IQ Single-Family and Multifamily channels. Direct install of General Purpose Lighting (GPL) will only occur in instances where non-LED lighting currently exists in a customer’s home or multifamily building and with such inefficient lamps being recycled or otherwise disposed of by the program. The Parties agree to support Ameren Illinois in its efforts to modify the Technical Reference Manual Version v14, to allow continued direct install of lighting in IQ Single-Family and Multifamily properties.*

**Policy Issue #1, Question 2:** ComEd proposed to extend eligibility in IL-TRM Version 14.0 for General Service Lamp (GSL) offerings to income qualified customers through 2029, including:

1. EE kits
2. Retail programs

Do you have comments or feedback on the ComEd proposal? Please explain.

**Policy Issue #1, Question 3:** During the June 9 SAG meeting, several stakeholders suggested ComEd consider using the same approach as Ameren Illinois, offering lighting via direct install in the Income Qualified (IQ) Single Family and Multifamily channels. Do you have comments or feedback on this proposed approach? Please explain.

**Policy Issue #1, Question 4:** Should the measure lifetime for LED bulbs continue to be eight (8) years in IL-TRM Version 14.0? Please explain.

Background information for policy issue #1:

* [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 slides 4-5
* [ComEd Presentation: EISA Exemption for General Service Lamps](https://www.ilsag.info/wp-content/uploads/ComEd-SAG_TRM_Policy_EISA-Exemption_June-2025-FINAL.pdf)
* See [IL-TRM Version 13.0](https://www.ilsag.info/wp-content/uploads/IL-TRM-Version-13.0-Volumes-1-4-Compiled-Final.pdf) LED measures, including:
  + 5.5.6 LED Specialty Lamps
  + 5.5.8 LED Screw Based Omnidirectional Bulbs
  + 5.5.9 LED Fixtures

**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 for policy issue #3:

* [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)

**Policy Issue #4: Revisiting the electric vehicle as an efficiency measure issue**

**Policy Issue #4, Question 1:** Can electric utilities claim energy efficiency savings for incentives used to encourage customers to purchase a more efficient Electric Vehicle over a standard baseline Electric Vehicle within separate vehicle classes? Please explain.

Background information for policy issue #4:

* [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 slides 9-16
* [Ameren Illinois Presentation: New Measure - Light Duty Electric Vehicles](https://www.ilsag.info/wp-content/uploads/v14-Efficient-EV-TAC-Slides_Ameren-Illinois_6-9-25.pdf)
* [Light Duty Electric Vehicle New Measure (Ameren Illinois)](https://www.ilsag.info/wp-content/uploads/Illinois_Statewide_TRM_Workpaper_LightDutyEV_051425.docx)
* Additional Reference Provided: [ACEEE White Paper: Electric Vehicle Efficiency: Unlocking Consumer Savings and Environmental Gains (August 2024)](https://www.ilsag.info/wp-content/uploads/ACEEE_EV_unlocking_consumer_savings_and_environmental_gains_August2024.pdf)

1. Policy issue #2 related to renewable/solar EE measures will be discussed at a follow-up SAG meeting on Monday, June 23. Written comments will be requested after the June 23 meeting, with a deadline of Friday, July 11. A written comment template will be circulated following the June 23 meeting. [↑](#footnote-ref-1)