

IL EE Stakeholder Advisory Group (SAG) Equity Subcommittee Request for Comments on Weatherization Criteria

Instructions:

- Using this template, send written comments to the SAG Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com by **Friday, October 3**.
- Include “Weatherization Feedback” in the subject line of the email.
- All comments will be posted on the [SAG website](#), and circulated to the SAG Equity Subcommittee.

Background Information:

- At the [September 18, 2025](#) SAG Equity Subcommittee meeting, there was a discussion regarding weatherization participation criteria and customer prioritization for the northern Illinois utilities’ jointly implemented Home Energy Savings (HES) Income Eligible Single Family Upgrades Program.
- The September 18th discussion was scheduled due to a commitment in 2026-2029 EE Plan stipulated agreements for ComEd, Nicor Gas, Peoples Gas and North Shore Gas. This document includes relevant stipulation language for each utility: [Excerpted EE Plan Stipulation Language for ComEd, Nicor Gas, Peoples Gas and North Shore Gas](#).
- Written comments are requested regarding participation criteria and customer prioritization for the northern Illinois utilities jointly implemented Home Energy Savings (HES) Income Eligible Single Family Upgrades Program.
- Following the written comment deadline, a follow-up discussion will be held at the [October 21, 2025 SAG Equity Subcommittee meeting](#). In order to implement changes on January 1, 2026, retrofits prioritization criteria must be finalized October 21st.

Comments Submitted By:

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Question 1: Please describe comments on the utilities’ 2026 proposal for retrofits prioritization criteria:

- [Joint Utility Presentation \(ComEd, Nicor Gas, Peoples Gas and North Shore Gas\): Home Energy Savings 2026 Retrofits Prioritization Plan](#) – see slide 6, or the excerpt on page 2 below.

Response:

NRDC’s first concern with the utilities’ proposed criteria for eligibility for weatherization services is with regards to homes with electric resistance heating systems. Currently (in 2025), such homes must only meet criteria A (a single-family home with its own heating system) and B (no obvious deferrable conditions). Under the proposal for 2026, such homes would have to also meet criteria C (no more than 6 inches of attic insulation) and D (basement/crawlspace air sealing opportunity). Electric resistance heating is by far the most expensive form of heating for customers on a per unit of heating output basis. The utility value of energy savings from weatherization (i.e., based on avoided costs) are also far greater

per BTU of reduction in heating fuel than any other form of heating. Furthermore, the biggest source of savings potential for such homes will usually be a measure – ductless mini-split heat pumps – that has nothing to do with criteria C or D. Thus, we see it as highly problematic that the utilities are proposing to add criteria C and D as requirements for more comprehensive efficiency upgrades for electric resistance heated homes.

We recommend that the criteria for such homes be *loosened* to just criterion A rather than tightened as the utilities are proposing. We understand that criterion B requirements for no deferrable conditions may preclude efforts to insulate and/or seal homes. However, it is not clear why such conditions would necessarily preclude the installation of cold climate heat pumps to displace much use of inefficient electric resistance heat.¹ While we agree with the sentiment of CEDA (in slide 5 of its presentation) that it would be ideal to improve insulation and reduce leakiness of homes getting heat pumps, we disagree with their suggestion that just installing a heat pump and not weatherizing electric resistance heated homes may create comfort problems. It is our understanding that ductless heat pumps would be expected to displace most, but not necessarily all, electric resistance heat and that electric resistance baseboards will remain in place to supplement heating provided by heat pumps when the heat pumps cannot meet heating loads on their own. That should address any concerns about significant heating comfort problems. Moreover, the heat pumps will almost certainly provide *comfort benefits* in cooling mode. Finally, we would observe that the number of homes affected by using only criterion A rather than criteria A, B, C and D to qualify electric resistance homes for installation of major measures is unlikely to have a huge impact on demand for retrofit services because there are very few single-family homes with electric resistance heat in ComEd's service territory.

Our second recommendation for changing the proposed minimum criteria is to change the maximum existing attic insulation requirement under criterion C from six inches, equal to R-19, to R-30. There is still significant heat load-reduction potential associated with upgrading from R-30 to R-49, especially when coupled with air sealing. We further observe that in its settlement agreement with stakeholders, Ameren has agreed to use a max of R-30 as its criterion starting in 2026.

In addition to these comments on the criteria for being eligible for weatherization and HVAC measures, NRDC has concerns with the proposed protocols for several measures in the utilities' operations manual:

- **Attic insulation.** As discussed above, the max existing insulation level should be increased from R-19 to R-30.
- **Air sealing.** We have concerns about the statement that homes must have a CFM50 reading equal to or greater than 110% of the building's square footage. That means that a 2,000 square foot home must have an initial CFM50 of more than 2,200 to be eligible for air sealing. While a CFM50 of 2,200 would not be considered "super leaky" for a home of that size, it would also not be considered "tight". There may be relatively large and/or easy-to-address air leakage opportunities in such homes. In addition, while CFM50 is a critically important indicator of air leakage, it is not the only thing that matters. Not all air leaks contributing to CFM50 ratings are equal in importance in terms of actual impacts on heating loads. Those in the basement and attic will be most important because they contribute to the "stack effect" that is one of the main reasons for energy loss. Moreover, once a blower door has been set up and a leakage rate has been estimated, there is little cost to walking around the home while the blower door is still

¹ There may be some cases where specific conditions in the home would make a ductless heat pump installation problematic, but not the full range of conditions described in the utilities' proposed screening criterion B.

operating to feel where leaks are occurring and to identify larger and/or easy-to-address leaks. Put simply, we suggest that there be no floor air leakage level required to pursue air sealing opportunities. Instead, if the utilities are hiring qualified contractors who understand building science, those contractors should be given some discretion in treating air sealing opportunities regardless of the initial CFM50 rating.

- **Central A/C replacements.** We agree with CEDA that the requirement for a “before 2000” manufactured date is too limiting. We would suggest that 2006 be the cut-off instead as that is the year that SEER 13 became the new (much higher than before) minimum federal efficiency standard. We further suggest having criteria to assess whether existing central A/Cs that warrant early replacement could be most cost-effectively addressed through heat pump installations that partially meet heating needs (i.e., creating hybrid heating systems with the existing heating system in place to meet heating loads during the coldest hours).
- **Room A/C replacements.** We agree with CEDA and NCLC that room A/C replacements should not be limited to emergency conditions (i.e., non-functional existing unit). Room A/Cs are much less expensive to replace than central A/Cs, and there are significant cooling efficiency improvements possible relative to still functioning older units.

Per Plan 7 Stipulations: 2026 Proposal

Home must have:

A. SF-type configuration.

In-unit mechanical equipment
Customer has decision-making power over building envelope (building envelope can be addressed comprehensively); the attic and/or basement of the unit can be served without impacting any other units.

B. No obvious deferrable conditions.

No blatantly obvious issues that would likely exceed the per home health and safety funding available
Current list is roof leaks, vermiculite, hoarding, active water damage/bulk moisture, cracked ceilings that prohibit attic insulation, knob and tube wiring, or severe disrepair of access points (e.g., lack of railings, deteriorating porch).

C. Attic air sealing and insulation opportunity.

Attic insulation must be less than 6 inches on average across the entire attic.
If attic does not have a hatch, criterion is marked “yes” if the customer is willing to let a contractor cut a hatch in the future.
If the home does not have an attic, this criterion is waived (marked n/a).
If customer refuses access to space, criterion is marked “no.”

D. Basement/crawlspace air sealing opportunity.

At least 20% of rim joist is accessible and not air sealed.
If the home does not have a basement, this criterion is waived (marked n/a).
If basement is finished (i.e., rim joist and ducts are not accessible) and home does not have a crawlspace, criterion is marked “no.”
If basement is finished and home has a crawlspace, criterion is marked “yes.”
If there is only a crawlspace, criterion is marked “yes.”

And at least one of the following:

- ~~E. Duct sealing opportunity:
Ducts located in semi- or unconditioned spaces:~~
- ~~F. HVAC equipment is inefficient:
Existing furnace or boiler is < or = 80% efficient and/or AC is < or = SEER 13~~

~~OR home must have:~~

- ~~G. An electric resistance heating system and the customer meets A and B~~

equivalent to R-19, per ComEd Plan 7 Stipulation Agreement

*Estimate 24% referral rate to Retrofits based upon historic data.