Illinois EE Stakeholder Advisory Group (SAG)
Small Group Meeting #2 – IL-TRM Policy Issues

Thursday, July 24, 2025
9:00 – 11:30 am
Teleconference

Attendees and Meeting Notes

Meeting Materials

- Facilitator Introduction to July 24 SAG Small Group Meeting
- Solar Policy Issue, Question 1
  - Facilitator Introduction to Solar Policy Issue, Question 1
  - MEEA Position on Solar Question 1
  - NRDC + NCLC Position on Solar Question 1
  - CIC + The Preservation Compact Position on Solar Question 1
  - Franklin Energy Position on Solar Question 1
  - ComEd Position on Solar Question 1
- Solar Policy Issue, Question 2
  - Facilitator Introduction to Solar Policy Issue, Question 2
  - Explanation of Measure Proposal (Morehead Energy, on behalf of Ameren Illinois)
  - MEEA Position on Solar Question 2
  - CIC + The Preservation Compact Position on Solar Question 2
  - Opinion Dynamics Position on Solar Question 2 (verbal)
  - NRDC + NCLC Position on Solar Question 2
  - Franklin Energy Position on Solar Question 2

    - ComEd Position on Solar Question 2
- Lighting Policy Issue
    - Facilitator Introduction to Lighting Policy Issue + VEIC Position
- Electric Vehicle Policy Issue
    - Facilitator Summary – Electric Vehicle Policy Issue Status

Attendees

Name	Company or Organization
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Abbigail Penk	ICC Office of General Counsel
Abigail Miner	IL Office of the Attorney General (OAG)
AJ Young	Greenlink
Ali Kazmi	Guidehouse
Andrey Gribovich	DNV
Andy Vaughn	Leidos
Anna Lydia Marrero	CEDA
Ashley Bukowski	ICC Office of General Counsel
Attiq Rahman	Energy Infrastructure Partners
Cassidy Kraimer	Community Investment Corp.
Charles Schreier	Go Sustainable Energy, representing OAG
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Courtney Golino	Guidehouse
Daniel Gonzalez	ComEd
Danish Murtaza	Peoples Gas & North Shore Gas
Dena Jefferson	Franklin Energy
Dylan Royalty	ScottMadden
Ebony Buchanan	CEDA
Elder Calderon	ComEd
Elizabeth Horne	ICC Staff
Emma Schuster	PSG Energy Group
Erin Kempster	Power Takeoff
Erin Stitz	ICF
Hannah Howard	Opinion Dynamics
Jaleesa Scott	ComEd
Jason Fegley	Leidos
Jean Gibson	Peoples Gas & North Shore Gas
Jeff Erickson	Guidehouse
Jessica Raker	Opinion Dynamics
Josh Raebel	PSG Energy Group
Josh Schreck	The JPI Group
Kanchan Swaroop	Resource Innovations

Name	Company or Organization
Karalyn Berman	Illinois Power Agency (IPA)
Karen Lusson	National Consumer Law Center
Kate Agasie	Cook County DES
Keith Cronin	VEIC
Kelly A. Turner	Illinois Power Agency (IPA)
Kim Janas	IL Office of the Attorney General (OAG)
Kit White	MEEA
Larry Kotewa	Elevate
Lisa Koerner	Illinois Power Agency (IPA)
Lisa Obear	BrightLine Group
Liz Cote	Utility Energy Services
Lloyd Kass	Franklin Energy
Mary-Hall Johnson	BrightLine Group
Matt Armstrong	Ameren Illinois
Matt Ludwig	ComEd
Nicholas Crowder	Ameren Illinois
Nick Warnecke	Ameren Illinois
Nicole Popejoy	IL Association of Community Action Agencies
Nora Fitton	ICC Office of General Counsel
Paige Knutsen	MEEA
Parini Shah	Guidehouse
Patrice McFarlin	Encolor Consulting
Randy Opdyke	Nicor Gas
Rashaan Keeton	Center for Energy & Environment
Sagar Phalke	Guidehouse
Sam Dent	VEIC
Sara Castleberry	Resource Innovations
Seth Craigo-Snell	SCS Analytics
Sushmitha Ramakrishnan	ComEd
Ted Weaver	Dunsky Climate Advisors, representing Nicor Gas
Wade Morehead	Morehead Energy
Yangsu Kim	ICC Office of General Counsel
Zach Obert	Franklin Energy
Zach Ross	Opinion Dynamics

Facilitator Introduction to July 24 Small Group SAG Meeting

Celia Johnson, SAG Facilitator

Purpose of July 24 SAG Small Group Meeting:

To follow-up on Illinois Technical Reference Manual (TRM) policy issues.

Background

- June 9 Large Group SAG meeting focused on introducing IL-TRM policy issues with a request for feedback:
    - Review and potential update of stakeholder compromise on general service lamps
    - New measures involving renewable/solar generation
    - Energy efficiency upgrade at a site with significant on-site generation
    - Revisiting the Electric Vehicle as an efficiency measure issue
- June 23 Large Group SAG meeting focused on additional discussion of solar policy issues
- July 9 SAG Small Group Meeting: Follow-up discussion on the lighting issue (#1) and electric vehicle issue (#4)
- Goal: To resolve IL-TRM policy issues before August 1

Comments Received

- Comments received on TRM Policy Issues 1,3, and 4 (due June 30, 2025):
    - ICC Staff
    - Illinois Office of the Attorney General
    - NRDC
    - Opinion Dynamics
- Comments received on TRM Policy Issue 2 (due July 11, 2025):
    - Ameren Illinois (Solar Thermal Issue)
    - Community Investment Corp. and The Preservation Compact
    - Franklin Energy
    - ICC Staff
    - Illinois Office of the Attorney General
    - Illinois Power Agency (IPA)
    - Midwest Energy Efficiency Alliance (MEEA)
    - Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)
    - Opinion Dynamics (Solar Thermal Issue)

IL-TRM Policy Issue #2 – Solar

- **Policy Question #1:** Whether electric utilities can incentivize solar PV (e.g. rooftop solar) through EE programs.
    - Opportunity for parties who submitted comments to briefly explain their rationale
    - Opportunity for ComEd to respond to comments
    - No additional Q&A or discussion about this issue
- **Policy Question #2:** Whether electric utilities can incentivize solar thermal measures through utility EE programs.
    - Opportunity for parties who submitted comments to briefly explain their rationale
    - Discussion**:** Is there an opportunity for compromise, to allow the proposed solar thermal measure to be included in the IL-TRM?

IL-TRM Policy Issue #1 – Lighting

- VEIC (IL-TRM Administrator) will explain their position
    - Discussion and Q&A

IL-TRM Policy Issue #3 – EE with On-Site Generation

- Guidehouse presents brief overview of policy question, and response to questions from Illinois Office of the Attorney General
    - Discussion and Q&A
    - Opportunity for additional comments – due Friday, August 8

IL-TRM Policy Issue #4 – Electric Vehicle Measure

- Summary of issue status and next steps
- No additional Q&A or discussion about this issue

Facilitator Introduction to Solar Policy Issue, Question 1

Celia Johnson, SAG Facilitator

Solar Policy Issue: Question 1

- **Issue:** Whether electric utilities can incentivize solar PV (e.g. rooftop solar) through EE programs
    - Does the statutory definition of energy efficiency allow a solar as energy efficiency measure (i.e. rooftop solar generation in the Illinois TRM?
        - "'Energy efficiency' means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use. 'Energy efficiency' includes voltage optimization measures that optimize the voltage at points on the electric distribution voltage system and thereby reduce electricity consumption by electric customers' end use devices. 'Energy efficiency' also includes measures that reduce the total Btus of electricity, natural gas, and other fuels needed to meet the end use or uses".
            - *Statutory definition of "energy efficiency" excerpted from Illinois Power Agency Act (20 ILCS 3855/ 1-10) and Public Utilities Act (220 ILCS 5/8-104(b))*

Solar Policy Issue - Question 1			
Does the statutory definition of "energy efficiency" allow a solar as energy efficiency measure (i.e. rooftop solar generation) in the Illinois TRM?			
Comment Submitted By	**Yes**	**No**	**Link to Comments**
ComEd	X		ComEd Presentation (June 9 SAG meeting): Solar as Energy Efficiency
Community Investment Corp. and The Preservation Compact		X	Community Investment Corp. and The Preservation Compact
Franklin Energy	X		Franklin Energy
ICC Staff		X	ICC Staff
Illinois Office of the Attorney General		X	Illinois Office of the Attorney General
Illinois Power Agency (IPA)	IPA did not take an official position on the merits of this proposal - comments explain potential impact of utilities incentivizing solar. IPA urges the SAG to consider (1) whether this proposal is consistent with current statutory language; (2) the potential operational challenges this approach might create for the existing state solar market and interactive effects it may have with the IPA's solar incentive programs; and (3) the maturity of Illinois' solar market.		Illinois Power Agency (IPA)
Midwest Energy Efficiency Alliance (MEEA)		X	Midwest Energy Efficiency Alliance (MEEA)
Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)		X	Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)

- Opportunity for parties who submitted comments to briefly explain their rationale:
  - Midwest Energy Efficiency Alliance (MEEA)
  - Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)
  - Community Investment Corp. (CIC) and The Preservation Compact
  - Franklin Energy
- ComEd Response:
  - Brief explanation of position

IL Technical Reference Manual Next Steps:

- IL-TRM Deliverable #2 will be released on Friday, August 1
- Comments on Deliverable #2 are due Friday, August 15

Next Steps for Solar PV Measures:

- VEIC will not include the proposed solar as PV measures in IL-TRM Deliverable #2. Objection(s) to VEIC not including these measures are due by the Deliverable #2 deadline.
- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.

Kim Yangsu (via chat): For awareness, I have linked credits that will be going away under the One Big Beautiful Bill beginning September 2025: Clean Energy Credits Under the One Big Beautiful Bill

Karen Lusson: We have all placed comments on the proposals themselves. Therefore, are these requested comments our reactions to VEIC's decision to not include measures in the TRM? If you support VEIC's decision, can you remain silent?

- *Celia Johnson: Yes, I think so. Sam, can you clarify?*
- *Sam Dent: If there are objections to our decision, this is when we will create the non-consensus exhibit. In this exhibit, we would present all sides and positions. But there needs to be a party objecting in order to draft this exhibit.*

Solar Policy Issue, Question 1: Does the statutory definition of energy efficiency allow a solar as energy efficiency measure (i.e. rooftop solar generation in the Illinois TRM?

MEEA Position on Solar Question 1
Kit White, MEEA

- MEEA's position: No.
    - Installing customer-sited solar PV does not reduce "the amount of electricity or natural gas consumed in order to achieve a given end use."
    - Solar PV generates electricity. It does not change the amount of energy needed by the customer. It changes the source of their energy.
    - If solar PV (or any other supply-side DER) were added to the TRM, it should only be allowable for cost recovery to the extent that the DER is providing necessary peak demand reduction and not count toward energy saving goals.

NRDC + NCLC Position on Solar Question 1
Chris Neme, Energy Futures Group (on behalf of NRDC) and Karen Lusson, NCLC

PV Should Not be Counted as EE

- Proposal violates statutory intent
    - Key statutory language: "'Energy efficiency' means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use…"
    - Rooftop PV does not reduce the amount of electricity "consumed". It only changes where it is generated.
    - ComEd interpreting statute to mean reduces electricity drawn from the grid, but that's not what the statute says.
- Many other policy concerns
    - Reduces investment in actual electric EE given fixed 8-103B budget
        - There are no other sources of electric EE funding…but there are other sources of ratepayer funding of distributed PV
    - ComEd's legal interpretation opens door to any distributed generation – including gas-fired and/or diesel generators – and/or behind-the-meter battery storage being counted as EE
        - Effect would be further reduction in actual electric EE
        - This constitutes a huge change that really should have to be made legislatively
    - Proposal to only count customer-sited PV as EE – and not community solar – will distort market choices between the two
    - Proposal raises range of consumer protection concerns – and redundancy w/current state oversight of current PV programs

- Unclear how proposal would ultimately affect the grid – if portions of PV counted as EE would have been installed anyway using other sources of funds, the grid might be worse off (because of reductions in actual electric EE that will not be replaced)

Community Investment Corp. + The Preservation Compact Position on Solar Question 1
Cassidy Kraimer, CIC and The Preservation Compact

Response to Question 1:

- Solar photovoltaic (PV) systems, does not meet the statutory definition of energy efficiency.
- These statutes define energy efficiency as measures that reduce the amount of electricity consumed. Rooftop solar changes the source of electricity, but it does not reduce the total electricity used and therefore should not be included as an energy efficiency measure within the Technical Reference Manual (TRM).
- Including solar PV in the TRM would divert limited funds away from whole-building energy efficiency programs.
- Expanding the TRM to include solar PV threatens to dilute these essential efforts and reduce the reach and impact of true energy efficiency programs.
- This statement reflects our position and interpretation, not a legal opinion.

Franklin Energy Position on Solar Question 1
Dena Jefferson., Franklin Energy

Response to Question 1:

- Yes, rooftop solar should be allowed.
- Statutory Support
  - Solar meets criteria for reducing net energy consumption.
  - Supported by IL Public Utilities Act (220 ILCS 5/8-103B, 5/8-104).
  - 220 ILCS 5/16-111.10 includes solar in 'energy projects'.
  - Solar eliminates fuel-based Btus, exceeding CHP efficiency.
  - Aligns with CEJA decarbonization goals and TRC test.
- State Examples
  - Pennsylvania
    - RM includes solar PV for commercial/industrial (2024).
  - Massachusetts & Maryland
    - Include solar PV and water heating in TRMs
  - Texas
    - TRM recognizes PV reducing purchased energy/peak demand.

ComEd Position on Solar Question 1
Elder Calderon, ComEd

Summary of Stakeholder Comments

- Portfolio Impacts: Risk of Diverting Funds from Core EE Programs
  - Organizations like NRDC and The Preservation Compact argue that including PV solar in the TRM could dilute funding for traditional EE measures (e.g., insulation, HVAC upgrades)
  - These programs are seen as more cost-effective and critical for low-income and multifamily housing

- Statute Definition: Statutory and Legal Framework Excludes Generation
    - Multiple stakeholders (e.g., ICC Staff, IL OAG, IPA) emphasize that Illinois law explicitly excludes generation, transmission, and distribution infrastructure from the definition of energy efficiency
    - Including PV solar could conflict with existing statutes and blur the lines between energy efficiency and renewable generation programs
- Market Impacts: Potential for Market Confusion and Program Overlap
    - The Illinois Power Agency and NRDC warn that integrating PV solar into EE programs could confuse customers, duplicate existing incentives (like Illinois Shines), and weaken consumer protections
    - It may also complicate REC tracking and undermine the integrity of renewable energy programs
- Generation Technologies: Slippery Slope to Including Other Generation Technologies
    - Several stakeholders caution that allowing PV solar as EE could set a precedent for including other generation sources (e.g., fossil- fuel generators, battery storage), which could undermine environmental goals and distort the intent of EE programs

Future Portfolio Considerations

- The portfolio has already closed the gap of screw-in lighting (300 GWh) by increasing investment in comprehensive offerings for C&I Markets such as Industrial Studies, Commissioning Solutions and Energy Advising. In parallel, ComEd is implementing innovative new upstream offerings such as Stretch Codes and Market Transformation efforts.
- In the coming years, linear lighting offerings will be phased out, introducing an equally large savings and offering gap to customers
    - To date, no other existing or incoming energy efficiency measure/technology has demonstrated the same level of effectiveness and market penetration as lighting
    - Advanced lighting controls, Heat Pumps and Weatherization alone cannot close this gap
    - Neither will PV Solar, It's not a replacement for "Traditional Energy Efficiency" it's one more tool in our tool-box. Not even our most cost-effective tool at that.
- The solution is integrating these offerings, into comprehensive whole building offerings
    - Whole Home Electric + Solar Integration
    - A bundled offering that combines deep electric efficiency (or EEE) upgrades (e.g., heat pumps, induction stoves, building controls and Water Heating) with rooftop solar installation, delivered through a single contractor under the EE framework

Solar as EE: Market Impact

- We've heard concerns on maintaining "Traditional Energy Efficiency" and we've asked the question "Is there some other magical thing we're missing?"
    - To date, no energy efficiency measure has matched the impact and mass adoption of lighting
    - The market is shaped by our customers, contractors, and stakeholders
        - Innovation is welcome, but adoption depends on Customer Needs, Market Capacity, and Economic Feasibility
        - We continue to explore new measures, but none currently offer the scale or cost-effectiveness of lighting
- Solar's Value Proposition as Energy Efficiency

    - Resource Adequacy
        - Solar contributes to grid reliability by offsetting peak demand, especially when paired with storage
        - Helps reduce reliance on dispatchable fossil generation
    - Price Suppression
        - Solar generation can lower wholesale electricity prices by displacing higher-cost generation
        - This effect benefits non-participants through societal cost reductions and Price Suppression
    - Energy Savings & Customer Protections
        - Solar delivered through EE frameworks ensures stronger consumer protections when combined with traditional REC-based models

Solar as EE: Enhancing, Not Undermining, REC Contracts

- Solar delivered through EE frameworks complements REC contracts, rather than replacing or weakening them
    - The REC contract remains intact, preserving IPA's oversight and compliance mechanisms
    - Solar generation can still be tracked for exported power, while EE frameworks focus on behind-the-meter consumption—ensuring no double-counting
- Consumer protections are stronger when combined with EE delivery:
    - Customers benefit from one installer, transparent pricing, and standardized quality assurance
    - EE programs have their own consumer protections in place that will stack on-top of those existing
- Point-of-sale (POS) rebates under EE are not taxable, unlike REC-based incentives:
    - This results in ~20% more MW delivered per dollar compared to traditional REC contracts
    - Customers save more upfront and avoid additional tax burdens, improving affordability and adoption
- EE-led solar deployment supports broader state policy goals:
    - Drives resource adequacy by reducing peak demand and grid stress
    - Contributes to price suppression in wholesale markets, benefiting all ratepayers—including non-participants.
    - Delivers energy savings by reducing delivery load and improved grid efficiency
    - Reduces total BTU's of Electricity or Natural gas needed to meet end uses

Solar as EE: Generation Technologies

- Opening the Door for Generation
    - Generation measures already exists in the TRM and portfolio offerings, Combined Heat and Power is a generation measure and power generation consumed on-site can be claimed as Energy Efficiency
        - Proposed solar savings methodology for Solar PV is no different
        - Every generation technology must be explored within this own merit in accordance with the definitions and intent of the law
    - Solar PV is Uniquely Aligned with EE and Decarbonization Goals
        - Unlike fossil-fuel generators, solar PV produces zero-emission electricity and directly supports Illinois' climate and equity mandates under CEJA. Its inclusion in EE portfolios is based on environmental performance, not just generation capability

- Policy Precedent Already Differentiates Generation Technologies
  - Regulatory frameworks already distinguish between clean distributed generation (like PV Solar and CHP) and fossil-based systems. Including solar PV does not require opening the door to all generation technologies—criteria such as emissions, fuel source, and grid impact can be used to maintain program integrity
  - Unlike other carbon-fuel based generation technologies, PV Solar Reduces total BTU's of Electricity or Natural gas in the grid needed to meet end uses at the meter

Facilitator Introduction to Solar Policy Issue, Question 2
Celia Johnson, SAG Facilitator

Solar Policy Issue: Question 2

- **Issue:** Whether electric utilities can incentivize solar thermal measures through utility EE programs
  - Does the statutory definition of "energy efficiency" allow a solar thermal measures (i.e. solar hot water and solar air heaters) in the Illinois TMR?
    - "'Energy efficiency' means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use. 'Energy efficiency' includes voltage optimization measures that optimize the voltage at points on the electric distribution voltage system and thereby reduce electricity consumption by electric customers' end use devices. 'Energy efficiency' also includes measures that reduce the total Btus of electricity, natural gas, and other fuels needed to meet the end use or uses".
      - *Statutory definition of "energy efficiency" excerpted from Illinois Power Agency Act (20 ILCS 3855/ 1-10) and Public Utilities Act (220 ILCS 5/8-104(b))*

Solar Policy Issue - Question 2			
Does the statutory definition of "energy efficiency" allow a solar thermal measure (i.e. solar hot water and solar air heaters) in the Illinois TRM?			
Comment Submitted By	**Yes**	**No**	**Link to Comments**
Ameren Illinois	X		Ameren Illinois (Solar Thermal Issue)
ComEd	X		ComEd Follow-up: Position on the grouping of solar PV and solar thermal technologies/measures
Community Investment Corp. and The Preservation Compact	X		Community Investment Corp. and The Preservation Compact
Franklin Energy	X		Franklin Energy
ICC Staff		X	ICC Staff
Illinois Office of the Attorney General	X		Illinois Office of the Attorney General
Midwest Energy Efficiency Alliance (MEEA)	X		Midwest Energy Efficiency Alliance (MEEA)
Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)	X		Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)
Opinion Dynamics	X		Opinion Dynamics (Solar Thermal Issue)

- Opportunity for parties who submitted comments to briefly explain their rationale:
    - Ameren Illinois – including summary of proposed measure
    - MEEA
    - Community Investment Corp. and The Preservation Compact
    - Opinion Dynamics
    - NRDC and NCLC
    - Franklin Energy
    - ComEd
    - ICC Staff
- **Follow-up Discussion:** Is there an opportunity for compromise, to allow the proposed solar thermal measure to be included in the IL-TRM?

IL Technical Reference Manual Next Steps:

- IL-TRM Deliverable #2 will be released on Friday, August 1
- Comments on Deliverable #2 are due Friday, August 15

Next Steps for Solar Thermal Measures:

- TBD, pending outcome of July 23 discussion

Explanation of Solar Thermal Measure Proposal

Wade Morehead, Morehead Energy, on behalf of Ameren Illinois

Solar Thermal Measures

- Uses electricity via pump or fan to move heat from outside the building to inside the building.
    - The addition of this heat to the building allows one or more building systems to achieve an end use more efficiently through reduced run time.
- Solar water heater pumps a heat transfer fluid through a solar heat collector and a heat transfer tank. This “preheats” the water before it enters the water heater, which then runs less to heat the water to the prescribed temperature.
- Solar air heater heats blows indoor air through a solar heat collector and back into the building. This causes the existing space heating system to run less often to maintain the desired indoor air temperature.
- Similar in concept to other energy efficiency measures that use heat or light energy from outside the system.

Existing TRM Measures Using Solar Energy for Efficiency

- 5.3.1 Air Source Heat Pumps
    - Example: A ductless heat pump is installed to supplement heat provided by an electric resistance baseboard heating system. The heat pump uses a refrigeration cycle to move heat from the outside air (solar thermal energy, ultimately) to the indoor air. As a result, the existing electric heating system run less and uses less electricity.
- 4.5.10 Lighting Controls - Daylight Sensor
    - Example: A daylight sensor detects when the combination of LED lighting and natural sunlight exceeds the brightness needed in a space. The brightness of the LED lighting is reduced to achieve the prescribed brightness level, which reduces the total electricity needed to illuminate the space.

Solar Policy Issue, Question 2: Does the statutory definition of "energy efficiency" allow a solar thermal measures (i.e. solar hot water and solar air heaters) in the Illinois TMR?

MEEA Position on Solar Question 2
Kit White, MEEA

- MEEA's position: Yes.
    - Unlike solar PV, solar thermal can actually "reduce the amount of electricity or natural gas consumed in order to achieve a given end use" and as such could be an allowable energy efficiency measure in the TRM.
    - The thermal heat captured by a thermal absorber and then used onsite for applications like water heating does directly reduce the amount of kWh or therms needed for those end uses.
    - ComEd has raised the fact that combined heat and power (CHP) is not defined as an energy efficiency measure in statute but is included in the TRM while solar PV is not. We believe there is sound reasoning for this. With CHP the thermal energy captured is used for onsite heating applications, and it ultimately reduces the amount of electricity or natural gas consumed to achieve an end use. CHP is more akin to solar thermal than it is to solar PV.

Community Investment Corp. + The Preservation Compact Position on Solar Question 2
Cassidy Kraimer, CIC and The Preservation Compact

- Response to Question 2: Yes.
    - Including solar-assisted heat pumps or other solar thermal systems in the TRM would expand consumer choice while staying rooted in efficiency. These technologies offer meaningful energy savings on their own and complement existing measures by making buildings more efficient overall.
    - Solar thermal reduces energy use at the point of consumption and fits squarely within both the letter and intent of Illinois' energy efficiency framework.
    - This statement reflects our position and interpretation, not a legal opinion.

Opinion Dynamics Position on Solar Question 2 (Verbal Presentation)
Zach Ross, Opinion Dynamics

Response to Question 2: Yes.

- The statutory definition of energy efficiency allows for solar thermal. Solar thermal can reduce electricity or natural gas to meet a specific end use such as water heating. I would also like to point out that the ICC approved TRM includes another measure that makes use of outside energy. In TRM 2.0, there is a direct use of solar energy. We then added measure 4.5.11, and solar light tubes have been approved ever since. This is an EE measure that directly replaces residential lighting with sunlight. Solar thermal concentrates and directs light – showing parallels between the two. Both measures are concentrating and directing solar light to meet a purpose that would otherwise be met by electric or natural gas. It is clear that the commission agrees that using solar to replace a direct end use is eligible under the statute.

NRDC +NCLC Position on Solar Question 2
Chris Neme, EFG (on behalf of NRDC) and Karen Lusson, NCLC

Response to Question 2: Yes, solar thermal should be counted as EE.

- Proposal consistent with statute
    - Key statutory language: "'Energy efficiency' means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use…"
    - Solar water heating (and other solar thermal) does reduce the amount of electricity (or gas) "consumed".
- Solar thermal's use of heat from sun to reduce electricity/gas is similar to other EE measures
    - Ground source heat pumps extract heat from ground or groundwater to lower heating/cooling kWh
    - Air source heat pumps extract heat from the air
    - Passive solar design reduces heating need in buildings by taking advantage of solar gains thru windows
    - Incorporating "daylighting" into new commercial buildings uses "free" light from outside to reduce kWh consumption
    - All of these – and more – have been supported by EE programs across the country for decades

Franklin Energy Position on Solar Question 2
Dena Jefferson, Franklin Energy

- Response to Question 2: Yes.
    - Solar thermal reduces net energy consumption.
    - Functions like traditional EE when behind-the-meter.
    - PA, TX, MA, NY include solar water/pool heaters in TRMs.
    - Delivers long-term savings, offsets peak load.
    - Supports cost-effective EE portfolios post-lighting phase-out

ComEd Position on Solar Question 2
Elder Calderon, ComEd

Solar PV and Thermal: M&V Alignment

- Clear End-Use
    - Solar Thermal: M&V boundaries are tightly aligned with specific thermal end uses (e.g., domestic hot water, space heating). Energy savings are measured by the reduction in conventional fuel (electricity or gas) needed to meet these end uses
    - Solar PV: M&V boundaries can be clearly defined around on-site electrical loads. PV offsets grid-supplied electricity for lighting, appliances, and HVAC, directly reducing delivery load
- Self-Consumption Enables Accurate Attribution
    - Both technologies primarily serve on-site loads, allowing for direct attribution of savings within the customer's meter boundary. This simplifies M&V and avoids reliance on broader grid modeling or assumptions
- Comparable to Existing EE Measures
    - Solar thermal systems are already treated similarly to other EE technologies like heat pumps, which also shift energy sources while reducing total Btus consumed

    - PV systems can be measured like other load-reducing technologies (e.g., voltage optimization), where the focus is on net reduction in delivered energy, not just source substitution
- Avoids Double Counting Through Defined Boundaries
    - Properly defined M&V boundaries ensure that solar technologies do not double-count savings across EE and renewable portfolios. This supports program integrity and compliance with REC tracking

Solar Thermal Measure Follow-up Discussion
Celia Johnson, SAG Facilitator

Question for Discussion: Is there an opportunity for compromise, to allow the proposed solar thermal measure to be included in the IL-TRM?

Elizabeth Horne: Staff disagrees. The need for electricity is being replaced by a different fuel, but the need for electricity is still there. There might be a slight reduction in energy use, but for policy, you need the same amount of energy saved. If this measure is included, there are no guarantees that overall consumption will decrease. The statute speaks more to consumption, and it can be interpreted that consumption is still there, it is just replaced with a different fuel. The issue with Staff is that there is no reduction in consumption, just a replacement. We would like to have more discussion on this.

- *Chris Neme: I think I hear you stating that the total amount of energy you would need from water heating does not change with a solar water heater, it is just coming from heat from the sun. While that is true, I have two concerns. One is that the statute defines EE not as measures that reduce the total amount of energy consumed but rather measures that reduce the amount of electricity of natural gas consumed. It is clear that when replacing an electric water heater with a solar water heater, you reduce the KWH of electricity used, and not just by a small amount, it could be up to seventy percent. Given this, and that solar thermal reduces the amount of KWH of electricity or gas, does this not meet the statutory definition?*
- *Elizabeth Horne: Yes, it seems like it does. However, the need is still there and not being decreased. It is being supplemented by another source.*
- *Chris Neme: EE is not defined as reducing total energy consumption but reducing electricity or natural gas consumption.*
- *Elizabeth Horne: Yes, consumption. But this measure still needs a certain amount of energy to be generated. We are saying that reducing consumption and replacing that energy with a renewable source is not reducing consumption.*
- *Chris Neme: I am still struggling to understand. If the statutory definition mentions reducing electric or natural gas to meet an end use, why is that not the basis for deciding whether the measure is legal or not?*
- *Elizabeth Horne: It is not decreasing energy consumption but replacing with renewable solar.*
- *Chris Neme: But it is reducing electricity consumed. We have many measures in the TRM that reduce electricity and replace with renewable energy.*
- *Elizabeth Horne: To claim EE savings, the energy for that measure needs to be decreased. In terms of claiming savings, the measure does not decrease need. We do not have an issue discussing this with colleagues, but this would be our commission recommendation.*

- *Chris Neme: Where is Staff generally in terms of this issue? We hear you saying that this is not a preferred approach. Is there a line in the sand where no compromise is possible, or is this a measure staff could live with?*
- *Elizabeth Horne: Staff's issue is with claiming savings.*
- *Chris Neme: We understand that you prefer that it not be possible. I am more interested in knowing if you have a preference and you could live with this measure.*
- *Elizabeth Horne: I can live with it, but I cannot recommend it to the Commission. When there is a non-consensus like this, we look for things that Staff can stand behind. There is no genuine argument for this. We are in the weeds, but this is the basis for our concerns. In our opinion, it does not completely satisfy the definition in decreasing the needed amount of energy.*
- *Chris Neme: There is nothing in the statute that says it is not possible.*
- *Sam Dent: If we cannot reach consensus, it is our policy to not include this measure in the TRM. If we did not include this measure in the TRM and a party objects, we would then hold a non-consensus exhibit and file it with the final document.*

Elder Calderon: Elizabeth, the position is that solar thermal is not making the equipment more efficient but simply replacing equipment with renewables. We heard this with PC solar, replacing the end use with PV solar. Both measures reduce total consumption at the meter, which is why they should be adopted. ComEd supports solar thermal.

- *Elizabeth Horne: I appreciate having this discussion. I think if we continue, eventually there will be a solar measure that would satisfy.*
- *Chris Neme (via chat): Elder, the argument we are making for solar thermal is different than PV solar. Solar thermal reduces kWh consumption, period. PV does not. it produces kWh.*
- *Charles Schreier (via chat): This seems to be entering into the discussion I thought was not going to be taking place today.*
- *Celia Johnson: My interpretation is this issue is nonconsensus, so there will not be any more discussion. If there is an objection to VEIC not including the solar thermal measure in the TRM, please share by the August 15th TRM deliverable #2 deadline.*

Facilitator Introduction to Lighting Policy Issue + VEIC Position
Celia Johnson, SAG Facilitator and Sam Dent, VEIC

Policy Issue: Lighting

- **Issue:** Review the stakeholder compromise on General Service Lamps (GSLs).
- **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.
- **Question 2:** ComEd proposed to extend eligibility in IL-TRM Version 14.0 for GSL offerings to income qualified customers through 2029, including:
    - EE Kits
    - Retail programs

Lighting Issue - Question 1			
Issue: Review the stakeholder compromise on General Service Lamps.			
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?			
Comment Submitted By	**Yes, allow IQ direct install lighting**	**No, do not allow IQ direct install lighting**	**Link to Comments**
ICC Staff	X		ICC Staff
Illinois Office of the Attorney General	X		Illinois Office of the Attorney General
Natural Resources Defense Council (NRDC)	X		NRDC
Opinion Dynamics	X		Opinion Dynamics

Lighting Issue - Question 2			
Issue: Review the stakeholder compromise on General Service Lamps.			
Question 2: Do you have comments or feedback on ComEd's proposal 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 and 2) Retail programs?			
Comment Submitted By	**Yes, allow additional IQ lighting offerings**	**No, do not allow additional IQ lighting offerings**	**Link to Comments**
ICC Staff	X		ICC Staff
Illinois Office of the Attorney General		X	Illinois Office of the Attorney General
Natural Resources Defense Council (NRDC)		X	NRDC
Opinion Dynamics		X	Opinion Dynamics

- VEIC Position:
  - VEIC, the TRM Administrator has reviewed comments submitted and listened to the SAG discussion on the potential continuation of support for the installation of general service LED lamps. On reflection, since there is consensus that direct install (DI) lighting should continue, but no consensus on the appropriateness of additional programming (i.e. retail or kit programs), VEIC plan to default the TRM to reflect the consensus, and limit use of the measures for direct install applications only.
  - In regards to the measure life for these DI replacements, without a stakeholder compromise to the contrary, VEIC plan to default to the proposed 2-year measure life, which we believe is an appropriate technical assumption for the remaining useful life of the replaced incandescent or halogen baseline. If an alternative measure life is agreed through a stakeholder agreement (as occurred in 2023) we will reflect that in the TRM, and/or we are open to discussions in the TAC for a longer measure life in conjunction with a lower first year savings reflecting bulbs being installed in sockets with lower run hours.

IL Technical Reference Manual Next Steps:

- IL-TRM Deliverable #2 will be released on Friday, August 1
- Comments on Deliverable #2 are due Friday, August 15

Next Steps for Lighting Issue:

- VEIC will include their position in IL-TRM Deliverable #2. If parties object or share feedback on VEIC's position, please submit a comment by the Deliverable #2 deadline.
- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If there is a recommended adjustment to VEIC's position on a 2-year measure life, that discussion will be held in the TRM TAC process.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.

Facilitator Introduction to EE with On-Site Generation Policy Issue

Celia Johnson, SAG Facilitator

Policy Issue: EE Measures with On-Site Generation

- **Issue:** Whether there are concerns about utilities claiming energy efficiency savings from measures at a site with significant on-site generation.
- **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?
- **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?
- **Guidehouse:** Brief explanation of policy issue

On-Site Generation Issue - Question 1		
Issue: Whether there are concerns about utilities claiming energy efficiency savings from measures at a site with significant on-site generation.		
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?		
Comment Submitted By	**Explanation of Position**	**Link to Comments**
ICC Staff	Yes, if utilizing an "offset-purchased-power rule", which grounds the EE results in what actually happens at the meter.	ICC Staff
Illinois Office of the Attorney General	No position yet - raised questions and requested additional discussion.	Illinois Office of the Attorney General
Natural Resources Defense Council (NRDC)	Yes. The fact that there may be on-site supply of electricity does not change the fact that the EE measure will reduce electricity consumption by the measure, which is the statutory goal.	NRDC

On-Site Generation Issue - Question 2		
Issue: Whether there are concerns about utilities claiming energy efficiency savings from measures at a site with significant on-site generation.		
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?		
Comment Submitted By	**Explanation of Position**	**Link to Comments**
ICC Staff	Yes, there should be limits on the claimed savings. Staff supports claimed savings for EE measures installed in buildings with on-site renewable generation be limited to, and not exceed, the customer's metered grid imports over the most recent twelve-month period.	ICC Staff
Illinois Office of the Attorney General	No position yet - raised questions and requested additional discussion.	Illinois Office of the Attorney General
Natural Resources Defense Council (NRDC)	There should be no limits to savings.	NRDC

Guidehouse responds to questions raised by Illinois Office of the Attorney General

1. **IL AG Question:** How do other states evaluate efficiency savings at sites with on-site behind-the-meter renewable generation?
    a. **Guidehouse Answer:** We do not have research that would provide a comprehensive answer to the question.
2. **IL AG Question:** Referring to Guidehouse's memo re: Energy Efficiency Measures in Net Zero Buildings dated June 3, 2025, provide statutory support for the "Arguments" on page 2.
    a. **Guidehouse Answer:** The Guidehouse memo was intended to help policy makers think about the issues at hand. The memo has a section labeled 'arguments' but it should have been labelled something else. We take no position on the policy question and make no arguments either in favor or against it. We feel it is not appropriate for us to extend any specific argument.
3. **IL AG Question:** If behind-the-meter on-site renewable generation expands because of utility intervention, how do we ensure this does not lead to an increased infrastructure investment expenses because of variable or increased load (assuming these projects do not have battery components)?
    a. **Guidehouse Answer:** The intent of policy issue #3 is to address only energy efficiency measures installed in buildings that already have on-site generation. Thus questions of the implications of expanding renewable generation behing the meter are not german to the policy issue at hand.
4. **IL AG Question:** Clarify whether these questions exclusively apply to on-site, behind-the-meter, renewable projects, or whether they would apply to all on-site, behind-the-meter, generation projects (e.g. gas generation)?
    a. **Guidehouse Answer:** This is a question that the policy should address and as such Guidehouse takes no position.

Opportunity for Discussion: Are there any additional questions or comments on this policy issue?

Jeff Erickson: We circulated a memo ahead of the last meeting on this topic to outline the issues we saw and facilitate discussion. I wish I wrote it differently, as we are not trying to make a stance. The goal was to give utilities clarity on what conditions or circumstances they can pursue EE measures in buildings with onsite solar, which could apply to campuses, businesses,

etc. The first question noted, it is probable that some buildings have small on-site generation. For question two, there can be conditions that need to be applied depending on what the building's solar looks like. Whether a solar system is configured to the grid, and either big enough that it could meet one hundred percent of the building's energy needs, or on average, meets more than the average power demand over the years. We presented three possible policy stances including a full savings claim, offsetting purchase power, or full savings under certain conditions. This discussion is about standard EE measures in the TRM, energy savings are not under question. If the policy ends up as something other than full savings, there are concerns about how the data will be collected, how the rules are made.

Kim Janas: Overall, I am confused about the tone or limitations of the answers. For question one, you have not done research on other states, should we look at these? I understand you are suggesting this for discussion and not taking a position, but it seems framed differently than other measures in the TRM. Maybe this is not complete yet. Your answer is clear, but could we do research on ither states?

- *Jeff Erickson: My initial thought is that I could do that. But my research might surface a skewed response. We might hear about places that do allow it, but not those that debated and decided to not do it. If it is to be done, it should be done thoroughly. To your other question, we are operating under rules very specific to legislation, this happens when we are looking to other states for insight.*
- *Kim Janas: Thank you, I appreciate it. As a lawyer, it would not be legally binding, but it can be persuasive. The more we learn, the better things can be. Maybe we can take on this research, I know we have until August 8th for written comments, but I feel as though we should always learn more, especially dealing with ratepayer money.*
- *Jeff Erickson: I do not disagree with that.*
- *Celia Johnson: You observed, Kim that this is different than the other TRM measures, this is more about savings. VEIC and myself both concluded that this does not need to go into the TRM, but instead is a policy issue outside of the TRM.*
- *Kim Janas: Yes, that is helpful.*

Chris Neme: I have not done a review of other jurisdictions, but I will say that I am not aware of another jurisdiction that limits savings goals based on the building in which the measures are installed. Rooftop PV has been around a long time, it is not a new thing. I am not aware of constraints. My other comment is that EE measures are defined as those that decrease electricity or natural gas for an efficient end use. If I rebate a fridge in an EE building, there will be a reduction, no matter the amount of PV on the roof of that building.

Jeff Erickson: Regarding question two, we are not taking a position.

- *Kim Janas: I am a little confused on the global positioning with these responses, we are asking about the statutory support you have for your memo.*
- *Jeff Erickson: I would go off what Chris said – it is about reducing energy of an end use. The statutory support is in the definition of energy efficiency.*

Jeff Erickson: For question three, we tried to emphasize it in the introduction. The focus is the EE measure and whether there is an expansion. More about if the measure can be counted. It seems that this question does not relate to the policy at hand.

- *Charles Schreier: It clearly articulates that the goal of the plan is to offset infrastructure costs, as we add DERMS and solar and integrate into the grid. To what degree, contrary to the portion of the law, might this accelerate the need for grid infrastructure. We may need more time to address the details we would like to respond to.*

- *Abigial Miner: Circling back to Celia's point that this is different than other TRM measures, I am not clear on if an EE program implements this, as we already have buildings with onsite energy generation. I am not sure why this question is coming up now.*

Jeff Erickson: This issue came up relative to a site that had solar PV [ComEd EE project]. If we define a policy, we could define it only to solar PV. Buildings with solar are being built all the time now. You could create a policy that only applies to PV, or make a statement clarifying what it does and does not apply to.

- *Charles Schreier: Our team's perspective is getting ahead of the technology precedent. We are all watching the AI infrastructure buildout, so we need to be mindful of impacting future interpretations regarding data centers with behind the meter generation, infrastructure cannot keep up. Improper or vague language could start an avalanche.*
- *Abigail Miner: Other policy proposals were more specific, they had a policy to react to, we were not being asked a yes or no question, which is I think why we are having a harder time.*

Chris Neme: Regarding the last question, I am struggling with the response that the policy could apply to PVs but not to other things. I do not understand from a policy or statistical perspective why that would be the case. I am wondering if someone could articulate why or how it would be different.

- *Zach Ross: Jeffs comments are noting that we need to be specific if we are going to write a policy that goes in the TRM. Jeff is not suggesting there is a statutory reason they should be different, but we have to be careful when we are writing the language.*
- *Jeff Erickson: My other thought is that we could have no policy statement, hear everyone's concern, then evaluators would proceed when something comes through and operates. If no decision is made, we would just operate on that measure as we do any other measure. Verified net savings on procedures.*
- *Zach Ross: Yes, that aligns. Solar PV has never had a correction.*
- *Jeff Erickson: The decision could be that we do not need one. We will continue to think about it.*
- *Abigial Miner: Thank you for reminding us about the retro-commissioning project in question, I was not connecting this to that issue. Is the retro-commissioning project in a TRM measure?*
- *Jeff: It is custom.*
- *Abigial Miner: Why are we talking about it in the TRM?*
- *Zach Ross; Why would you make an adjustment other than a custom project, and not for a customer? There needs to be consistency.*
- *Abigial Miner: I appreciate that, we are talking about deemed savings measures. Say we have a rebate measure for a household with solar PV, how would the evaluator know the nature of the home that the rebate is going to?*
- *Zach Ross: If SAG's guidance is that we need to do that, then we have to change data collection practices.*
- *Jeff Erickson: If there is no need, we operate and measure savings as we usually do. If we change data requirements, we will then need clarification on data flow and rules. It will be very complicated if that is the route we take. I am not suggesting anything needs to come of this.*

Celia Johnson: Thanks for the discussion. I heard a desire for research on other jurisdictions. Evaluators could consider this research during 2026, then a proposal could be presented to the

SAG with draft evaluation plans. If additional time is needed to share written comments, we can extend the comment deadline.

- *Kim Janas: Our original point is that we have not been able to have full discussion because of the other weighty issues in SAG. Happy to abide by the August 8th deadline. This would be past the August 1st TRM deadline, so this would not be included, correct?*
- *Celia Johnson: Yes, it is not necessary to include in the TRM. We do not need to do a nonconsensus exhibit at this point either.*

Elder Calderon: This issue needs more time. There are several pending customer applications, and we do not want to keep them waiting too long. We would appreciate clarity on how to handle such applications as policy discussions develop.

- *Celia Johnson: We could hold a follow-up discussion in September if needed. What timeline would you suggest for solving this issue?*
- *Elder Calderon: Customers have already been waiting. We would like for this to be resolved within the TRM timeframe, so by August. Any further will create issues. We would like interim clarity on how we can move forward with pipeline applications while we wait.*
- *Celia Johnson: At this point, it will not be possible to resolve by August, but we can aim for September. Since this is not a proposed measure, it does not need to be in the TRM.*
- *Elder Calderon: Is there any way to have these applications going through honoring savings while discussions are happening?*
- *Kim Janas: This is the first time we are hearing this. The Guidehouse model does not connect back between the customers. We are confused about the sudden urgency.*
- *Sam Dent (via chat): Seems to me this is a discussion between the utility and their evaluator... until a central policy is developed.*
- *Celia Johnson: Note the chat comment from Sam. Without a SAG policy, a decision like this is between the evaluator and the utility. Does that help?*
- *Elder Calderon: Yes, thank you.*

Chris Neme: I am not sure what that means. To Zach's point, we have a lot of measures in the TRM that are prescriptive savings that implicitly assume that an efficient measure produces all counted savings, there are no adjusted TRM measures for fractions of the businesses that have some generation distributed on the grid from behind the meter. The TRM implicitly assumes all the savings are counted. As Zach pointed out, this is not a rationale for customers to be treated differently. Given this and our interpretation of the statute, I wonder whether we could say we are not going to change the savings count and hold a discussion next year with a commitment to research and analysis to inform those conversations.

- *Celia Johnson: Chris is proposing that savings should be counted as they have been, and we agree to further discuss in 2026. We will keep the August 8th written comment deadline for additional feedback on this policy question.*

Next Steps for On-Site Generation Policy Issue:

- Additional comments due Friday, August 8 – send to Celia@CeliaJohnsonConsulting.com
- SAG will hold a follow-up discussion in 2025, if needed.
- Resolution of this policy does not need to be included in the IL-TRM; resolution could be considered for a future update to the IL EE Policy Manual.

Facilitator Summary – Electric Vehicle Policy Issue Status

Celia Johnson, SAG Facilitator

Policy Issue: Electric Vehicle Measure

- **Issue**: *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?*

Electric Vehicle Policy Issue			
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?			
Comment Submitted By	**Yes**	**No**	**Link to Comments**
Ameren Illinois	X		Ameren Illinois Presentation on June 9: New Measure - Light Duty Electric Vehicles
ICC Staff		X	ICC Staff
Illinois Office of the Attorney General		X	Illinois Office of the Attorney General
Natural Resources Defense Council (NRDC)	Conceptually supported the concept of this measure, but shared concerns about program design.		NRDC

IL Technical Reference Manual Next Steps:

- IL-TRM Deliverable #2 will be released on Friday, August 1
- Comments on Deliverable #2 are due Friday, August 15

Next Steps for Proposed Electric Vehicle Measure:

- VEIC will not include the proposed EV measure in IL-TRM Deliverable #2. Objections to VEIC not including these measures are due by the Deliverable #2 deadline.
- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If needed, a draft non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.

Closing and Next Steps

Upcoming IL-TRM Version 14.0 Deliverable:

- IL-TRM Deliverable #2 will be released on Friday, August 1
- Comments on Deliverable #2 are due Friday, August 15

Next Steps for IL-TRM Policy Issues

Policy Issue #1 – Lighting

IL-TRM Deliverable #2 will reflect the consensus that General Service Screw-based Lamps can continue to be supported through Direct Install (DI). In the absence of consensus on additional programming or for an extended measure life, the measure will be limited to DI only and lifetime will reflect the estimated remaining life of the baseline lamp. If parties object or share feedback, please submit a comment by the Deliverable #2 deadline.

- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.

- If there is a recommended technical adjustment to the measure life, that discussion will be held in the TRM TAC process.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.

Policy Issue #2 – Solar Measures

Solar PV Measures
In the absence of SAG consensus, VEIC will not include the proposed solar as PV measures in IL-TRM Deliverable #2. Objection(s) to not including these measures are due by the Deliverable #2 deadline.

- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.

Solar Thermal Measures
In the absence of SAG consensus, VEIC will not include the proposed solar thermal measure in IL-TRM Deliverable #2. Objection(s) to not including these measures are due by the Deliverable #2 deadline.

- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.

Policy Issue #3 – EE Measures with On-Site Generation

- Additional comments due Friday, August 8, as referenced above.
- A follow-up meeting to discuss policy issue #3 will be scheduled, if needed.

Policy Issue #4 – Electric Vehicle Measure
In the absence of SAG consensus, VEIC will not include the proposed EV measure in IL-TRM Deliverable #2. Objection(s) to not including these measures are due by the Deliverable #2 deadline.

- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.