

Illinois EE Stakeholder Advisory Group (SAG) Small Group Meeting

Tuesday, March 3
2:30 – 4:00 pm
Teleconference

Attendees and Meeting Notes

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Meeting Materials

Meeting materials are posted on the [March 3 SAG Small Group meeting page](#):

- [March 3, 2026 SAG Small Group Meeting Agenda](#)
- [SAG Facilitator Introduction to March 3 Meeting](#)
- [Joint Utility Presentation](#)
- [Next Steps](#)

Attendees

Name	Company or Organization
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Ashley Palladino	Inova Energy Group
Channel Turbides	ComEd
Courtney Golino	Guidehouse
John DeRosa	Illinois Environmental Protection Agency
Elder Calderon	ComEd
Emily Sims	ACEEE
Fernando Morales	Ameren Illinois
Omayra Garcia	Peoples Gas and North Shore Gas
Elizabeth Horne	ICC Staff
Jane Anderson	Inova Energy Group
Jeff Erickson	Guidehouse
Joe Mays	Cascade Energy
Jonathan Skarzynski	Nicor Gas
Kari Ross	NRDC
Kim Swan	ComEd
Kit White	MEEA
Kristen Kalaman	Resource Innovations

Name	Company or Organization
Matt Armstrong	Ameren Illinois
Mick Prince	DCEO
Danish Murtaza	Peoples Gas and North Shore Gas
Nicole Popejoy	IL Association of Community Action Agencies (IACAA)
Nordhus, Jarred	Peoples Gas and North Shore Gas
Rohith Mannam	Nicor Gas
Scott Bernstein	No Organization Identified
Scott Mallory	Brubaker & Associates, representing IIEC
Tina Grebner	Ameren Illinois
Wade Morehead	Morehead Energy

Meeting Notes

See **red text** for follow-up items.

Introduction to Small Group SAG Meeting

Celia Johnson, SAG Facilitator

Purpose of March 3 SAG Small Group Meeting

- To hold a follow-up discussion with interested SAG participants on the Inflation Reduction Act (IRA) savings attribution proposal from Illinois utilities
 - At the January 13 Large Group SAG meeting, Illinois EPA, DCEO, and Illinois Utilities presented
 - Illinois utilities jointly proposed a savings attribution policy proposal, to replicate the existing approach and methodology used for the Illinois Home Weatherization Assistance Program (IHWAP):
 - A 50% cost contribution for eligible measures by funding utility or utilities (based on fuel type/savings) for full (100%) savings attribution to the funding utility or utilities for funded measures.
 - Utility/Utilities fund 50% of the total cost for eligible measures, as calculated by the CAA; includes material, labor, and CAA administration and implementation fees.

Feedback Received and Next Steps

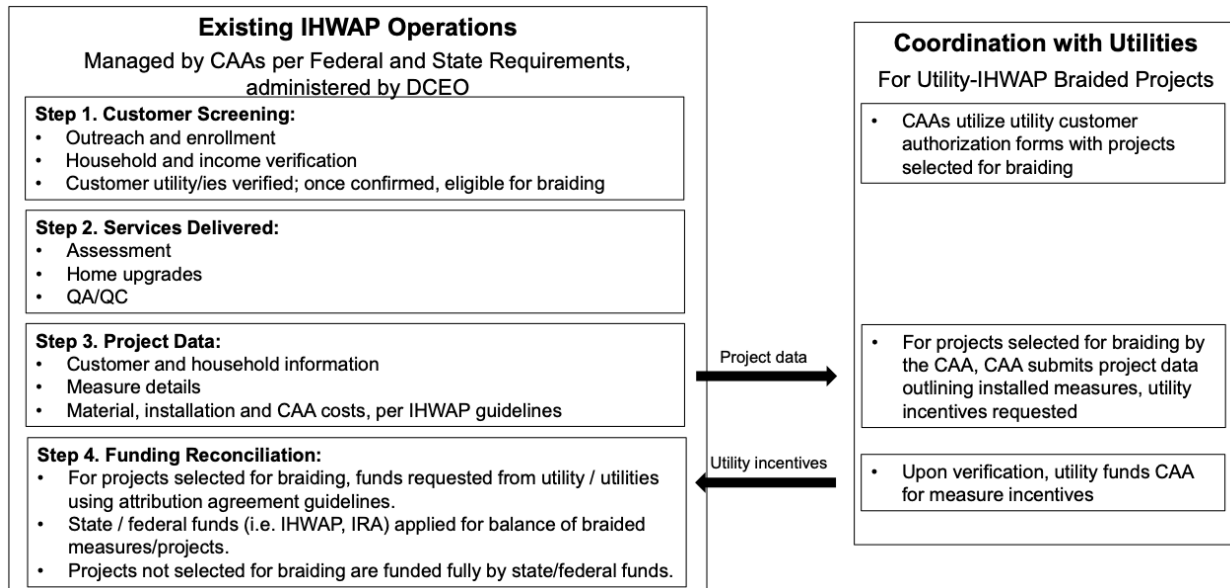
- Feedback Received
 - Written feedback on the savings attribution policy proposal was requested from interested SAG participants, due January 28
 - The following SAG participants submitted feedback by the January deadline, posted on the March 3 meeting page:
 - American Council for an Energy Efficient Economy (ACEEE)
 - Natural Resources Defense Council (NRDC)
 - Illinois Commerce Commission (ICC) Staff
- Next Steps
 - At the March 3 follow-up meeting:
 - Illinois utilities will respond to feedback received
 - The goal is to confirm agreement on the savings attribution policy proposal

- Discuss whether a savings attribution policy should be documented in: 1) A future update to the Illinois EE Policy Manual; or 2) A statewide stipulated agreement

Joint Utility Presentation

Matt Armstrong, Ameren Illinois

Current Utility Coordination with IHWAP



Scott Bernstein (via chat): Can you elaborate on the 400 homes/year cap?

- *Matt Armstrong: It's not a cap. Over the years we have been working closely with DCEO and with our CAAs. We have recognized there is a limitation on their capacity. Their program allies and work crews out in the field have not been able to get more than 400 homes per year [in Ameren's service territory]. Dollars spend on utility-only programs can get more savings than dollars spent with IHWAP/DCEO. It is not ideal from a customer value perspective for us to be shifting dollars and serving more than 400 homes per year.*

Topics to Address During March 3 Meeting – Responding to SAG Feedback

1. Enhanced data sharing (ACEEE)
2. Evaluate how “eligible measures” will be defined (ICC Staff)
3. How CAA-calculated costs will be reviewed and validated for attribution purposes (ICC Staff)
4. How the approach will be applied in multi-funded projects to ensure it does not produce inequitable or distorted portfolio results (ICC Staff)
5. Utilities should affirmatively commit that adoption of this attribution proposal will not be used to justify reductions, offsets, or redistribution of utility IQ budgets, program scope, or service levels in future planning cycles for the 2027-2029 energy efficiency plan (ICC Staff)
6. Mitigate risk of unintended ROE “windfall” outcomes (ICC Staff)
7. Basis points discussion (Ameren and ComEd) // (ICC Staff)
8. Format of agreement – Policy Manual proposed

Topic #1: Enhanced data sharing (ACEEE)

Response from Illinois Utilities:

- The utilities are not eager to circulate that amount of data around; it is Personally Identifiable Information (PII). We also are not sure that DCEO would want to have that amount of data, both due to PII and cybersecurity concerns. I also don't know if DCEO has the analytics to determine who the highest users are.
- The biggest reason we are not sure this is not a viable path is because Community Action Agencies already have wait-lists for these programs. They have already verified eligibility for customers; there isn't a need for this type of targeting. If waiting lists were to shrink to the level where we need to introduce more customers, we could look at data and Ameren could provide a list of the highest using customers to Agencies (as opposed to handing the data over). Where we are at now, we don't see a need to target customers in this manner since there is already a pipeline.

Emily Sims: Thank you for addressing our recommendation. You mentioned Ameren will conduct future analysis - will there be other data points beyond what is shared with IHWAP that is needed for IRA evaluation?

- *Matt Armstrong: We have been working with DCEO on the ability to exchange data and are preparing to share more than what we currently do under the IHWAP program.*
- *Mick Prince: One of the subtle differences with the IRA HOMES funding is that HOMES funding requires a calibrated model, which we need 12 months of pre-weatherization consumption data. That is something we have never needed from utilities in the past. We don't run a calibrated model in IHWAP. That is mostly what we need the data for, for the BPI 2400 calibrated model. We are also looking at using the data post-weatherization, for evaluation purposes.*

Scott Bernstein: Even with budget capacity limits, this program is a reliable stream of funding for this sector. Comprehensive answers to questions like this can help and apply to other programs. I understand the capacity limits, but whether you are keeping up with the need in these communities should be considered.

- *Matt Armstrong: Thank you. We appreciate the input and agree that the collaboration is important.*

Topic #2: Evaluate how "Eligible measures" will be defined (ICC Staff)

Response from Illinois Utilities:

- Our assumption is that eligible measures done through funding from the IRA would match measures done through the 50/50 attribution-eligible IHWAP measures. There would be no additional review.

Elder Calderon: We are largely working off assumptions of existing IHWAP structure. There are other details, such as measure mixing, assumptions of pairs, existing EE and prescriptive measures, as well as TRM measures that will be included.

- *Elizabeth Horne: I imagine it will be the same, all eligible measures will be included.*
- *Mick Prince: For the IRA HOMES program, the measures are exactly the same as IHWAP. For the HEAR program, the only new measure compared to IHWAP is the heat pump clothes dryer.*

Topic #3: How CAA-calculated costs will be reviewed and validated for attribution purposes (ICC Staff)

Response from Illinois Utilities:

- This is similar to topic #2. We haven't seen exactly what this would look like and what the funding levels are on the DCEO side, but similarly to the eligible measures, we are assuming that CAA costs will be applied in the same way through projects funded through IHWAP.

Elizabeth Horne: These are joint programs with IRA dollars, but the IRA funds will funnel from DCEO, correct?

- *Matt Armstrong: Yes, IL EPA has determined that the best way to deliver these funds is through DCEO and the CAAs. There is no funding going directly to the utilities.*
- *Elizabeth Horne: Joint utility programs are 50% or 25% for each utility, correct?*
- *Matt Armstrong: It is 50/50 for Ameren. We fund 50% of the project costs and DCEO funds the other 50%.*
- *Elizabeth Horne: The funds are 50% Ameren and 50% IRA in this situation? And Ameren receives 100% savings attribution?*
- *Matt Armstrong: Yes.*
- *Elder Calderon: For the northern utilities, the 50% is funded jointly for 100% attribution, and then the savings are distributed based on attribution. The only difference is that in northern Illinois, there are multiple utilities.*
- *Kim Swan: Utility attribution equals 100%, not 100% for solely electric or solely gas, they get credit for their respective savings.*
- *Elizabeth Horne: The initial question was that the increase in funding or receiving IRA dollars would benefit the joint programs, and depending on what the split was, there would be a certain level of recovery for those funds. It should be 100% attribution for the energy savings, as it was before. When introducing the IRA dollars, are you increasing where you are recovering?*
- *Elder Calderon: For the utilities to get the attribution, they have to fund 50%. The utilities will always fund their share of 50%, to get the 100% attribution. State funding and federal funding cannot mix for a single project – CAAs will have to pick either IHWAP or IRA funding. You will always have the dynamic of 50% coming from the utilities, and 50% coming from another source. If the utilities don't provide that 50% of the funding, then we would not have that attribution in place.*
- *Kim Swan: I think there has been some confusion about the attribution of IRA dollars. It is not that the utilities are receiving additional budgets – those dollars are going to IEPA/DCEO. They are asking utilities to help them go after projects. Utilities are helping [DCEO and the Agencies] utilize the funding they are getting through IRA. The utilities are not getting a windfall of funding. This is a very expensive program for ComEd. The utilities are trying to help stretch the dollars to help implement savings that are envisioned by other state agencies. There is no money coming to a utility. Utility budgets are dictated by the statute. We are not contemplating higher profits, or more savings that we are not paying for.*

Topic #4: How the approach will be applied in multi-funded projects to ensure it does not produce inequitable or distorted portfolio results (ICC Staff)

Response from Illinois Utilities:

- Multi-funded projects are funded 50% IHWAP through DCEO and 50% through utilities. We are not talking about IRA dollars stacking on top of IHWAP dollars. In our EE plans that have been filed and approved, assumed budgets for 50% split for projects that are delivered in conjunction with DCEO with dollars from IHWAP. If IRA dollars come to fruition, the utility's 50% is all they have. As an example for Ameren, it is 400 homes total that are being served – we cannot serve 400 houses through IHWAP funds then 400 more through IRA funding.

Topic #5: Utilities should affirmatively commit that adoption of this attribution proposal will not be used to justify reductions, offsets, or redistribution of utility IQ budgets, program scope, or service levels in future planning cycles for the 2027-2029 energy efficiency plan (ICC Staff)

Response from Illinois Utilities:

- We have talked a lot already about how this will work, so there will not be shifts that affect this budget. Starting in 2027, CRGA has minimum IQ spend levels, so the utilities will be held to those. From Ameren's perspective, we have agreed to an IQ minimum spend level in our stipulation agreements and that would be the same under CRGA. Whether we leverage IHWAP or IRA funds, it would still be held to the same level of IQ spending.

Elder Calderon: Agreed, there is a similar assumption from topic #4 that if the other 50% of the spending is count under the utility which is not the case. The utility only gets savings for the dollars spent.

Topic #6: Mitigate risk of unintended ROE “windfall” outcomes (ICC Staff) and Topic #7: Basis points discussion (Ameren and ComEd) // (ICC Staff)

Response from Illinois Utilities:

- This does not change any outcomes for ROE [for Ameren and ComEd]. This has nothing to do with basis points.
- There is no additional funding that the utilities will be receiving. We have a set budget, and we will not receive any funding above us. There is no ROE windfall, but a continuation of what we have been doing for the last few years with DCEO regarding 50/50 costs and 100% attribution. Utilities are claiming these savings, and they have been considered in the plans. There are no additional savings to be had.

Elizabeth Horne: You were saying that the plan includes 400 homes that Ameren would be able to reach? With or without IRA funding?

- *Matt Armstrong: Yes, assuming the CAAs have that capacity.*
- *Elizabeth Horne: If the IRA funds come through, could the number of homes increase?*
- *Matt Armstrong: Yes, the only difference is where the funding would be coming from. If not from IRA, then it would come from IHWAP.*
- *Elizabeth Horne: Where would additional IRA funds go in the portfolio after the 400 homes are reached?*
- *Kim Swan: Reminder that it is not additional budget for the utilities; the IRA money is going through DCEO. Our budgets remain stagnant whether IRA funds come through or not.*
- *Elizabeth Horne: From a portfolio standpoint, what would be included in the plan if the budgeted amount of funds for IRA come through?*

- *Elder Calderon: The additional IRA-funded projects only displace other projects. In Ameren’s case, IRA funds could serve 200 homes, there will not be a net increase in homes overall over 400. Similarly to ComEd, it would displace other projects that would have been done.*
- *Matt Armstrong: For Ameren, if we serve 400 homes in conjunction with DCEO, we need a certain amount of funds. If DCEO, mid-year, says they’ve exhausted IHWAP funds, then IRA funds come through, we have still exhausted our budget. We do not have any more money unless we shift dollars into that program, we cannot spend above what we were given.*

Confirmation of Agreement

Elizabeth Horne: When we reach agreement on the policy, this would be put in the Policy Manual?

- *Matt Armstrong: Are we agreed on the attribution? If we are, then we can start thinking about memorializing.*
- *Elizabeth Horne: That sounds like a discussion for the SAG.*
- *Celia Johnson: We are trying to confirm agreement at this point, no one in the SAG flagged a concern about the IRA attribution proposal and there seemed to be general agreement through the comments submitted [in advance of this Small Group meeting]. Does ICC Staff need more time?*
- *Elizabeth Horne: It seems like everyone agrees.*
- *Matt Armstrong: Thanks for the confirmation.*

Topic #8: Format of agreement – Policy Manual proposed

Response from Illinois Utilities:

- All Illinois utilities recommend the final IRA attribution policy be included in a future Policy Manual update.

Matt Armstrong: Celia, would this need to be an interim policy until next year?

- *Celia Johnson: Yes. I will ask the utilities to draft a policy circulated to those in the small group meeting who submitted comments. We can have a follow-up if needed to resolve policies. The final policy will be posted on the SAG website Policy page. There are two options for adding the IRA attribution policy to Policy Manual: 1) In mid-2026, when the Policy Manual is corrected for errors due to CRGA; or 2) In the next comprehensive Policy Manual update process that will occur at SAG in 2027.*
- *Kim Swan: We are happy to draft the policy language. It makes more sense from ComEd’s perspective to include this policy in the 2027 Policy Manual update.*

Next Steps

Celia Johnson, SAG Facilitator

ComEd will prepare a draft policy document and coordinate with the other utilities before circulating the document for review.

Process to resolve final IRA attribution policy document:

1. The final draft IRA attribution policy document will be circulated for review to the distribution list from the March 3 SAG Small Group Meeting.

2. If substantive edits are received, a follow-up discussion will be scheduled with parties who shared proposed edit(s).
3. The final policy document will be posted on the Policy page of the SAG website.
4. The policy will be included in the next comprehensive update to the Policy Manual, planned for 2027.