Illinois TRM Version 14.0:
TRM Policy Issues

June 9th, 2025

Presentation to SAG

TRM Policy Issues

- VEIC is the TRM Administrator, responsible for facilitating the Technical Advisory Committee (TAC) to agree upon updates and additions to the TRM each year.
- Where issues arise with potential policy implications, the TAC/VEIC request review and guidance from the SAG.
- Four distinct policy items have been raised in this year's update (v14).
- We request focus and judgement on the key policy questions posed.
  - The TAC remains the appropriate venue for any further technical related discussions and agreements.

TRM Policy Issues

1. Review and potential update of stakeholder compromise on general service lamps:
   - (Residential) screw-based LED lamps
   - LED Screw Based Omnidirectional Bulbs
2. New measures involving renewable/solar generation:
   - Solar as Energy Efficiency
   - Solar Air Heater
   - Solar Water Heating
3. A policy question relating to energy efficiency upgrade at a site with significant on-site generation:
   - Building with on-site generation saves more energy than the net annual energy purchased from the grid
4. Revisiting the Electric Vehicle as an efficiency measure issue:
   - Electric Vehicles/EV Efficiency

1. Review Stakeholder Compromise on General Service Lamps

In August 2022, the Stakeholders reached an agreement on the continued support of General Service LED Lamps after the enactment of the backstop provision of the Energy Independence and Security Act (2007).

August, 2022 Stakeholder Agreement

Non-IQ Programming:

- End support of LED lamps in retail, kit and school distribution programs from July 1st, 2023.
- Direct Install programs could continue, assuming 2 year measure life.

IQ Programming:

- All programs (retail, direct install, kit, school and foodbanks) could continue through 2025, assuming 8 year measure savings lifetime.

1. Review Stakeholder Compromise on General Service Lamps

Both ComEd and Ameren submitted items to allow continued support for these measures noting baseline study shows continued savings available.

Questions for SAG:

- *Can IQ lighting programs continue to support screw based LED lamps beyond 2025?*
- *If so through which program types (retail, direct install, kit, school and foodbanks)?*
- *Should measure lifetime continue to be 8 years?*

- *Can non-IQ direct install programs continue?*

2. New Measures Involving Renewable/Solar Generation

Three new measures have being proposed for inclusion in v14 of the TRM, which involve a renewable energy source (namely solar):

Solar Generation Measure:

- Solar as Energy Efficiency (ComEd): Claiming savings from rooftop PV when generation is simultaneous with site consumption (i.e. not claiming generation fed back in to the grid)

Solar Thermal Measures:

- Solar Water Heating (Morehead Energy on behalf of Ameren)
- Solar Air Heater (Morehead Energy on behalf of Ameren) - Request removed for v14

2. New Measures Involving Renewable/Solar Generation

- Note, prior SAG discussions (2021/2022) around if/when renewable measures can be part of EE program goals:
  - https://www.ilsag.info/wp-content/uploads/Proposed-Policy-RE-as-EE_Guidehouse_2022-06-09.pdf
  - https://www.ilsag.info/wp-content/uploads/Illinois-Renewable-Measures-EE-Eligibility-SAG-2021-07-14.pdf

Questions for SAG:

- *Are these three measures, involving the replacement of electric/fuel loads with renewable sources permissible in the utilities programs?*
- *Are there any restrictions or requirements, rules or stipulations the TAC can follow for any future proposed measure involving renewables?*

3. Energy Efficiency Upgrades at Sites With On-Site Generation

Request from Guidehouse to consider the policy implications of energy savings from standard energy efficiency measures installed in buildings with on-site renewable energy generation.

Guidehouse memo

Questions for SAG:

- *If a utility energy efficiency program implements a measure in a building that has on-site renewable energy supply, under what circumstances can the program claim energy efficiency savings from that measure and how should those savings be calculated?*

4. Electric Vehicles

- In 2024 an Ameren workpaper was submitted which compared a new Electric Vehicle against a gasoline car baseline.
  - Objections were raised by ICC Staff and the Attorney General's Office and the measure was ultimately withdrawn.

- In 2025, a new Ameren workpaper has been submitted which compares a new high efficiency Electric Vehicle against a standard efficiency Electric Vehicle.

Electric Vehicles/EV Efficiency

4. Electric Vehicles

2024 Objections:

- Issues around applicability of measure increasing electricity usage and solely saving gasoline.
- Stipulation as part of the Beneficial Electrification provision of CEJA, that utilities are precluded from offering rebates for passenger electric vehicles, as this authority has been delegated to the IL EPA.
- Most customers likely freeriders as incentive insufficient to change customer mind.
- Unlikely to support low-income customers

- ICC Staff Comments on Ameren Electric Vehicle Measure Proposal
- Illinois Attorney General's Office and National Consumer Law Center Comments on Ameren Electric Vehicle Measure Proposal and ComEd Policy Proposals
- NRDC Comments on Ameren Electric Vehicle Measure Proposal and ComEd Policy Proposals

4. Electric Vehicles

2025 Feedback from ICC Staff:

- ICC previously determined utilities can not provide rebates for passenger electric vehicles because that authority is granted to the IL EPA.
- This pertained to the electric utility Beneficial Electrification plan, but the same concept applies to EE.
- Excerpt from ICC Docket No. 22-0432, Interim Order for ComEd's petition for approval of Beneficial Electrification Plan:

> *ComEd's BE Plan proposes rebates for residential passenger EVs and rebates for charging stations (as opposed to make-ready infrastructure). These are exactly the types of rebates that the IEPA was given the authority to grant. To state that the Commission has the authority to approve such rebate programs under the EVA would dilute the purpose of assigning the rebates to the IEPA through the EV Rebate Act and the EVA. Moreover, if the Commission approved similar rebate programs through the EVA, they would be unnecessarily duplicative.*
>
> *Accordingly, the Commission finds that the rebate programs identified and contested by Staff are not within the authority of the Commission to approve and should be removed from the BE Plan. Staff's Motion regarding this issue is granted.*

4. Electric Vehicles

Ameren response to 2025 ICC Staff Feedback:

"…It is our position that the rebates described (by ICC Staff) are designed to encourage drivers to switch from a combustion engine to an electric vehicle. This switch by nature would increase demand on the grid. Our proposal is designed to reduce that added demand by encouraging participants to purchase a more efficient EV.

The existing rebates from IL EPA are designed to accomplish something different than our proposed measure would."

4. Electric Vehicles

Question for SAG:

- *Can utilities claim electric savings for incentives used to encourage customers to purchase more efficient Electric Vehicles over a standard baseline Electric Vehicle?*

Ameren Illinois Energy Efficiency Programs
IL TRM v.14 – New Measure
Light Duty Electric Vehicles

Ameren ILLINOIS | Energy Efficiency PROGRAM

IL TRM v.14 – NEW MEASURE: Light Duty Electric Vehicles

Measure Description

- This measure establishes standard levels of efficiency for EVs within separate car classes (e.g., Car, Small SUV, Large SUV, Truck) and electric energy savings associated with the purchase of higher efficiency equipment above that standard level.

Policy Position

- Growth in EV adoption driving electric load growth and distribution needs
  - Section 8-103B policy is that electric utilities are to "use cost-effective energy efficiency and demand-response measures to reduce delivery load“

- Broader goals of CEJA support decarbonization: including buildings, electric generation, transportation, etc.
  - Energy Efficiency can play an ***incremental*** role by promoting not just EVs, but instead higher efficiency EVs.

IL TRM v.14 – NEW MEASURE: Light Duty Electric Vehicles

Important Considerations

- Not a combustion fuel to electric savings measure
  - Savings ***only*** from standard EV to a more efficient EV
  - "More-efficient EVs benefit drivers, the environment, and the electricity grid." ACEEE, 2024*

- Encouragement of efficient models does not necessarily include a monetary incentive
  - Efforts to promote more efficient EV's may include customer/dealer education, etc.

- IL TRM used to calculate gross energy savings
  - FR and other NTG concerns sorted out via established NTG framework rather than the TRM

* Huether, Peter (2024). "Electric Vehicle Efficiency: Unlocking Consumer Savings and Environmental Gains". ACEEE White Paper