

**Illinois EE Stakeholder Advisory Group  
Large Group SAG Meeting**

**Tuesday, May 14, 2024  
9:30 am – 12:30 pm Teleconference**

**Attendees and Meeting Notes**

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**Meeting Materials**

Posted on the [May 14, 2024 meeting page](#):

- [Tuesday, May 14 SAG Agenda](#)
- [SAG Facilitator Introduction: May SAG Meetings](#)
- [Ameren Illinois Presentation: Electric Savings Goals Update](#)
- [General Utility Statements in Response to SAG EE Ideas](#)
- [EE Idea Spreadsheet Tracker: Utility Responses to Ideas](#)
- [Word Version: Utility Responses to EE Ideas at May 14 SAG Meeting](#)

**Attendees**

<b>Name</b>	<b>Company or Organization</b>
Celia Johnson	SAG Facilitator (Celia Johnson Consulting)
Jorge Medina Zambrano	SAG Meeting Support (Inova Energy Group)
Abigail Miner	IL Attorney General's Office
AJ Young	U.S. Greenlink

<b>Name</b>	<b>Company or Organization</b>
Alan Elliott	Opinion Dynamics
Alisa Garcia	ICF
Allen Dusault	Franklin Energy
Amber Anderson	Walker-Miller Energy Services
Andrea Salazar	Michaels Energy
Andrew Cottrell	ScottMadden
Andrey Gribovich	DNV
Andy Gorecki	Franklin Energy
Andy Vaughn	Leidos
Ashley Palladino	Resource Innovations
Becca McNish	DNV
Bill Risley	Franklin Energy
Cassidy Kraimer	Community Investment Corp.
Chad Balthazor	Cascade Energy
Cheryl Watson	Equitable Resilience & Sustainability LLC
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Christina Frank	Peoples Gas & North Shore Gas
Corey Grace	Resource Innovations
Darren McRoy	Walker-Miller Energy Services
David Siddiqui	Power Takeoff
Deb Dynako	Slipstream
Dheeraj Kodi	Resource Innovations
Elder Calderon	ComEd
Elizabeth Applegate	Applied Energy Group
Elizabeth Horne	ICC Staff
Eljona Fiorita	CLEARresult
Ella Mure	RMI
Erica Tillotson	ScottMadden
Erika Dominick	Walker-Miller Energy Services

<b>Name</b>	<b>Company or Organization</b>
Erin Daughton	ComEd
Eva Rosenbloom	RMI
Fernando Morales	Ameren Illinois
Grey Staples	Mendota Group
Hannah Howard	Opinion Dynamics
Hilary Snover	CLEAResult
Jaleesa Scott	ComEd
Jarred Nordhus	Peoples Gas & North Shore Gas
Jason Fegley	Ameren Illinois
Jean Gibson	Peoples Gas & North Shore Gas
Jeff Carroll	DNV
Jim OShaughnessy	Energy Infrastructure Partners
John Carroll	Ameren Illinois
John Carroll	Ameren Illinois
John DeRosa	IL EPA
Jonathan Skarzynski	Nicor Gas
Josh Sharon	ComEd
Julie Hollensbe	ComEd
Kanchan Swaroop	Resource Innovations
Kari McCue	Nicor Gas
Kari Ross	NRDC
Kate Shonk	Citizens Utility Board
Katherine Elmore	Community Investment Corp.
Kathryn Brewer	CLEAResult
Keely Hughes	The JPI Group
Kelly Shelton	Shelton Solutions
Ken Parker	Community Investment Corp.
Ken Walczak	DarkSky International
Kim Swan	ComEd
Kristen Kalaman	Resource Innovations

<b>Name</b>	<b>Company or Organization</b>
Lance Escue	Ameren Illinois
Larry Kotewa	Elevate
Laura Agapay-Read	Guidehouse
LeDeidre Turner	ComEd
Leyah Williams	ICC Staff
Liz Connolly	ComEd
Mark Milby	Elevate
Mark Szczygiel	Nicor Gas
Matt Armstrong	Ameren Illinois
Matt Ludwig	ComEd
Maura Mooney	RMI
Melissa Helphingstine	Primera Engineering
Mike King	Nicor Gas
Nate Baer	i3 Energy
Nelson May	Future Energy Enterprises (IQ South Facilitation Team)
Nick Lovier	Ameren Illinois
Nick Moshage	Walker-Miller Energy Services
Nick Warnecke	Ameren Illinois
Nicole Popejoy	IL Ass'n of Community Action Agencies
Omayra Garcia	Peoples Gas & North Shore Gas
Pat Justis	Ameren Illinois
Paul Higgins	Abacus Energy Works
Peter Pasholk	Champaign County Regional Planning Commission
Philip Halliburton	ComEd
Philip Mosenthal	Optimal Energy, representing IL AG and NCLC
Randy Opdyke	Nicor Gas
Rashaan Keeton	Center for Energy and Environment
Ron Markus	BCMw Community Services
Sam Stahl	Ameren Illinois
Sara Castleberry	Resource Innovations

<b>Name</b>	<b>Company or Organization</b>
Scott Yee	Resource Innovations
Seth Craigo-Snell	SCS Analytics
Shivana Shrestha	Walker-Miller Energy Services
Tamika J. Cole	Walker-Miller Energy Services
Tara Cunningham	Rinnai
Ted Weaver	First Tracks Consulting, representing Nicor Gas
Thomas Ketchum	South Suburban Action Conference
Tina Grebner	Ameren Illinois
Travis Hinck	GDS Associates
Tyler Sellner	Opinion Dynamics
Victoria Nielsen	ScottMadden
Wade Morehead	Morehead Energy
Zach Ross	Opinion Dynamics
Zachary Froio	AEG

### **Opening and Introductions**

#### **Purpose of May 14 SAG Meeting:**

1. For Ameren Illinois to present an update on electric utility savings goal challenges; and
2. For Illinois utilities to respond to the Energy Efficiency Ideas presented to SAG on April 9 and April 16.

Follow-up items indicated **in red**.

#### **Electric Utility Savings Goals: Ameren Illinois Update**

*Matt Armstrong, Ameren Illinois; Andrew Cottrell, ScottMadden*

#### **Introduction**

- High level considerations need to be made in order to adjust to policy directives and achieve goals equitably, especially considering disadvantaged communities.
- With CEJA in mind there are increased benefits for these aforementioned communities.
- Deliver a more integrated customer experience.
- Utilities' portfolios are judged against savings goal benchmarks, which offer incentives for exceeding these goals and penalties for falling short.

- Cumulative Persisting Annual Savings (CPAS) and the Applicable Annual Incremental Goal (AAIG) allow utilities to track the impact of their Energy Efficiency portfolios.
- These are the methods to track the impact of the portfolios and measures implemented.
- **Savings Goals & Implications**
  - Importance of setting achievable goals:
  - Goals as benchmarks for utility performance and incentives/penalties.
  - Two elements of the goal framework: cumulative persisting annual savings (CPAS) and applicable annual incremental goal (AAIG)
- **Cumulative Persisting Annual Savings (CPAS)**
  - CPAS is focused on lifetime savings, looking to incentivize long-term persisting savings
  - Assumption that measures reaching end of life revert to less efficient options.
    - Long-Term Focus
    - Legacy Savings and Expiration
    - Savings Persist Through Lifetime
- **Applicable Annual Incremental Goal (AAIG)**
  - AAIG represents the incremental savings achieved as measure savings expire.
  - Basis for performance evaluation and penalties/incentives.
    - Short-Term Focus
    - Single Year Savings Snapshot
    - Measure of how the measures perform and the success of the program.
    - Harsh Penalty for Expired Savings
- Each year, utilities need to produce enough savings to offset expired savings and make positive contributions to both AAIG and CPAS
- Impact on ban of manufacturing any lightbulb that is non-LED
  - If the only selection is LED, then the savings are cumulative and ongoing and don't expire.
- Expired savings are rapidly increasing and will severely impact AIC's ability to reach these goals in their current form
- A "business-as-usual approach" will not be acceptable in this EE Plan cycle, and a policy fix is needed if the focus is to continue with whole-home and disadvantaged communities.

*Chris Neme – NRDC has a different perspective about the statute. Customers will not necessarily revert to the less efficient measure if given the choice. The intent of the statute is to only give credit to the utilities for savings that they caused. Perfect forecasting wasn't possible when the statute was written.*

*Matt Armstrong – Ameren recognizes the point of view; comments were mainly reflecting on previous field experience.*

- Plan challenges
  - Starting in 2026 a gap develops between CPAS/AAIS Goals and projected savings and that expands significantly in 2028 and beyond
  - Recognizing a significant gap between goals and achievements, particularly in 2028 and future years.
  - Must focus on the best savings for the dollar spent. Unfortunately, from past experience that doesn't include IQ programs, which would have to be limited if no solution to the CPAS challenge is found.
  - Whole home solutions are mutually exclusive with CPAS efforts.
- Implications
  - High levels of IQ spending and current focus may not be sustainable without addressing these challenges.
  - This will create a less comprehensive portfolio built on cheaper measures.

### **AAIG Goals & Achievements**

- Highlights the importance of quantifying challenges to conceptualize the gap between projected portfolio savings and goals.
- The red upper line is the annual incremental goal in order to continue to provide savings to the CPAS goal
- Current portfolio (2024-2025) exceeds annual incremental goals, helping to close the gap from past cycles and move toward 2030 CPAS goals.
- Starting in 2026, a decline begins due to several factors, including the loss of residential lighting savings.
- Residential lighting savings, about 80-100,000 MWh per year, will no longer be included after the current cycle.
- Continued business-as-usual approach for income-qualified spending (~\$45 million/year) shows significant performance decline.
- In 2026, the portfolio achieves only 60% of the annual incremental goal, with further declines each year.
- By 2028, a large amount of expired savings, particularly from 10-year measures installed in 2018, leads to a significant drop in performance.
- The issue extends beyond 2028, with expired savings surpassing entire portfolios annually, making it impossible to meet goals.
- Without creative solutions, the goals will remain unattainable, especially starting in the next cycle in 2028 and beyond.
- Key Takeaways
  - 2028 has almost double the expiration than in prior years.
  - In 2028 and 2031+ entire portfolios will need to be replaced
  - This will lead to portfolio implications and adjustments to spending.
  - Putting in the work towards a solution now will pave the way for successful EE portfolios for cycles to come.
- Ameren wants to continue focusing on disadvantaged communities, whole-home, and increasing spend on various EE measures. However, with expiring savings, those goals are hard to achieve, and these challenges will impact not only this portfolio but future cycles as well.

*Chris Neme – Important to recognize Ameren can ask for modified goals that deviate from CPAS and AAIG numbers. Bonuses could be earned for achieving more than goals, but there is room for modification of goals. Important to understand and consider the trade-offs associated with modified goals.*

**Utility Introduction to Energy Efficiency Idea Responses**

General Utility Statements in Response to SAG EE Ideas

1. The utilities oppose adding Program Administrative activities and costs with no clear benefit.
2. The utilities’ Supply Groups have developed policies to increase Diverse Supplier spend.
  - a. Consistent with prudent purchasing practices (competitive RFP’s etc.) and Illinois legislation
  - b. These policies were based on stakeholder input
  - c. Diverse suppliers must be certified
3. Many of the utilities’ existing programs are intended to be comprehensive and it is an on-going effort to monitor and improve program comprehensiveness
4. The utilities believe the stakeholders should be limited to an advisory role consistent with original intent and the Policy Manual
5. The utilities feel that the future SAG idea process should limit commercial proposals that are a better fit for other utility competitive bidding processes.

<b>Color Codes for Utility Responses to EE Ideas</b>	
<b>Green</b>	Utility is interested in exploring further; will follow-up with idea submitter with any questions
<b>Light Green</b>	Utility is already offering EE idea proposed + plans to include in next EE Plans
<b>Yellow</b>	Utility thinks further analysis is needed; may require follow-up discussion or input from additional parties
<b>Red</b>	Utility has concerns about the idea proposal + not interested in pursuing
<b>Blue</b>	Idea should be submitted now through current utility Research & Development (R&D) process (if applicable), or utility thinks further analysis is needed - idea could be considered within Breakthrough Equipment & Device (BED) program; or the idea could be considered as a pilot program
<b>Gray</b>	Not applicable to utility
<b>Purple</b>	Outside scope of EE



**Utilities Respond to April 9 Energy Efficiency Ideas**

Illinois utilities respond to EE Ideas presented to SAG on [April 9](#), referenced below

**Recurve EE Ideas**

- Electrification Targeting Analysis (EE Idea tracker rows 53-56)
- FLEXMarket (EE Idea tracker rows 57-60)

Recurve EE Ideas	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Electrification Targeting Analysis (rows 53-56)	AIC already has the ability to target customers for electrification projects. No further input necessary at this time.	ComEd does not understand the value proposition of this Idea and interprets this idea as a means for a private company to solicit business through this process. We do not feel this is the proper forum for such consideration and encourage any such ideas to be submitted through our R&D process.	N/A	PGL/NSG suggests vendor product proposals be submitted through business development or RFP processes.
FLEXMarket (rows 57-60)	AIC does not believe this idea assists utilities in achieving the goals required by CEJA.	ComEd does not understand the value proposition of this Idea and interprets this idea as a means for a private company to solicit business through this process. We do not feel this is the proper forum for such consideration and encourage any such ideas to be submitted through our R&D process.	N/A	PGL/NSG suggests vendor product proposals be submitted through business development or RFP processes.

**Ameren**

*Matt Armstrong*

- The electrification targeting analysis idea could add value to the portfolio. Echoing other utilities' comments, this idea might not fit well within the current process. Suggests considering a different approach for future portfolio planning to involve vendors and their ideas in a more suitable forum.
- On the FLEXMarket concept, it is understood as more of a demand response program. The flex market is not seen as helpful in achieving energy efficiency goals and CEJA.

**ComEd**

*Jim Fay*

- See comments above.

Phil Mosenthal – Is the third-party bidding process different from this effort or will it be an R&D process?

Jim Fay – Not along the lines of a third-party proposal, more of an analytical strategy for program targeting.

**PG & NSG**

Jean Gibson

- Vendor proposals like this one would be interesting through an RFP process, even though they are electrification focused, but there is merit to the ideas.

Chris Neme – The process needs to be open-ended. As a group we need to think about how to surface these new ideas if the stakeholder mechanism is not the right approach. The importance of these suggestions is to inform people openly about potential benefits and solutions for new programs.

**Joint Stakeholder Small Business EE Ideas:**

Small Business EE Idea	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
<p>Customize small biz DI delivery services for strategic market segments, with vendors that can address unique needs (e.g., food service, refrigeration, laundry, etc.) (row 34)</p>	<p>AIC will consider as part of program design/delivery with next plan. No further input necessary at this time.</p>	<p>ComEd has experience with segment programs (e.g. Grocery, Agriculture, Telecom) in Plan 5. However, given the market confusion and costs we folded these programs to our existing offerings. We will continue to explore this delivery approach to understand it's effectiveness in bring in new specialized vendors that can identify and implement more savings opportunities, instead of having the same EESPs participate in multiple segments. Additionally, it should be noted we don't believe a separate food service delivery channel is needed as we already have joint utility funded Commercial Kitchen Program</p>	<p>Will consider but for gas segments where this is practicable.</p>	<p>PGL/NSG provides comprehensive solutions leveraging specialized contractors for our small business customers.</p>

Small Business EE Idea	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Expand small business DI programs to promote more comprehensive treatment of larger (non-lighting) savings opportunities, including weatherization where applicable (row 33)	Ameren is working to add and expand standardized weatherization rebates	ComEd is committed to promoting comprehensive energy savings opportunities for customers. ComEd's small business program already identifies and incentives non-lighting opportunities, including weather stripping. We are constantly working to improve measure comprehensiveness in our programs.	We're assessing the size and costs of the program. Our BOP is starting to address this issue. We need examples.	PGL/NSG provides comprehensive solutions for our small business customers.

**Ameren**

*Matt Armstrong*

- These ideas have merit and are focused on program delivery and design, not so much on the plan itself. There is a desire to explore further. On some Small Biz programs Ameren is expanding weatherization rebates in order to continue expanding program delivery.

**ComEd**

*Jim Fay*

- ComEd is already implementing different commercial business types that would benefit particularly in sectors like grocery, telecom, and agriculture. Focused efforts on being more comprehensive in the commercial sector and small business.

**Nicor Gas**

*Chris Vaughn*

- Already examined what it would entail, but it's currently on a small scale for Nicor. Uncertain about the potential scale at which it could be implemented, but we'll seek practical alignment.

**PG & NSG**

*Jean Gibson*

- Already providing comprehensive solutions for our small business customers, actively seeking opportunities to serve all business segments within territories. Utilizing specialized trade allies to deliver unique and comprehensive solutions.

*Phil Mosenthal – Gas utilities are already implementing these measures, but not really involved in joint programs. It's challenging to offer comprehensive solutions because contractors often specialize in lighting and electrical work. The idea is to create joint programs that encompass a wider range of measures. This would require the lead implementer*

to deploy appropriate subcontractors.

Chris Neme – It seems ComEd is already implementing non-lighting measures, such as weather stripping. However, I don't think weather stripping aligns with what we had in mind regarding weatherization. The focus is on providing comprehensive weatherization solutions for small businesses, especially those located in older buildings or repurposed spaces. Even in strip malls, there's an opportunity for more extensive building envelope weatherization.

Jim Fay – ComEd is offering comprehensive weatherization, not only weather stripping.

Chris Neme – It seems like this aligns well with Nicor's focus on gas savings, especially for North Shore residents. Expanding these efforts beyond weatherization may not offer as much opportunity for gas companies, but weatherization appears to be where the most significant potential lies.

Chris Vaughn – Nicor is always trying to provide comprehensive solutions for customers, but at what scale? It wouldn't be a big program as opposed to ComEd and Nicor.

Chris Neme – Budget restrictions are understandable. Weatherization is achievable through various methods.

Philip Mosenthal – There is more benefit to the customer by utilizing one-stop-shop incentives and measures implementation so that customers don't miss out on measures.

**Joint Stakeholder C&I Lighting EE Ideas:**

C&I Lighting EE Ideas	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
All electric C&I: significantly increase focus on and savings from LLLC and networked lighting controls (row 32)	AIC is focused on continued education and training of customers, installers, and distributors for NLC to increase participation and project volumes.	ComEd has already placed a significant emphasis on lighting controls. Over the last several years, our NLC and lighting control projects have significant grown. In 2023, approximately 66 net GWH of savings were from NLC. While ComEd is committed to continuing to grow the NLC market – it needs to be cost effective. Additionally, as LED fixtures approach saturation, opportunities to add or include controls become more cost prohibited.	N/A	N/A

C&I Lighting EE Ideas	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
All electric C&I: stop all upstream/midstream or downstream rebates for TLEDs (row 31)	AIC believes further discussion is required	There still is a customer opportunity to switch from baseline fluorescent to TLEDs since the market is not yet saturated. As long as fluorescent technology is baseline, there is still an opportunity to offer product to customers and claim energy savings, along with very good NTG. We should not "stop" because the market is evolving in CT or MA, but rather monitor the IL market. We strongly believe that customers would be forgoing LED upgrade projects without these incentives and would like to wait until outcomes of potential study to better understand savings impact for TLEDs.	N/A	N/A

**Ameren**

*Matt Armstrong*

- Ameren has a big focus on education and training for NLCs and will continue to focus on the training.
- Further discussion is required for the downstream rebates as there is some Interplay with network lighting controls. Should have some discussions about offering customers the ability to receive rebates for TLEDs.

*Chris Neme – The CPAS challenges presented earlier assume TLEDs are not included. Is that correct?*

*Matt Armstrong – Yes. But that is not to say that coupling incentives for lighting controls would not be effective.*

*Chris Neme – To clarify, TLEDs as a standalone measure is possible?*

*Matt Armstrong – Ameren is leaving the door open to that possibility depending on federal standards.*

**ComEd**

*Jim Fay*

- On the lighting controls, the stakeholders are familiar with what the program has achieved. There are significant challenges to overcome regarding the savings in NLCs.
- The TLEDs are a good idea for ComEd. Based on the economics from the TRM, TLEDs present a great opportunity to achieve goals. The amount of savings from TLEDs has been declining from previous years, but as long as it is a good measure it should be included in the portfolio.

*Philip Mosenthal – Requests reviewing more closely given the market progression. Tends to be difficult for customers to go further and control efficiency fixtures.*

*Jim Fay – We looked at Massachusetts and are interested in continuing to discuss how to implement them.*

**Joint Stakeholder C&I EE Idea:**

- Limit new CHP projects to those that use biogas or waste products (e.g., wood, sawdust, etc.) (EE Idea tracker row 27)

Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
AIC believes further discussion is required	ComEd agrees to explore this idea, but would like to recognize that topping cycle CHP can still provide a clean energy solution. ComEd believes that Topping Cycle Combined Heat and Power (CHP) projects still provide an effective and efficient vehicle for industrial and commercial customers to reduce energy usage while providing valuable process fuels such as steam and hot water. As it currently stands, CHP projects are still more efficient than the grid and are still included in the Illinois Technical Reference Manual for potential to claim EE savings.	CHP is an effective EE measure that we are allowed to utilize to create savings.	PGL/NSG supports providing a diverse portfolio of solutions for all customers.

- Ameren and ComEd outreach ASAP to large industrials to identify needs and what could be offered to get them to not opt out (EE Idea tracker row 26)

Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Ameren has reached out to large customers to communicate benefits of EE and offer further discussion if interested.	The contact and engagement process for >10MW customers that was established in Plan 6 was enhanced for Plan 7 and was initiated in late Q1 2024. Outreach includes customers already over 10MW, currently opted-out customers, and customers that could potentially exceed 10MW before 12/31/25. ComEd's Large Customer Services account managers are directly engaged to ensure all customers are contacted and informed of the energy efficiency program opportunities in addition to their eligibility to opt out. Customers are also invited to recurring customer office hours (Q&A) calls. ComEd also coordinated with Ameren on the general approach and updates to the Plan 7 opt-out form.	N/A	N/A

## **Ameren**

*Matt Armstrong*

- Ameren recognizes the potential for CHP projects to help industrial customers with high heat loads reduce natural gas usage. They emphasize that opportunities exist beyond just utilizing biogas or waste products.
- Ameren has already reached out to large industrial customers, including those above 10 megawatts, to communicate the benefits of energy efficiency and offer one-on-one discussions to understand their interest in participating in the program further.

## **ComEd**

*Jim Fay*

- On the CHP idea ComEd would like to dive on a deeper level to make sure to have all the CHP options before implementation. Would like to explore what the rationale is on which technology is cleaner. Co-gen is being offered, but they want to continue exploring options.

*Chris Neme – Clarifies that they are not suggesting stopping any ongoing projects. Stakeholders understand the project development cycles and the importance of maintaining customer engagement. Looking forward to further discussions on the topic.*

## **Nicor Gas**

*Chris Vaughn*

- Not of interest for Nicor. CHP is an effective energy efficient method that will be offered but will be left to customer preferences. It is not in any legislative enforcement or inconsistency with state-wide policies.

*Chris Neme – If there was no budget restriction there wouldn't be a problem. However, this idea comes by about where to prioritize resources.*

## **PG & NSG**

*Jean Gibson*

- PG&NSG believes on offering a comprehensive approach to energy efficiency and PG will continue to offer CHP options for customers.

**Joint Stakeholder Cross-Cutting EE Ideas related to Contracting:**

Contracting EE Idea	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Implementer 3rd Party Ombudsman (row 17)	In accordance with its current stipulated agreement, AIC has designated a liaison support channel for implementers to express concerns or grievances. This channel allows AIC to address concerns raised.	ComEd disagrees with this Idea and struggles to understand the benefit or necessity of such role. We believe adding and paying for an additional company to serve as an Ombudsman, adds layers of administration and costs by adding additional admin burden on utilities with questionable benefit.  Additionally, we'd like to point out that the Policy Manual says the Program Administrator is responsible for overseeing program ICs and the program implementation process. SAG's role is advisory. This idea blurs the line between the two roles.	What issue are we solving? Is the cost-benefit analysis worth it?	PGL/NSG believes this is an unnecessary administrative expense. We do conduct regular Trade Ally surveys for feedback and responses can remain anonymous.
Diverse contracting (row 18)	Ameren Illinois developed the MDI program to grow local/diverse workforce and employ those vendors in program implementation. As a result, AIC has created tremendous growth of the local/diverse workforce.	As far as it pertains to presence, resources and services provided to our customers, all of our ICs and service providers are local. Contracting with companies that have a local presence bolsters job creation and wage growth in the local economy. Results from the CY2022 Economic Non-Energy Impact (NEI) analysis indicate that the ComEd energy efficiency portfolio generated 16,454 job-years, \$1.14B in total labor income, and \$4.05B in industry output in 2022, the most recent year for which data was available.	Most important aspect is having local offices/employees vs. incorporation state	PGL/NSG supports diverse contracting and largely leverages implementers that have an Illinois office and utilize Illinois workforce.



Contracting EE Idea	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Transparency provisions on contracting (row 19)	AIC is not supportive of ideas that limits its ability to fulfill its statutory obligations, nor does it support ideas that expand the stakeholder role defined in the IL EE policy manual	ComEd cannot allow outside parties to participate in our internal contracting process. Additionally, we'd like to point out that the Policy Manual says the Program Administrator is responsible for overseeing program ICs and the program implementation process. SAG's role is advisory. This idea blurs the line between the two roles.	Goes beyond EE and this a corporate business practice.	PGL/NSG follows corporate procurement requirements for all RFPs.
Non-Profit Bidding (row 37)	AIC supports scoring criteria that show preference to non-profits when services are bid out.	ComEd has its own policies for bidding and providing special consideration for diverse and local contractors, we will continue to follow those internal policies.	Will need to assess with corporate-wide supplier diversity. There are concerns about the definition of "local."	PGL/NSG follows corporate procurement requirements for all RFPs.

**Ameren**

*Matt Armstrong*

1. The current 2022 plan has a condition that Ameren has a dedicated liaison channel (same idea as a 3<sup>rd</sup> party Ombudsman). The current setup is working well, and grievances have been able to be taken care of effectively. Adding a third-party would only slow down an already effective process.
2. MDI has put a strong emphasis on diverse workforce growth. That is an important area for Ameren to continue to grow.
3. Not supportive of this idea. Expands the stakeholder role beyond the manual guidelines. It prohibits Ameren to deliver programs effectively and efficiently.
4. Ameren supports preference to non-profits when services are bid out. Emphasizes that any non-profit is eligible and not only restricted to IL. If evidence is provided for dollars not staying in the state when implementers are from out-of-state, then Ameren will reconsider.

**ComEd**

*Jim Fay*

1. For ComEd, there is not a need to introduce another layer through a third party. Not worth pursuing.
2. ComEd is mostly local, and RFPs require that implementers have a local office. Hence, why it was mentioned that it was already being done.
3. ComEd cannot allow outside parties to participate in internal contracting process.

4. ComEd uses the diverse certification process and should note that this process excludes non-profits. The process that is being used does not allow for nonprofits.

*Chris Neme – The current process does not allow for nonprofits. Will there be consideration about changing the process to include nonprofits?*

*Jim Fay – It is not impossible to change. However, the supply group does not allow nonprofits currently. Changing the current policy would have to be evaluated and it could be difficult to do that.*

*Philip Mosenthal – The metric for diverse contracting, which cannot be changed without commission approval, extends beyond energy efficiency. There is typically flexibility in scoring criteria for RFPs, and the suggestion is proposing a scoring approach to favor nonprofits.*

### **Nicor Gas**

*Chris Vaughn*

1. Nicor does not see the value for the cost-benefit analysis to incorporate any third-party analysis in addition to any ongoing processes. Liaisons exist for trade ally issues and communication. Poses a question about what this idea is trying to resolve.
2. Nicor disagrees about how local is defined. Not concerned about any incorporation state, but rather prioritizing a workforce that is local.
3. This idea is more of a corporate practice and there is no appropriate standing for stakeholders to enforce these transparency practices.
4. Supplier diversity team will have to approve any such change, but Nicor does not foresee any changes to incorporate nonprofits. Will discuss internally with the team.

### **PG & NSG**

*Jean Gibson*

1. It is an unnecessary expense due to pre-existing feedback mechanisms.
2. Support the spirit of diverse contracting and creating new opportunities. PG largely focuses on implementing local workforce and not looking to change current practices.
3. PG has current procurement processes which already includes it
4. Will continue to follow current procurement processes not modifying to include nonprofits.

**Joint Stakeholder Cross-Cutting Process EE Idea:**

- Quarterly Deep Dives from Implementors (EE Idea tracker row 16)

Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
<p>AIC does not support additional SAG meetings nor does it support ideas that expand the stakeholder role defined in the IL EE policy manual.</p>	<p>Contributions and feedback from IC's and EESP's are included in ComEd's deep dives. EESPs are surveyed on a yearly basis and ICs make adjustments on how they manage their EESPs based on survey results. IC's are included by nature of their contract to ComEd in administrating these programs. Therefore, ComEd feels we are already fulfilling this request and further interactions between the SAG and IC's add layers of administration and costs by adding additional admin burden on utilities with questionable benefit.</p> <p>Additionally, we'd like to point out that the Policy Manual says the Program Administrator is responsible for overseeing program ICs and the program implementation process. SAG's role is advisory. This idea blurs the line between the two roles.</p>	<p>This appears to be within the current mechanics of the SAG process for some report-outs. What exactly are we trying to solve?</p>	<p>PGL/NSG incorporates implementing contractor input in required quarterly reporting.</p>

**Ameren**

*Matt Armstrong*

- Ameren is not supportive of adding additional SAG meetings. It does not follow the policy manual about adding input. The main duty is to deliver the programs and not only focus on input and discussion.

**ComEd**

*Jim Fay*

- Also opposed to the idea. The existing process allows for adequate updates for the program. If the perspective is unique, the idea would be including them into the current reporting and not creating new dimension of reporting.

**Nicor Gas**

*Chris Vaughn*

- Nicor feels this is already included in the planning process. Not clear about what the proposal is trying to resolve and what the benefits of added meetings are.

## **PG & NSG**

*Jean Gibson*

- There is no need to add extra administrative efforts at this point.

*Chris Neme – The idea is not to take power away from utilities. Based on previous conversations there was an idea about understanding current processes better in order to discuss updates and changes more efficiently and effectively. Periodically, these extra meetings provide useful information for stakeholders to consider in their suggestions and collaboration.*

*Chris Vaughn – The context is appreciated. There is alignment with the sentiment, but the efforts are being made about editing the current SAG process to be as effective as possible.*

*Chris Neme – The idea is to understand how stakeholders can periodically get insights about strategic programs.*

*Matt Armstrong – What was the outcome of ComEd specific meetings?*

*Chris Neme – It was demonstrated that the IQ program got three times as many applicants as were initially mentioned. ComEd was recommended to change processes in order to include more applicants in the programs and added protocols to screen applicants.*

*Julie Hollensbe – The stakeholders appreciated the in-depth review of the joint program collaboration, and the concerns were clarified across the utilities. Input from utilities about their internal framework of projects is useful for stakeholders to reassess and expand on suggestions to make all programs more efficient.*

*Matt Armstrong – Utilities have dynamic projects and always evolving to customers needs, so there are insufficient resources to get deeper on implementation because of the vast number of resources derived from added conversations.*

*Chris Neme – If it was every year, it would be unmanageable. But every now and then adding more meetings to understand programs better is useful to clarify projects and enable stakeholders to engage more effectively.*

*Matt Armstrong – Stakeholders can always request to dive deeper into specific subjects on an ad-hoc basis.*

*Chris Vaughn – where do we need to dedicate SAG resources for? How can we dedicate resources in the best way possible?*

**Joint Stakeholder Market Transformation (MT) EE Ideas:**

MT EE Ideas	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Support market transformation program for triple glazed windows (row 24)	AIC has been participating in this initiative with the other IL utilities and is supportive of continued efforts to increase market penetration of cost-effective measures.	ComEd has supported research efforts into the potential savings and market barriers for high-performance windows along with other IL utilities. We continue to monitor developments in the market and will evaluate additional opportunities to support MT initiatives in the future. Side note- most of the energy savings for improved windows in the residential space are recognized through reduced heating demand; as most homes are gas heat, the cost-effectiveness of improving windows as an EE strategy for ComEd is limited. As more homes are electrically heated going forward, that equation will improve from ComEd's perspective. We'd like to continue to explore this idea to better understand ideal targeted market as well as capacity of benefits.	We're currently pursuing this opportunity in MT.	PGL/NSG currently supports triple-glazed windows within its Market Transformation effort.
Support municipalities interested in adopting stretch codes (row 25)	AIC believes further discussion is required. Work previously conducted by MEEA found that only one municipality in AIC service territory has potential for stretch code adoption and that it was unlikely to adopt stretch codes.	ComEd has been working directly with municipalities over the last few years on a Market Transformation initiative to advance stronger energy codes for new buildings and building performance standards (BPS) for existing buildings; this includes all types: residential, MF, and C&I. The purpose of the initiative is not only to encourage/support municipalities during their rulemaking processes but to provide financial/technical support and incentives to assist in enforcement of the new rules by the municipality and compliance for the buildings subject to the new rules.	Exploring with various municipalities.	PGL/NSG may consider incorporating this idea into the 2026-2029 Plan.
Work with one or more municipalities to develop a multi-family rental energy efficiency standard (row 15)	AIC believes further discussion is required	ComEd has been working directly with municipalities over the last few years on a Market Transformation initiative to advance stronger energy codes for new buildings and building performance standards (BPS) for existing buildings; this includes all types: residential, MF, and C&I. The purpose of the initiative is not only to encourage/support municipalities during their rulemaking processes but to provide financial/technical support and incentives to assist in enforcement of the new rules by the municipality and compliance for the buildings subject to the new rules. To date,	Working with municipalities for Building Performance Standards (BPS) primarily targeting commercial bldgs but need more info on	PGL/NSG will require further information regarding this idea to consider for inclusion in the 2026-2029 Plan.

MT EE Ideas	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
		there has not been a specific focus on MF but they would be covered by the new codes.	what "support" entails.	

**Ameren**

*Matt Armstrong*

1. Ameren has been participating in this initiative with the other IL utilities and is supportive of continued efforts to increase market penetration of cost-effective measures. Municipalities across the territory were assessed but only found 1 municipality to adopt stretch codes, but unlikely to implement.
2. Similarly, as the above, it is not as good as other territories, and it is cost inefficient.

**ComEd**

*Jim Fay*

1. Partners with Nicor for the triple glaze market transformation program but discontinued it due to cost-effectiveness. If reevaluated to make it more cost-effective, then it would be considered for implementation. Interested, but needs adjustment.
2. Currently pursuing a stretch code in municipal mobility in the MT program.
3. Already pursuing this opportunity. Working on developing a rental standard.

**Nicor Gas**

*Chris Vaughn*

1. Still exploring within MTI.
2. Been working with various municipalities to adopt stretch codes.
3. Already incorporating something similar, building performance standards, which could transfer to other multifamily properties even though it has a commercial focus right now.

**PG & NSG**

*Jean Gibson*

1. Currently supporting triple glazed windows.
2. PGL/NSG may consider incorporating this idea into the 2026-2029 Plan.
3. Interested in the idea but need clarification to implement in the next plan.

**Utility Responses to April 16 Energy Efficiency Ideas**

Illinois utilities respond to EE Ideas presented to SAG on [April 16](#), referenced below.

**DarkSky Chicago EE Idea:**

Efficient and Effective Use of Outdoor Lighting (EE Idea tracker rows 40-42)

Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
AIC will consider enhanced incentives for adopting outdoor lighting that meets the DarkSky principals.as part of program design/delivery with next plan. No further input necessary at this time.	ComEd is interested in looking into this recommendation further. We would be supportive as long these specs don't drive customers away from LED saving projects and projects are cost-effective	N/A	N/A

**Ameren**

*Matt Armstrong*

- AIC will consider enhanced incentives for adopting outdoor lighting that meets the DarkSky principles. No further input is necessary at this time.

**ComEd**

*Jim Fay*

- Concern is that it would increase costs. ComEd is interested in looking into this recommendation further.

**The Mendota Group EE Idea:** Market Access Program Design (EE Idea tracker row 62)

Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
AIC has concerns with how this concept impacts installer participation.	ComEd is initially in support of such an idea but needs more information to fully understand the benefits and consider further. The CPUC included quite a bit of information on metrics, but how would the aggregators be qualified and managed? Also, what messaging to customers on this aggregated approach seems to work? Finally, what NTG, RR, and cost-effectiveness values have been found elsewhere? We believe this should be run through our R&D process to better understand the answers to these questions.	Underdeveloped idea; additionally, incorporating varying baselines would be challenging.	PGL/NSG delivers cost-effective and comprehensive solutions for C&I customers. PGL/NSG suggests vendor product proposals be submitted through business development or RFP processes.

**Ameren**

*Matt Armstrong*

- The way it operates could result in delays and impacts installer participation.

**ComEd**

*Jim Fay*

- ComEd is initially in support of such an idea but needs more information to fully understand the benefits and consider further. R&D group looking into it.

**Nicor Gas**

*Chris Vaughn*

- From a policy and practice perspective, it is not an appropriate idea. Incorporating varying baselines would be challenging.

**PG & NSG**

*Jean Gibson*

- Not looking at other solutions. Business development routes or RFPs would be considered for new ideas.

**RMI and the Advanced Building Construction Collaborative EE Idea:**

Industrialized Decarbonization Retrofits (EE Idea tracker row 61)

Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Idea requires more research and information, appears to fall outside of EE scope.	ComEd recognizes the numerous benefits listed but struggles to understand the energy efficiency savings potential behind the idea. We would be happy to explore such an idea and understand the energy savings implications further through our R&D process.	Underdeveloped idea better suited for R&D.	PGL/NSG suggests further research would be necessary to consider this proposal.

**Ameren**

*Matt Armstrong*

- The majority of recommendations fall out of scope of energy efficiency. Perhaps an R&D project.

**ComEd**

*Jim Fay*

- Challenges to take this idea and find energy savings is present. R&D is looking into it.



**Nicor Gas**

Chris Vaughn

- Underdeveloped idea better suited for R&D.

**PG & NSG**

Jean Gibson

- PGL/NSG suggests further research would be necessary to consider this proposal.

*Eva Rosenbloom – Envelope-first for any renovations in order to improve the air tightness and efficiency of buildings, especially in cold climates. 57-89% reductions from UI. Prefabricated options in order to scale rapidly and minimize construction time and disruption to tenants.*

*Chris Neme – When are the utilities responding to this? It is worthy to pilot projects or what are the next steps?*

*Jim Fay – The first step is to do an initial evaluation. When a set of measures is targeted, the first step is to look at it from an energy efficiency perspective. If there are energy savings, the next step is to evaluate cost-effectiveness.*

*Eva Rosenbloom – The strategic focus is on low and moderate-income multifamily housing to support the transition away from fossil fuels, but the models can apply to other types of housing as well. RMI is positioned to support this effort with data on energy efficiencies, both modeled and measured, from projects that are either in design or under construction, providing precedents to inform future work.*

*Philip Mosenthal – This could be appropriate to Market Transformation and other buildings other than MF.*

**Eva Rosenbloom (RMI) to share follow-up case study information.**

**Joint Stakeholder Residential EE Ideas:**

Residential EE Ideas	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
Strong commitments to leveraging Inflation Reduction Act funding, especially HOMES/HEERA rebates, to maximize reach of utility programs and the	AIC will continue working with IL EPA on program design that leverages IRA funding for its utility delivered programs. AIC has been promoting tax	While ComEd is interested in leveraging IRA funding into braided programs, we are also monitoring the development of IRA funding policies and procedures being developed by the Illinois EPA. Pursuit of projects with IRA	We're committed to working w/ the State however we need to understand the program structure first.	PGL/NSG will require further information regarding how the IL EPA will begin implementing IRA-funded programs

Residential EE Ideas	Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
number of customers served (row 6)	credits currently available to market rate customers.	funding depends on resolution of attribution issues.		before committing to this proposed idea.
For gas or dual fuel utilities, start (if not already in place) or significantly ramp up residential market rate weatherization program savings (row 11)	AIC believes further discussion is required	N/A	Will require portfolio balance trade offs.	PGL/NSG will require further information regarding this idea to consider for inclusion in the 2026-2029 Plan.

**Ameren**

*Matt Armstrong*

- While there is a commitment, ultimately there is no control over IL EPA and where they will lead rebates. Cannot commit on their behalf. Ameren has been promoting tax credits currently available to market rate customers. Working with installers and allies as well as customers to take advantage of the federal tax credits.
- Ameren understands the concept, but recognizes the portfolio needs to be balanced and requirements are premature to commit residential weatherization.

**ComEd**

*Jim Fay*

- Working with IL EPA and how their programs overlay with ComEd. Close monitoring on the rollout and would like to have clarity on the attribution initiatives for projects funded from both organizations.

*Philip Mosenthal – Is there any timing from IL EPA on final decisions? Will the administrator design the program? Or will the program be defined before it goes out to bid?*

*Celia Johson – My understanding is IL EPA will bid out for an administrator or funds in late summer.*

**Nicor Gas**

*Chris Vaughn*

- In alignment with Ameren regarding leveraging IRA funding.
- Will keep in mind tradeoffs within the portfolio and what the scaling costs would look like.

**PG & NSG**

*Jean Gibson*

- PGL/NSG will require further information regarding how the IL EPA will begin implementing IRA-funded programs before committing to this proposed idea.
- PGL/NSG will require further information regarding this idea to consider for inclusion in the 2026-2029 Plan.

*Kari Ross – The intent of the idea is to codify these commitments to ensure consistency and proposes discussing specific recommendations from the IRA in future conversations. **There are six bullets within the IRA funding idea, stakeholders are interested in feedback from utilities on those six suggestions.***

**Elevate EE Idea:**

Home EE Electrification (EE Idea tracker rows 43-44)

Ameren IL Response	ComEd Response	Nicor Gas Response	PG & NSG Response
<p>Idea requires more research and information, potential as a Breakthrough Equipment and Devices (BED) project.</p>	<p>ComEd has developed leave behind materials and is working with participating Energy Efficiency Service Providers to ensure equipment maintenance requirements are clear for Whole Home Electric participants.</p> <p>In response to the 4-part suggestion:</p> <ol style="list-style-type: none"> <li>1. ComEd is pursuing a post-project equipment monitoring study for a subset of Whole Home Electric participants through R&amp;D.</li> <li>2. ComEd will investigate the energy savings associated with Clean and Check services and if this can be implemented within Whole Home Electric in coordination with the participating Energy Efficiency Service Providers</li> <li>3. ComEd will consider expanding the R&amp;D monitoring scope to assess how 'Clean and Check Services' impact system performance</li> <li>4. If ComEd is able to incorporate suggestion #2, it will be feasible to also incorporate this suggestion as part of the Clean and Check service and expectations.</li> </ol> <p>We believe this idea needs further investigation to understand the energy savings potential and suggest it should be submitted through our R&amp;D team.</p>	<p>N/A</p>	<p>N/A</p>

**Ameren**

*Matt Armstrong*

- Having a better understanding of savings would be helpful. This could be considered through BED.

**ComEd**

*Jim Fay*

- Understanding the field performance (technology and equipment rating) about field performance.
- If this is a program idea, analogous to quality install, where there is yearly follow-up in order to track savings, then that would be useful as well. Will refer to R&D group to continue analyzing.

*Chris Neme – Is there a formal process regarding testing?*

*Matt – There is limited R&D that can be done. The suggestion is that the process outlined will be developed enough to determine what savings would be provided for the program. The suggestion is that there is further information needed from the submitter.*

*Mark Milby - Elevate acknowledges the complexity of the proposal, noting it has multiple components. The first components, such as monitoring efforts, are straightforward and based on Elevate's hands-on experience in building electrification. However, other components, like the proposed cleaner check service, need further exploration and information.*

## **Closing and Next Steps**

### **Summary of Follow-up Items:**

1. *RMI Idea on Decarbonization Retrofits:* Eva Rosenbloom (RMI) to share follow-up case study information.
2. *Joint Stakeholder Idea for Utility Commitments to Leverage leveraging Inflation Reduction Act funding:* Kari Ross – Stakeholders are interested in feedback from utilities on the six suggestions in the IRA idea submitted.

### **Upcoming Large Group SAG Meetings:**

Wed. May 14 (Utility Responses to EE Ideas)