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| **Illinois EE Stakeholder Advisory Group (SAG) Meeting:Wed. May 15, 2024Utility Responses to Submitted Energy Efficiency Ideas** | **Color Codes for Utility Responses** |
| **Green** | Utility is interested in exploring further; will follow-up with idea submitter with any questions |
| **Light Green** | Utility is already offering EE idea proposed + plans to include in next EE Plans |
| **Yellow** | Utility thinks further analysis is needed; may require follow-up discussion or input from additional parties |
| **Red** | Utility has concerns about the idea proposal + not interested in pursuing |
| **Blue** | 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 |
| **Gray** | Not applicable to utility |
| **Purple** | Outside scope of EE |

**Utilities Respond to April 10 Energy Efficiency Ideas**

Illinois utilities respond to EE Ideas presented to SAG on [April 10](https://www.ilsag.info/event/wednesday-april-10-sag-meeting/), referenced below

**Vote Solar EE Idea: Integrated Income Qualified EE Programs and Illinois Solar for All** (EE Idea tracker row 63)

* Idea excerpt: *Providers of low-income energy efficiency programs should help connect customers to the Illinois Solar for All (ILSFA) program. Specifically, practitioners should be trained to connect interested customers to the ILSFA Program Administrator, who can then connect them with registered and vetted Approved Vendors who can help provide significant solar savings. Language in the Climate and Equitable Jobs Act (Public Act 102-0662) requires the utilities to build and support the connective tissue that better integrates these programs.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC has and will continue collaborating with Solar for All, keeping protection of customer data as a priority. | Language surrounding IL Solar for All has been incorporated into Home Energy Savings and Multi-Family Energy Savings leave behind materials for income-eligible customers. The Multi-Family Energy Savings leave behind is provided to tenants (versus the building owner). ComEd has a direct connection with the ILSFA Program Administrator. Further consideration on integrating solar into our programs can be taken if there is change in how solar can be considered into our energy efficiency measure savings potential.  | Solar for All information is already within our marketing information. We need to better understand what "help connect" means. Additionally, CEJA language cited here is not applicable to gas. | CEJA language does not apply to natural gas utilities, but PGL/NSG may consider incorporating opportunities to introduce customers to Solar for All. |

**Joint Stakeholder EE Ideas: ComEd-Specific** (EE Idea tracker rows 20, 29, and 28)

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| **ComEd-Specific EE Ideas** | **ComEd Response**  |
| ComEd-specific: Change ComEd's IE SF Whole Home Electric program SF eligibility offering (row 20) | ComEd will consider this, along with what resources might be needed in terms of education and information on the operation and maintenance of the equipment given the potential for tenant turnover. However, until this program can serve at greater scale, we'd recommend prioritizing homeowners. |
| ComEd-specific: Targeted community propane electrification "sprint" (row 29) | ComEd is currently investigating this strategy for the current plan cycle and would appreciate any stakeholder insight into geographic targeting to assist with the effort. We'd also like to recognize that there is a challenge in adding additional fuel switching measures to our portfolio due to fuel switching savings limits.  |
| ComEd-specific: Relax criteria for weatherizing electrically heated homes (row 28) | ComEd agrees and is already prioritizing homes with electric resistance heat for building envelope upgrades. The current Home Energy Savings' EESP network is trained to identify and replace forced air electric furnaces with air source heat pumps. Ductless resistance heat systems are not currently being replaced because of the high costs associated with ductless mini-splits for a whole-house application. ComEd will further investigate the estimated cost and energy savings associated with electric resistance to ductless mini-split conversion to inform current and future program design. |

**Joint Stakeholder EE Idea: Drop "efficiency kit" programs** (EE Idea tracker row 30)

* Idea excerpt: *With LEDs now standard products, the value of kits is significantly diminished. Funds are better spent on IQ weatherization. Possible exception might be kits distributed through community partners such as food pantries, only when used/marketed as an opportunity to introduce customers to weatherization.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC's plan, per statute, must represent a diverse cross-section of opportunities for customers of all rate classes, other than opt out customers.  | Kits provide an easy entry into energy efficiency for many customers while allowing for customer energy savings. Given their low cost, they reach many more customers than what's possible for retrofits and provide awareness to customers of additional energy efficiency and other utility assistance programs. ComEd will continue to investigate the cost effectiveness of kits going into Plan 7.  | Kits serve as a great marketing function and entry point into wide range of EE offerings.  | PGL/NSG supports providing a diverse portfolio of solutions for all customers. |

**Joint Stakeholder EE Idea: IQ Weatherization: Quality Assurance / Quality Control Requirements** (EE Idea tracker row 38)

* Idea excerpt: *Illinois needs a local, independent third party(ies) to perform quality assurance/quality control of all weatherization projects for both SF and MF income-qualified projects. We need an unbiased, non-financially incentivized party to ensure that work performed has ensured a whole-building, robust treatment with inspections to ensure work is done correctly.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC believes further discussion is required to allow understanding of what challenges this idea solves. | ComEd already has established a third-party QA/QC program across its energy efficiency portfolio. We believe any additional party performing QA/QC adds layers of administration and costs by adding additional admin burden on utilities with questionable benefit.  | This is essentially already being done.  | PGL/NSG does not believe this is a justifiable administrative expense.  |

**Joint Stakeholder EE Idea: Coordination and Referrals** (EE Idea tracker row 36)

* Idea excerpt: *Enhance, to the extent possible, coordination and referrals between IQ EE programs, bill payment assistance programs, IL Solar for All and other IQ programs. All IQ customers who enquire about an EE program should be made aware of other non-EE programs for which they are eligible - and vice versa. Such customers should also receive support in accessing those other programs (not just given a brochure, but direct human help navigating to and enrolling in other programs if eligible and interested)*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC will consider as part of program design/delivery with next plan. No further input necessary at this time | ComEd has incorporated information on non-EE programs for which customers may be eligible for, such as financial assistance programs and Solar for All, in Home Energy Savings and Multi-Family Energy Savings offering leave behind materials. It is understood that the submitter is interested in a representative helping to navigate and enroll customers into these programs directly. Given the breadth of programs and the various entities administering such programs, this type of hands-on assistance being available through ComEd's IQ Energy Efficiency offerings is not feasible. There would be a risk of representatives sharing incorrect information and given the administrative requirement and cost this type of scope would have, this would result in ultimately less customers being served with energy efficiency measures. | We already implement this concept with our C3 initiative. We will continue to find ways to enhance C3. | PGL/NSG intends to follow the pathway defined in IL Policy Manual Version 3.0. |

**Joint Stakeholder EE Ideas: Multi-Family** (EE Idea Tracker rows 7, 8, 14)

| **Multi-Family EE Ideas** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
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| Enable EE programs to incentivize bringing vacant/distressed IQ MF units to above-code energy efficiency (row 7) | AIC recognizes that it must meet savings targets with a set budget. Given the regulatory construct, EE efforts should focus spending on areas that provide customers the greatest benefit. Further detail on cost required.  | ComEd would like to review this opportunity further to understand the cost efficiency and impact of this offering. Such funds to bring vacant/distressed communities to above-code energy efficiency would need to be drawn from our Health & Safety budgets. Current IE retrofit programs (Home and multi-Family Energy Savings and Whole Home Electric) fully utilize the 15% budget allocation for health & safety. Reductions/offsets would be needed to shift health & safety funds. We'd also like to note that due to increased costs that would result from this idea, cost effectiveness of the offering will be impacted drastically and ComEd would like to explore policy changes to help offset these changes. We would like to hold further discussions on these policy changes within a separate setting. |  At what scale because this could be costly and goes beyond the scope of EE. | PGL/NSG believes focus of energy efficiency funding should focus on occupied buildings. |
| Enhance IQ multifamily building owner customer outreach by targeted building owners (i.e. subsidized vs unsubsidized) (row 8) | AIC plans to continue targeting building owners and partner with housing associations to market IQ multifamily offerings.  | The Multi-Family Energy Savings offering implements a robust marketing and outreach plan each year. In 2023, the offering attended over 60 community events and conferences to educate building owners and Public Housing Authority on the offering and available incentives. However, the offering does not track subsidy status of participants. ComEd believes that tracking and collecting subsidy status of building owners is outside the scope of the Energy Efficiency program and greatly surpasses policy for approach on "Least burdensome and time-consuming" data collection for building owners.  | What would be different from today because this is already adopted. | PGL/NSG will require further information regarding this idea to consider for inclusion in the 2026-2029 Plan. |
| More comprehensiveness on building envelope measures and outline what protocols are in place to understand which multifamily building measures are in place and what measures are implemented (row 14) | AIC supports serving MF properties in a comprehensive manner where appropriate. Recently agreed upon reporting metrics should provide a clearer picture of which MF building measures are appropriate to offer. | Through the Multi-Family Energy Savings offering, Energy Advisors identify all of the measures that the property is eligible for through the offering during the assessment. These opportunities are relayed to the building owner through the assessment report. It is not feasible for many building owners to have all of the measures for which they are eligible for to complete the upgrades in 'one fell swoop'. In many instances, building owners opt to implement upgrades over time. Information on the baseline requirements necessary to be eligible for each measure along with measure specifications is clearly outlined on offering applications.  | The program is already geared towards being as comprehensive as possible. | PGL/NSG offers comprehensive programs and we intend to follow the reporting elements as defined in IL Policy Manual Version 3.0. |

**Joint Stakeholder EE Idea: IQ Multi-Family Electrification** (EE Idea Tracker row 9)

* Idea excerpt: *Enhance cross program coordination between IQ Multifamily programs and Electrification programs and clearly define protocol for cross-program coordination and referrals for property owners from one program to the other.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC will consider as part of program design/delivery with next plan. No further input necessary at this time. | Currently, coordination exists between ComEd's Whole Home Electric and Multi-Family Energy Savings offering. The Whole Home Electric team refers buildings that have not previously been weatherized or that are not eligible for the Whole Home Electric offering to the Multi-Family Energy Savings offering for follow up and service. If a building owner expresses interest in electrification or fuel switching measures to the Multi-Family Energy Savings team, they are referred to the Whole Home Electric offering. | Concerns about joint program promoting electrification. | PGL/NSG does not support electrification efforts as part of jointly funded gas/electric programs. |

**Joint Stakeholder EE Idea: IQ Multi-Family Eligibility** (EE Idea Tracker row 12)

* Idea excerpt: *Continue to determine IQ eligibility using the qualification methodologies that are the least burdensome and time-consuming for building owners and maximize the potential for and ease of participation in their IQ multifamily programs*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC will continue to utilize the policy manual when determining customer eligibility for its IQ programs. | For Multi-Family Energy Savings, location in an income eligible census tract (based on density of population with household incomes at or below 80% Area Median Income) is the primary means of income eligibility. If properties are not located within an income eligible census tract, they can qualify by meeting secondary qualification criteria as outlined in the IL Policy Manual. In short, this is already being implemented. | We currently try to use the least burdensome method.  | PGL/NSG intends to follow the pathway defined in IL Policy Manual Version 3.0. |

**Joint Stakeholder EE Idea: Nicor and ComEd Joint Affordable New Construction** (EE Idea Tracker row 23)

* Idea excerpt: *Change Nicor + ComEd's joint Affordable New Construction program's base measure package to include electric heat pump and heat pump water heaters.*

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| **ComEd Response**  | **Nicor Gas Response**  |
| ComEd is interested in this idea given potential for attribution of savings in braiding with IRA funding sources. We'd also like to note that due to increased costs that would result from this idea, cost effectiveness of the offering will be impacted drastically and ComEd would like to explore policy changes to help offset these changes. We would like to hold further discussions on these policy changes within a separate setting. | This could disrupt participation and remove customer choice within a joint offering. |

**Joint Stakeholder EE Idea:** Tenant Protection Agreements (EE Ideas tracker row 39)

* Idea excerpt: *When building electrification occurs in either multi-family or single-family tenant occupied buildings, tenants need to be protected from both rent increases and monthly utility bill increases. As part of the electrification process, ComEd and Ameren should have in place an agreement that requires the building owner to agree to the following minimum tenant protections, particularly when HOMES and HEAR rebates from the Inflation Reduction Act are incorporated (braided) into the programs.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC recognizes that it must meet savings targets with a set budget. Given the regulatory construct, EE efforts should focus spending on areas that provide customers the greatest benefit.  | While we agree with the intent of this idea, ComEd feels the practice of such protections go beyond the scope of the Energy Efficiency program. The following language is incorporated into the Whole Home Electric Terms and Conditions for Multi-Family participants:1. Property owner, on behalf of itself and its heirs, executors, successors, or assignees, shall not increase Tenant’s monthly rent solely as the result of the improvements completed on the building as agreed to in the Installation Agreement for a period of 12 months from the date of the completion of final inspection. HUD/Section 8 annual rental restructuring increases are exempt and may still be applied as a rental increase; 2. If property owner sells, assigns, or conveys any interest of the building within 12 months from the date of final inspection of the installation of measures, property owner shall require the new owner interest holder to comply with the obligations outlined in this Authorization and Agreement.3. If property owner is in breach of the Authorization and Agreement, property owner shall reimburse the cost of the energy efficiency improvements completed at the property address to the OfferingComEd will consider expanding upon these terms and conditions for Plan 7 agreements, but cannot commit to enforcement of this agreement as it is not feasible. Additionally, since ComEd does not administer to the Percentage of Income Payment Plan (PIPP) or the Illinois Low Income Home Energy Assistance Program (LIHEAP), ComEd cannot make commitments related to these offerings.  | Although we currently implement a similar policy in IHWAP offerings, the policing mechanism is better suited for local municipalities. | PGL/NSG includes advisory language in our terms and conditions but does not believe monitoring and enforcing is practical within energy efficiency programs. |

**Utility Responses to April 17 Energy Efficiency Ideas**

Illinois utilities respond to EE Ideas presented to SAG on [April 17](https://www.ilsag.info/event/wednesday-april-17-sag-meeting/), referenced below

**IQ South EE Committee EE Idea:** **AC/High Heat Pilot Program to address High Heat Days** (EE Idea Tracker row 46)

* Idea excerpt: *The AC/High Heat Energy Efficiency Program aims to deliver life-sustaining cooling resources during high heat episodes to communities and customers through cost-efficient packages of energy efficient measures. While resources exist to provide emergency heating resources and bill stipends to income qualified customers (Low Income Home Energy Assistance Program, LIHEAP), there is no program to support the delivery of emergency cooling resources in Illinois. The IQ-S AC/High Heat Subcommittee is proposing a program that would offer emergency cooling resources to at-risk, eligible low-income households via one or more energy efficient measure package(s), depending on the customer and residential dwelling type. Expected outcomes include generating savings for Ameren Illinois, providing bill relief to income qualified customers via higher efficiency cooling equipment, and protecting income qualified customers against potentially life-threatening high heat episodes.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC is interested in exploring the idea further. | ComEd struggles to understand the Energy efficiency savings implications of this Idea and believes it's outside of the scope of EE | N/A  | N/A |

**IQ South EE Committee EE Idea: Increase and Support Diverse Contractors** (EE Idea Tracker rows 48-50)

* Idea excerpt: *Program Proposal for Increasing the Number of Diverse Contractors for the 2026 -2029 utility portfolios so that the amount of funding received by diverse contractors, in all program areas (not limited to IQ and/or residential programs) is proportionate to the diverse population in IL. The purpose of the Program would be to continue supporting and growing diverse businesses in energy efficiency who are interested in becoming implementers, Program Allies and/or portfolio/program support contractors.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC supports increasing diverse contractors through support provided by its MDI program. However, it does not support the concept of aligning population ethnic mix with the DBE spend. | ComEd will explore this idea, given there are no additional commitments provided to the spread of our diverse spend. ComEd has a strong commitment to diversity and strives to continuously increase diverse spend within our EE portfolio. We have a total diverse spend requirement of 43% overall and are working to increase the number of diverse contractors. We do note that our diversity goals include categories of diversity that are not addressed in this EE Idea (e.g., WBE, VBE, NGLCC-certified).  | Supportive of increasing DBEs but targeting population percentages would be difficult | PGL/NSG supports increasing and supporting diverse contractors through our MDI program but believes in maintaining flexibility in contractors so that we can achieve program goals. |
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**IQ South EE Committee EE Idea: Support Returning Citizens entering the Clean Energy Workforce** (EE Idea Tracker row 52)

* Idea excerpt: *This program would integrate returning citizens into the clean energy workforce, particularly in energy efficiency (EE) and solar industries. Goals include identifying, supporting, and connecting returning citizens with job opportunities, as well as engaging employers willing to hire them. The program also aims to prepare incarcerated individuals for clean energy jobs upon release.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC currently supports returning citizens entering the clean energy workforce through its MDI.  | ComEd has developed a thorough Market Development Initiative (MDI) and this is something discussed as part of recruitment into the newcomer cohort. We are interested in further investigating ideas to improve pathways for returning citizens to contribute to the clean energy sector.  | Will need to understand more.  | PGL/NSG supports returning citizens entering the energy efficiency workforce through our MDI program. |

**IQ South EE Committee EE Idea:** **Clean Energy Plans “Framework” for CBOs, CAAs, and Local Governments** (EE Idea Tracker row 47)

* Idea excerpt: *To assist community-based organizations (CBOs), community action agencies (CAAs), and local governments in developing comprehensive clean energy plans for underserved communities.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| Through its MDI, AIC and its partners have been working with CBO's to leverage CEJA funding. The current efforts are aligned with budgetary limitations. Further growth of existing efforts will require greater funding for the MDI. | ComEd does not see the direct energy efficiency savings benefit of such an idea and believes this falls outside the scope of Energy Efficiency, outside of stretch codes and market transformation. This idea does not seem to be stretch codes and market transformation  | Will need to examine the costs and impacts | PGL/NSG will require further information to understand how this would be a justifiable use of energy efficiency funding. |

**IQ South EE Committee EE Idea:** **Mobile Home Initiative to deliver EE Measures to Mobile Homes** (EE Idea Tracker row 51)

* Idea excerpt:*Initiative aims to address the energy efficiency needs of mobile home residents in Illinois, who face disproportionately high energy burdens due to factors such as low incomes and inefficient housing. Mobile homes, particularly older ones, consume significantly more energy per square foot compared to other types of homes. Residents often struggle with high energy costs, uncomfortable living conditions, and limited access to energy efficiency programs.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| AIC currently offers weatherization to customers whom are mobile home residents and plans to explore further for the next plan | Mobile homes are currently eligible to participate in ComEd's Home Energy Savings offering. While ComEd does not currently have plans to develop a separate offering for this building type in Plan 7, we'd like to wait to see outcomes of the potential study to better understand savings potential for this market.  | Customers qualify for programs not specific to mobile homes. | PGL/NSG has the ability to serve mobile homes through existing programs. |

**Elevate EE Idea: Market Development Initiative Diverse Business Support** (EE Idea tracker row 45)

* **Idea excerpt:** *The proposal aims to enhance support for diverse businesses, also known as Energy Efficiency Service Providers or Trade Allies, working within energy efficiency (EE) portfolios of utilities. It addresses two common barriers faced by these businesses: diverse certification and insurance costs. To tackle these issues, the proposal suggests allowing self-identification as diverse for a limited period while pursuing official certification and providing comprehensive support for the certification process. Additionally, grants would be offered to assist small businesses in covering insurance costs for a specified duration.*

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| **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
| Through its MDI, AIC has been providing suppliers assistance in obtaining its DBE certification and assisting community partners with grants to overcome insurance cost barriers. The MDI efforts are aligned with budgetary limitations. Further growth of existing efforts will require greater funding for the MDI. | ComEd cannot consider this idea as the requirements to allow upload of diverse spend is not decided by EE nor by ComEd. We follow Exelon policies. | We do some aspects now such as subsidies for certifications or insurance but more discussion is required. | PGL/NSG is already implementing aspects of this proposal, including awarding grants to business through MDI. However, the company cannot commit to self-certification of participating businesses. |

**Joint Stakeholder EE Ideas: Ameren specific** (EE Idea tracker rows 5 and 13)

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| **Ameren-Specific EE Ideas** | **Ameren IL Response**  |
| Significantly increase electrification for propane/oil heated homes, including marketing to all propane/oil customers regardless of whether Ameren Gas may be considering them for connection (row 5) | AIC strategy for outreach/marketing to propane users now includes offering customers a choice of fuel, whether electric or natural gas. AIC supports offering customers a choice of fuel, whether electric or natural gas. |
| Ameren should launch a super-efficient, all-electric residential new construction program analogous to ComEd's (row 13) | AIC supports super-efficient electric equipment where it’s in the best interest of the customer. More information (cost/benefit analysis) required. |

**Joint Stakeholder EE Ideas: HVAC Focused** (EE Idea Tracker rows 35, 10, 22, and 21)

| **HVAC EE Ideas** | **Ameren IL Response**  | **ComEd Response**  | **Nicor Gas Response**  | **PG & NSG Response**  |
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| Stop central A/C rebates; increase focus on heat pump rebates. Heat pumps should be the only HVAC measures rebated through non-IQ channels by Ameren and ComEd (row 35) | AIC sees this as an effort to promote electrification and believes customer circumstances dictate the optimal cooling equipment. Therefore, AIC supports offering customers a choice of cooling equipment. | ComEd discontinued offering incentives through Home Heating & Cooling (HHC) for central air conditioners in 2023. ComEd's HHC program only has incentives for heat pumps (air source, ductless and geothermal). ComEd continues to monitor alternatives for window air conditioners (ex, study in New York) and is pursuing transitioning to only income eligible incentives for room air conditioners through the Retail program.  | N/A  | N/A  |
| For gas or dual fuel utilities, end rebates for market rate residential gas consuming equipment (row 10) | AIC supports offering customers a choice of fuel, whether electric or natural gas. | N/A  | This is beyond the current policy of the state.  | PGL/NSG supports providing a diverse portfolio of solutions for all customers. |
| Eliminate furnace and central A/C replacements, unless the HVAC system is no longer functioning, there is a health and safety emergency (e.g. carbon monoxide leak), and/or there is above-average ongoing maintenance costs. When any of these three criteria are triggered for a central HVAC replacement, electric utilities will determine whether the home is a good candidate to first offer a heat pump replacement (rows 22 + 21 combined) | AIC supports offering customers a choice of fuel, whether electric or natural gas. | This is currently being implemented within Home Energy Savings and Multi-Family Energy Savings offerings | We try to tune up first, then repair however if a repair cost is too high (above $800) then it is eligible for emergency replacement. | PGL/NSG's current program already aligns with the proposed idea. |