

Illinois Energy Efficiency Stakeholder Advisory Group Policy Manual Subcommittee

Interim Policy Resolution: Single Family Income Qualified (IQ) Eligibility Verification Guidelines Final (11/9/2022)

Policy Issue:

Current Illinois policy provides multiple verification pathways for multifamily programs but does not provide the same pathways for single family programs. The current verification pathway of requiring proof of income documentation can be overly burdensome on both the customer and program administrator. Allowing multiple eligibility pathways assists program administrators in serving the single-family IQ sector more effectively by maximizing the time spent serving the customer.

Background:

- Ameren Illinois submitted a policy proposal as part of the SAG Policy Manual Version 3.0 update process, to establish a policy on single family IQ eligibility verification guidelines.
- At the September 21, 2022 Policy Manual Subcommittee meeting, Ameren Illinois requested interim resolution of this policy, to help address customer eligibility verification challenges in their single-family IQ EE programs.
- A Policy Manual Small Group meeting was held on October 13, 2022 to discuss and edit proposed policy language.
- At the October 19, 2022 Policy Manual Subcommittee meeting, participants reached consensus on an interim policy resolution, with the understanding there will be further refinement of policy language through the Policy Manual Subcommittee process, including identifying additional single family IQ eligibility pathways.

Interim Policy Resolution: Many federal, state and/or local programs have income requirements comparable to or more stringent than the Illinois utilities' income eligible efficiency programs' income qualification threshold of 80% of Area Median Income (and, for Ameren's moderate income offerings, 300% of Federal Poverty Level). Because income verification for income qualified single-family homes can be challenging, expensive and time-consuming, and in order to ensure that such challenges, costs and or impositions on customers do not adversely affect an energy efficiency program administrators' ability to serve income qualified single-family customers, there should be multiple pathways to establishing income eligibility for purposes of program participation and spend tracking.

This policy establishes pathways to identifying customers by their participation in other income eligible programs. Program administrators may verify eligibility using documentation submitted showing participation in an income eligible program. For example, the following pathways would be acceptable ways to demonstrate income eligibility for single family customer participation in program administrator income qualified single-family programs:

- Participation in a weatherization assistance program with like eligibility
- Participation in a ratepayer-funded, utility shareholder-funded, federal, state, or locally-funded energy assistance programs with like income eligibility (e.g., Low Income Home Energy Assistance Program (LIHEAP), Percentage of Income Payment Plan (PIPP))

- Participation in other state, federal, or local income eligible programs with like income eligibility (e.g., Supplemental Nutrition Assistance Program (SNAP), Medicaid)

Program Administrators will employ the qualification methodologies that are the least burdensome and time-consuming for home owners and maximize the potential for and ease of participation in their Income Qualified single-family Programs.

Customers identified as eligible to participate in Income Qualified programs using a pathway established above should receive program benefits that align with the income eligibility requirements for the program pathway used to determine eligibility.