**Illinois EE Stakeholder Advisory Group (SAG):**

**Income Qualified (IQ) Policies Developed by SAG Policy Manual Subcommittee**

**SAG Facilitator Background:**

* The SAG Policy Manual Subcommittee requested feedback on income qualified (IQ) related policies following the Monday, June 26 SAG Equity Subcommittee meeting, which was held jointly with the IQ North EE Committee and IQ South EE Committee (also referred to as the LIEEAC)
  + IQ related policies were developed over the past year by the Policy Manual Subcommittee
  + These IQ policies are intended to support Illinois utility IQ EE program offerings
* Three weeks were provided for feedback – comments were due Monday, July 17
  + SAG Facilitator consolidated feedback into one document and circulated it
  + Comments received from:
    - Briana Moore, Will County Land Use Department
    - Cheryl Watson, Equitable Resilience & Sustainability
    - IQ South Committee Facilitator (Annette Beitel), reflecting comments from the June 26 meeting
    - Katherine Elmore, Community Investment Corp.
    - Kevin Dick, 389nm
    - Michelle McSwain, Sustainable Environmental and Economic Development Solutions
* SAG Policy Manual Subcommittee discussed feedback on Wednesday, July 19
* This document includes redline edits to the IQ policies that will be included in the Policy Manual update – follow-up from the July 19 meeting is in yellow highlight

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# Single Family Income Qualified Eligibility Verification Guidelines Policy

**Policy:** 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 do not adversely affect a customer’s ability to participate or 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 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)
* For tenant-occupied single family and 2-unit homes, location in a Census Tract identified by the Program Administrator as low-income. As a starting point, the Program Administrator should use HUD’s annually published “Qualified Census Tracts.” HUD’s Low-Income Housing Tax Credit Qualified Census Tracts must have fifty percent (50%) of households with incomes below sixty percent (60%) of Area Median Income or areas that have a poverty rate of twenty-five percent (25%) or more. However, the Program Administrator’s target Census Tracts may be expanded or restricted based on additional analysis demonstrating that the change would ensure that the majority of homes treated would have at least fifty percent (50%) of tenants with incomes at or below eighty percent (80%) of Area Median Income. For example, a Program Administrator may choose to target a higher percentage of poverty within their definition of a low-income Census Tract.
* For non-IHWAP braided, single-family whole building retrofit projects, a self-certification process will include information in languages other than English when there is a demonstrated need:
  + Customers will answer these questions:
    - How many people live in your household?
    - What is the estimated combined yearly income for your household? This includes all members of the household aged 18 and above.
    - In the alternative, Program Administrators shall permit customers to establish eligibility by providing 30-consecutive days of income anytime during the prior twelve (12) months.
    - This information is used to verify income eligibility against the AMI criteria.
  + Additionally, during retrofit service delivery, customers verify their eligibility by signing a customer authorization form.
* For non-comprehensive[[1]](#footnote-1) single-family programs, a self-certification process may also be used, including but not limited to:
  + Customers will answer these questions:
    - How many people live in your household?
    - What is the estimated combined yearly income for your family? This includes all members of the household aged 18 and above.
    - This information is used to verify income eligibility against the AMI criteria.
  + Residents of mobile homes located in a mobile home park.
  + Program Administrators, to the extent they utilize Community Action Agencies (CAAs) and Community-Based Organizations (CBOs) to establish eligibility for income qualified programs, shall permit those entities to use reasonable discretion to serve needy customers using low-income funds even if the customer cannot produce documentation of income and/or they do not meet any of the eligibility requirements above but shall document its decision to qualify the customer as eligible for low-income funds.

In addition to the options above, Program Administrators may use other approaches that can demonstrably identify single family homes occupied by customers whose incomes are expected to be at or below 80% AMI (or, for Ameren’s moderate income offerings, at or below 300% Federal Poverty Level) in a manner less burdensome than by requiring income information. Program Administrators will inform stakeholders of any new qualification approaches and confirm no objections before beginning to use them. 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.

**Proposed Effective Date:** October 2022

# Net-to-Gross for Disadvantaged Areas Policy

**Policy:** Free ridership for certain types of customers in economically-disadvantaged areas is highly likely to be very low. That assumption is supported by data indicating that the participation rate for smaller customers in economically-disadvantaged areas has historically been much lower than for similar customers in communities that are not as economically challenged. To reflect that reality, the net to gross (NTG) ratio for such customers will be set to 100%. This will have the added advantage of creating greater incentives for utilities to target delivery of their efficiency programs to economically disadvantaged areas.”

The economically-disadvantaged areas designated by this policy[[2]](#footnote-2) are:

1. Areas identified as “income-eligible households” by Illinois Solar for All (“disadvantaged neighborhood”), and
2. the entire area of certain municipalities where at least 50% of the municipality is identified as income-eligible through Illinois Solar for All[[3]](#footnote-3) (“disadvantaged municipality”)

The policy will apply to all program activity involving the following customer segments within disadvantaged areas:

1. residential customers in disadvantaged neighborhoods,
2. business customers in disadvantaged neighborhoods with rate class designations or energy consumption levels below annual thresholds in the table below

|  |  |  |
| --- | --- | --- |
| **Utility** | **Criteria for Eligibility (either/or)** | |
| **Rate Class** | **Annual Consumption Threshold** |
| Ameren Illinois | Electric: DS-2 (<150 kW)  Gas: GDS-2 (<200 therms/day in any month) | Electric: <750,000 kWh/year  Gas: <35,000 therms/year |
| ComEd | Small Load Delivery Class (<100 kW) | <750,000 kWh/year |
| Nicor Gas | N/A | <35,000 therms/year |
| Peoples Gas and North Shore Gas | N/A | <35,000 therms/year |

For projects jointly delivered by a gas and electric utility, eligibility for either the electric or gas thresholds in the table above would trigger the application of 100% percent NTG ratio for both fuel savings.

1. any general delivery service municipal, public school and local government customers in a disadvantaged municipality

It is expected that, though customers in disadvantaged areas are currently underrepresented in evaluation research due to lower participation levels, going forward, this policy will require that research to establish NTGRs for program activity explicitly sample customers in non-disadvantaged areas. Any NTG research targeting customers in disadvantaged areas will fall under Section 7.3 of the Policy Manual.

**Proposed Effective Date:** January 1, 2024

# LIEEAC Facilitator Independence Policy

**Policy:** Illinois Commerce Commission Staff (Commission Staff) shall submit the final but not yet executed contract and scope of work with the independent LIEEAC Facilitator to the Illinois Commerce Commission (Commission), containing its assessment of the contract and scope of work and describing its recommendations to the Commission. Alternatively, if a utility agrees to hold the contract, a utility shall submit the final but not yet executed contract and scope of work with the independent LIEEAC Facilitator to the Commission by letter to the Executive Director, and then Staff will submit a report to the Commission containing its assessment of the contract and scope of work and describing its recommendations to the Commission. Commission Staff will use reasonable efforts to submit its report to the Commission within 5 business days of receiving the finalized but not yet executed contract from the Program Administrator containing its assessment of the contract and/or scope of work and describing its recommendations for Commission action, if any. Absent a Commissioner request for a longer review time, no later than 15 business days after the submittal of the Staff Report to the Commission, Staff will notify the Program Administrator as to whether it may move forward with contract execution. In the event a Commissioner requests a longer review time, Staff will notify the Program Administrator that the contract is still under review by the Commission and provide an estimated date the review may be complete by.

In addition, the utility will submit any fully executed contract and scope of work with the independent LIEEAC Facilitator as a compliance filing in the most current Policy Manual approval proceeding, within fourteen (14) days of execution. Such compliance filing will be treated as public information, subject to redactions by the Commission of provisions deemed confidential.

The independent LIEEAC Facilitator contract will provide that the Commission has the right to terminate (or direct a utility to terminate) the LIEEAC Facilitator contract, if the Commission determines the LIEEAC Facilitator was not abiding by the requirement in Section 8-103B(c) to be fair and responsive to the needs of all stakeholders involved in the Committee and/or was not acting independently.

If a LIEEAC Committee member believes that the LIEEAC Facilitator is not acting independently and/or is not being fair and responsive to the needs of all stakeholders involved in the Committee, that member is encouraged to raise the concern with the LIEEAC Statewide Leadership Committee or Regional Subcommittee Leadership, as appropriate, and ICC Staff. In the event that the concern cannot be resolved through such conversations, the party may file a petition with the Commission requesting that the Commission order ComEd to terminate the contract. The LIEEAC Facilitator contract will automatically terminate upon a Commission finding that the contract should be terminated, after issuance of notice and hearing and an opportunity for interested parties to be heard, including through Commission resolution of any filed applications for rehearing. All due process rights guaranteed by the PUA and the Commission’s rules shall apply.

**Proposed Effective Date:** January 1, 2024

# Process-Related Income Qualified Policies

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## **Grouping Income Qualified Topics**

**Policy:** All income qualified items discussed through SAG and/or SAG Subcommittees should be grouped so that interested income qualified participants can participate in targeted way in SAG meetings, where reasonably possible.

**Proposed Effective Date:** January 1, 2024

### **Creating an Income Qualified Reference Section**

There is no policy language for review. The Policy Manual will include a simple cross-reference section, to list all IQ-related policies in one place. If it would be helpful to summarize or explain IQ-related policies in more detail the Policy Manual, that can be added in a future Policy Manual update, in coordination with the IQ North and IQ South Committees.

# Income Qualified Reporting Policies

## **Income Qualified Multi-Family Reporting Principles Policy**

**Policy:** Each Program Administrator will report on the effectiveness of its efforts to deliver efficiency improvements to the Income Qualified Multi-Family housing sector. In addition to standard program reporting on spending and savings, the PAs will report on a statewide set of metrics designed to provide insight into a variety of other program and policy objectives including:

* The mix of buildings being treated. This could include breakdowns between public housing, subsidized housing and unsubsidized housing; the type/size of buildings.
* Levels of joint delivery and/or coordinated delivery between gas and electric utilities.
* The comprehensiveness of efficiency upgrade opportunities being addressed in participating buildings. This would include a particular emphasis on understanding the level of uptake of building envelope, HVAC equipment, water heating equipment and other major measures (vs. just lower cost measures through direct installation and/or other delivery mechanisms) and barriers encountered in increasing uptake of such major measures.
* Uptake of new technologies. This would include, but not be limited to cold climate heat pumps and heat pump water heaters.
* Leveraging of other funding sources to support IQ MF retrofits
* Geographic distribution. This would include where buildings are served, which could be provided by zip code and/or census tract.
* ~~How tenants were engaged in the project, feedback they provided and responses to feedback~~
* ~~Number of tenants who received energy education~~
* ~~The allie(s) who performed audits, installation and energy education, and information about each participating ally, including where they are located, their business size and diversity status.~~

The specific reporting metrics used to inform understanding of these issues will be developed collaboratively with interested stakeholders and may evolve over time.

The list of metrics will be posted on the SAG and LIEEAC website(s). To the extent there are lessons learned and recommendations made from reported metric data, each Program Administrator will describe how they have been addressed in its subsequent four-year plan filings. Each Program Administrator’s subsequent four-year plan filings will also state the metrics that will be tracked and reported on in the next plan cycle.

**Proposed Effective Date:** The policy will go into effect, in full, no later than for the 2024 program year. However, Program Administrators will apply best efforts to address as many of the objectives as possible in reporting for both program year 2022 and program year 2023.

**~~Income Qualified Single Family Reporting (including Mobile Homes) Principles Policy~~**

**~~Policy:~~** ~~Each Program Administrator will report on the effectiveness of its efforts to deliver efficiency improvements to the Income Qualified Single Family housing sector. In addition to standard program reporting on spending and savings, the PAs will report on a statewide set of metrics designed to provide insight into a variety of other program and policy objectives including:~~

* ~~The mix of dwellings being treated. This could include breakdowns between public housing, subsidized housing and unsubsidized housing.~~
* ~~Levels of joint delivery and/or coordinated delivery between gas and electric utilities.~~
* ~~The comprehensiveness of efficiency upgrade opportunities being addressed in participating buildings. This would include a particular emphasis on understanding the level of uptake of building envelope, HVAC equipment, water heating equipment and other major measures (vs. just lower cost measures through direct installation and/or other delivery mechanisms), health and safety measures and barriers encountered in increasing uptake of such major measures.~~
* ~~Uptake of new technologies. This would include, but not be limited to cold climate heat pumps and heat pump water heaters.~~
* ~~Leveraging of other funding sources to support SF retrofits~~
* ~~Other measures offered and taken to help residents save energy, such as solar.~~
* ~~Geographic distribution. This would include where dwellings are served, which could be provided by zip code and/or census tract.~~
* ~~How residents were engaged in the project, feedback they provided and responses to feedback~~
* ~~Number of residents who received energy education~~
* ~~The allie(s) who performed audits, installation and energy education, and information about each participating ally, including where they are located, their business size and diversity status.~~

~~The specific reporting metrics used to inform understanding of these issues will be developed collaboratively with interested stakeholders and may evolve over time.~~

~~The list of metrics will be posted on the SAG and IQ website. To the extent there are lessons learned and recommendations made from reported metric data, each Program Administrator will describe how they have been addressed in its subsequent four-year plan filings. Each Program~~

## **Income Qualified Health and Safety Reporting Principles Policy**

**Policy:** Health and safety issues can sometimes be impediments to weatherizing homes. When that is the case, income qualified households not only lose the potential for realizing energy bill reductions, but also are left with underlying structural and/or other problems in their home that they typically do not have the financial or technical resources to remedy. This policy is intended to provide transparency on how the Illinois Program Administrators are addressing health and safety issues encountered through their income qualified weatherization programs, to enable understanding of similarities and differences in opportunities and challenges experienced by each Program Administrator, as well as to make available data that can shed light on both successes and future opportunities for improvement in addressing such issues. Specifically, it requires that each Program Administrator report on the effectiveness of its efforts to address health and safety improvements necessary to enable efficiency retrofits – particularly building envelop upgrades, HVAC equipment upgrades and other major measures – in income qualified single family and multi-family buildings. The reporting will be on a statewide set of metrics designed to provide insight into the following issues for both single family and multi-family buildings:

* How often health and safety concerns are found.
* The types of health and safety concerns that are found and the measures used to address those concerns.
* How often the programs are able to address (vs. unable to address) any health and safety concerns that are found and why.
* Levels of spending to address health and safety concerns.
* ~~All measures used to address health and safety concerns, including costs, numbers of each measure by year, and any savings attributable to the measure.~~
* Geographic and building type distribution of health and safety data.
* The types of materials used for air sealing and insulation.

The specific reporting metrics used to inform understanding of these issues will be developed collaboratively with interested stakeholders and may evolve over time.

The list of metrics will be posted on the SAG and LIEEAC website(s). To the extent there are lessons learned and recommendations made from reported metric data, each Program Administrator will describe how they have been addressed in its subsequent four-year plan filings. Each Program Administrator’s subsequent four-year plan filings will also state the metrics that will be tracked and reported on in the next plan cycle.

**Proposed Effective Date:** The policy will go into effect, in full, no later than for the 2024 program year. However, the PA’s will apply best efforts to address as many of the objectives listed in the bullets above as possible in reporting for both program year 2022 and program year 2023.

## **Equity and Affordability Reporting Principles Policy**

**Policy:** Each Program Administrator will report on the delivery of its energy efficiency programs to disadvantaged communities. In addition to standard reporting of disconnection and other credit and collections data by zip code already required by Section 8.201.10 of the Public Utilities Act, the Program Administrators will report on a statewide set of metrics designed to provide insight into a variety of other program and policy objectives, which shall include:

* How participation in utility whole building retrofit programs overlaps with geographic areas with economic need
* How participation in utility whole building retrofit programs overlaps with LIHEAP and PIPP participation; and
* How participation in utility whole building retrofit programs overlaps with disadvantaged communities or other indicators of equity.

Each Program Administrator will also perform periodic analyses to provide insight into additional program and policy objectives, which may include:

* The effectiveness of whole building retrofit and other utility-sponsored assistance and efficiency programs in reducing low income energy burdens;
* The number of and effectiveness of cross referrals between energy efficiency and credit/collections departments in enrolling low income customers.
* The number or proportion of energy efficiency program participants that are payment troubled (e.g., customers at risk of being disconnected; with high arrears; participating in bill assistance programs).

The utilities and stakeholders shall work to reach consensus in developing the specific metrics to address these reporting needs. The metrics may evolve and be amended over time.

The list of metrics will be posted on the SAG and LIEEAC website(s). To the extent there are lessons learned and recommendations made from reported metric data, each Program Administrator will describe how they have been addressed in its subsequent four-year plan filings. Each Program Administrator’s subsequent four-year plan filings will also state the metrics that will be tracked and reported on in the next plan cycle.

**Proposed Effective Date:** The policy will go into effect, in full, no later than for the 2024 program year. However, the Program Administrators will apply best efforts to address as many of the objectives listed in the bullets above as possible, and in a manner consistent with each utility’s 2022-2025 Plan Stipulation and future Plan Stipulations, in reporting for both program year 2022 and program year 2023.

## **Diverse Contracting Reporting Principles Policy**

**Policy:** Each Program Administrator will report on its efforts to enable and provide increases in diverse contracting within the PA’s energy efficiency portfolio. In addition

to any standard diverse contractor reporting already undertaken by the Program Administrator pursuant to Section 5-117 of the Public Utilities Act, and for electric utilities, as ordered by the Commission in the electric utility performance based ratemaking dockets (ICC Docket Nos. 22- 0063 and 22-0067), the Program Administrators will report on a statewide set of metrics designed to provide insight into the policy objective of increasing opportunities for diverse contractors and trade allies to engage in energy efficiency and other policy objectives. The following metrics will be reported by diverse category, including but not limited to woman-owned, minority-owned, and veteran-owned businesses:

1. The number of diverse contractors and/or proportion of spending on diverse contracts for the energy efficiency portfolio, by tiered contract level (primary contract (direct with a Program Administrator) or secondary contract (subcontract to a primary), as applicable. If a Program Administrator has two (2) or less diverse contractors in a tier level and/or diverse category, this reporting requirement will be waived to protect the confidentiality of contract values. This waiver will not supersede a utility’s obligation to provide expense detail in any ICC proceeding in which the reasonableness and prudence of utility spending is being assessed.
2. Percent of or amount of portfolio dollars, excluding pass-through incentives, for diverse contractor spend
3. Spending with diverse trade allies, relative to total trade ally spending
4. ~~Number of diverse trade allies how the trade ally is diverse, and the specialtie(s) of the trade allies by county, by zip code.~~

In addition to reporting on the set of metrics above, additional reporting metrics used to inform understanding of these issues will be developed collaboratively with interested stakeholders and may evolve over time. The set of metrics designed to provide insight into the policy objective of increasing opportunities for diverse contractors and trade allies to engage in energy efficiency and other policy objectives may include:

* Number of diverse trade allies and their specialtie(s)
* How diverse trade allies are distributed geographically by program
* Location of diverse trade allies relative to historically disadvantaged communities,

The list of metrics will be posted on the SAG and LIEEAC website(s). To the extent there are lessons learned and recommendations made from reported metric data, each Program Administrator will describe how they have been addressed in its subsequent four-year plan filings. Each Program Administrator’s subsequent four-year plan filings will also state the metrics that will be tracked and reported on in the next plan cycle.

**Proposed Effective Date:** The policy will go into effect, in full, no later than for the 2024 program year. However, Program Administrators will apply best efforts to address as many of the objectives listed in the bullets above as possible, and in a manner consistent with each utility’s 2022-2025 Plan Stipulation and future Plan Stipulations, in reporting for both program year 2022 and program year 2023.

# One-Stop-Shop Program Design Definition for Income Qualified Multifamily Retrofit Policy

**Policy:** When Program Administrators commit to One-Stop Shop approaches to delivering IQ MF efficiency programs, and other programs as applicable, in order to help participants navigate a complex program landscape, the approaches are defined as including the following:

* **Contact and Engage/Seek Feedback from Any Tenant Organizations** – engage tenants in the energy efficiency projects so they understand and can contribute to shaping the project.
* **Program navigation support –** making the process of participating in the IQ MF EE program easier through integrated program services. This can include a single point or reduced points of contact, application and enrollment support, coordinating access to other programs, assisting with coordination of rebates, incentives, and financing options, monitoring progress, and more.
* **Application ease –** reducing application burdens, which can include a single or universal intake application or other simplified processes.
* **Comprehensive technical assistance –** supporting participants with technical assistance, which can include navigating audits and auditors, reviewing scopes of work proposed, discussing available rebates, incentives, and financing options, providing a list of potential contractors, supporting post-project quality inspections and annual benchmarking services, and more.
* **Integrated offers of all potentially applicable efficiency measures –** clearly articulating to building owners and/or tenants the full range of efficiency measures, solar measures, green financing, and other measures, offerings and/or tools (regardless of whether they are utility offerings) that can help tenants reduce energy bills that may be applicable to their building and which the utility supports.
* **Energy Education**: Ensure all tenants have the opportunity to understand how to read their bills, what actions they can take to reduce their bills, and what measures and actions most contribute to their energy bills.

**Proposed Effective Date:** 2022

**~~One-Stop-Shop Program Design Definition for Income Qualified Single Family Retrofit Policy (including Mobile Homes)~~**

**~~Policy:~~** ~~When Program Administrators commit to One-Stop Shop approaches to delivering IQ SF efficiency programs, and other programs as applicable, in order to help residents maximize energy savings based on available opportunities, including energy education, balanced billing, rate options, as well as measures such as energy efficiency and solar measures, the approaches are defined as including the following:~~

* **~~Contact and Engage/Seek Feedback from Residents~~**~~– Educate residents before a project is finalized to ensure residents understand all options available to them to help manage their bills, both utility offerings and non-utility offerings, and including balanced billing, rate options as well as measures.~~
* **~~Application ease –~~** ~~reducing application burdens, which can include a single or universal intake application or other simplified processes.~~
* **~~Comprehensive technical assistance –~~** ~~supporting participants with technical assistance, which can include navigating audits and auditors, reviewing scopes of work proposed, discussing available rebates, incentives, and financing options, providing a list of potential contractors, supporting post-project quality inspections and annual benchmarking services, and more.~~
* **~~Integrated offers of all potentially applicable efficiency measures –~~** ~~clearly articulating to residents the full range of efficiency measures, solar measures, green financing, and other measures, offerings and/or tools (regardless of whether they are utility offerings) that can help tenants reduce energy bills that may be applicable to their dwelling.~~
* **~~Energy Education~~**~~: Ensure all tenants have the opportunity to understand how to read their bills, what actions they can take to reduce their bills, and what measures and actions most contribute to their energy bills. Ensure tenants know who to call if they have follow-up questions.~~

**~~Proposed Effective Date:~~** ~~2022~~

1. A “non-comprehensive” program example is the ComEd home energy assessment program. [↑](#footnote-ref-1)
2. Program implementers and evaluators may convert from the two geographies listed (census tracts and municipal boundaries) to zip code tabulation areas for operational purposes (especially with program ally driven initiatives). The method for used for this conversion should comply with industry standards (see <https://www.huduser.gov/portal/periodicals/cityscpe/vol20num2/ch16.pdf> for more information on this type of conversion. [↑](#footnote-ref-2)
3. See <https://www.illinoissfa.com/programs/non-profit-and-public-facilities/> for more information and an interactive map identifying these communities. [↑](#footnote-ref-3)