**Policy Document for the Illinois Statewide Technical Reference Manual Excerpt – TRM Update Process**

Edits to TRM Administrator Role Policy Language – 12/14/2022 Policy Manual Subcommittee Meeting

2.1 Stakeholder Roles and Responsibilities

Formal recommendations for TRM Updates shall be submitted along with all supporting work papers consistent with the approved work paper format (as specified by the TRM Administrator) to the TAC. Although any party is free to recommend TRM Updates, the following stakeholders have ongoing responsibilities that can be specified.

**1. Evaluators** (Evaluation Teams, Independent Consultants) – The Evaluators have primary responsibility pursuant to 220 ILCS 5/8-103(f)(7), 220 ILCS 5/8-103B(g)(6) and 220 ILCS 5/8-104(f)(8) to provide independent evaluations of the performance of the Program Administrators’ energy efficiency portfolios. To support this responsibility in the context of the TRM, Evaluators will use the Commission-approved TRM to perform savings verification (see glossary section) for prescriptive measures covered by the TRM, and, where warranted and budget allows, conduct measure and program level research (see glossary section) to inform future TRM Updates. The Evaluators shall collaborate with the Program Administrators and the TAC to determine appropriate data collection and analysis that supports TRM savings verification and TRM Policy Document for the Illinois Statewide Technical Reference Manual – TRM Update Process Page 6 of 13 Updates while considering the administrative cost and participant burden associated with such data collection. The Evaluators make recommendations for TRM Updates and participate in the SAG and the TAC.

**2. ICC Staff** – The ICC Staff has primary responsibilities to make recommendations to the Commission, participate in the development of the annual TRM Update filing, make recommendations for TRM Updates, and participate in the SAG and the TAC. On or about October 1 st of each program year, the ICC Staff shall submit a Staff Report (with the Updated TRM attached) to the Commission to initiate the TRM Update proceeding, wherein the Commission would consider officially approving the Updated TRM.

**3. Illinois Energy Efficiency Stakeholder Advisory Group[[1]](#footnote-1)** (SAG) – The SAG is advised of and given the opportunity to comment on the TRM Administrator’s recommended TRM Updates prior to the Updated TRM being filed with the ICC. However, technical issues regarding the TRM are usually addressed substantively through the TAC, which is open to any SAG participant. SAG participants can make recommendations for TRM Updates.

**4. Program Administrators** (Utilities) – The Program Administrators have primary responsibility to costeffectively meet the energy savings targets defined by Illinois statute by implementing energy efficiency programs. The Program Administrators are also responsible for tracking program participation, reporting estimates of energy savings using TRM values (where such values exist), estimating cost effectiveness, and implementing the TRM savings values, including TRM Measure Codes and other information necessary to apply the TRM, through their tracking systems. The Program Administrators and the TAC collaborate with the Evaluators prior to the start of each program year to determine an appropriate balance of data collection necessary to update and implement the TRM in the upcoming program year while considering the administrative cost and participant burden associated with such data collection. The Program Administrators and the TAC make recommendations for TRM Updates. The Program Administrators may present to the SAG prior to the annual TRM Update proceeding, information explaining how the proposed TRM Updates impact their energy efficiency portfolios.

**5. SAG Technical Advisory Committee (TAC)** – The TAC is a subcommittee of the SAG whose primary responsibility is to provide a forum to allow all interested parties to recommend TRM Updates and facilitate consensus for TRM Updates among the Evaluators, ICC Staff, Program Administrators, environmental organizations, interested stakeholders (e.g., other SAG participants), and the TRM Administrator prior to the annual TRM Update proceeding. All recommendations for TRM Updates shall be submitted to the TAC. Where consensus does not emerge in the TAC regarding a particular TRM Update, the SAG provides a forum where experts on all sides of the contested issue can present their expert opinions in an effort to inform parties of the contested issue and to also facilitate consensus.

**6. TRM Administrator** (Independent Consultant) – The TRM Administrator has primary responsibilities to manage updates to the TRM document, present TRM Updates to the SAG and the TAC, coordinate with the SAG, serve as an independent technical resource, serve as an independent facilitator to support consensus building, and—if desired by the SAG—manage a publicly accessible TRM website that contains TRM-related documents such as references, recommendations, responses, and versions of the TRM. The TRM Administrator reviews and responds [[2]](#footnote-2)to all formal TRM Update recommendations by a date specified in advance by the TRM Administrator, when updating the TRM for a specific program year. The TRM Administrator prepares the Updated TRM document (redlined and clean versions) each year for filing with the ICC based on recommended TRM Updates vetted through the TAC and the SAG. The TRM Administrator prepares a list of all the changes incorporated in the redlined Updated TRM document with rationale for each change. The TRM Administrator shall make any necessary revisions to the TRM to reflect the Commission Order from the annual TRM Update proceeding. Efforts will be made to ensure that all interested parties have equal and equally timely access to information related to the TRM. To ensure independence of the TRM Administrator and transparency in the TRM Update Process, the TRM Administrator shall ensure that all requesting parties are copied on all correspondence between the TRM Administrator and any other party related to the Illinois Statewide TRM development and TRM Update Process and other activities associated with the TRM Administrator’s role. The TRM Administrator shall provide detailed meeting notes after each TRM meeting to the TAC that includes a list of meeting attendees. The TRM Administrator shall keep a user-friendly log of all TRM recommendations, clarifications, errors, corrections, and typos submitted that may be organized at least by TRM Measure Code, commenter, and date of submission in a location accessible by TAC participants. As noted above, the TRM Administrator is an independent entity who has primary responsibility for managing the update process to the TRM. As part of the TRM Administrator’s management responsibilities, to the extent the TRM Administrator has a reasonable basis to determine that a TAC participant (that is not a Program Administrator or an entity acting on the Program Administrator’s behalf) has a financial conflict of interest, becomes disruptive, and/or is hindering complete and frank discussions, the TRM Administrator may manage and limit participation in discussions as appropriate.

2.4 SAG Consensus on TRM Development and Updates

The Illinois Statewide Technical Reference Manual was developed to comply with the Commission’s Final Orders from the electric and gas Utilities’ energy efficiency Plan dockets. In the Final Orders, the ICC required the Utilities to work with DCEO and the SAG to develop a statewide TRM. See, e.g., ComEd’s Final Order (Docket No. 10-0570, Final Order9 at 59-60, December 21, 2010); Ameren’s Final Order (Docket No. 10-0568, Order on Rehearing10 at 19, May 24, 2011); Peoples Gas/North Shore Gas’ Final Order (Docket No. 10-0564, Final Order11at 76, May 24, 2011), and Nicor Gas’ Final Order (Docket No. 10-0562, Final Order12 at 30, May 24, 2011). Each Utility’s Order enables it to implement energy efficiency programs and also provides guidance concerning the TRM. Generally speaking, these Orders describe the TRM’s creation and maintenance as being a collaborative process between the Program Administrators and the SAG. As a result and as a document that applies statewide, the TRM has been and will continue to be developed through a collaborative using the SAG process. In practice, this means that the TAC will work toward consensus on the issue first, and then bring the result to the SAG for its review and comment. Through the annual TRM Update Process, SAG participants shall make good faith efforts to reach consensus on all TRM Updates. If Program Administrators and non-financially interested stakeholders and the ICC Staff reach consensus regarding an appropriate assumption related to specific IL-TRM updates, that consensus shall be deemed for the upcoming Program Year and included in the updated IL-TRM that gets submitted to the ICC for approval, even if it is different from the TRM Administrator’s recommendation.

To the extent a consensus among Program Administrators and non-financially interested stakeholders and the ICC Staff cannot be reached regarding issues related to specific TRM updates, the TRM Administrator shall have the authority to use its best judgment to propose a resolution of the issue and include such in the updated TRM that gets submitted to the ICC for approval. For transparency and informational purposes, the ICC Staff will document such dispute and include a link to a “Comparison Exhibit of Non-Consensus TRM Update Issues” developed by the TRM Administrator in the Staff Report submitted to the Commission. The “Comparison Exhibit of Non-Consensus TRM Update Issues” will document, with input from the parties, the various parties’ positions concerning a non-consensus TRM update as well as the TRM Administrator’s rationale for its decision to resolve the issue.

Nothing in this language shall preclude Program Administrators and stakeholders from challenging the TRM Administrator’s proposed resolution by petitioning the Commission. Until the Commission resolves the petition, the Commission-approved TRM value shall be the default pending the issuance of a Commission Order. The applicable date for the Commission-resolved value will be the latter of January 1 of the year the TRM was designed to go into effect, or the first day of the next month following the Commission order. In the petition, the filing party should note all Program Administrators affected by the TRM dispute, and request that the Commission join each affected Program Administrator to the docket.

1. The Commission first defined the SAG in the electric utilities’ first energy efficiency Plan Orders to include “… the Utility, DCEO, Staff, the Attorney General, BOMA and CUB and representation from a variety of interests, including residential consumers, business consumers, environmental and energy advocacy organizations, trades and local government... [and] a representative from the ARES (alternative retail electric supplier) community should be included.” Docket No. 07-0540, Final Order at 33, February 6, 2008. http://www.ilsag.info/ [↑](#footnote-ref-1)
2. The TRM Administrator’s “response” to a formal recommendation for a TRM Update shall explain whether the TRM Administrator agrees with the formal TRM Update recommendation (either in its entirety or as modified by the TRM Administrator) and the justification for the TRM Administrator’s recommendation. [↑](#footnote-ref-2)