

**To:** Val Jensen, ComEd  
Keith Martin, Ameren

**From:** Juliana Pino, Policy Director, Little Village Environmental Justice Organization  
Anne McKibbin, Policy Director, Elevate Energy  
Rev. Booker Steven Vance, Policy Director, Faith in Place  
Mary Ellen Guest, Executive Director, Chicago Bungalow Association  
Jennifer Walling, Executive Director, Illinois Environmental Council  
Laura Goldberg, Energy Efficiency for All State Lead, Natural Resources Defense Council  
Jessica Collingsworth, Midwest Energy Advocate, Union of Concerned Scientists  
Rev. Tony Pierce, Board President, Illinois People's Action  
Kristin Munsch, Deputy Director, Citizens Utility Board  
Stacie Young, Director, Preservation Compact  
Tamara Dzubay, Clean Energy and Sustainable Business Specialist, Environmental Law and Policy Center  
Carrie Thomas, Executive Director, Chicago Jobs Council  
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Cheryl Johnson, Executive Director, People for Community Recovery  
Naomi Davis, Founder & CEO, Blacks In Green  
Edith Makra, Director of Environmental Initiatives, Metropolitan Mayor's Caucus

**Date:** March 23, 2017

**Re:** Low-Income Energy Efficiency Advisory Committee

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Hello Val and Keith,

Congratulations, again, on the passage of the Future Energy Jobs Act. Our organizations look forward to working with ComEd and Ameren to ensure that the Act's implementation brings significant benefits to low-income communities across Illinois. As each of our groups has extensive experience and relationships in these communities, we are writing to share a proposal for the formation of the low-income energy efficiency advisory committee described in the Future Energy Jobs Act (PA 99-2906).

#### Advisory Committee Principles

The Low-Income Efficiency Advisory Committee is an important opportunity to foster trust and a culture of mutual support between low-income communities and the utilities and implementation vendors who administer low-income efficiency programs. Consequently, the advisory group's activities must be **transparent** for it to succeed. We recommend that the Low-Income Efficiency Advisory Committee be led by an independent facilitator, that meetings convene with notice, and that it maintain a website that includes meeting agendas and meeting minutes, at a minimum. We believe that this process could be enabled through the existing Stakeholder Advisory Group (SAG) facilitation team and website.

A good word from trusted messengers within the community is the best marketing for low-income efficiency programs. The working group must be **inclusive** to ensure that all potential

trusted messengers have an opportunity to participate. We recommend that the meetings be open to any interested stakeholders, although we make recommendations for a core group of stakeholder participants, below. In addition, we recommend that the advisory group's scope of discussion be broad, extending to any issues that affect the success of the low-income efficiency programs.

#### Advisory Committee Goals

Statutory language from Future Energy Jobs Act (PA 99-2906) is as follows:

*The electric utilities shall also convene a low-income energy efficiency advisory committee to assist in the design and evaluation of the low-income energy efficiency programs. The committee shall be comprised of the electric utilities subject to the requirements of this Section, the gas utilities subject to the requirements of Section 8-104 of this Act, the utilities' low-income energy efficiency implementation contractors, and representatives of community-based organizations.*

In consideration of the Act, we recommend that the goals of creating the Low-Income Efficiency Advisory Committee are to ensure that:

- Program delivery responds to the needs of the low-income population;
- Program design is tailored to needs of low-income population;
- Programs are delivered by groups that have on-the-ground experience in low-income communities;
- Programs are monitored and optimized in an ongoing fashion, by stakeholders with strong ties to low-income communities who can provide a continual gap analysis to find new marketing, outreach, design, and innovation opportunities;
- Programs provide consistency of offerings across geography and time, as appropriate, while still creating opportunities for improvement and understanding the utility's need to balance the portfolio;
- Marketing is coordinated across state programs to ensure consistency where appropriate;
- Program quality and funding levels do not diverge from the rest of the utility portfolios in an inequitable or substantively differential manner over time;
- Suppliers and contractors who serve low-income programs are afforded opportunities to participate in the whole efficiency portfolio of programs, where applicable;
- Low-income efficiency programs co-deliver and integrate with natural gas and solar programs and health and safety upgrades;
- Low-income efficiency program marketing is coordinated across state programs to ensure program consistency; and
- Allocation of funding for low income programs is, at a minimum, commensurate with Section 8-103B of the Public Utilities Act, including ensuring that the allocation of dollars for low income programs is consistent with the revenue contributions of persons whose annual incomes are at or below 80% of the average median income of a utility's service territory;

### Advisory Committee Logistics

The Low-Income Efficiency Advisory Committee will likely have a large number of geographically dispersed participants, as it requires input from low-income communities across the state. In addition, before passage of the FEJA, the SAG was contemplating the creation of its own low-income advisory group. The group's meeting structure should balance stakeholder interests by:

- Minimizing overlap among advisory groups,
- Minimizing the total meeting time stakeholders must commit to be fully engaged,
- Ensuring that stakeholders who live and work in low-income communities are able to participate, and
- Responding to the varying needs of communities in different regions of our state.

Consequently, we recommend that there be only one statewide Low-Income Efficiency Advisory Committee that both encompasses the SAG participants who are interested in low-income issues and satisfies the requirements of the Future Energy Jobs Act (PA 99-2906). We also recommend that the Low-Income Efficiency Advisory Committee have two regional working groups (one for ComEd and one for Ameren) and that the quarterly meeting location rotate around the state, allowing rotating in-person participation by stakeholders in the Chicago area, Peoria, Bloomington, Rockford, and Metro East, at a minimum. A webinar and call-in number should be made available for each meeting so that meeting participants who are unable to travel may participate and monitor the meeting.

### Advisory Committee Membership and Leadership

Many stakeholders will be interested in the Low-Income Efficiency Advisory Committee's work. To achieve its goals, we recommend that the advisory group be open to all interested stakeholders including, at a minimum, the following potential participants:

- Utilities;
- Program implementation contractors;
- Preservation Compact;
- Little Village Environmental Justice Organization;
- Faith in Place;
- Blacks in Green;
- People for Community Recovery;
- Chicago Bungalow Association;
- Elevate Energy;
- University of Illinois at Chicago's Energy Resources Center;
- A representative of the Department of Commerce and Economic Opportunity (DCEO);
- A representative of DCEO who works with the state Weatherization Assistance Program;
- Office of the Illinois Attorney General;
- Illinois People's Action;
- Chicago Jobs Council;
- Citizens Utility Board;
- Natural Resources Defense Council;
- Midwest Energy Efficiency Alliance;

- Environmental Law and Policy Center;
- Enterprise Community Partners, Inc.;
- AARP;
- Illinois Public Interest Research Group (ILPIRG);
- Midwest Worker's Alliance;
- Cook County Worker's Benefit Council;
- Representatives from community organizations in the Metro East area;
- Representatives from local governments;
- A representative from the Chicago Housing Authority; and
- A representative who can speak to other housing authorities' needs.

Convening a group of this size effectively is no small task, and participants often do not have the resources to both participate and provide neutral facilitation services. Again, a webinar and call-in number should be made available for each meeting so that meeting participants who are unable to travel shall be able to participate and/or monitor the meeting. In addition, we recommend that the Low-Income Efficiency Advisory Committee be co-led by two representatives of participating groups chosen by the advisory committee, with one co-leader coming from ComEd territory and one from Ameren territory to ensure geographically appropriate representation and coordination. These co-leaders should rotate on a 2-year schedule so that one co-leader changes to a representative of a different organization each year, with staggered overlaps to preserve facilitator knowledge for the new co-facilitator in each rotation. We believe that this will increase buy-in to the advisory group's decision making over time, giving each organization a personal stake in its success and by extension, in the success of the utility programs.

In closing, we make these recommendations with the aim to work together with your companies to ensure the successful, high-quality implementation of the Future Energy Jobs Act's expanded low-income energy efficiency programs for Illinois communities that need these services the most. Please do not hesitate to contact us with questions or comments in regards to this matter.