**Equity and Affordability Reporting Principles Policy and Proposed Metrics**

**January 16, 2024 Reporting Working Group Meeting**

**REDLINE VERSION**

The text in italics below is the final Policy Manual Version 3.0 language. The text in red below represents draft proposed reporting metrics. The text in yellow highlight was added during the November 28th meeting.

**Final “Equity and Affordability Reporting Principles Policy” from Policy Manual Version 3.0:**

*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, 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:*

1. *How participation in Program Administrator whole building retrofit Programs overlaps with geographic areas with economic need;*
2. *How participation in Program Administrator whole building retrofit Programs overlaps with the Low Income Home Energy Assistance Program (LIHEAP) and Percentage of Income Payment Plan (PIPP) participation; and*
3. *How participation in Program Administrator whole building retrofit Programs overlaps with disadvantaged communities or other indicators of equity.*

**Timing:** ~~Quarterly Reports~~

Annual Reports

**Stakeholder Response:** Stakeholders want quarterly for this reporting, consistent with IQ multifamily geographic reporting.

**Reporting Location:** ~~Quarterly~~ Annual reports. Within a given program year the data will reflect cumulative year-to-date data in each quarterly report.

**Metrics:**

1. Report total number of participants in the single family IQ whole building programs (all IQ SF whole building programs collectively) quarterly by zip code, provided in spreadsheet format added to the Statewide Quarterly Report Template. Within a given program year the data will reflect current year-to-date data in each quarterly report.
2. A heat map showing the geographic participation by zip code, with an overlay of all residential customers that are on a deferred payment plan, discount rate, and/or LIHEAP/PIPP heat map by zip code. The heat maps will provide a general indication of the levels of either program participants or the general magnitude of residential customers on PIPP/LIHEAP and available discount rates.
   * Items 1 and 2 can more accurately be assessed utilizing the approach below.
     1. We can monitor the incentive spend vs non-incentive spend for IQ SF retrofits against non-IQ zip codes.
     2. Furthermore, although explicitly stated within the policy, LIHEAP and PIPP are poor indicators for cross-comparing customers of need and their participation in SF retrofits. It would be more appropriate to use the disadvantaged community overlay.
     3. **Stakeholder Response:** Stakeholders are interested in the utilities reporting 1) the total number of IQ SF participants by zip code, and 2) participant spend by zip code.
        1. Which tool are the utilities considering using for the Environmental Justice / disadvantaged areas tool? IL Solar for All or another tool? Deciding which tool is best should be considered as Nicor Gas develops the mapping mechanism. EPA EJ Screening tool has a lot of good information: <https://ejscreen.epa.gov/mapper/index.html?wherestr=3310+w+palmer+st+chicago+il>
        2. Stakeholders want the same agreement related to geographic reporting for equity / affordability as was discussed in the IQ multifamily metric at the December 19th meeting:
           1. *Stakeholders accept using the* *disadvantaged area definition first, and overlaying MF program participants (incentives provided) across each of the utilities service territories to show distribution in disadvantaged areas.*
           2. *Nicor Gas will work to develop a beta mapping mechanism. Stakeholders are interested in at a minimum, receiving the list of building participants by zip code or census tract, starting April 1, 2024 (which is the reporting policy effective date). Stakeholders are interested in receiving this information quarterly.*
3. At least once per 4-year EE Plan, conduct an analysis (can be by evaluators or other entity) of how IQ single family whole building program participants correlate with low income census tracts and/or the Solar for All EJ communities. Utilities are encouraged to collaborate on a single study, however, data should be broken out by utility.
   * This may be duplicative if our recommended approach with respect to items 1 and 2 is adopted as that may highlight any concerns about penetrating IQ zip codes for SF whole building offerings.
   * **Stakeholder Response:** Agree, as long as the mapping is provided stakeholders are ok dropping the analysis request.

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

1. *The effectiveness of whole building retrofit Programs and other Program Administrator-sponsored assistance and efficiency programs in reducing Low Income Customer energy burdens.*
2. *The number of and effectiveness of cross referrals between Energy Efficiency and credit/collections departments in enrolling Low Income Customers.*
3. *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).*

*Program Administrators shall work with interested stakeholders to reach consensus in developing the specific metrics to address these reporting needs. The metrics may evolve over time.*

*The list of metrics will be posted on the SAG and LIEEAC website(s). The metrics*

*will be referenced in, and lessons learned from reported metric data will be referenced in, the Program Administrators’ quarterly and/or annual reports and discussed in SAG and LIEEAC with the goal of improving Program delivery and outcomes.*

**For (*i)*:**

**Timing:** ~~Quarterly~~

Annual

**Reporting Location:** ~~Quarterly~~ Annual reports. The ~~Quarterly~~ Annual reports will provide the appropriate data. Within a given program year the data will reflect cumulative year-to-date data in each quarterly report. Reporting should be in spreadsheet format.

**Metrics:** Reporting includes (separately for each program):

1. Total number of IQ single family whole building program participants.
2. Total number of IQ single family whole building program participants adopting air sealing.
3. Total number of IQ single family whole building program participants adopting insulation.
4. Total number of IQ single family whole building program participants with electric resistance heating adopting heat pumps.
5. Total number of IQ single family whole building program participants with fossil fuel heating adopting heat pumps.
6. Total number of IQ single family whole building program participants adopting heat pump water heaters.
7. Total number of fossil fuel heating or how water systems replaced with another fossil fuel system.

Items 1 through 7 are captured in Annual Evaluation Reports.

**Stakeholder Response:** Stakeholders accept this information being included in annual evaluation reports. Stakeholders like the format of the Opinion Dynamics appendix reporting for Ameren, and request that Guidehouse adopt the same format for this reporting for the other utilities – ComEd, Nicor Gas, Peoples Gas and North Shore Gas. See Appendix D of Ameren’s 2022 Residential Program Impact Evaluation Report.

**For (*ii)*:**

**Timing:** One time study to be completed no later than the end of 2026 (utilities are encouraged to collaborate on a single study that quantifies results by utility).

**Reporting Location:** One time study report.

**Metrics:** Study will assess the level and consistency of cross referrals made by credit and collections departments to IQ EE programs, and what portion of customers receiving referrals subsequently participate in an IQ whole building program.

A one-time study should not be captured as a reporting metric. We should continue the dialogue surrounding this study in a forum external to the Reporting Working Group which is now centered on developing metrics captured in perpetuity.

**Stakeholder Response:** Discuss further in 1/16 meeting.

**For (*iii)*:**

**Timing:** Annually

**Reporting Location:** Either in Q4 Quarterly reports, or as a separate annual report.

**Metrics:** Reporting includes:

* Percentage of participants in the IQ single family whole building programs that that were in arrears at some point during the year, or that were participating in payment assistance at some point during the year.
  + This would be difficult to achieve considering the Utilities do not have mechanisms that allow us to consistently track customers described above. Furthermore, these metrics ignore a large subset of customers who also may even qualify for payment assistance or carry an additional economic need and is not formally captured as well.
  + **Stakeholder Response:** Stakeholders want to better understand the difficulty with this reporting- discuss on 1/16. Stakeholders agree there are no perfect indicators, but are interested in information being reporting that would help understand who is participating in IQ SF whole building programs.
  + **1/16 Meeting:** Did not have time to cover; follow-up in the 1/23 meeting
    - Karen Lusson: Instead of arrears, perhaps a better indicator is disconnection notices