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May 3<sup>rd</sup>, 2017

Chairman Brien Sheahan  
Illinois Commerce Commission  
160 N. LaSalle St., Suite C-800  
Chicago, IL 60601

Re: MEEA's Comments on the Illinois Commerce Commission's Certification for Energy Efficiency Installers Rulemaking

Dear Chairman Sheehan and Members of the Illinois Commerce Commission,

Thank you for the opportunity to comment on this rulemaking. The Midwest Energy Efficiency Alliance (MEEA) is a non-profit, membership association working across a 13-state region in the Midwest. Our members include utilities (investor-owned, municipal, and cooperatives), energy efficiency technology and service providers, manufacturers, state and local governments, and research and advocacy organizations. We are the Midwest's key proponent and resource for energy efficiency policy, helping to educate and advise a diverse range of stakeholders on ways to pursue a cost-effective, energy-efficient agenda.

Our members in Illinois include: Commonwealth Edison, Ameren Illinois, Nicor Gas, Northshore Gas, Peoples Gas, Department of Commerce and Economic Opportunity, City of Chicago, Citizens Utility Board, Navigant, Franklin Energy, Clearesult, Argonne National Laboratory, Energy Resources Center at UIC, DNV GL, Association of Illinois Electric Cooperatives, Geothermal Alliance of Illinois, Blackstone Group, Lime Energy, West Monroe Partners, Inova Energy Group Future Energy Enterprises, Mitsubishi Electric Heating and Cooling, NEST, Ecobee, Agentis, Leidos, GE Lighting, Green Home Experts, CB&I, Energy Education Council and City Water, Power & Light.

MEEA has experience in both managing qualified contractor networks and working with utilities and stakeholders to clearly and succinctly define contractor participation requirements for various energy efficiency sectors.

Additionally, MEEA believes in a market transformation approach to energy efficiency in Illinois where the industry provides the training and tools necessary for trade allies to deliver energy efficiency measures and subsequent energy savings while simultaneously educating consumers on their benefits. This will be a big task and it is exciting to see the state of Illinois moving in a direction that require training, education, and accountability for energy efficiency contractors.

The objective of the comments below is to maximize investment in cost-effective energy efficiency and achieve energy and non-energy benefits of energy efficiency to all customers.

The *Installer* definition could use additional clarity on which measures specifically require an installer. Not all electricity-saving energy efficiency measures require electricity. Electricity-saving measures range from installing LED A lamps in residential settings, to installing new air conditioners, to performing air sealing to reduce air leakage, to lighting retrocommissioning, to installing occupancy sensors for lighting or vending machines, to installing software to manage computer sleep modes, to even planting trees (creating shade and reducing cooling load). The efficacy of these measures is highly contingent on the trade ally having the knowledge, skills, and ability to follow manufacturers' recommendations and ensure measures are installed



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properly which assures maximum energy savings. The wide array of electricity-saving energy efficiency measures requires a large variety of skillsets, training, and trades people. For example, the Iowa Technical Reference Manual derates Central Air Conditioners that do not receive a quality installation by 10.5%.

In the Certification Requirements Section xxx.50 the rulemaking requires that the applicant shall “comply with the energy efficiency measure manufacturer’s installation instructions.” MEEA agrees that this is critical to ensuring ex-ante energy savings are realized.

Elsewhere in Section xxx.50 the requirements state that every installation of an EE measure should be performed by “a person enrolled in a training program that upon satisfactory completion will meet the requirement to become a qualified person, provided he/she is directly supervised by a qualified person.” One of the requirements to become a “qualified person” is to complete the installation at least five times. Would any training program where students are supervised by a “qualified person”, and perform an installation five times, qualify those students as “qualified persons” or are there additional requirements for the trainings?

There are a number of quality, nationally recognized building science trainings and certifications covering a wide variety of energy efficiency measures installations, including but not limited to: Building Performance Institute (BPI) certifications, NATE, Building Operator Certifications (BOC), National Comfort Institute, US Green Building Council LEED, IFMA, BOMI, Association of Energy Engineers (AEE) Certified Energy Manager, GPRO, DOE’s Standard Work Specifications, RESENET, ASHRAE, and HVAC SAVE. These trainings provide the knowledge and skills to perform energy efficiency installations in their respective areas and could be appropriate for determining qualified persons, but they currently would not be included in the definition of a “qualified person”. MEEA would recommend expanding the definition to include certifications for specific measures.

Delineating large projects from smaller projects through the incentive dollar amount may not appropriately reflect the Commissions’ intentions. Some facilities can receive large incentive amounts for relatively small measures, through direct install or self-install programs, while other more complicated measures could potentially not receive very large rebates. Facility size, sector, or engineering requirements may be better ways to determine which projects require certified energy efficiency installers.

MEEA has years of experience creating contractor networks and determining eligibility for program participation. Below, please find some relevant information and links on resources already in place in Illinois and the Midwest:

The Illinois Home Performance (IHP) program website includes listings for Building Performance Institute Building Analyst and Envelope certified contractors that are qualified to perform energy audits and retrofits according to the state’s IHP guidelines. MEEA built this list and determined the qualifications for contractor participation in concert with stakeholders.

<http://illinoishomeperformance.org/findcontractor/participating>

IHP contractor certification requirements:

<http://illinoishomeperformance.org/become-a-contractor>



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MEEA worked with the State of Illinois to develop the Illinois Code Diagnostics website to help code officials and builders identify individuals who have taken specific trainings or hold certifications related to using building diagnostic equipment. These individuals are capable of doing the diagnostic testing required of the Illinois Energy Conservation Code.

<http://ilcodediagnostics.org/>

MEEA worked with utilities in the State of Iowa to develop a similar site that helps homeowners find HVAC SAVE Certified Professionals that can participate in Iowa's approved utility HVAC programs.

<http://hvacsave.com/homeowner/find-contractor>

We look forward to being a resource for you as you identify your next steps. If you have any questions or need additional information please contact me at 312-784-7267 or [sparadis@mwalliance.org](mailto:sparadis@mwalliance.org) or Will Baker, MEEA's Director of Programs at 312-673-2489 or [wbaker@mwalliance.org](mailto:wbaker@mwalliance.org). Thank you for the opportunity to provide comments.

Sincerely,

Stacey Paradis  
Executive Director  
Midwest Energy Efficiency Alliance