

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)	
)	
On Its Own Motion)	20-NOI-01
)	
Notice of Inquiry Regarding Energy Affordability)	

**Initial Comments of Illinois Energy Efficiency For All,
Community Organizing and Family Issues and the
Low Income Utility Advocacy Project**

Illinois Energy Efficiency for All (IL EEFA), including Community Investment Corporation, Natural Resources Defense Council, and People for Community Recovery, Community Organizing and Family Issues (COFI), represented by the National Consumer Law Center (NCLC), and the Low Income Utility Advocacy Project (LIUAP) by Allen Cherry, appreciate the opportunity to comment in this Notice of Inquiry on Utility Service Affordability.

I. INTRODUCTION

The undersigned parties appreciate the Illinois Commerce Commission’s (the Commission) interest in critically examining the affordability of utility services in Illinois, the necessity of transparent and robust utility data collection, an overview of energy assistance and energy efficiency programs in Illinois and best practices in credit and collections practices and other affordability measures. We are encouraged to see this notice include a wide breadth of programs and questions, as it is important to look at affordability across sectors and programs to ensure all Illinois residents can afford and maintain access to essential utility services and healthy, safe homes in which to live.

Continuing to expand and improve utility assistance, credit and collection practices, reporting, energy efficiency, and solar can help with utility affordability, especially as programs better coordinate, expand, target under-resourced households, and include those most impacted by energy unaffordability in decision-making and program design. In particular, there’s an urgent need to ensure utility services and programs are accessible and affordable for under-resourced, low-income communities of color in Illinois, as these families have relatively high energy burdens and less household income due to historic, structural, societal inequities, including racist redlining practices that prevented generations of Black and brown families from accumulating home equity and wealth.

The signatories, Community Investment Corporation, the Natural Resources Defense Council and People for Community Recovery are a part of Illinois EEFA, which focuses on increasing access to energy efficiency and solar in the affordable multifamily housing sector. For the past six years, the coalition has collaborated on work in the affordable housing, financing, utility, regulatory, state agency, clean energy advocacy, energy efficiency, health, environmental justice, racial equity, and low-income advocacy arenas. The Energy Efficiency for All project unites people from diverse sectors and backgrounds to collectively make multifamily affordable homes energy and water efficient. We do this work so people in under-resourced communities – particularly Black, Latinx, and other communities of color – who have been marginalized can equitably benefit from the health, economic, and environmental advantages of energy and water efficiency. Reducing energy and water use in affordable multifamily housing will improve the quality of life for millions, preserve affordable housing across the country, reduce the energy burden on those who feel it the hardest, and cut carbon pollution. EEFA focuses on affordable multifamily homes as they are the least likely type of housing to have efficiency upgrades. Our work primarily helps communities and families that spend upward of 20 percent of their income on energy, a burden that is unsustainable for these communities and generally missing from our energy policy conversations. We work to ensure everyone experiences their fair share of energy efficiency benefits, but especially those that are most burdened.

COFI is a community-based not-for-profit center and resource for family-focused organizing, leadership development and community building focused on the well-being of children, youth and families in low-income and working families. COFI has offices in both Chicago and East St. Louis, Illinois, and works for public policy change on a variety of statewide issues impacting low-income and working families throughout the State of Illinois.

COFI's members include low-income parents and grandparents who, in turn, have built local and citywide organizations that are fighting for change around issues affecting families. COFI's parent leadership and community organizing model, Family Focused Organizing, has engaged thousands of low-income African American and Latino parents in improving preschools, schools, communities and public policies in Chicago, throughout Illinois and beyond.

The Low Income Utility Advocacy Project (LIUAP) engages in administrative and legislative advocacy in Illinois in the utility/energy area on behalf of low income households and not-for-profits. It is a project of the Shriver Poverty Law Center, Voices for Illinois Children and Heartland Alliance for Human Needs and Human Justice.

The comments below will provide responses to the “all interested parties” sections in the NOI initiating order.

II. RESPONSES TO THE “ALL INTERESTED PARTIES” QUESTIONS

C. Definitions

1. How should the following terms be defined? Are there federal or other state standards or guidelines that more clearly define these terms?

a. Affordability

Assessing a customer's energy burden (also defined in Section C question #2) is a key indicator of energy affordability. Energy burden is defined as the percentage of income devoted to utility costs. In Illinois, the General Assembly established the Percentage of Income Payment Plan (PIPP) program, which is designed to lower eligible participants' electric and gas (heat) utility bills so that they pay no more than 6% of the relevant income for gas and electric utility bills combined. 305 ILCS 20/18(c)(2). Accordingly, the PIPP statute considers energy burdens of 6% or under as affordable.

The Home Energy Affordability Gap, an index established by economist and utility affordability expert Roger Colton, defines the "affordable burden" for home heating and cooling at 2% of gross household income.¹ What is clear is that a significant percentage of the population struggles to afford essential utility service each month. The U.S. Energy Administration reports that nearly 1 in 3 U.S. households faced challenges in paying energy bills or keeping their homes heated or cooled in 2015, as did 50% of households with less than \$20,000 in annual income.²

b. Low-Income

There is no one-size-fits all approach for defining low-income. Importantly, the Utilities limit their definition of low-income customers to those who are enrolled in either the Low Income Home Energy Assistance Program (LIHEAP), the Percentage of Income Payment Plan (PIPP), or utility-sponsored assistance programs. The utilities' definition excludes the majority of low-income utility customers in Illinois who, in fact, would otherwise qualify under state and federal program definitions of "low income" employed in the Illinois Energy Assistance Act programs, federal assistance programs and U.S. Census Bureau statistics.

According to the U.S. Department of Energy's Office of Energy Efficiency & Renewable Energy,

There are several scales to define low- and moderate-income households in the United States. These definitions are used to determine who is eligible for various federal- and state-funded programs and are adjusted every year due to inflation. It should be noted that there is no direct relationship between these scales and there is no "one-size-fits-all" approach to poverty because different states and cities across the United States have varying costs of living.³

¹ See http://www.homeenergyaffordabilitygap.com/01_whatIsHEAG2.html

² See <https://www.eia.gov/todayinenergy/detail.php?id=37072>

³ See <https://www.energy.gov/eere/slsc/low-income-community-energy-solutions>

Typical scales used in state and federal assistance programs assess Area Median Income (AMI) and the Federal Poverty Level (FPL). AMI is the midpoint of a region's income distribution—half of families in a region earn more than the median and half earn less than the median. The AMI is calculated each year by the U.S. Department of Housing and Urban Development (HUD) to set limits that determine eligibility for assisted housing programs. HUD considers households earning less than 80% of the AMI to be below-income. HUD's Office of Policy Development and Research updates a [spreadsheet of the AMIs](#) nationwide every year.⁴

Eligibility for low income energy efficiency programs in Illinois is set at 80% AMI.⁵ Illinois' Home Weatherization Assistance Program (IHWAP) sets eligibility at 200% FPL. An eligibility benchmark of up to 300% FPL is frequently used for low-moderate income energy efficiency programs.

Whether FPL benchmarks properly define low-income status is a subject of debate. More than a decade ago, the Center for Women's Welfare created a state-by-state analysis of what is described as the "Self Sufficiency Standard" (SSS). This standard "creates 'bare bones' family budgets that detail the minimum amount of income required by families (of varying sizes) to meet their basic needs without public or private assistance."⁶ The SSS for the state of Illinois reveals that the 150-200% FPL measures used to provide energy assistance excludes many in significant financial need. For example, the 2018 SSS index for Cook County is 330% for a single-parent, two-children household.⁷ The authors of the SSS point to five reasons why the FPL measurement is lacking:

- The FPL measure is based on the cost of a single item -- food -- rather than a "market basket" of all basic needs.
- The measure's methodology is "frozen," not allowing for changes in the relative cost of food or non-food items, nor the addition of new necessary costs.
- The FPL measure is date, implicitly using the demographic model of a two-parent family with a "stay-at-home wife", or if a single parent, implicitly assumes she or he is not employed. Thus, costs associated with child care and transportation are excluded.
- The FPL does not vary by geographic location.

⁴ *Id.*

⁵ 220 ILCS 5/8-103B(c).

⁶ See <http://www.selfsufficiencystandard.org/Illinois>

⁷ See <http://www.selfsufficiencystandard.org/Illinois>, National Consumer Law Center Energy Analyst John Howat analysis.

- The FPL provides no information or means to track how individual costs change.⁸

In short, determining “low income” status based on current means-tested programs that rely on the FPL ignores the fact that persons whose income exceeds the maximum eligibility measure still struggle to afford basic life necessities, including essential utility service. In addition, Commission action is needed to improve utility credit and collection practices to protect customers’ continued access to affordable utility service and move away from the current punitive approach to credit and collections that leaves so many Illinois utility customers at risk of disconnection each year. (See section E.6 and F. below.)

Recent changes to Illinois’ Energy Assistance Act allow the Department of Commerce and Economic Opportunity (DCEO) to set eligibility for the Low Income Home Energy Assistance Program (LIHEAP) and the state’s Percentage of Income Payment Plan (PIPP) program up to 200% FPL through June 30, 2021. Currently, DCEO has set eligibility for LIHEAP and PIPP participants at 200% FPL and 150% FPL, respectively.⁹

It is also key to ensure that eligibility verification is not a barrier or burdensome to participation in a program. Ensuring simple, easy verification of energy assistance eligibility is critical to prompt processing of needed benefits. Best practices provide for the proxy incorporation of other state and federal financial or housing assistance programs, as well as self-certification of hardship -- particularly during the time of COVID-19.

Ensuring that undocumented persons have access to energy assistance programs is critical, too. Accordingly, community action agencies should permit income verification through documentation other than social security numbers. It should be noted that undocumented workers do not qualify for unemployment, which is affecting thousands throughout Illinois. It is estimated that there are about 500,000 undocumented immigrants in Illinois, and it is assumed that most of the jobs that these individuals fill - hospitality, agriculture, construction - are being downsized. And, because undocumented immigrants are more likely to make less at these jobs to begin with, they are likely not to have savings to rely on and are therefore especially vulnerable.¹⁰ Many are having to make the difficult choice of whether to keep working during a pandemic so they can pay for essentials, or keeping themselves and their families safe by following social distancing recommendations.

⁸ http://selfsufficiencystandard.org/sites/default/files/selfsuff/docs/IL2009_Methodology.pdf

⁹ 305 ILCS 20/18.

¹⁰ See <https://www.npr.org/local/309/2020/03/27/822475329/thousands-of-undocumented-workers-face-the-pandemic-without-a-safety-net>; See also <https://www.chicago.gov/city/en/sites/covid-19/home/employment-and-financial-assistance.html> (“Undocumented immigrants are not eligible at this time. To be eligible, you must be authorized to work in the U.S.”)

Likewise, any immigrant, not just undocumented individuals, who does not have a social security number did not receive a \$1,200 relief check authorized in the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act. On top of that, even if individuals have a social security number, if they filed taxes and listed an undocumented child or family member on the returns, they will not receive a relief check.¹¹

In terms of energy efficiency programs, the Illinois Energy Efficiency Stakeholder Advisory Group’s (SAG) policy manual defines best practices for verifying eligibility for low-income multifamily energy efficiency programs. This type of eligibility verification is key in ensuring flexible verification methods that reduce any barriers to participation. The more flexible low-income multifamily energy efficiency program income verification in the SAG policy manual includes the following:

- a. Participation in an Affordable Housing Program.
- a. Participation in the Weatherization Assistance Program.
- b. Location in a Low-Income Census Tract
- c. Rent Roll Documentation.
- d. Tenant Income Information.
- e. Alternative Approaches to Verify Income for Multi-Family Customers Program.

e. Critical Medical Needs Customers:

The definition of Critical Medical Needs Customers recognizes the essential role utility service plays in ensuring health and safety, and that the termination of service would lead to life-threatening illness. As such, the term should be defined as households in which 1) a member requires uninterrupted power to run a medical care device, refrigerate prescription medications, or maintain contact with their physician, for whom a loss of power could be life-threatening, or 2) a household in which a member suffers from a medical condition that prevents them from relocating in the event of a loss of heating, cooling, lighting or water due to disconnection of gas, electric or water service.

f. Vulnerable Customers:

Vulnerable customers include customers whose health is threatened without access to affordable, continuous utility service. Vulnerable customers include infants

¹¹ See <https://www.congress.gov/bill/116th-congress/senate-bill/3548/text>, Sec. 6428(e)(3).

and children, seniors and anyone with a medical condition that requires continued access to utility service.

g. Displacement:

Displacement was one of several terms specifically identified in the National Association of State Utility Consumer Advocates/National Association of Regulatory Utility Commissions (NASUCA/NARUC) resolution which is cited in the NOI. The resolution calls for an exploration of all circumstances that arise when “*a customer once disconnected...does not ever reconnect to service at the same address.*”¹²

Critical Medical Needs Customers are partially defined by an inability to relocate in response to a disconnection. A more robust term might be “disconnection-related housing or utility service displacement,” and would encompass multiple eventualities:

Displacement: any circumstance in which a utility account holder, following disconnection of gas, electric or water service, a) permanently moves out of that premises, whether by choice or through eviction, regardless of the subsequent destination or subsequent utility account status, or b) fails to reconnect utility service at the current premises or any other premises, regardless of whether or not they remain at the same location.

2. Are there other undefined terms that are critical to understanding utility service affordability and/or the ability of customers to receive essential levels of electric, natural gas, water and sewer services and, if so, how should such terms be defined?

Understanding a customer’s “energy burden” is key to understanding affordability of utility services. Energy burden means the percentage of household income spent on energy bills. Typically, a high energy burden is defined as households whose energy burden exceeds 6%, as noted above.

As noted in economist and energy affordability expert Roger Colton’s Home Energy Affordability Gap index, “Home energy is a crippling financial burden for low income Illinois households. Illinois households with incomes of below 50% of the Federal Poverty Level pay 30% of their annual income simply for their home energy Bills.”¹³ Colton notes that “(h)ome energy unaffordability, however, is not only the province of the very poor. Bills for households with incomes between 150% and 185% of Poverty take up 7% of income. Illinois households with incomes between 185% and

¹² See *Resolution on Best Practices in Data Collection and Reporting for Utility Services Delinquencies in Payments and Disconnections of Service*, adopted November 2019, NARUC, NASUCA annual meetings; <https://pubs.naruc.org/pub/9392BD1E-D055-4A2C-9677-AAD00FEA7527>

¹³ <http://www.homeenergyaffordabilitygap.com/>

200% of the Federal Poverty Level have energy bills equal to 6% of income.”¹⁴ Colton notes the following home energy burden percentages¹⁵:

Poverty Level	Home Energy Burden
Below 50%	30%
50 – 100%	16%
100 – 125%	11%
125 – 150%	9%
150 – 185%	7%
185% - 200%	6%

In Illinois, DCEO has tracked energy burdens, both before and after receipt of energy assistance through LIHEAP and PIPP. The results indicate that even following the awarding of energy assistance, Illinois’ poorest residents experience high energy burdens. For example, customers whose income is at or below 50% of the FPL experience energy burdens of 25% -- even after receipt of PIPP program assistance¹⁶:

¹⁴ http://www.homeenergyaffordabilitygap.com/03a_affordabilityData.html

¹⁵ *Id.*

¹⁶ April, 2020 DCEO Presentation to Low Income Energy Assistance Policy Advisory Council, David Wortman, Deputy Director of DCEO’s Office of Community Assistance; DCEO Presentation to PIPP Steering Committee (April 2020).



PY2019 LIHEAP & PIPP Statistics

LIHEAP						
Percent of Poverty	Application Count	Utility Bill	LIHEAP Benefit	Income	EB Prior	EB After
0-50	61,392	2,171	913	4,940	44%	25%
51-100	113,810	2,067	692	12,930	16%	11%
101-150	76,348	2,075	526	20,364	10%	8%
Grand Total	251,550	2,092	681	13,848	15%	10%

PIPP						
Percent of Poverty	Application Count	Utility Bill	PIPP Benefit	Income	EB before benefit	EB after benefit
0-50	2,331	2,102	1,041	5,839	36%	18%
51-100	13,235	2,051	978	10,868	19%	10%
101-150	8,069	2,266	906	17,151	13%	8%
Grand Total	23,635	2,129	960	12,517	17%	9%

Research published by EEFA shows that under-resourced, Black, Latinx, renters, and rural households have greater energy burdens than other households. Improving household energy affordability can result in health benefits and can help lift families out of poverty.¹⁷ Black, Hispanic, Native American, and older adult households, as well as families residing in low-income multifamily housing, manufactured housing, and older buildings experience disproportionately high energy burdens nationally, regionally, and in metropolitan areas. The median energy burden for Black households is 43% higher than for non-Hispanic white households (4.2% versus 2.9%), and the median energy burden for Hispanic households is 20% higher than that for non-Hispanic white households (3.5% versus 2.9%), according to data gathered by the American Council for an Energy Efficiency Economy (ACEEE).¹⁸

In addition, systemic exclusions, under-investments, discriminatory lending practices, and limited housing choices within communities of color have limited access to efficient and healthy housing.¹⁹ Energy efficiency improvements, as discussed later in

¹⁷

<https://assets.ctfassets.net/ntcn17ss1ow9/7JPAB12O4ZLFeDoVcR2jeU/bf80310e1583d9ef58a45670ffea85c6/EEFA Reducing FS 02.pdf>

¹⁸ *How High Are Household Energy Burdens*, Ariel Dreihobl, Lauren Ross, and Roxana Ayala, p. iii;

<https://www.aceee.org/sites/default/files/pdfs/u2006.pdf>

¹⁹ <https://www.aceee.org/sites/default/files/pdfs/u2006.pdf>

these Comments, can significantly cut or eliminate the excess energy burden experienced by these households.

Another term that is relevant to any affordability discussion is “**Energy Security.**” The National Consumer Law Center (NCLC) defines energy security as “Uninterrupted, affordable access to basic residential home energy services without disconnection notices, involuntary disconnection of service, foregoing other necessities to retain service or maintaining an unhealthy indoor temperature.”²⁰ Likewise, “**Energy Insecurity**” is defined as the inability to afford basic household energy needs.²¹

Energy Use Intensity is an important term when assessing energy efficiency needs. Energy use intensity, defined as “building energy use as a function of its size or other characteristics,” is a valuable metric for understanding energy affordability.²² While low-income customers tend to use less energy overall, due to inefficient housing, their energy use per square area is likely higher.

D. Information Collection and Reporting

- 1. Please identify any changes that could be made to current information reporting requirements that would better inform the Commission regarding service affordability and/or the ability of customers to receive essential levels of utility services including the entities that should be required to provide the information. In your response please also address the format of such information collection, the authority for compelling the production of such information, and how the information should be publicly reported.**

Until ICC Docket No. 20-0309, which adopted specific reporting of credit and collections (C&C) data by each investor-owned utility (IOU) *by zip code*, there was no clear, easily understandable way of determining how a utility’s credit and collection practices impacted customers’ ability to retain uninterrupted essential utility service. Unless the Commission has critical information about disconnection, reconnections, deferred payment arrangements and arrearages, to name but a few data points, the Commission will be unable to monitor the impact on affordability of these procedures.

Understanding the affordability of utility service relies not only on reviewing utility rates, but also analyzing the effectiveness of credit and collection protocols. Last year, the National Association of Regulatory Utility Commissions (“NARUC”) and the National Association of State Utility Consumer Advocates (“NASUCA”) issued a joint resolution entitled, “Resolution on Best Practices in Data Collection and Reporting for Utility

²⁰ See https://www.nclc.org/images/pdf/energy_utility_telecom/additional_resources/NCAP-NCAF-Managing-Low-income-Utility-Debt-in-the-Age-of-Covid-19.pdf

²¹ See <https://www.sciencedirect.com/science/article/pii/S0277953616304658?via%3Dihub>

²² See <https://www.energystar.gov/buildings/facility-owners-and-managers/existing-buildings/use-portfolio-manager/understand-metrics/what-energy>

Services.” The resolution cited the “the value of evidence-based policy making to improve outcomes for both utilities and customers” and the fact that “data collection and sharing play an integral role in providing information for developing evidence-based policies.”

There are several key data points that the utilities should be required to gather going forward if the Commission is to determine whether C&C procedures are protecting continued access to essential utility service. NCLC Senior Energy Analyst John Howat is a nationally known expert on energy affordability issues and served on both the NARUC/NASUCA Committee that drafted the Resolution and the panel that discussed data collection issues and the Resolution at the November, 2019 NARUC Conference. His NCLC issue brief, “The Need for Utility Reporting of Key Credit and Collections Data Now and After the Covid-19 Crisis” concludes that commissions will need monthly data, by zip code, broken down by both general residential customers and identified low-income residential customers, in order to truly assess the effectiveness of the C&C protections in place. His paper²³ advises that the following, minimum data protocols should be tracked and reported by utilities:

- number of customers;
- dollar amount billed;
- number of customers charged a late payment fee (if authorized against COFI’s continued waiver request);
- dollar value of late fees collected;
- number of customers with an arrearage balance by vintage;
 - 60 – 90 days
 - 90+ days
- dollar value of arrearages by vintage;
 - 60 – 90 days
 - 90+ days
- number of disconnection notices sent;
- number of disconnections for nonpayment;
- number of service restorations after disconnection for nonpayment;
- average duration of disconnection;

²³ <http://bit.ly/brief-covid-19-data>

- dollar value of security deposits collected (if authorized, against COFI's waiver request);
- number of security deposits collected;
- number of new DPAs entered into;
- average repayment term of new DPAs; and
- successfully completed DPAs.

It should be noted that reporting by zip code is essential to assess the affordability of utility service for customers within a service territory, and the effectiveness of revised C&C procedures. Some national and regional data sets show disparities by race in disconnections and other important energy security metrics, even after controlling for income. These disparities raise profound racial justice concerns, and highlight the importance of obtaining utility-specific credit and collections data at the Census tract level. In addition, geographically granular data will also assist the utilities in targeting of effective energy efficiency and other low-income assistance programming. Utilities should be required to file the information monthly so that the Commission can evaluate the effectiveness of the revised C&C procedures.

In addition, all utilities should be directed to consider implementing (if they're not already) best practice reporting for low-income energy efficiency programs. This will help in creating an understanding of program effectiveness, equity, penetration, and where program dollars are going. The following energy efficiency data points should be tracked by the utilities as part of program implementation:

General Reporting

- Separating reporting by low-income single family vs. multifamily and by zip code. Tracking energy efficiency investment by zip code assists utilities and stakeholders in ensuring that all customers in all areas of the state are being served, with an emphasis on areas where high rates of disconnection are occurring.
- Details on which projects were direct install vs whole building (or both)
- Savings per unit in energy
- Total annual electric consumption savings (in kWh), projected and completed (total and per unit)
- Total annual gas consumption savings (in therms), projected and completed (total and per unit)
- Program spending: total project cost in dollars spent - separate from project administration costs - including incentive cost, non-incentive cost, and participant-paid/out of pocket costs (total and per unit)
- Program administration cost

- Annual program budget, projected and actual
- Percent of annual budget in direct project incentives, projected and actual
- Number of projects (upgrades or retrofits) projected and completed
- Number of properties projected and completed (properties impacted)
- Number of units projected and completed (units impacted)
- Number of program participants projected and completed
- Conversion rate from application to completion of intervention
- Measures completed (quantities for each individual measure)

Affordability- and equity-related reporting for consideration and future discussion:

- Service territory demographic information – such as by race, income, zip code, census tract, and other relevant factors
- Program participant demographic information – such as by zip code, census tract, and other relevant factors disaggregated by program and service territory
- Participant site location: may be used in geographic reference and analysis
- Utility bills and costs for program participants, used as input for calculating energy burden
- Income range of households in service territory
- Number or proportion of diverse trade allies and program implementers
- Proportion of eligible population participating in program

Reporting format:

- Clear report and spreadsheet detailing which program, quarter, and year the data relates to, including:
 - Spending and savings data for low-income multifamily are clearly labeled and shared
 - Report data and definitions match spreadsheet
 - Quarterly and year-to-date data are shared within both the report and spreadsheet
- Definitions and consistency of all reporting language used, such as participants, projects, measures installed
- Use of the same language and format across all IOUs, especially joint program reporting

- Disconnection and arrearage data are disaggregated at the program and customer group levels

2. Please identify any additional information that might be collected that would better inform the Commission regarding service affordability and/or the ability of customers to receive essential levels of utility services including the entities that should be required to provide the information. In your response please also address the format of such information collection, the authority for compelling the production of such information, and how the information should be publicly reported.

Transparency in utility reporting is critical to understanding how utility credit and collection practices impact the public and communities in particular. Data should be filed with the Commission and in a manner that is easily accessible to the public and stakeholders. The reports should be accessible through the Commission’s website. Ideally, these data points filed by all utilities would be available for viewing on a single webpage. In addition, the data should be filed both in pdf and in “native” Excel format, so that data can be readily analyzed by the public, stakeholders and regulators. All of the data described above, tracked by zip code, should be filed monthly.

In addition, the following equity-related reporting suggestions would detail to regulators and stakeholders how effectively customers are being served:

- Develop standardized energy equity indicators as metrics to ensure low income customers are being served²⁴
 - Use these metrics to set a statewide baseline, advance energy savings, and track performance.²⁵
 - Establish standardized metrics to track employment and job quality impacts of energy efficiency programs.
- Develop a refined energy burden indicator that factors in costs from both electricity and natural gas consumption, with consideration of other fuel types.
- Ensure that impacted customers, especially from low-income communities and communities of color, are able to influence utilities’ programs, policies, and priorities via transparent, highly accessible public input opportunities such as direct community engagement, working groups, public hearings, direct input into program planning, additional written and verbal public comment opportunities, focus groups, and customer surveys

²⁴ California Energy Commission. “Commission Final Report for the SB 350 Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities.” California Energy Commission, December 16, 2016. <https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350-3>

²⁵ *Id.*

- Develop measurement and regular reporting on procedural equity and inclusion of other voices, especially the inclusion of low-income, environmental justice, renter, Black, brown and other community of color residents and organizations, in energy assistance, energy efficiency, solar, and other energy-related program planning and development.
 - Examples of equity measurements for energy efficiency that could be used to indicate affordability and equity of programs include:
 - “The State of Equity Measurement: A Review for Energy-Efficiency Programs” by Carlos Martin and Jamal Lewis.²⁶
 - VEIC. “The State of Equity Measurement: A Review of Practices in the Clean Energy Industry.” VEIC, September 2019.²⁷
 - Energy Equity Indicators Tracking Progress by California Energy Commission – Table of recommendations and associated indicators.²⁸ (See below chart of indicators)

²⁶ Ibid.

²⁷ https://www.veic.org/Media/default/documents/resources/reports/equity_measurement_clean_energy_industry.pdf

²⁸ https://www.energy.ca.gov/sites/default/files/2019-12/energy_equity_indicators_ada.pdf

Table 1: Energy Commission Low-Income Barriers Study Recommendations and Associated Indicators

#	Recommendation	Indicator
1	Organizing a multiagency task force to facilitate coordination across state-administered programs	Health and safety issues abated
2	Enabling community solar offerings for low-income customers	Community energy resilience
3	Formulating a statewide clean energy labor and workforce development strategy.	Clean energy jobs
4	Developing new financing pilot programs to encourage investment for low-income customers.	Energy savings
5	Establishing common metrics and encouraging data sharing across agencies and programs.	All Indicators
6	Expanding funding for photovoltaic and solar thermal offerings for low-income customers.	Rooftop solar
7	Enhancing housing tax credits for projects to include energy upgrades during rehabilitation.	Amount invested
8	Establishing regional outreach and technical assistance one-stop shop pilots.	Number served
9	Investigating consumer protection issues for low-income customers and small businesses in disadvantaged communities.	Number served
10	Encouraging collaboration with community-based organizations in new and existing programs.	High energy bills
11	Funding research and development to enable targeted benefits for low-income customers and disadvantaged communities.	Amount invested
12	Conducting a follow-up study for increasing contracting opportunities for small businesses located in disadvantaged communities.	Small businesses

Source: California Energy Commission

E. Assistance Programs

1. What changes could make the programs more effective?

Several steps need to be taken by the General Assembly to enable more people within the state (and the City of Chicago in particular) to participate in PIPP. Currently, only approximately 30,000 Illinoisans are able to participate in PIPP statewide. In years past, the Community Economic Development Association (CEDA) has been unable to enroll new PIPP participants due to both a lack of funding in general for the program or inadequate administrative compensation through the program that would enable the community action agencies (CAAs) to hire the additional staff needed to process PIPP applications. But a larger problem exists that severely limits new enrollments each year. Even when the agencies have sufficient employee capacity to process new applications, the program quickly shuts down due to a statutory restriction that requires all amounts remitted by each utility to be used to provide assistance to that utility's customers. 305 ILCS 20/13(g). As a practical matter, because Peoples Gas Light & Coke Company, Chicago's gas delivery utility, has significantly fewer customers than ComEd, the program shuts down for all electric and gas customers once the Peoples Gas funds are exhausted.

In addition, funds that are not spent in a given year are frequently swept by the state for other needs. As shown below, more than \$217 million has been swept from the

Supplemental LIHEAP funding pool (listed as “Borrowings” below) that funds PIPP over the last six years:



History of SLIHEAP Fund Balance

Year	Collections	Expenditures (non-sweep)	Borrowings	Balance (end of year)
2015	111,507,494	112,417,289	(75,049,613)	17,481,300
2016	99,239,893	61,896,327	0	45,580,152
2017	101,928,955	68,838,520	(67,729)	81,239,236
2018	109,629,070	81,855,989	(15,000,000)	90,951,144
2019	100,471,460	49,778,852	(27,074,279)	115,604,715
2020	76,895,221	33,982,425	*(100,000,000)	20,000,000

As of 4/9/2020

*\$30M borrowed last fall, additional \$70M in COVID response.



Source: DCEO April 2020 Presentation to the PIPP Policy Advisory Committee.

In separate discussions as a part of the settlement/stipulation among the utilities Commission Staff and consumer advocates negotiated in ICC Docket No. 20-0309, an Energy Affordability working group discussion was begun on July 27, 2020 and continues outside of this NOI. The goal is to reach consensus on needed statutory and policy changes related to the PIPP program, and other utility service affordability issues. In that process, and during Policy Advisory Committee discussions, DCEO has stated that it recommends that this service territory limitation be removed from the statute to enable greater PIPP participation and dispersal of funds. This and other issues related to improvement of the operation of the PIPP are being discussed in that forum.

Outside of the credit and collection policy changes recommended above, additional action could be taken by the utilities to improve affordability and ensure more effective performance of energy assistance programs. These include:

- a. Ensuring that customers who participate in low income programs, particularly multifamily weatherization, are connected with energy assistance information to help lower their utility bills.
- b. Continue and expand the bill payment assistance and consumer protections approved in ICC Docket No. 20-0309. While this docket was tied to program changes and flexibility during and directly following the COVID-pandemic, these assistance needs are only heightened during a pandemic. The need for enhanced protections existed before the pandemic, and will continue to be needed going forward. In this regard, Utilities should be directed to:

1. Continue to increase and enhance customer outreach, education, and communications to inform customers about all methods of assistance with their bills, including information about LIHEAP, PIPP, other forms of energy assistance and aid, and energy efficiency programs. Communication materials and website content should be made available in multiple languages -- at a minimum English and Spanish.
2. Extend flexible Deferred Payment Arrangements (DPAs) to all customers, including the offering of 24-month DPAs, to anyone who verbally expresses financial hardship, with no down payments for self-certifying financial hardship customers.
3. Continue and expand the COVID-19 bill payment assistance program for water, gas, and electric bill payment assistance for those continuing to experience hardship due to or enhanced because of the COVID-19 pandemic.
4. Eliminate deposit and late fee requirements for residential customers.
5. ICC staff should bring data collected from this NOI on affordability into the Energy Affordability discussions operating outside of this NOI, described above. Discussions are also scheduled to include exploration of the creation of a low-income discount and expanded arrearage management/reduction programs.
6. Review assistance programs and affordability priorities in the [EEFA Utility COVID letter](#) and Community Organizing and Family Issues April 6,2020 Response filed in ICC Docket No. 20-0309.²⁹

F. Credit and Collections Practices

1. Please identify and describe best collection practices and how existing collection practices can be improved.

There are several best practices that have been implemented in other states related to utility credit and collection procedures that should be adopted in Illinois, either through a new rulemaking or preferably, through legislation and Commission action, where possible. All incorporate a movement away from punitive disconnection practices that have historically ignored the structural roots of poverty and wrongly punish customers for being poor. Best practices include:

- Eliminating disconnections from essential utility services based on the inability to pay. In order to achieve this goal, the Public Utilities Act would need to be modified to remove language that requires utilities to demonstrate the issuance of disconnection notices as a means to prove reasonableness of disconnection

²⁹ See ICC Docket No. 20-0309, Response of COFI, filed April 6, 2020; <https://www.icc.illinois.gov/docket/P2020-0309/documents/298279>

practices. See, e.g., Sections 16-111.8(c) and 19-145(c) of the Act.³⁰ Instead, these provisions should require utilities to demonstrate the provision of flexible C&C procedures that reflect engagement with customers, requiring utilities to refer customers to energy assistance opportunities and arranging for deferred payment arrangements that reflect a customer's ability to pay based on income and expenses. In short, the utilities should be required by statute to do everything possible to minimize the likelihood of disconnection and the ability of the customer to afford the outstanding bill.

- Prohibiting utilities from imposing deposits on residential customers in order to receive and maintain essential utility services.
- Prohibiting utilities from imposing fees on residential customers for late payment of utility bills.
- Providing deferred payment arrangements with terms that truly reflect a customer's ability to pay based on income and expense circumstances.
- Prohibiting the disconnection of seniors.³¹
- Prohibiting the disconnection of customers with infants in the household.³²

2. Please identify and describe any concerns regarding privacy associated with collecting, storing and/or sharing of consumer information.

Customer energy usage and payment data is private information that should not be shared without a customer's permission.

3. Within the following subjects as they relate to affordability, please identify and describe practices/concepts that are currently working well, areas that can be improved and ideas/plans for improvement:

In ICC Docket No. 20-0309, the Commission approved a new suite of consumer protections rooted in a settlement/stipulation entered into among the investor-owned utilities, consumer advocates (including COFI and LIUAP) and the Commission Staff. While this docket was initiated as a result of the COVID-19 pandemic and the accompanying economic shutdown, these more generous and flexible credit and collection practices will likely continue to be needed going forward. The Commission

³⁰ 220 ILCS 5/16-111.8(c); 19-145(c).

³¹ State law requires the Massachusetts Department of Public Utilities to establish rules governing terminations of accounts serving elderly households. Those rules (220 C.M.R. 25.05) require that the company submit a request to the DPU and obtain the permission of the DPU before it can send a termination notice. The company must give a separate notice of this request to the Department of Elder Affairs as well. Before giving its approval, the DPU must investigate the company's request and determine that proper notice has been given to the household; that the company has used other reasonable means to collect on the bills, short of terminating service; and that the company has not refused to enter into a reasonable payment plan with the household.

³² Massachusetts law provides that "no gas or electric company shall shut off gas or electric service in any residence in which there is domiciled a person under the age of twelve months" if the household is suffering a financial hardship in paying its bills. M.G.L. Ch. 164, section 124H.

should continue to monitor in ICC Docket No. 20-0309 the effectiveness (or lack thereof) of the more robust C&C protections to determine whether an extension of the protections is needed. Among

- Extend the suspension of disconnections for nonpayment
- Continue the suspension of late fees
- Continue reconnecting customers that were previously disconnected due to non-payment, and waive any reconnection fees
- Continue no reporting of late payments and nonpayment for active customers to credit bureaus and reporting agencies
- Extend robust credit and collection reporting agreed upon in the stipulation beyond August 2021
- Consider extending DPAs and payment assistance to small business and commercial accounts associated with multifamily building common areas that are experiencing financial hardship.
- Review flexible credit and collection practices and related priorities in the [IL EEFA Utility COVID letter](#), filed as a public comment in the docket.
- Integrate strategies to reduce utility arrears with energy efficiency. Consider programs and pilots that target customers in arrears directly with energy efficiency offerings to help reduce energy bills and burden in the long-term.

G. Energy Efficiency Measures

1. What current utility energy efficiency programs aimed at increasing the affordability and/or the ability of customers to receive essential levels of electric services are available and how effective are they?

Energy efficiency can offer long-term solutions to energy burden and energy affordability issues, especially when utilities offer programs tailored to the needs of under-resourced (low-income) communities.³³ But the current low-income programs don't explicitly prioritize affordability. Programs should include equitable processes around their design and implementation, a focus on deep energy savings to maximize the long-term benefits, include affordability goals, and have affordability and equity reporting requirements embedded to ensure that energy affordability is a direct priority and outcome of the programs.

a. Low-Income Energy Efficiency Spending Requirements:

In December 2016, the Illinois State Legislature passed the Future Energy Jobs Bill (FEJA). The legislation directs utilities to implement low-income energy efficiency measures of no less than \$25 million per year for electric utilities that serve more than 3

³³ <https://www.aceee.org/sites/default/files/energy-affordability.pdf>

million retail customers in the state (Commonwealth Edison Company), and no less than \$8.35 million per year for electric utilities that serve less than 3 million but more than 500,000 retail customers in the state (Ameren Illinois Company).³⁴ Stakeholders negotiated significantly larger investments in low income programs for three of the four IOUs implementing energy efficiency programs beyond the statutory minimums. Going forward, residential programs should prioritize low income program spending, with a particular emphasis on multifamily weatherization.

b. Cost-Effectiveness Rules for Low-Income Energy Efficiency Programs

Section 8-103B (Energy Efficiency and Demand-Response Measures) the Public Utilities Act (the Act) excludes low-income energy efficiency measures from the total resource cost-effectiveness (TRC) test requirement. While low-income programs don't directly have to be cost-effective as defined under the TRC, allowing for some additional flexibility in spending and covering a larger portion of the cost of measures, they are still included in an overall portfolio level cost-effectiveness testing. This requires the utilities to still review and evaluate the cost-effectiveness of their low-income programs. It should be noted that the goal of spending more on the low-income programs operates in tension with the broader, statutory energy savings goals and the need to maximize cost-effective savings within the spending cap.

c. Affordability and energy efficiency

Affordability is named only once in the latest version of the SAG energy efficiency policy manual - to be considered as an objective, when appropriate:

“Administrators shall also consider the following objectives, where appropriate: • Develop, implement and deliver Programs to moderate-low income populations, disadvantaged communities and/or underserved communities in order to help foster the affordability of utility service for all utility customers and engagement in the Energy Efficiency workforce, when practicable.”³⁵

If energy affordability is a true priority of the energy efficiency programs, this should be named more directly - and program decision-making processes, design and implementation should be adjusted accordingly.

2. What changes could be made to utility energy efficiency programs to make them more effective at increasing the affordability and/or the ability of customers to receive essential levels of electric services?

³⁴ 220 ILCS 5/8-103B(c).

³⁵ https://s3.amazonaws.com/ilsag/IL_EE_Policy_Manual_Version_2.0_Final_9-19-19.pdf

Increased investment in utility-administered low-income energy efficiency programs is needed to help permanently reduce the home energy burden, improve the comfort and safety of a home and increase overall affordability of utility service. The need to increase energy efficiency investment in low-income households and communities throughout the state – particularly given the economic shutdown associated with COVID-19 – persists. We offer the following observations:

- There is an overall underinvestment of energy efficiency in low-income households and communities:
 - According to the 2017 American Housing Survey Census data, 9% of total U.S. households completed an energy-efficient improvement in the past two years, but only 17% were low-income households. “Low income households (200% of the federal poverty level or below) make up about 30% of the population, which means that they are underrepresented in households completing energy efficiency upgrades and thus are not proportionally accessing and benefiting from these investments.”³⁶
- There is also underinvestment of energy efficiency in low-income multifamily households in particular:
 - Untargeted utility-administered energy efficiency programs do not effectively reach communities of color and low-income communities—particularly those living in multifamily buildings.³⁷
 - Multifamily units occupied by low-income renters had 4.1 fewer energy efficiency features in 2005 and 4.7 fewer in 2009 compared with other households.³⁸

Changes that could be made to address these issues include:

- Track metrics that measure the effectiveness of energy efficiency programs in improving energy affordability and reducing energy burden, including those referenced in the reporting section of these comments. This may include tracking energy burden and/or energy use intensity of targeted communities over time following targeted energy efficiency programs.
- Increase low-income energy efficiency budgets, that include investments in and prioritization of both low-income single family and multifamily energy efficiency programs.
- In order to address energy affordability issues in low-income multifamily homes and buildings in particular, utilities should incorporate, if they are not already, the following low-income multifamily program design best practices:
 - Comprehensive Whole Building Approach with Rich Incentives - A whole building approach includes measures and incentives for all types of low-income multifamily spaces addressed comprehensively in one program.

³⁶ <https://www.aceee.org/sites/default/files/pdfs/u2006.pdf>

³⁷ <https://www.aceee.org/research-report/u1903>

³⁸ <https://www.tandfonline.com/doi/abs/10.1080/09613218.2014.905395>

All the in-unit, common area, building systems, building envelope, and outdoor measures should be addressed in one program. Owners and residents should be given an understanding of the full scope of all available energy efficiency offerings. A whole building approach should be paired with robust data analysis, client management, benchmarking, and rich incentives in order to help owners move to a comprehensive package of measures.

- True one-stop shop³⁹ for program engagement
 - Single Point of Contact
 - Comprehensive Technical Assistance
 - Single Application for program entry - to be fully accessible online
 - Single Application process for incentives to be fully accessible online
 - Access to financing for multifamily building owners (with application of incentives first)
 - Gas and electric co-delivery of offerings
 - Collaboration with Illinois Housing Development Authority and other affordable housing groups and developers.
- Additional low-income energy efficiency program best practices include:
 - Better connections between energy assistance and energy efficiency: For example, applying for energy assistance should prequalify properties for energy efficiency program incentives and sign them up for at least an energy assessment.
 - Better connections between low-income solar: Energy efficiency measures should be completed as a prerequisite (where applicable/eligible) to installing solar to reduce load and increase affordability long term. Joint solar and energy efficiency assessments should be considered where cost-effective. This could simply include adding some questions about solar to an energy efficiency assessment and assessing solar potential in a building.
 - Health and safety funding: All Illinois utilities should be directed to allow for funding of minor health and safety repairs and measures to be covered in their low-income energy efficiency programs. Utilities should look for opportunities to leverage outside health funding and partnerships as well. Implementation of energy efficiency measures are often postponed or halted because of health and safety issues in a home or building. This is especially true in the case of low-income homes and buildings that are older and more inefficient. These health and safety deferrals and “walk-away” issues are a barrier to implementing energy efficiency in low-income properties that need energy efficiency most. Typical health and

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https://assets.ctfassets.net/ntcn17ss1ow9/30B8LUDt8GTegiPE8claf/8c5e68405c9692afb9f11fe898b8653e/EEFA_OneStopShop_Fact_Sheet_2.pdf

safety issues include asbestos, mold, moisture, electrical wiring issues, leaky roofs, increased pest infestations, lead, knob and tube electrical wiring, and other structural issues.

- Healthy Building Materials - Utilities should prohibit insulation materials with worst-in-class chemicals.⁴⁰ Ensure insulation materials used for weatherization and efficiency programs, are free of asthmagens and respiratory sensitizers (such substances should not be intentionally added or present at greater than 0.1 percent [1,000 parts per million] by weight in the product).⁴¹
- Equitable Workforce Development, Job Training, and Hiring: Utilities should increase the number of local, diverse vendors and subcontractors that deliver energy efficiency programs. Increased job training and hiring from directly within under-resourced communities and communities of color in Illinois.
- Incorporating water efficiency including deeper incentives for domestic hot water, and new incentives for efficient toilets or water leak detection as part of assessments.
- Increase direct community input into energy efficiency decision-making at the utility and regulatory level, especially from under-resourced communities and communities of color. Create authentic, equitable spaces for direct input and ideas on programs from environmental justice, racial equity, affordable housing, low-income advocacy, and other community groups and advocates. There should be ICC oversight to ensure that utilities are held accountable to listen to and incorporate changes from these critical groups directly into programs.
- Resident engagement: Increase and expand communication with residents of homes and buildings before energy efficiency work on a home or building is started, while work is getting done, and after work is completed.

Below are several examples of effective practices that utilities have used to increase participation in hard-to-reach multifamily customer segments. It is possible that similar strategies are being used by Illinois utilities. In addition to these, examples from ACEEE's Fourth National Review of Exemplary Energy Efficiency Programs⁴² can help identify program models and strategies to improve Illinois utility programs:

- Efficiency Maine participates in trade shows that target building owners and property managers and hosts informational breakfasts.

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https://assets.ctfassets.net/ntcn17ss1ow9/3Bw3JFqYHgl7xWcvb7unwN/ec90d476bc2fd1315fb018eeeb467978/NRDC-3084_Guide_to_Healthier_Retrofit_Hi-res_smaller.pdf

⁴¹ Per California Energy Efficiency for All Coalition. "Recommendations for Governor's Task Force on Business and Jobs Recovery." EEFA, July 24, 2020.

⁴² <https://www.aceee.org/sites/default/files/publications/researchreports/u1901.pdf>

- Puget Sound Energy attends affordable housing association meetings to reach target populations for their multifamily program.
- Austin Energy has a partnership with the Austin Apartment Association, a strong network of property managers, which has allowed them to spread awareness and adoption even as property managers move to manage other properties. Austin energy also partners with the Independent Renters and Owners Committee, which represents smaller multifamily properties, to educate onsite managers and maintenance staff on best practices and programs.
- Public Service Electric and Gas in New Jersey provides Investment Grade Audits for owners to help them better understand how improvements can improve operation and cash flow.⁴³
-

3. Identify obstacles faced by low-income consumers that prevent them from participating in weatherization programs?

The weatherization program, like many low-income energy programs in Illinois, is only able to serve a portion of Illinois residents in need. Limited budget and capacity of community action agencies can be a barrier to participation. Lack of availability of weatherization to low-income multifamily households is a clear barrier preventing participation from a large portion of Illinois multifamily residents. While multifamily weatherization is allowed in the Illinois Weatherization State Plan, there are only a few agencies in the state doing multifamily weatherization work.

There are barriers for agencies in terms of training, different reporting technology, equipment, perceived concerns about spending all funds on one building, and more that are preventing multifamily weatherization work by a broader number of agencies. As such, there is a great deal of untapped potential in the Illinois affordable multifamily housing stock for multifamily weatherization work, that is leaving low-income multifamily residents in need.

For some low-income residents in Illinois, there is either a lack of awareness of the weatherization program and/or confusion between all of the different energy efficiency and weatherization related programs offered by the utilities. In addition, many community action agencies have long waiting lists, which can be a barrier to participation. Different funding cycles and different reporting methods between weatherization and the utility energy efficiency programs may also present challenges. Efforts to ensure that Illinois residents have access to the same measures in either the braided weatherization program and utility-sponsored programs continues through the SAG and income-qualified subcommittees.

4. What changes could be made to weatherization programs to make them more effective at increasing the affordability and/or the ability of customers to receive essential levels of electric services?

⁴³ http://ilsag.s3.amazonaws.com/Apartment_Hunters_Programs_Searching_Energy_Savings_MF_Buildings.pdf

Several actions can be taken to improve access to needed weatherization programs:

- Increased funding for the Illinois Home Weatherization Program.
- Establish clear requirements that a portion of the funds must be used to serve low-income multifamily properties and units. This should also include a percentage of weatherization funds going to multifamily weatherization, plus multifamily training, widespread understanding of the different reporting tools and technology for multifamily, and encouragement/incentives for agencies that begin offering multifamily weatherization.
- Increase community outreach and communications about the weatherization program, and ensure it is available in multiple languages.
- Increase input from under-resourced community groups, advocates, community action agencies, and other community-based organizations into the design and implementation of weatherization programs.
- Continue work to improve the braided weatherization and utility funded programs, to reduce burden on community action agencies and confusion by residents. Programs should leverage one another to better reach residents and improve affordability.
- Ensure weatherization is promoted with a suite of other offerings, energy assistance, rental assistance, and other community action agency and financial assistance offerings.

H. Distributed and Community Solar

1. What distributed and community solar programs are currently available to customers that increase affordability and/or the ability of customers to receive essential levels of electric services, how effective are the programs at achieving these objectives, and what changes could make the programs more effective?

The Illinois Solar for All program⁴⁴ is a start, but it is limited in its reach, especially for low-income multifamily residents. There is also a lot of room for growth in collaboration and co-delivery of Solar for All and low-income energy efficiency programs in Illinois. Energy efficiency is a critical foundation to solar work.

2. Are there programs not currently available in Illinois, including programs adopted in other states, that could increase affordability and/or the ability of customers to receive essential levels of electric services?

The Colorado Energy Office's strategy for reducing energy burden through solar energy installation is a valuable model for Illinois to better pair solar and energy efficiency programs. The three major components of their strategy include supporting low-income community solar demonstration projects, incorporating solar into the state weatherization program and promoting utility investment in low-income solar. Through

⁴⁴ See <https://www.illinoissfa.com/for-il-residents/>

Low Income Utility Advocacy Project

By: _____/s/_____
Allen Cherry

Low-Income Utility Advocacy
Project (LIUAP)