

June 30, 2022

Illinois Commerce Commission
Leland Building 527 East Capitol Avenue
Springfield, IL 62701

RE: Midwest Energy Efficiency Alliance (MEEA) Response to Notice of Inquiry Regarding the Infrastructure Investment and Jobs Act (22-NOI-01)

Thank you for the opportunity to submit information in response to the critical questions regarding the federal Infrastructure Investment and Jobs Act (IIJA) posed by the Notice of Inquiry 22-NOI-01. The Midwest Energy Efficiency Alliance (MEEA) is a collaborative network, promoting energy efficiency to optimize energy generation, reduce consumption, create jobs and decrease carbon emissions in all Midwest communities.

As the Midwest's principal proponent, information source and networking forum for energy efficiency policy, MEEA helps educate and advise a diverse set of stakeholders on new and meaningful ways to pursue an energy-efficient agenda that's achievable, beneficial and cost-effective. With a knowledgeable and experienced staff capable of producing high-value content across a broad range of energy efficiency issues, we take pride in educating legislators and regulators throughout the region to recognize and implement cost-saving measures that are environmentally sound with a positive economic impact.

Energy Efficiency

Energy efficiency is the most cost-effective solution to meet energy demand, reduce consumption, address grid capacity constraints and lower emissions. Energy efficiency reduces energy waste, saves Illinois residents and businesses money and creates local jobs. It is a vital component to create an immediate impact from the energy infrastructure investments made via IIJA. Energy efficiency projects will reduce energy consumption from day one, relieving pressure on the energy system, increasing the amount of renewable generation and reducing the need for energy storage investments.

According to a Cadmus [study](#) commissioned by MEEA, one year of Midwest energy efficiency investments and resulting energy savings will lead to nearly 105,000 jobs, increase net regional income by almost \$8.8 billion and add over \$13.7 billion of total value to the region's economy over a 25-year period. According to Environmental Entrepreneurs (E2), there were over 91,000 energy efficiency jobs in Illinois in 2019, representing 73% of all clean energy jobs within the state. Despite pandemic setbacks, strong energy efficiency policy helps all Illinoisans by simultaneously continuing state job growth and reducing the state's energy consumption.

The 2021 passage of the Clean and Equitable Jobs Act (CEJA) modernized and expanded Illinois' energy efficiency framework. By increasing electric utilities' energy efficiency savings requirements, repealing the large commercial and industrial customer exemption and expanding low-income energy efficiency programs, CEJA will help Illinois utilize energy efficiency as a tool for advancing equity and decarbonization, both of which are also goals of the IJA.

Infrastructure Investment and Jobs Act

The 2021 passage of the Infrastructure Investment and Jobs Act offers states, municipalities, tribal communities and other public entities a unique opportunity to bolster their infrastructure while helping to aid in the nation's economic recovery from the COVID-19 pandemic. The 1,000+ page law offers significant new and increased funding opportunities in transportation; climate, energy and clean environment; broadband; and other programs.¹

In the climate, energy and clean environment category, funding is divided and subdivided into different categorizations:

- Clean Energy and Power
 - Delivering Clean Power (~\$21.3 billion)
 - Clean Energy Demonstrations (~\$21.5 billion)
 - Energy Efficiency and Weatherization Retrofits for Homes, Buildings, and Communities (\$6.5 billion)
 - Clean Energy Manufacturing and Workforce Development (\$8.6 billion)
- Water
 - Drinking Water and Clean Water State Revolving Funds (\$23.43 billion)
 - Lead Service Lines (\$15 billion)
 - PFAS and Emerging Contaminants (\$10 billion)
 - Indian Water Rights (\$2.5 billion)
 - Indian Health Service Water and Sewer (\$1.8 billion)
 - Water and Sewer Tax (\$1.25 billion)
 - Rural Water (\$1 billion)
 - Western Water (\$7.1 billion)
- Resilience
 - Promoting Resilient Operations for Transformative, Efficient, and Cost Saving Transportation (PROTECT) Grants (\$8.7 billion)
 - Wildfire Management (\$8.25 billion)
 - Investments in Resilience through the Army Corps of Engineers (\$7 billion)
 - Western Water (\$3.8 billion)

¹ Program details were pulled from both the Infrastructure Investment and Jobs Act (Public Law 117-58), found at <https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf>, and from the White House's Guidebook to the Bipartisan Infrastructure Law for State, Local, Tribal, and Territorial Governments, and Other Partners, found at https://www.whitehouse.gov/wp-content/uploads/2022/01/BUILDING-A-BETTER-AMERICA_FINAL.pdf

- Flood Mitigation Assistance Program (\$3.5 billion)
- Weatherization (\$3.5 billion)
- Cybersecurity (\$1.3 billion)
- Environmental Remediation
 - Abandoned Mine Land Reclamation (\$11.3 billion)
 - Orphan Oil & Gas Well Plugging, Remediation and Restoration (\$4.7 billion)
 - Superfund Site Cleanup (\$3.5 billion)
 - Brownfield Remediation and Revitalization (\$1.5 billion)

By our count, out of the hundreds of individual programs, 28 explicitly include utilities as prospective recipients of funding. Six of these programs are targeted toward water utilities and were eliminated from this research. The remaining twenty-two² programs are listed below in response to NOI question #1. Toward the bottom of the chart are programs that did not explicitly list utilities as eligible recipients, though it's possible that certain utilities may qualify if they are owners of hydroelectric, nuclear or transmission resources. It is possible that other commenters may include additional programs, since several programs use vague terminology for targeted recipients, like "industry partner."

IIJA Sec. No	Section Title	Application Date	Funding Level/Type	Brief Description of Program
Division J – Title III	Natural Gas Distribution Infrastructure Safety and Modernization Grants*	TBD	\$1,000,000,000 over 11 years. Competitive grant.	Grant funds will be made available to municipalities or community owned utilities (not including for-profit entities) to repair, rehabilitate, or replace natural gas distribution pipeline systems or portions thereof or to acquire equipment to reduce incidents and fatalities, and to avoid economic loss.
40314	Regional Clean Hydrogen Hubs	Application will open in the summer of 2022.	\$8,000,000,000 available until expended. FY 2022-26. Grant.	To support the development of at least 4 regional clean hydrogen hubs to improve clean hydrogen production, processing, delivery, storage, and end use.
40107	Deployment of Technologies to Enhance Grid Flexibility	Application expected to be open by the end of 2022.	\$3,000,000,000; \$600,000,000 appropriated annually for FY 2022-26. Grant.	Funding and expansion of eligible activities under the Smart Grid Investment Matching Grant Program established under section 1306 of the Energy Independence and Security Act of 2007.

² Programs with an asterisk are those that appear targeted toward municipal and cooperative utilities. The language that refers to public utilities varies in the bill. Sometimes eligible entities in this category are referred to as Small/Local/Public Utilities, Rural Electric Cooperatives, Municipally-Owned Electric Utilities, Other State-Owned Utilities, Public Utilities, Electric Cooperatives, Municipal or Community-Owned Utilities (Not-for-Profit) or Small Electric Utilities. For the purposes of this NOI, Illinois' public utilities (in this case, referring to investor-owned utilities) likely will not qualify for these programs.

41004(b)	Carbon Capture Demonstration Projects Program	TBD	\$2,537,000,000. \$937,000,000 for FY 22, \$500,000,000 for FY 23, \$500,000,000 for FY 24, \$600,000,000 for FY 25 Cooperative agreement.	To establish a carbon capture technology program for the development of 6 facilities to demonstrate transformational technologies that will significantly improve the efficiency, effectiveness, costs, emissions reductions, and environmental performance of coal and natural gas use, including in manufacturing and industrial facilities.
40103(c)	Energy Improvement in Rural and Remote Areas	Application expected to be open in the Fall of 2022.	\$1,000,000,000. \$200,000,000 appropriated annually for FY 22-26. Cooperative agreement.	To provide financial assistance to increase environmental protection from the impacts of energy use and improve resilience, reliability, safety, and availability of energy in rural or remote areas of the United States.
41004(a)	Carbon Capture Large-Scale Pilot Programs	TBD	\$937,000,000. \$387,000,000 for FY 22, \$200,000,000 for FY 23, \$200,000,000 for FY 24, and \$150,000,000 for FY 25. Cooperative agreement.	To establish a carbon capture technology program for the development of transformational technologies that will significantly improve the efficiency, effectiveness, costs, emissions reductions, and environmental performance of coal and natural gas use, including in manufacturing and industrial facilities.
41001(a)	Energy Storage Demonstration Pilot Grant Program	Estimated application opening date, 3rd quarter 2022.	\$355,000,000 available until expended for FY 2022-25 Grant or cooperative agreement.	To enter into agreements to carry out 3 energy storage system demonstration projects.
40302	Carbon Utilization Program*	Estimated application opening date, 4th quarter 2022	\$310,140,781. \$41,000,000 for FY 22, \$62,250,000 for FY 23, \$66,562,500 for FY 24, \$67,940,625 for FY 25, \$69,387,656 for FY 26. Grant.	To establish a grant program for state and local governments to procure and use products derived from captured carbon oxides.
41001(b)	Long-Duration Energy Storage Demonstration Initiative and Joint Program	Estimated application opening date, 3rd quarter 2022.	\$150,000,000 until expended for FY 2022-25 Cooperative agreement or other (TBD).	To establish a demonstration initiative composed of demonstration projects focused on the development of long-duration energy storage technologies.
40555(2)	Energy Efficient Transformer Rebates	Estimated application opening date,	\$10,000,000 available until expended. Rebate/grant.	To provide rebates to industrial or manufacturing facility owners, commercial building owners, multifamily building owners, utilities,

		2nd quarter 2022		or energy service companies for the replacement of a qualified energy inefficient transformer with a qualified energy efficient transformer
40334	Pumped Storage Hydropower Wind and Solar Integration and System Reliability Initiative	TBD	\$10,000,000 available until expended. Cooperative agreement.	To provide financial assistance to eligible entities to carry out project design, transmission studies, power market assessments, and permitting for a pumped storage hydropower project to facilitate the long-duration storage of intermittent renewable electricity.
40125(b)	Activities Under Cybersecurity for the Energy Sector Research, Development, and Demonstration Program	Estimated application opening date, 3rd quarter 2022	\$250,000,000 available until expended. Cooperative agreement/contract/lab calls.	To support development and deployment of advanced cyber applications, technologies, and threat collaboration efforts with the U.S. energy sector.
40124	Rural And Municipal Utility Advances Cybersecurity Grant and Technical Assistance Program*	Estimated application opening date, 4th quarter 2022.	\$250,000,000. \$50,000,000 appropriated annually for FY 2022-26. Grant/cooperative agreement/contract.	To provide grants and technical assistance to, and enter into cooperative agreements with, eligible entities to protect against, detect, respond to, and recover from cybersecurity threats.
40125(d) (1)	Advanced Energy Security Program	Estimated application opening date, 4th quarter 2022.	\$50,000,000 available until expended. Interagency Agreement with Commerce, National Laboratory funding.	To increase the functional preservation of electric grid operations or natural gas and oil operations in the face of threats and hazards.
Division J – Title III	Water Infrastructure Finance and Innovation Program Account*	TBD	\$75,000,000 (Including \$64 million for loans and \$11 million for administration of the program) available until expended. Credit assistance.	Federal credit program to provide credit assistance to creditworthy borrowers for projects to maintain, upgrade and repair dams identified in the National Inventory of Dams owned by non-federal entities.
40125(c)	Energy Sector Operational Support for Cyber Resilience Program*	TBD	\$50,000,000 available until expended. National	To support a program to build energy sector operational support for cyber resilience.

			Laboratory funding.	
60401	Middle Mile Grants Program	Estimated application opening date, 2nd quarter 2022.	\$1,000,000,000 for FY 2022-26. Grant.	Establishes and funds a \$1 billion program for the construction, improvement or acquisition of middle mile infrastructure. The purpose of the grant program is to expand and extend middle mile infrastructure to reduce the cost of connecting unserved and underserved areas to the internet backbone.
40333	Hydroelectric Incentives ³	TBD	\$553,600,000. \$276,800,000 each year for FY 22 and 23. Incentive payments.	To make incentive payments to the owners or operators of qualified hydroelectric facilities for capital improvements.
40332	Hydroelectric Efficiency Improvement Incentives	TBD	\$75,000,000 for FY 22 available until expended. Direct subsidy.	To incentivize upgrades to hydroelectric facilities to increase their efficiency.
40323	Civil Nuclear Credit Program ⁴	TBD	\$6,000,000,000. \$1,200,000,000 appropriated annually for FY 2022-26. Credit allocation.	To establish a civil nuclear credit program for reactors that compete in a competitive electricity market.
41002	Advanced Reactor Demonstration Program ⁵	Agreements went into effect on 2/21 and 5/21; NRC licensing of reactors TBD	\$2,477,000,000. \$677,000,000 for FY 22 and \$600,000,000 each year for FY 23-25. Cooperative agreement.	To fund two large demonstrations of advanced nuclear reactors for electricity generation.
40101	Preventing Outages and Enhancing the Resilience of the Electric Grid Grants ⁶	Estimated application opening date, 4th quarter 2022	\$5,000,000,000 for FY 22- 26 available until expended. Competitive grant.	To make grants to eligible entities, States, and Indian Tribes to prevent outages and enhance the resilience of the electric grid.

While these twenty-two programs appear to target utilities as applicants (either alone or in conjunction with other entities), these are certainly not the only programs that could support utilities and their efforts. Below is a list of programs that do not explicitly include utilities as targeted recipients but would likely either benefit from the support of utilities

³ This program lists eligible recipients as “Non-Federal owners of qualified hydroelectric facilities.”

⁴ This program lists eligible recipients as “certified nuclear reactors.”

⁵ This program lists eligible recipients as “domestic nuclear industry partners.”

⁶ This program lists eligible recipients as “Electric Grid Operators, Electricity Storage Operators, Electricity Generators, Transmission Owners and Operators, Distribution Providers, Fuel Suppliers, States, Tribes.”

or could benefit the utilities in improving their infrastructure or meeting their decarbonization targets. While dozens of IJA programs could possibly impact utilities, this list focuses on programs that touch on energy efficiency. As a response to NOI question #2, this chart includes an additional column for eligible recipients to help make it clear to the state's public utilities on what entities they could partner with on these proposals.

IJA Sec. No	Section Title	Application Date	Eligible Recipients	Funding Level/Type	Brief Description of Program
40551	Weatherization Assistance Program	Estimated first round of funds released date, 1 st quarter 2022	States, Tribes	\$3,500,000,000 beginning in FY22 and to remain until expended. Formula grant.	To increase the energy efficiency of dwellings owned or occupied by low-income persons, reduce their total residential energy expenditures, and improve their health and safety, especially low-income persons who are particularly vulnerable such as the elderly, the handicapped, and children.
40552	Energy Efficiency and Conservation Block Grant Program	The first funding opportunity is expected for release in the fall of 2022.	States, Local Governments, Tribes	\$550,000,000 available until expended. Block and competitive grants.	To assist states, local governments, and Tribes to reduce energy use, reduce fossil fuel emissions, and improve energy efficiency.
40541	Grants for Energy Efficiency and Renewable Energy Improvements at Public School Facilities	The opportunity to apply for funding is expected to be open in the fall of 2022.	Consortium of One Local Education Agency and one or more Schools, Non-Profits, For-Profits and Community Partners	\$500,000,000. \$100,000,000 made available each FY 22-26 until expended. Grant.	To provide competitive grants to make energy efficiency, renewable energy, and alternative fueled vehicle upgrades and improvements at public schools.
41008	Industrial Emission Demonstration Projects	Estimated application, opening date, 2 nd quarter 2022	Technology Developers, Industry, Manufacturers, Universities, National Laboratories, Engineering and Construction firms, State and Local Governments, Environmental Groups, and	\$500,000,000. \$100,000,000 made available until expended each year FY 22-23. \$150,000,000 made available until expended each year FY 24-25. Cooperative agreement.	To fund demonstration projects that test and validate technologies that reduce industrial emissions.

			Community Based Organizations		
40109	State Energy Program	Estimated first round of funds released date, 2 nd quarter 2022	States	\$500,000,000 available FY 2022-26. Formula grant.	To provide funding to states to support electric transmission and distribution planning as well as planning activities and programs that help reduce carbon emissions in all sectors of the economy, including the transportation sector and accelerate the use of alternative transportation fuels and vehicle electrification.
40502	Energy Efficiency Revolving Loan Fund Capitalization Grant Program	TBD	States	\$250,000,000 available until expended. Grant.	To provide capitalization grants to States to establish a revolving loan fund under which the State shall provide loans and grants for energy efficiency audits, upgrades, and retrofits to increase energy efficiency and improve the comfort of buildings.
40554	Assisting Federal Facilities with Conservation Technologies	Estimated application will open before the end of 2022.	Federal Agencies	\$250,000,000 available until expended. Grant.	To provide grants to federal agencies that they can leverage with private capital to make energy and water efficiency upgrades to federal buildings.
40511	Building Codes Implementation for Efficiency and Resilience	Applications for funding are expected to be open by the end of 2022.	States and State Partnerships	\$225,000,000. \$45,000,000 made available each FY 22-26 until expended. Grant.	A competitive grant program to enable sustained, cost-effective implementation of updated building energy codes to save
40521	Industrial Research and Assessment Center Implementation Grants	Estimated application opening date, 4th quarter 2022	Small- and Medium-Sized Manufacturers	\$400,000,000. \$80,000,000 made available each FY 22-26 until expended. Grant.	To fund upgrades for small- and medium-sized manufacturers that have been recommended in an assessment from an Industrial Assessment Center or Combined Heat and Power Technical Assistance Partnership.
40521	Industrial Research and Assessment Centers	Applications for funding are expected to be open by the end of 2022.	Institutions of Higher Education, Community College, Trade School, Or	\$150,000,000. \$30,000,000 made available each FY 22-26 until	To provide funding for institutions of higher education-based industrial research and assessment centers to identify opportunities for

			Union Training Program	expended. Grant.	optimizing energy efficiency and environmental performance at manufacturing and other industrial facilities.
40542	Energy Efficiency Materials Pilot Program	Estimated application opening date, 1st quarter 2023.	Non-Profit Organizations	\$50,000,000 available until expended. Grant.	To provide grants to supply nonprofit buildings with energy-efficiency materials.
40503	Energy Auditor Training Grant Program	Estimated application opening date, 2nd quarter 2022.	States	\$40,000,000 available until expended. Shall not exceed \$2,000,000 for any eligible State. Grant.	To provide grants to eligible States to train individuals to conduct energy audits or surveys of commercial and residential buildings to build the clean energy workforce, save customers money on their energy bills, and reduce pollution from building energy use.
40555	Energy Efficient Transformer Rebates	Estimated application opening date, 2nd quarter 2022	Owners of industrial or manufacturing facilities, commercial buildings, or multifamily residential buildings, a utility, or an energy service company that purchase a qualified transformer to replace an energy-inefficient transformer	\$10,000,000 available until expended. Rebate/grant	To provide rebates to industrial or manufacturing facility owners, commercial building owners, multifamily building owners, utilities, or energy service companies for the replacement of a qualified energy inefficient transformer with a qualified energy efficient transformer.
40513	Career Skills Training	Estimated application opening date, 1st quarter 2023	Non-Profit Partnerships	\$10,000,000 available until expended. Grant.	To provide grants to pay the Federal share of career skills training programs under which students concurrently receive classroom instruction and on-the job training for the purpose of obtaining an industry-related certification to install energy efficient building technologies.
40512	Building, Training, and Assessment Centers	Estimated application opening date, 2nd quarter 2022	Institutions of Higher Education	\$10,000,000 available until expended. Grant.	To provide grants to institutions of higher education to establish building training and assessment centers to

					educate and train building technicians and engineers on implementing modern building technologies.
Division J – Title VII	Low Income Home Energy Assistance Program	First round of funds released this January, 2022.	States, Territories, Tribal Governments, Indian Housing Authorities, and Consortia Authorized to Administer the Program by Eligible Tribal Entities	\$500,000,000 for 2022-26. \$100,000,000 made available each FY 22-26. Grant.	The Low-Income Home Energy Assistance Program assists eligible low-income households with their heating and cooling energy costs, bill payment assistance, energy crisis assistance, weatherization and energy-related home repairs

Utility Coordination with IJA-funded EE and Workforce Development Projects

While utilities may not be direct recipients of funding from energy efficiency programs within the IJA, projects funded through the law will have significant overlap with the state’s public utility energy efficiency programs. MEEA recommends that the ICC encourage utilities to explore opportunities for coordination and partnership with recipients of these funds to support implementation, increasing efficiency investment overall. Leveraging the utilities’ existing infrastructure would improve and expand the impact and benefits of the projects. Projects with the most opportunity for increased benefits include energy efficiency programs for:

- Public facilities;
- Low-income households through the Weatherization Assistance Program;
- Industrial Facilities; and
- Communities awarded Energy Efficiency and Conservation Development Block Grants.

Moreover, there may be an opportunity to supplement the workforce development programs under IJA with existing efforts of the utilities to equitably expand and diversify the energy efficiency and clean energy workforce. The ICC should explore partnerships between utilities and workforce development agencies as the state, local governments and nonprofits seek or receive workforce development funding and stand-up programs.

Reduce Deferral Rates by Leveraging Utility Health and Safety Funds

As the ICC is aware, the Illinois Home Weatherization Assistance Program receives funds from the Low-income Home Energy Assistance Program, the federal Weatherization Assistance Program and contributions from utility ratepayers. Utility contributions to IHWAP go toward agencies within their respective territories. Agencies braid these sources of funding to more holistically serve a single dwelling. With incoming

weatherization funding through IJJA, the ICC should encourage continued coordination between utilities and agencies.

While some funds for weatherization may be eligible to be used for pre-weatherization work, average cost per unit and savings to investment ratio requirements of DOE makes addressing high deferral rates difficult, as health and safety repairs can be too costly. In an interview with MEEA in 2020 the Community and Economic Development Association of Cook County (CEDA), which provides weatherization services to all of Cook County, noted that deferral rates related to 'walkaways' in their service territory are as high as 39%. Under CEJA, some weatherization-braided funds can now go toward health and safety measures. These funds are an opportunity to reduce deferral rates and increase efficiency benefits for customers who most need assistance.

To better address walkaways in the long-term, agencies and utilities should coordinate on the development of a database of deferred properties. ComEd, Nicor Gas, Ameren Illinois and Peoples Gas/North Shore Gas have all agreed to tracking and/or reporting of information related to health and safety issues in their territory within their stipulated agreements for approval of energy efficiency programs. While exactly what utilities will track is yet to be determined, it is being actively discussed within the Illinois Stakeholder Advisory Group and Income Qualified Accountability Committee. The ICC should encourage utilities to coordinate with agencies and stakeholders to identify the range of data tracking necessary to support the long-term goal of weatherizing all eligible properties. Data collected may include addresses, zip codes and the cause for the deferral.

Support Public Schools and Federal Facilities Receiving of EE Grants

Public utilities are in a unique position to support the implementation of Grants for Energy Efficiency and Renewable Energy Improvements at Public Schools (Sec. 40541) and Assisting Federal Facilities with Energy Conservation Technologies (AFFECT) (Sec. 40554). Specifically, utilities could support the implementation of recipients' projects by supplementing grant funding with ratepayer programs where appropriate. MEEA recommends that the ICC encourage utilities to work with their public sector customers in securing funding for projects and track recipients of funds within their service territories to braid funding where appropriate.

Support Small- and Medium-Sized Manufacturers Receiving EE Grants

IJJA makes \$400,000,000 available through the Industrial Research and Assessment Center Implementation Grants for small- and medium-sized manufacturers to implement projects following assessment from an Industrial Assessment Center or Combined Heat and Power Technical Assistance Partnership (TAP). Applications are estimated to open in late 2022.

The ICC should encourage coordination between utilities and those manufacturers receiving grants. Following the passage of the Climate and Equitable Jobs Act, large,

private energy users (>10 MW demand) can opt-out of contributions and participation in ratepayer utility programs. Opportunities to braid funding from this grant program with utility energy efficiency programs for those manufacturers that haven't opted-out of utility programs would support achieving greater energy savings in this crucial, high-energy consuming sector. Moreover, the availability of these grants coupled with the availability of utility incentives may encourage those customers who have opted out to opt back in.

Lastly, combined heat and power systems are significantly underutilized technologies capable of delivering valuable resilience, reliability and efficiency benefits. Despite utility energy efficiency incentives for CHP, projects haven't moved forward due to the high up-front cost. Utilities should coordinate with the Midwest CHP TAP located at the Energy Resources Center at the University of Illinois at Chicago and Industrial Assessment Centers to improve understanding of the benefits of CHP among manufacturers, and where possible, supplement utility incentives with implementation grants to improve the economic case for CHP deployment and provide technical assistance. Utilities may play a role in providing third-party assessments.

Support Local Governments Receiving EECBG Funding

The infrastructure bill appropriates \$550 million to the Energy Efficiency and Conservation Block Grant (EECBG) program to assist states, local governments and tribes to develop an energy efficiency strategy, retain technical assistance, conduct energy audits, establish incentive programs and implementation of building energy codes, among other initiatives. EECBG funds are distributed through formula grants to state and local units of government and there is likely to be significant overlap with initiatives funded under this program and utility energy efficiency programs.

Encouraging coordination between utilities and EECBG fund recipients could increase investment impact by leveraging technical assistance and program costs.

MEEA recommends that the ICC encourage public utilities to work with local governments within their service territory on grant applications where possible and identify where ratepayer-funded programs and financing programs, like CEJA's new Equitable Energy Upgrade program, may support the implementation of community initiatives. Additionally, utility energy usage and energy assistance data may support community planning, energy efficiency program targeting efforts and Justice40 requirements. The ICC should encourage data sharing where possible to support implementation of EECBG projects.

Coordinate State and Utility Workforce Development Programs and Support Justice 40 Initiatives

The infrastructure bill includes several energy efficiency related workforce development programs which may present opportunities for coordination with current utility workforce development programs. Specifically, the expanded Market Development

Initiative, successfully piloted by Ameren Illinois in its previous energy efficiency program cycle, may be able to support some of these programs and the targeting of opportunities to underrepresented, historically marginalized and BIPOC communities.

The following are workforce development programs within the infrastructure bill:

- INSULATE Buildings Act (Sec. 40503)
 - Energy Auditor Training Grant Program - \$40,000,000 from FY2022 - 2026
- Building, Training, and Assessment Centers (Sec. 40512) - \$10,000,000 until expended
- Cybersecurity for the Energy Sector Research, Development, and Demonstration Program (Sec. 40125) - \$250,000,000 from FY2022 - 2026
- Career Skills Training (Sec. 40513) - \$10,000,000 until expended

Conclusion

In closing, we hope that the information in this response is useful to the Commission's discussions and decision-making on the Infrastructure Investment and Jobs Act. We also greatly appreciate the effort of the Commission to solicit ideas from a broad range of stakeholders about IIJA, as it is critical that the state and its public utilities capitalize on this timely opportunity. If you have any questions or need more information, please feel free to contact MEEA's Executive Director Stacey Paradis at 312-784-7267 or via email at sparadis@mwalliance.org. Thank you for this opportunity; we look forward to providing additional assistance.

Sincerely,

A handwritten signature in black ink that reads "Stacey Paradis". The signature is written in a cursive, flowing style.

Stacey Paradis

Executive Director, MEEA