

April 10, 2024 Large Group SAG Meeting Follow-up Responses from ComEd

Joint Stakeholder EE Idea for ComEd – Relax criteria for weatherizing electrically heated homes (EE idea tracker row 28):

- Kara Jonas (ComEd) will share more information about contractor challenges serving manufactured homes.

There are two main challenges to serving manufactured homes that have been highlighted by Home Energy Savings' participating Energy Efficiency Service Providers (EESPs):

1. Insulating a manufactured home requires a different skillset/equipment than insulating a non-manufactured single-family home. EESPs must be trained in assessing and installing underbelly insulation.
2. HVAC systems in mobile homes are often unique, involving furnaces with nested AC coils (as opposed to separate systems). It can be a challenge for participating EESPs to find HVAC subcontractors who specialize in this equipment/are willing to do this kind of work.

In 2023, 22 manufactured homes were served with a braided or non-braided retrofit through Home Energy Savings. The offering is leveraging the Illinois Home Weatherization Assistance Program (IHWAP) for service of these home types in 2024.

Joint Stakeholder EE Idea for ComEd and Ameren Illinois – Enhance and clarify electrification offerings and coordination with one-stop-shop (EE idea tracker row 9):

- Stakeholders are interested in additional information about any existing cross-program coordination from both ComEd and Ameren Illinois, between IQ multifamily programs and electrification programs.

Currently, coordination exists between ComEd's Whole Home Electric and Multi-Family Energy Savings offering. The Whole Home Electric team refers buildings that have not previously been weatherized or that are not eligible for the Whole Home Electric offering to the Multi-Family Energy Savings offering for follow up and service. If a building owner expresses interest in electrification or fuel switching measures to the Multi-Family Energy Savings team, they are referred to the Whole Home Electric offering. ComEd is interested in evolving this cross-program coordination.

Joint Stakeholder EE Idea for All Utilities – Continue to determine IQ eligibility using the qualification methodologies that are the least burdensome and time-consuming for building owners and maximize the potential for and ease of participation in their IQ multifamily programs (EE idea tracker row 12):

1. Stakeholders are interested in whether the northern IL IQ single family retrofit program will use census tract for qualifying customers. ComEd will follow-up.
2. Which methods are the utilities currently using to determine IQ eligibility for 1) IQ Multi-Family programs and 2) IQ Single Family retrofit programs.

1. The Home Energy Savings offering does not currently use census tract information to qualify customers. ComEd will assess the opportunity for future program years, in conjunction with gas utility partners.

2.1 – IQ Eligibility for Multi-Family (Whole Home Electric, Multi-Family Energy Savings):

The offerings use ‘Location in Low Income Census Tract’ as primary means of qualification, aligning with the process detailed within the IL EE Policy Manual, which states:

“Location in a Census Tract identified by the Program Administrator as low-income. As a starting point, the Program Administrator should use HUD’s annually Tracts.” HUD’s Low-Income Housing Tax Credit Qualified Census Tracts must have fifty percent (50%) of households with incomes below sixty percent (60%) of Area Median Income or areas that have a poverty rate of twenty-five percent (25%) or more. However, the Program Administrator’s target Census Tracts may be expanded or restricted based on additional analysis demonstrating that the change would ensure that the majority of buildings treated would have at least fifty percent (50%) of tenants with incomes at or below eighty percent (80%) of Area Median Income. For example, a Program Administrator may choose to target a higher percentage of poverty within their definition of a low-income Census Tract.”

The offerings use alternative means of qualification, as detailed in the IL EE Policy Manual, as secondary mechanisms if the building does not qualify based on location.

2.2 – IQ Eligibility for Single Family Retrofit Programs (Whole Home Electric, Home Energy Savings):

ComEd defines ‘Income Qualified’ as having an annual household income of 80% or less of the Area Median Income. AMI is based on US Department of Housing and Urban Development (HUD) Statistics for Illinois (detailed by city/county) published in the preceding year’s publication. Upon intake, customers respond to the below questions which allows the Implementation Contractor to verify income eligibility by zip code using HUD data:

1. How many people live in your household?
2. What is the estimated combined yearly income for your family? This includes all members of the household aged 18 and above.

For Home Energy Savings, if a customer is at or below 200% of the Federal Poverty Level, has not been served with weatherization in the past 15 years and their local Community Action Agency (CAA) is willing to accept leads, their information is passed to the applicable CAA for follow-up and service through the Illinois Home Weatherization Assistance Program (IHWAP) after they have an initial Home Energy Savings assessment. Program eligibility requirements, including income qualification, follow IHWAP’s requirements outlined in the IHWAP Operations Manual. The CAA determines if the project can be braided with utility funding.