



ComEd Cost Effectiveness Analysis CY2025 Report

Energy Efficiency and Demand Response Plan

Program Year 2025 (CY2025)

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1 Overview

As part of ComEd’s energy efficiency program evaluation for program year 2025 (CY2025), Guidehouse determined program and portfolio-level cost-effectiveness using the Illinois total resource cost (TRC) test and the utility cost test (UCT). This analysis included quantifying the program, measure, and portfolio costs for implementing the energy efficiency programs, along with the benefits derived from these investments. This report contains TRC values with and without Societal non-energy impacts (Societal NEIs). The following sections include the results of the cost-effectiveness analysis for each program in ComEd’s portfolio and a detailed breakdown of all the costs and benefits included in the analysis.

The savings numbers and results included in this report are reflective of only ComEd’s Energy Efficiency Portfolio Standard (EEPS) programs. For programs that are jointly implemented by ComEd and one or more Illinois gas utilities (including Nicor Gas, Peoples Gas [PG], and North Shore Gas [NSG]) only ComEd’s portion of the program savings and costs are included in this report.¹ The combined joint TRC and UCT values for these programs will be shared in a separate memo.

The Illinois TRC test is defined in the Illinois Power Agency Act (see 20 ILCS 3855/1-10) as follows:²

“Total resource cost test” or “TRC test” means a standard that is met if, for an investment in energy efficiency or demand-response measures, the benefit-cost ratio is greater than one. The benefit-cost ratio is the ratio of the net present value of the total benefits of the program to the net present value of the total costs as calculated over the lifetime of the measures. A total resource cost test compares the sum of avoided electric utility costs, representing the benefits that accrue to the system and the participant in the delivery of those efficiency measures and including avoided costs associated with reduced use of natural gas or other fuels, avoided costs associated with reduced water consumption, and avoided costs associated with reduced operation and maintenance costs, as well as other quantifiable societal benefits, to the sum of all incremental costs of end-use measures that are implemented due to the program (including both utility and participant contributions), plus costs to administer, deliver, and evaluate each demand-side program, to quantify the net savings obtained by substituting the demand-side program for supply resources. In calculating avoided costs of power and energy that an electric utility would otherwise have had to acquire; reasonable estimates shall be included of financial costs likely to be imposed by future regulations and legislation on emissions of greenhouse gases. In discounting future societal costs and benefits for the purpose of calculating net present values, a societal discount rate based on actual, long-term Treasury bond yields should be used. Notwithstanding anything to the contrary, the TRC test shall not include or consider a calculation of market price suppression effects or demand reduction induced price effects.

The Illinois TRC test differs from traditional TRC tests due to its requirement to include a reasonable estimate of the financial costs associated with future regulations and legislation on the emissions of greenhouse gases (GHG) and the use of the societal discount rate. These differences

¹ For programs that are jointly offered by ComEd and gas utilities, the therm savings claimed by ComEd are included in this analysis.

² See Section 1-10 Definitions of the Illinois Power Agency Act:

<http://www.ilga.gov/legislation/ilcs/ilcs5.asp?ActID=2934&ChapterID=5>

add a benefit to investments in efficiency programs that are typically included in the societal cost test in other jurisdictions.

Table 1-1 summarizes the CY2025 TRC and UCT values for all EEPS programs in ComEd’s CY2025 portfolio. Overall, the CY2025 portfolio aggregate TRCs and UCTs show the portfolio was cost-effective, with aggregate TRC values of 5.86 with Societal NEIs and 3.62 without Societal NEIs, and a UCT value of 2.81.

The CY2025 results represent a considerable year-over-year improvement. CY2024 aggregate TRC values were 4.88 with Societal NEIs and 2.83 without Societal NEIs, and a UCT value of 2.02.

Table 1-1. Summary of CY2025 TRC and UCT Values for ComEd Programs

Program	TRC Test (With Societal NEIs)*	TRC Test (Without Societal NEIs)*	UCT*
ASI kWh Purchase**	5.92	4.05	6.73
Behavior - Res/IE	7.11	3.93	2.83
Contractor/Midstream Rebates	7.21	3.38	2.83
Electric Homes New Construction	3.11	1.64	1.75
Multifamily Upgrades	3.11	2.02	1.24
New Construction - IE	8.83	4.96	1.87
Product Distribution	22.53	13.02	8.59
Retail/Online	9.36	6.45	8.91
Single-Family Upgrades	1.18	0.85	0.77
Whole Home Electric	1.50	0.78	0.48
Residential & Income Eligible Total*	7.62	4.88	4.36
Behavior Bus/Pub	4.24	1.99	1.21
Business Energy Analyzer (BEA)	5.75	3.28	15.34
Incentives	4.10	2.48	2.09
Midstream/Upstream	11.86	7.07	5.10
New Construction - Bus/Pub	1.63	1.07	2.31
Small Business	4.96	3.02	1.66
Targeted Systems	3.65	2.00	1.43
Business & Public Sector Total*	5.53	3.29	2.31
Automated System Optimization	1.02	0.52	0.65
Virtual Energy Coach	2.68	1.40	1.85
Pilots	1.88	0.97	1.27
Voltage Optimization	3.75	2.21	1.52
Portfolio Total without IE & with VO*	5.56	3.41	2.60
Portfolio Total with IE & without VO*	6.02	3.72	2.91
Portfolio Total without IE, VO, & Pilots	5.76	3.54	2.72
Portfolio Total with IE & VO*	5.86	3.62	2.81

*The TRC and UCT values are calculated as a ratio of all the offerings’ benefits and costs. Values are rounded to 2 digits.
Source: Guidehouse analysis

Both the Residential and Business sectors achieved TRC cost-effectiveness in CY2025.

Performance remained strong across the portfolio. More details are provided in the Findings section at the end of this report.

- TRC costs decreased from \$643M in CY2024 to \$570M in CY2025. Voltage Optimization reduced software costs and more cost-effective implementation was the main driver.
- TRC benefits increased significantly from \$1,818M in CY2024 to \$2,062M in CY2025. The largest increase in benefits is attributable to electricity avoided costs, which rose from \$757M in CY2024 to \$1,074M in CY2025, primarily due to higher nominal avoided cost values.
- Income-Eligible (IE) components of applicable programs contribute \$541M in net utility benefits to ComEd’s CY2025 portfolio. Excluding IE programs, the portfolio cost-effectiveness decreases to 5.56 (with NEIs) and 3.41 (without NEIs).

1.1 Illinois Total Resource Cost Equation

Guidehouse used Equation 1 to calculate the Illinois TRC.

Equation 1. Illinois TRC

$$BCR_{ILTRC} = B_{ILTRC} / C_{ILTRC}$$

Where:

- BCR_{ILTRC}** = Benefit-cost ratio of the Illinois TRC test
- B_{ILTRC}** = Present value of benefits of an Illinois program or portfolio
- C_{ILTRC}** = Present value of costs of an Illinois program or portfolio

The evaluation team calculated the benefits of the Illinois TRC using Equation 2.

Equation 2. Illinois TRC Benefits

$$B_{ILTRC} = \sum_{t=1}^N \frac{UAEP_t + UATD_t + UAA_t + EB_t + RC + SNEI}{(1+d)^{t-1}} + \sum_{t=1}^N \frac{UAC_{at}}{(1+d)^{t-1}}$$

Guidehouse calculated the costs of the Illinois TRC using Equation 3.

Equation 3. Illinois TRC Costs

$$C_{ILTRC} = \sum_{t=1}^N \frac{PNIC_t + IMCN_t + UIC_t}{(1+d)^{t-1}}$$

Where benefits are defined as:

- UAEP_t** = Utility avoided electric and capacity production costs in year t
- UATD_t** = Utility avoided transmission and distribution (T&D) costs in year t

UAA _t	=	Utility avoided ancillary costs in year t
EB _t	=	Environmental benefits in year t
UAC _t	=	Utility avoided supply costs for the alternate fuel in year t
RC	=	Net present value (NPV) of replacement costs of baseline bulbs
S NEI	=	NPV societal NEI benefit

And costs are defined as:

PNIC _t	=	Program non-incentive costs in year t
IMCN _t	=	Net incremental costs in year t
UIC _t	=	Utility increased supply costs in year t

And:

d	=	Societal discount rate
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1.2 Utility Cost Test Equation

The Utility Cost Test (UCT) approaches cost-effectiveness from the perspective of the utility, in this case ComEd. The UCT determines whether the energy supply and capacity costs avoided by the utility exceed the overhead and cost outlays that the utility incurred to implement energy efficiency programs. The structure of the calculation is similar to the Illinois TRC with a few key changes. As the UCT is primarily focused on utility outlays, incentives paid by the utility to either participants or third-party implementers are included in the calculation in place of incremental or participant costs. Additionally, as non-energy benefits accrue to society rather than to the utility implementing energy efficiency programs, these benefits are not included in the UCT formula. The UCT, however, accounts for water benefits defined in IL TRM v13.0.

Using the equation terms previously defined for the Illinois TRC equation, Equation 4 shows the UCT equation.

Equation 4. UCT

$$BCR_{UCT} = B_{UCT} / C_{UCT}$$

Where:

BCR_{UCT}	=	Benefit-cost ratio of the UCT
B_{UCT}	=	Present value of benefits to a utility of a program or portfolio
C_{UCT}	=	Present value of costs to a utility of a program or portfolio

The benefits of the UCT are calculated using Equation 5.

Equation 5. UCT Benefits

$$B_{UCT} = \sum_{t=1}^N \frac{UAEP_t + UATD_t + UAA_t}{(1+d)^{t-1}} + \sum_{t=1}^N \frac{UAC_{at}}{(1+d)^{t-1}}$$

The costs of the UCT are calculated using Equation 6.

Equation 6. UCT Costs

$$C_{UCT} = \sum_{t=1}^N \frac{PNIC_t + UIC_t + PIN_t}{(1+d)^{t-1}}$$

Where the new term, PIN_t , is defined as the program incentives provided by the utility in year t .

1.3 Cost-Effectiveness Data Requirements

Table outlines the data points collected from different stakeholders to conduct cost-effectiveness analysis. The data is categorized into generic and program-specific categories.

Table 1-2. Data Points Needed to Conduct EEPS Cost-Effectiveness

Category	Data Point	Source
Generic	• Avoided Energy Costs (\$/kWh)	ComEd
	• Avoided Capacity Costs (\$/kW)	
	• Avoided T&D Electric (\$/kWh)	
	• Avoided Gas Production (\$/therm) ³	
	• Avoided Water Costs (\$/gallon)	
	• Escalation Rates	
	• Environmental Damages (GHG Adders)	
	• Discount Rate	
Program Specific	• Participants/Measure Count	Guidehouse Evaluation of ComEd Reports
	• Verified Energy and Demand Savings	
	• Realization Rate	
	• Net-to-Gross Ratio	
	• Measure Life	
	• Incremental Measure Costs ⁴	
	• NPV Replacement Costs	ComEd
	• Societal NEI Benefit	
	• Non-Incentive Costs	
	• Utility Incentive Costs	
• Direct Install Costs		
• Incremental Measure Costs		

Source: Guidehouse analysis

³ From Nicor Gas and Peoples and North Shore Gas.

⁴ Incremental measure costs come from program tracking data, program contractor invoices, and deemed value sources from IL TRM v12.0.

2 Summary of Results and Portfolio-Level Data Inputs

Table 2 summarizes the CY2025 cost-effectiveness analysis results by benefit and cost components relevant to each cost test for the portfolio without the inclusion of income eligible components or voltage optimization. The results indicate that ComEd’s CY2025 EEPS portfolio is cost-effective under both the UCT and the TRC tests for the Residential and Business sectors. On the cost side, net participant costs represent the largest component followed by the incentive costs of program implementation. For the UCT, the sum of all incentives provided is used in place of net participant costs.

Table 2-1. Summary of ComEd CY2025 Residential and Business Sectors’ Cost-Effectiveness Test Values (\$ Thousands)

Data Point	UCT		Illinois TRC Test	
	UCT Benefits	UCT Costs	Illinois TRC Benefits	Illinois TRC Costs
Electricity Cost Changes	\$688,153	\$68	\$688,153	\$68
Fossil Fuel Cost Changes	\$184,122	\$10,472	\$184,122	\$10,472
Water Cost Changes	\$19,222	N/A	\$19,222	\$0
Environmental Adder (GHGs)	N/A	N/A	\$328,134	\$26
Societal NEI Benefit	N/A	N/A	\$787,697	\$38
NPV Replacement Costs	N/A	N/A	\$39,830	\$0
Non-Incentive Costs	N/A	\$108,212	N/A	\$108,212
Incentive Costs	N/A	\$208,633	N/A	N/A
Net Participant Costs	N/A	N/A	\$0	\$236,508
Present Value Totals (with Societal NEI)	\$891,497	\$327,387	\$2,047,158	\$355,325
Present Value Totals (without Societal NEI)	\$891,497	\$327,387	\$1,259,462	\$355,287
Ratio (with Societal NEI)		2.72		5.76
Ratio (without Societal NEI)		2.72		3.54

Note: All categories exclude income eligible, voltage optimization, and pilots.

Source: Guidehouse analysis

2.1 Avoided Costs

The Illinois TRC test allows utilities to account for the NPV of the avoided cost of purchasing shorter lifetime bulbs, which accrue to program participants because of the significantly longer lifetimes of efficient LED light bulbs. In general, the avoided cost per bulb is determined by comparing the estimated useful life of efficient and baseline bulbs to determine the number of baseline bulb purchases that are avoided. Based on the average purchase price of baseline bulbs, NPV is determined by discounting the value of these avoided purchases over the course of the lifetime of the efficient bulb. Illinois Technical Reference Manual version 13.0 (IL TRM v13.0)⁵ provides

⁵ IL-TRM-Version-13.0-Volumes-1-4-Compiled-Final.pdf

deemed NPVs per bulb based on efficient bulb type, socket type (commercial or residential), and lumen range. These benefits were included in the program calculations.

Policy Manual Version 3.0⁶ asserts that negative avoided costs (accrued through electrification or other impacts) be treated as increases in TRC costs rather than decreases in TRC benefits, as was previously treated. Additionally, electricity avoided cost impacts (energy and demand) are grouped to create a net cost change due to electricity. Net cost change is reported under electric cost changes while changes due to gas savings are incorporated in fossil fuel cost changes. These updates are reflected in the TRC ratios and report tables.

The definitions of each avoided cost data point used in the analysis and their respective sources are as follows:

- **Avoided Energy Costs (\$/kWh):** Avoided electric production costs are those associated with purchasing energy from Pennsylvania-New Jersey-Maryland Interconnection (PJM).
- **Avoided Electric Capacity Costs (\$/kW):** Avoided electric capacity costs are those associated with the construction of additional electricity generation facilities to meet peak demand. Incremental reductions in the amount of electricity demand during peak hours can delay or eliminate the need to build additional generation. ComEd is a participant in the Reliability Pricing Model, which is PJM's forward capacity market.
- **Avoided T&D Electric (\$/kW):** Avoided T&D costs are a benefit associated with not needing to build T&D infrastructure to meet demand at peak times.
- **Avoided Electric Ancillary (\$/kWh):** Avoided ancillary is a benefit associated with avoided costs attributable to the Open Access Transmission Tariff that applies to utilities that participate in the PJM market.
- **Avoided Gas Costs (\$/therm):** This value is from Nicor Gas, Peoples Gas, and North Shore Gas, and is used to account for gas interactive effects due to lighting.
- **Avoided Water Costs (\$/gal):** This value accounts for savings associated with efficient water fixtures and clothes washers. The avoided water costs of \$9.97/1,000 gallons (as provided by ComEd) were used for the analysis.

2.2 Non-Incentive Costs

Non-incentive costs are program administrator costs (related to energy efficiency) that are not otherwise classified as financial incentives paid to customers or incentives paid to third parties. In other words, non-incentive costs are equal to all program administrator costs minus incentives.

Examples of non-incentive costs include:

- Costs for overhead, labor, and materials required to develop, deliver, and administer functions related to the implementation of energy efficiency programs or portfolios such as

⁶ https://www.ilsag.info/wp-content/uploads/IL_EE_Policy_Manual_Version_3.0_Final_11-3-2023.pdf

rebate processing, measurement and verification (M&V), quality assurance, advertising and marketing, and customer relations

- Program administrator payment to a third party whose principal purpose is not to reduce the cost of the efficient measure to the customer
- Program administrator payment to a third party to cover the cost of services that are principally intended to be a form of marketing, as opposed to being truly necessary for any customer implementation of efficient measures
- Sales performance incentive fund formula (SPIFF) paid out to a third party

There are currently some performance-based programs where the third-party program implementer is paid an amount per kilowatt-hour that includes incentives and non-incentives. Guidehouse worked with ComEd to separate out the costs appropriately.

2.3 Incentives

Incentives⁷ include financial incentives paid to customers plus incentives paid to third parties. Financial incentives paid to customers are payments⁸ made by a program administrator directly to an end-use customer to encourage the customer to participate in an efficiency program and offset some or all the customer's costs to purchase and install a qualifying efficient measure, ultimately resulting in a reduction in the net price paid by the customer for the efficient measure. This rebate type of incentive is often referred to as a downstream incentive, which has the result that the net price to the customer of an energy efficiency program-sponsored measure is reduced by the amount of the incentive.

Incentives paid to third parties are payments made by a program administrator to a third party that is principally intended to reduce the net price to the customer of purchasing and installing a qualifying efficient measure. These incentives include payments made by a program administrator to service providers, manufacturers, wholesalers, distributors, contractors, builders, retailers, implementation contractors, or other non-customer stakeholders that are principally intended to defray the incremental cost to the customer of purchasing and installing an efficient measure. They also include payments made by a program administrator to an implementation contractor to cover the full cost of direct installation measures (materials and labor) for the portion not covered by the customer. Incentives paid to third parties also include payment by a program administrator to a third party to cover the full cost of study-based services (e.g., facility energy audits, energy surveys,

⁷ Incentive definitions can be found in Section 8.4 TRC Costs of the Illinois Energy Efficiency Policy Manual Version 3.0. The Illinois TRC test requires that "all incremental costs of end use measures (including both utility and participant contributions)" should be reflected as costs in the TRC test calculation. As long as "all incremental costs of end-use measures" are included in the TRC test calculation, there is no need to add program administrator contribution costs (i.e., incentives) and participant contribution costs as separate components to the TRC test. However, program administrator contribution costs (i.e., incentives) are needed to calculate the Program Administrator Cost Test (PACT)/UCT because those are a component of the program administrator expenses. Most TRC modeling software requires users to input the incentives as a separate input in addition to providing all incremental costs such that the PACT/UCT can be calculated. For this reason, the separate incentives input in the TRC model is not used when calculating the TRC test because these costs are already reflected in the incremental cost input, and if the model were to use both the incentives input and the incremental cost input, it would result in double counting of costs in the TRC analysis.

⁸ Payments include non-measure items of value that would be treated as transfer payments, e.g., gift cards.

energy assessments, retro-commissioning) that are truly necessary for a customer to implement efficient measures, as opposed to being principally a form of marketing. The portion of the payments covered by the customers are not included in the incentives paid to third parties.

2.4 Incremental Costs

Incremental costs are the difference between the cost of the efficient measure and the cost of the most relevant baseline measure that would have been installed (if any) in the absence of the efficiency program. Installation costs (material and labor) and operations and maintenance (O&M) costs are included if there is a difference between the efficient measure and the baseline measure. In cases where the efficient measure has a significantly shorter or longer life than the relevant baseline measure (e.g., LEDs versus halogens), the avoided baseline replacement measure costs are accounted for in the TRC analysis as a benefit. The incremental cost input in the TRC analysis is not reduced by the amount of incentives.

Examples of incremental cost calculations include:

- The incremental cost for an efficient measure that is installed in new construction or is being purchased at the time of natural installation, investment, or replacement is the additional cost incurred to purchase an efficient measure over and above the cost of the baseline or standard (i.e., less efficient) measure (including any incremental installation, replacement, or O&M costs if there is a difference between the efficient measure and baseline measure).
- For a retrofit measure where the efficiency program caused the customer to update their existing equipment, facility, or processes, where the customer would not have otherwise made a purchase, the appropriate baseline is zero expenditure and the incremental cost is the full cost of the new retrofit measure (including installation costs).
- For the early replacement of a functioning measure with a new efficient measure, where the customer would not have otherwise made a purchase for several years, the appropriate baseline is a dual baseline that begins as the existing measure and shifts to the new standard measure after the expected remaining useful life of the existing measure ends. The incremental cost is the full cost of the new efficient measure (including installation costs) being purchased to replace a still-functioning measure less the present value of the assumed deferred replacement cost of replacing the existing measure with a new baseline measure at the end of the existing measure's life.
- For study-based services that are truly necessary for a customer to implement efficient measures, as opposed to being principally intended to be a form of marketing, the incremental cost is the full cost of the study-based service.

2.5 Discount Rate

Guidehouse applied the discount rate to determine the present value of the cumulative benefits (e.g., avoided electric production, capacity, T&D, and ancillary) that accrue over the life of the measures included in each program. The discount rate should reflect the societal discount rate as defined in the legislation to

be the actual, long-term treasury bond yields. The societal discount rate of 2.40% is used to calculate the TRC and UCT values.

2.6 Line Losses

Line losses were incorporated in the calculation of the benefits. The energy and demand savings calculated by the evaluation are estimated at the customer or meter level. The savings that are accrued to ComEd ratepayers are those at the generator level and so the estimated savings are increased by the line losses within ComEd’s T&D network. Guidehouse calculated total benefits using the energy line losses of 9.44% and the peak line losses of 10.57% as provided by ComEd.

2.7 Miscellaneous EEPS Portfolio Costs

In addition to costs allocated directly to energy efficiency programs, the cost-effectiveness analysis included portfolio-level costs that are not directly incurred by specific programs. These costs may include administrative, R&D, outreach, advertising, evaluation, M&V, legal, and other expenses. As statutory cost-effectiveness is measured at the portfolio level, ComEd does not allocate these costs to individual programs. Table outlines the portfolio-level costs included in the analysis.

Table 2-2. Breakdown of Portfolio-Level Costs

Portfolio-Level Cost Component	Value (\$)
Measurement & Verification (M&V)	\$8,323,217
R&D/Emerging Tech	\$7,651,731
Market Development	\$6,518,514
Legal	\$28,386
Tracking System	\$811,293
Labor (Non-Program Specific)	\$5,364,500
General Program Costs	\$5,644,352
General Education & Awareness	\$4,054,936
Total	\$38,396,929

Source: Guidehouse analysis of ComEd data

2.8 Societal NEIs

Societal NEIs occur when energy efficiency programs reduce electricity generated from fossil fuels, which reduces emissions including PM_{2.5}, SO₂, NO_x, and CO₂. This reduction in emissions causes reduced adverse health impacts, which are monetizable. The Societal NEIs were incorporated in the CY2025 analysis for the TRC values only. As discussed in previous sections, this report provides TRC results both with and without NEIs included.

Guidehouse quantified and monetized these Societal NEIs using the U.S. Environmental Protection Agency (EPA) AVOIDED Emissions and geneRation Tool (AVERT) and CO-Benefits Risk Assessment (COBRA) Health Impacts Screening and Mapping Tool. The EPA updated COBRA in 2024 to estimate changes in annual ambient concentrations of both particulate matter (PM_{2.5}) and ozone. In previous years, COBRA only

estimated the health impacts of PM_{2.5}. The COBRA update included additional health incidents (Hospital Admissions related to Alzheimer’s and Parkinson’s Disease, Incidence of Stroke and Lung Cancer, and Hay Fever/Rhinitis).

3 Program Specific Data

Table 3-1 and

Table 3-2 summarize the CY2025 cost-effectiveness calculations and results for each program. These tables include the value of each benefit and cost component for each program and EEPS totals for each sector (e.g., residential & income eligible [IE] and business). For programs jointly implemented by ComEd and one or more Illinois gas utility, the table includes only the electric portion of the program savings (unless ComEd claims the gas savings) and cost-benefit calculations.

Table 3-3 summarizes the CY2025 ComEd Electrification Measures’ energy consumption, savings, and costs (total cost, total utility cost, average cost, average utility cost).

Table 3-4 and

Table **3-5** provide the TRC and UCT analysis from electrification, and the Table 3-6 and Table 3-7 provide the results from income eligible programs perspective.

Table 3-1. ComEd Program-Level Benefits, Costs, and Illinois TRC without Gas Data from Joint Programs (\$ Thousands)

Program*	Benefits							Costs							IL Total Resource Cost (TRC) Test (NPV replacement cost as benefit)						
	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Incremental Costs (Net)	Electricity Cost Changes	Fossil Fuel Cost Changes†	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Non-Incentive Costs	Incentive Costs	Incremental Costs (Net)	IL TRC Benefits (w/o NEI)	IL TRC Costs (w/o NEI)	IL TRC Test Net Benefits (w/o NEI)	IL TRC Test (w/NEI)	IL TRC Test (w/o NEI)
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	(q)=a+b+c+d+f+g	(r)=h+i+j+k+m+n+p	(s)=q-r	(t)=(q+e)/(r+i)	(u)=q/r
ASI kWh Purchase*	\$1,683	\$0	\$0	\$570	\$1,042	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$250	\$0	\$307	\$2,253	\$557	\$1,696	5.92	4.05
Behavior - Res/IE	\$18,558	\$0	\$0	\$7,318	\$21,227	\$0	\$0	\$63	\$0	\$0	\$22	\$33	\$0	\$6,502	\$0	\$0	\$25,876	\$6,587	\$19,289	7.11	3.93
Contractor/Midstream Rebates	\$19,277	\$12,696	\$0	\$10,522	\$48,239	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,947	\$8,336	\$9,640	\$42,496	\$12,587	\$29,909	7.21	3.38
Electric Homes New Construction	\$1,227	\$459	\$68	\$753	\$2,255	\$0	\$0	\$5	\$0	\$0	\$4	\$4	\$0	\$534	\$463	\$985	\$2,507	\$1,528	\$979	3.11	1.64
Multifamily Upgrades	\$28,066	\$14,643	\$3,172	\$16,764	\$34,126	\$234	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,686	\$26,354	\$20,486	\$62,879	\$31,171	\$31,707	3.11	2.02
New Construction - IE	\$6,546	\$2,982	\$424	\$4,034	\$11,346	\$2	\$0	\$66	\$11	\$0	\$47	\$51	\$0	\$1,625	\$3,616	\$1,069	\$13,989	\$2,818	\$11,171	8.83	4.96
Product Distribution	\$130,225	\$22,347	\$5,166	\$65,543	\$176,473	\$18,589	\$0	\$0	\$996	\$0	\$0	\$0	\$0	\$5,095	\$12,278	\$12,479	\$241,870	\$18,570	\$223,300	22.53	13.02
Retail/Online	\$228,366	\$250,841	\$18,551	\$131,845	\$299,976	\$35,702	\$0	\$0	\$13,087	\$0	\$0	\$0	\$0	\$12,670	\$30,081	\$77,319	\$665,306	\$103,077	\$562,229	9.36	6.45
Single-Family Upgrades	\$9,668	\$10,449	\$1,607	\$4,315	\$10,056	\$349	\$0	\$0	\$284	\$0	\$0	\$0	\$0	\$8,687	\$19,144	\$22,029	\$26,389	\$31,001	(\$4,612)	1.18	0.85
Whole Home Electric	\$5,663	\$2,675	\$4	\$3,555	\$11,051	\$0	\$0	\$267	\$0	\$0	\$29	\$31	\$0	\$3,290	\$13,722	\$11,728	\$11,897	\$15,314	(\$3,417)	1.50	0.78
Res & IE Sector Admin Cost														\$1,197					\$1,197		
Res & IE Total	\$449,280	\$317,092	\$28,993	\$245,221	\$615,792	\$54,876	\$0	\$402	\$14,378	\$0	\$101	\$120	\$0	\$53,484	\$113,995	\$156,041	\$1,095,461	\$224,406	\$871,054	7.62	4.88
Behavior Bus/Pub	\$12,336	\$0	\$0	\$7,873	\$22,892	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$7,298	\$2,876	\$2,876	\$20,209	\$10,174	\$10,034	4.24	1.99
Business Energy Analyzer (BEA)	\$4,948	\$0	\$0	\$1,772	\$5,065	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$323	\$0	\$1,726	\$6,720	\$2,049	\$4,671	5.75	3.28
Incentives	\$134,164	\$14,168	\$0	\$60,144	\$138,366	\$2,123	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$12,485	\$58,556	\$72,602	\$210,599	\$85,088	\$125,512	4.10	2.48
Midstream/Upstream	\$226,944	\$0	\$155	\$102,413	\$236,879	\$19,741	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,025	\$39,506	\$44,386	\$349,252	\$49,411	\$299,841	11.86	7.07
New Construction - Bus/Pub	\$4,867	\$352	\$941	\$2,192	\$4,357	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,902	\$764	\$5,912	\$8,352	\$7,814	\$538	1.63	1.07
Small Business	\$143,467	\$1,212	\$0	\$62,692	\$145,523	\$18,878	\$0	\$0	\$10,443	\$0	\$0	\$0	\$0	\$9,065	\$67,869	\$55,441	\$226,248	\$74,950	\$151,299	4.96	3.02
Targeted Systems	\$38,963	\$1,310	\$0	\$18,936	\$48,958	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,234	\$17,885	\$19,401	\$59,208	\$29,635	\$29,574	3.65	2.00
Business & Public Sector Admin Costs														\$8,833					\$8,833		
Business & Public Sector Total	\$565,688	\$17,041	\$1,096	\$256,022	\$602,040	\$40,742	\$0	\$0	\$10,443	\$0	\$0	\$0	\$0	\$55,166	\$187,456	\$202,344	\$880,588	\$267,952	\$612,636	5.53	3.29
Automated System Optimization	\$13	\$0	\$0	\$6	\$19	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$20	\$0	\$18	\$19	\$37	(\$18)	1.02	0.52
Virtual Energy Coach	\$38	\$0	\$0	\$18	\$51	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$21	\$0	\$19	\$56	\$40	\$16	2.68	1.40
Pilot and Market Transformation Total	\$51	\$0	\$0	\$24	\$70	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$40	\$0	\$37	\$75	\$77	(\$2)	1.88	0.97
Voltage Optimization	\$59,130	\$0	\$0	\$26,557	\$60,077	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$38,837	\$0	\$0	\$85,687	\$38,837	\$46,850	3.75	2.21
Portfolio Admin Costs														\$38,397					\$38,397		
Portfolio Total without IE & with VO	\$747,335	\$184,122	\$19,222	\$354,715	\$847,843	\$39,830	\$0	\$68	\$10,472	\$0	\$26	\$38	\$0	\$147,090	\$208,633	\$236,545	\$1,345,224	\$394,202	\$951,022	5.56	3.41
Portfolio Total with IE & without VO	\$1,015,019	\$334,132	\$30,088	\$501,267	\$1,217,901	\$95,618	\$0	\$402	\$24,821	\$0	\$101	\$120	\$0	\$147,087	\$301,451	\$358,422	\$1,976,124	\$530,833	\$1,445,291	6.02	3.72
Portfolio Total without IE & VO	\$688,153	\$184,122	\$19,222	\$328,134	\$787,697	\$39,830	\$0	\$68	\$10,472	\$0	\$26	\$38	\$0	\$108,212	\$208,633	\$236,508	\$1,259,462	\$355,287	\$904,174	5.76	3.54
Portfolio Total with IE & VO	\$1,074,149	\$334,132	\$30,088	\$527,824	\$1,277,978	\$95,618	\$0	\$402	\$24,821	\$0	\$101	\$120	\$0	\$185,924	\$301,451	\$358,422	\$2,061,811	\$569,670	\$1,492,141	5.86	3.62

* The ASI kWh Purchase is not included as a program, but the TRC and UCT analysis for the offering is provided, and the results are counted in this table as part of the residential sector TRC and UCT.

† Gas heating penalties from energy efficiency measures designed to save electricity are being calculated as part of the overall fossil fuel cost changes.

Source: Guidehouse analysis

Table 3-2. ComEd Program-Level Benefits, Costs, and UCT without Gas Data from Joint Programs (\$ Thousands)

Program	Benefits							Costs							IL Utility Cost Test (UCT)					
	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Incremental Costs (Net)	Electricity Cost Changes	Fossil Fuel Cost Changes†	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Non-Incentive Costs	Incentive Costs	Incremental Costs (Net)	IL UCT Benefits	IL UCT Costs	IL UCT Test Net Benefits	IL UCT Test
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	(v)=a+b+c	(w)=h+i+n+o	(x)=v-w	(y)=v/w
ASI kWh Purchase*	\$1,683	\$0	\$0	\$570	\$1,042	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$250	\$0	\$307	\$1,683	\$250	\$1,433	6.73
Behavior - Res/IE	\$18,558	\$0	\$0	\$7,318	\$21,227	\$0	\$0	\$63	\$0	\$0	\$22	\$33	\$0	\$6,502	\$0	\$0	\$18,558	\$6,565	\$11,993	2.83
Contractor/Midstream Rebates	\$19,277	\$12,696	\$0	\$10,522	\$48,239	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,947	\$8,336	\$9,640	\$31,973	\$11,284	\$20,690	2.83
Electric Homes New Construction	\$1,227	\$459	\$68	\$753	\$2,255	\$0	\$0	\$5	\$0	\$0	\$4	\$4	\$0	\$534	\$463	\$985	\$1,753	\$1,003	\$750	1.75
Multifamily Upgrades	\$28,066	\$14,643	\$3,172	\$16,764	\$34,126	\$234	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,686	\$26,354	\$20,486	\$45,881	\$37,040	\$8,841	1.24
New Construction - IE	\$6,546	\$2,982	\$424	\$4,034	\$11,346	\$2	\$0	\$66	\$11	\$0	\$47	\$51	\$0	\$1,625	\$3,616	\$1,069	\$9,952	\$5,318	\$4,634	1.87
Product Distribution	\$130,225	\$22,347	\$5,166	\$65,543	\$176,473	\$18,589	\$0	\$0	\$996	\$0	\$0	\$0	\$0	\$5,095	\$12,278	\$12,479	\$157,737	\$18,369	\$139,369	8.59
Retail/Online	\$228,366	\$250,841	\$18,551	\$131,845	\$299,976	\$35,702	\$0	\$0	\$13,087	\$0	\$0	\$0	\$0	\$12,670	\$30,081	\$77,319	\$497,759	\$55,839	\$441,920	8.91
Single-Family Upgrades	\$9,668	\$10,449	\$1,607	\$4,315	\$10,056	\$349	\$0	\$0	\$284	\$0	\$0	\$0	\$0	\$8,687	\$19,144	\$22,029	\$21,725	\$28,115	(\$6,390)	0.77
Whole Home Electric	\$5,663	\$2,675	\$4	\$3,555	\$11,051	\$0	\$0	\$267	\$0	\$0	\$29	\$31	\$0	\$3,290	\$13,722	\$11,728	\$8,342	\$17,280	(\$8,938)	0.48
Res & IE Sector Admin Cost														\$1,197					\$1,197	
Res & IE Total	\$449,280	\$317,092	\$28,993	\$245,221	\$615,792	\$54,876	\$0	\$402	\$14,378	\$0	\$101	\$120	\$0	\$53,484	\$113,995	\$156,041	\$795,364	\$182,259	\$613,105	4.36

Program	Benefits							Costs									IL Utility Cost Test (UCT)			
	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Incremental Costs (Net)	Electricity Cost Changes	Fossil Fuel Cost Changes †	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Non-Incentive Costs	Incentive Costs	Incremental Costs (Net)	IL UCT Benefits	IL UCT Costs	IL UCT Test Net Benefits	IL UCT Test
Behavior Bus/Pub	\$12,336	\$0	\$0	\$7,873	\$22,892	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$7,298	\$2,876	\$2,876	\$12,336	\$10,174	\$2,161	1.21
Business Energy Analyzer (BEA)	\$4,948	\$0	\$0	\$1,772	\$5,065	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$323	\$0	\$1,726	\$4,948	\$323	\$4,625	15.34
Incentives	\$134,164	\$14,168	\$0	\$60,144	\$138,366	\$2,123	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$12,485	\$58,556	\$72,602	\$148,332	\$71,041	\$77,290	2.09
Midstream/Upstream	\$226,944	\$0	\$155	\$102,413	\$236,879	\$19,741	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,025	\$39,506	\$44,386	\$227,098	\$44,531	\$182,567	5.10
New Construction - Bus/Pub	\$4,867	\$352	\$941	\$2,192	\$4,357	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,902	\$764	\$5,912	\$6,160	\$2,666	\$3,494	2.31
Small Business	\$143,467	\$1,212	\$0	\$62,692	\$145,523	\$18,878	\$0	\$0	\$10,443	\$0	\$0	\$0	\$0	\$9,065	\$67,869	\$55,441	\$144,679	\$87,377	\$57,301	1.66
Targeted Systems	\$38,963	\$1,310	\$0	\$18,936	\$48,958	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,234	\$17,885	\$19,401	\$40,273	\$28,119	\$12,153	1.43
Business & Public Sector Admin Costs														\$8,833				\$8,833		
Business & Public Sector Total	\$565,688	\$17,041	\$1,096	\$256,022	\$602,040	\$40,742	\$0	\$0	\$10,443	\$0	\$0	\$0	\$0	\$55,166	\$187,456	\$202,344	\$583,824	\$253,065	\$330,760	2.31
Automated System Optimization	\$13	\$0	\$0	\$6	\$19	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$20	\$0	\$18	\$13	\$20	(\$7)	0.65
Virtual Energy Coach	\$38	\$0	\$0	\$18	\$51	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$21	\$0	\$19	\$38	\$21	\$18	1.85
Pilot and Market Transformation Total	\$51	\$0	\$0	\$24	\$70	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$40	\$0	\$37	\$51	\$40	\$11	1.27
Voltage Optimization	\$59,130	\$0	\$0	\$26,557	\$60,077	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$38,837	\$0	\$0	\$59,130	\$38,837	\$20,293	1.52
Portfolio Admin Costs														\$38,397				\$38,397		
Portfolio Total without IE & with VO	\$747,335	\$184,122	\$19,222	\$354,715	\$847,843	\$39,830	\$0	\$68	\$10,472	\$0	\$26	\$38	\$0	\$147,090	\$208,633	\$236,545	\$950,678	\$366,264	\$584,414	2.60
Portfolio Total with IE & without VO	\$1,015,019	\$334,132	\$30,088	\$501,267	\$1,217,901	\$95,618	\$0	\$402	\$24,821	\$0	\$101	\$120	\$0	\$147,087	\$301,451	\$358,422	\$1,379,240	\$473,760	\$905,479	2.91
Portfolio Total without IE & VO	\$688,153	\$184,122	\$19,222	\$328,134	\$787,697	\$39,830	\$0	\$68	\$10,472	\$0	\$26	\$38	\$0	\$108,212	\$208,633	\$236,508	\$891,497	\$327,387	\$564,110	2.72
Portfolio Total with IE & VO	\$1,074,149	\$334,132	\$30,088	\$527,824	\$1,277,978	\$95,618	\$0	\$402	\$24,821	\$0	\$101	\$120	\$0	\$185,924	\$301,451	\$358,422	\$1,438,370	\$512,598	\$925,772	2.81

* The ASI kWh Purchase is not included as a program, but the TRC and UCT analysis for the offering is provided, and the results are counted in this table as part of the residential sector TRC and UCT.

† Gas heating penalties from energy efficiency measures designed to save electricity are being calculated as part of the overall fossil fuel cost changes.

Source: Guidehouse analysis

Table 3-3. ComEd Electrification Measure Costs

Program	Component	IE	End Use Type	Savings Category	Quantity	Increase in Electricity Consumption (kWh)	Average Increase in Electricity Consumption (kWh)	Decrease in Gas Consumption (therms)	Average Decrease in Gas Consumption (therms)	Decrease in Gas Consumption (kWh)	Net Change in Electricity Consumption (kWh)	Ex Ante Gross Savings (kWh)	Program Gross Realization Rate	Verified Gross Savings (kWh)	Program Net-to-Gross Ratio (NTG)	Verified Net Savings (kWh)	EUL	Total Cost	Total Utility Cost	Average Cost	Average Utility Cost
Contractor/Midstream Rebates	Midstream	TRUE	HVAC	Ground Source Heat Pump - Electrification (Income Eligible)	3	17,131	6,489	3,282	1,243	96,181	79,050	75,295	1.16	87,479	1.00	87,479	25	\$0	\$0	\$0	\$0
Contractor/Midstream Rebates	Midstream	TRUE	HVAC	Ground Source Heat Pump - Electrification - DAC (Income Eligible)	0	2,473	7,026	402	1,141	11,777	9,304	9,912	1.00	9,912	1.00	9,912	25	\$0	\$0	\$0	\$0
Contractor/Midstream Rebates	Midstream	TRUE	HVAC	Midstream ASHP - Electrification (Income Eligible)	237	2,562,484	10,805	197,929	835	5,801,290	3,238,805	3,238,805	1.00	3,238,805	1.00	3,238,805	16	\$0	\$0	\$0	\$0
Contractor/Midstream Rebates	Midstream	TRUE	HVAC	Midstream ASHP - Electrification - DAC (Income Eligible)	227	2,302,149	10,150	184,781	815	5,415,925	3,113,776	3,113,776	1.00	3,113,776	1.00	3,113,776	16	\$0	\$0	\$0	\$0
New Construction - IE	Affordable Housing New Construction	TRUE	HVAC	VRF	45	414,341	9,208	81,754	1,817	2,396,203	1,981,862	1,975,789	1.00	1,981,862	1.00	1,981,862	16	\$22,296	\$371,471	\$495	\$8,255
New Construction - IE	Affordable Housing New Construction	TRUE	Appliances	Electric Dryers	412	173,663	422	8,200	20	240,329	66,666	46,258	1.44	66,666	1.00	66,666	16	\$62,624	\$1,043,384	\$152	\$2,532
Retail/Online	APR - IE	TRUE	Appliances	Electric Clothes Dryer EEE DAC IE	4	(153)	(38)	3	1	805	958	958	1.00	958	1.00	958	16	\$556	\$217	\$139	\$54
Retail/Online	APR - IE	TRUE	Appliances	Electric Clothes Dryer EEE IE	29	(1,113)	(38)	20	1	5,841	6,954	6,954	1.00	6,954	1.00	6,954	16	\$4,527	\$1,764	\$156	\$61
Retail/Online	APR - IE	TRUE	Appliances	Heat Pump Dryer EEE IE	3	(238)	(79)	4	1	1,250	1,488	1,488	1.00	1,488	1.00	1,488	16	\$1,094	\$426	\$365	\$142
Retail/Online	APR - IE	TRUE	Appliances	Induction Cooktop EEE DAC IE	6	1,524	254	12	2	3,494	1,785	1,242	1.44	1,785	1.00	1,785	16	\$5,751	\$2,240	\$958	\$373
Retail/Online	APR - IE	TRUE	Appliances	Induction Cooktop EEE IE	18	4,229	235	34	2	9,977	5,140	3,727	1.38	5,140	1.00	5,140	16	\$18,011	\$7,017	\$1,001	\$390
Whole Home Electric	MFU	TRUE	HVAC	Air Source Heat Pump - WHE - Electrification	61	348,537	5,714	41,778	685	1,224,518	875,981	875,911	1.01	884,611	1.00	884,611	16	\$773	\$818	\$13	\$13
Whole Home Electric	MFU	TRUE	HVAC	Air Source Heat Pump - WHE - Electrification - DAC	116	730,401	6,297	73,482	633	2,153,772	1,423,371	1,423,247	1.01	1,431,848	1.00	1,431,848	16	\$1,435,468	\$1,519,592	\$12,375	\$13,100
Whole Home Electric	MFU	TRUE	Appliances	Electric Dryer - Electrification	32	15,342	479	730	23	21,399	6,056	8,510	1.00	8,510	1.00	8,510	16	\$1,614	\$1,709	\$50	\$53
Whole Home Electric	MFU	TRUE	Appliances	Electric Induction Stove Top - Electrification	3	882	294	64	21	1,873	991	990	1.01	998	1.00	998	16	\$130	\$137	\$43	\$46
Whole Home Electric	MFU	TRUE	Appliances	Electric Induction Stove Top - Electrification - DAC	144	40,694	283	3,067	21	89,900	49,205	49,200	1.01	49,572	1.00	49,572	16	\$40,873	\$43,268	\$284	\$300
Whole Home Electric	SFHU	TRUE	HVAC	Ductless Heat Pump - Electrification	2	2,378	1,189	267	133	7,822	5,445	5,444	1.01	5,517	1.00	5,517	16	\$33,244	\$35,192	\$16,622	\$17,596
Whole Home Electric	SFHU	TRUE	HVAC	Ductless Heat Pump - Electrification - DAC	3	5,323	1,774	600	200	17,591	12,269	12,268	1.00	12,268	1.00	12,268	16	\$7,062	\$7,476	\$2,354	\$2,492
Whole Home Electric	SFHU	TRUE	Appliances	Electric Dryer - Electrification - DAC	116	64,908	560	2,647	23	77,570	12,662	23,044	1.00	23,044	1.00	23,044	16	\$96,161	\$101,796	\$829	\$878
Whole Home Electric	SFHU	TRUE	HVAC	Air Source Heat Pump - WHE - Electrification	64	708,934	11,077	79,250	1,238	2,322,821	1,613,888	1,613,755	1.01	1,632,631	1.00	1,632,631	16	\$208	\$220	\$3	\$3
Whole Home Electric	SFHU	TRUE	HVAC	Air Source Heat Pump - WHE - Electrification - DAC	155	1,748,190	11,279	195,425	1,261	5,727,892	3,979,702	3,979,375	1.01	4,012,898	1.00	4,012,898	16	\$3,374,062	\$3,571,796	\$21,768	\$23,044
Whole Home Electric	SFHU	TRUE	Appliances	Electric Dryer - Electrification	40	21,682	542	913	23	26,748	5,066	8,534	1.00	8,534	1.00	8,534	16	\$855	\$905	\$21	\$23
Whole Home Electric	SFHU	TRUE	Appliances	Electric Induction Stove Top - Electrification	44	12,274	279	929	21	27,217	14,943	14,941	1.00	14,941	1.00	14,941	16	\$1,526	\$1,615	\$35	\$37
Whole Home Electric	SFHU	TRUE	Appliances	Electric Induction Stove Top - Electrification - DAC	132	37,315	283	2,812	21	82,408	45,093	45,089	1.00	45,108	1.00	45,108	16	\$38,249	\$40,491	\$290	\$307

Program	Component	IE	End Use Type	Savings Category	Quantity	Increase in Electricity Consumption (kWh)	Average Increase in Electricity Consumption (kWh)	Decrease in Gas Consumption (therms)	Average Decrease in Gas Consumption (therms)	Decrease in Gas Consumption (kWh)	Net Change in Electricity Consumption (kWh)	Ex Ante Gross Savings (kWh)	Program Gross Realization Rate	Verified Gross Savings (kWh)	Program Net-to-Gross Ratio (NTG)	Verified Net Savings (kWh)	EUL	Total Cost	Total Utility Cost	Average Cost	Average Utility Cost
New Construction - IE	Affordable Housing New Construction	TRUE	HVAC	Ducted Heat Pump	339	1,350,187	3,983	130,095	384	3,813,079	2,462,892	2,455,345	1.00	2,462,892	1.00	2,462,892	16	\$167,961	\$2,798,412	\$495	\$8,255
Contractor/Midstream Rebates	Midstream	TRUE	HVAC	Midstream DMSHP - Electrification (Income Eligible)	80	277,964	3,460	35,897	447	1,052,147	774,182	774,182	1.00	774,182	1.00	774,182	15	\$0	\$0	\$0	\$0
Contractor/Midstream Rebates	Midstream	TRUE	HVAC	Midstream DMSHP - Electrification - DAC (Income Eligible)	49	201,304	4,110	25,259	516	740,331	539,027	539,027	1.00	539,027	1.00	539,027	15	\$0	\$0	\$0	\$0
Midstream/Upstream	Instant Discounts	TRUE	Other	Fork Truck EEE IE	26	1,331,028	51,447	16,251	628	4,762,994	3,431,965	3,432,058	1.00	3,431,965	1.00	3,431,965	15	\$602,901	\$458,122	\$23,303	\$17,707
Midstream/Upstream	Instant Discounts	TRUE	Other	Fork Truck DAC EEE IE	0	6,939	39,426	85	481	24,830	17,892	17,892	1.00	17,892	1.00	17,892	15	\$3,051	\$2,318	\$17,333	\$13,171
Midstream/Upstream	Instant Discounts	TRUE	HVAC	ASHP HVAC EEE IE	1	3,409	5,031	37	54	10,734	7,325	7,812	0.94	7,325	1.00	7,325	15	\$7,942	\$6,035	\$11,721	\$8,907
Midstream/Upstream	Instant Discounts	TRUE	HVAC	ASHP HVAC DAC EEE IE	1	3,032	5,221	34	58	9,895	6,863	7,415	0.93	6,863	1.00	6,863	15	\$3,642	\$2,767	\$6,271	\$4,765
Midstream/Upstream	Instant Discounts	TRUE	HVAC	MSHP HVAC EEE IE	3	9,173	2,632	165	47	48,293	39,120	41,707	0.94	39,120	1.00	39,120	15	\$32,862	\$24,971	\$9,430	\$7,166
Midstream/Upstream	Instant Discounts	TRUE	HVAC	MSHP HVAC DAC EEE IE	3	6,447	1,903	123	36	36,048	29,601	32,818	0.90	29,601	1.00	29,601	15	\$29,543	\$22,449	\$8,720	\$6,626
Midstream/Upstream	Instant Discounts	TRUE	HVAC	VRF HVAC EEE IE	1	23,630	18,778	352	280	103,187	79,557	78,464	1.01	79,557	1.00	79,557	15	\$13,565	\$10,308	\$10,780	\$8,191
Midstream/Upstream	Instant Discounts	TRUE	HVAC	VRF HVAC DAC EEE IE	1	14,845	10,224	232	160	68,069	53,224	53,216	1.00	53,224	1.00	53,224	15	\$9,075	\$6,896	\$6,250	\$4,749
New Construction - IE	Affordable Housing New Construction	TRUE	HVAC	Ductless Heat Pump	148	609,362	4,117	59,412	401	1,741,367	1,132,004	1,128,535	1.00	1,132,004	1.00	1,132,004	15	\$73,328	\$1,221,726	\$495	\$8,255
New Construction - IE	Affordable Housing New Construction	TRUE	Hot Water	Heat Pump Water Heaters	138	132,516	960	32,600	236	955,508	822,991	823,010	1.00	822,991	1.00	822,991	15	\$27,793	\$463,065	\$201	\$3,356
Whole Home Electric	MFU	TRUE	Hot Water	Heat Pump Water Heater - Electrification	34	22,594	665	4,792	141	140,443	117,850	122,535	1.00	122,535	1.00	122,535	15	\$117,273	\$124,145	\$3,449	\$3,651
Whole Home Electric	MFU	TRUE	Hot Water	Heat Pump Water Heater - Electrification - DAC	7	4,418	631	1,012	145	29,676	25,258	26,192	1.00	26,192	1.00	26,192	15	\$21,528	\$22,789	\$3,075	\$3,256
Whole Home Electric	SFHU	TRUE	Hot Water	Heat Pump Water Heater - Electrification	61	53,232	873	11,536	189	338,108	284,877	294,798	0.98	289,417	1.00	289,417	15	\$316,511	\$335,059	\$5,189	\$5,493
Whole Home Electric	SFHU	TRUE	Hot Water	Heat Pump Water Heater - Electrification - DAC	148	125,311	847	26,710	180	782,883	657,573	678,432	0.94	639,359	1.00	639,359	15	\$599,197	\$634,312	\$4,049	\$4,286
Retail/Online	APR - IE	TRUE	Appliances	All-in-One Washer Elec Dryer EEE DAC IE	4	(298)	(75)	4	1	1,094	1,392	1,632	0.85	1,392	1.00	1,392	14	\$168	\$66	\$42	\$16
Retail/Online	APR - IE	TRUE	Appliances	All-in-One Washer Elec Dryer EEE IE	2	(109)	(55)	1	1	428	538	663	0.81	538	1.00	538	14	\$142	\$55	\$71	\$28
Retail/Online	APR - IE	TRUE	Appliances	All-in-One Washer HP Dryer EEE DAC IE	11	(629)	(57)	16	1	4,604	5,233	5,879	0.89	5,233	1.00	5,233	14	\$982	\$383	\$89	\$35
Retail/Online	APR - IE	TRUE	Appliances	All-in-One Washer HP Dryer EEE IE	45	(3,766)	(84)	64	1	18,673	22,438	25,047	0.90	22,438	1.00	22,438	14	\$4,673	\$1,821	\$104	\$40
Whole Home Electric	SFHU	TRUE	Appliances	All in One Clothes Washer Dryer WHE - Electrification	1	284	284	24	24	713	429	420	1.02	429	1.00	429	14	\$4,031	\$4,267	\$4,031	\$4,267
Whole Home Electric	SFHU	TRUE	Appliances	All in One Clothes Washer Dryer WHE - Electrification - DAC	11	4,559	414	267	24	7,839	3,280	3,181	1.03	3,280	1.00	3,280	14	\$4,024	\$4,259	\$366	\$387
New Construction - IE	Affordable Housing New Construction	TRUE	HVAC	PTHP	315	473,931	1,505	68,551	218	2,009,224	1,535,293	1,530,588	1.00	1,535,293	1.00	1,535,293	8	\$156,070	\$2,600,295	\$495	\$8,255
Contractor/Midstream Rebates	Midstream	FALSE	HVAC	Ground Source Heat Pump - Electrification (Non - Income Eligible)	12	80,205	6,489	15,363	1,243	450,302	370,097	352,519	1.16	409,562	0.93	380,893	25	\$0	\$0	\$0	\$0
Contractor/Midstream Rebates	Midstream	FALSE	HVAC	Ground Source Heat Pump - Electrification - DAC (Non - Income Eligible)	2	11,579	7,026	1,881	1,141	55,136	43,557	46,408	1.00	46,408	1.00	46,408	25	\$0	\$0	\$0	\$0
New Construction - Bus/Pub	Non-Residential New Construction	FALSE	Other	DAC Ineligible Projects - Electrification	1	92,519	92,519	10,909	10,909	319,743	227,224	-	-	227,224	0.48	109,067	17	\$263,222	\$17,069	\$263,222	\$17,069
Contractor/Midstream Rebates	Midstream	FALSE	HVAC	Midstream ASHP - Electrification (Non - Income Eligible)	1,110	11,997,086	10,805	926,666	835	27,160,583	15,163,497	15,163,497	1.00	15,163,497	0.93	14,102,052	16	\$0	\$0	\$0	\$0
Contractor/Midstream Rebates	Midstream	FALSE	HVAC	Midstream ASHP - Electrification - DAC (Non - Income Eligible)	1,062	10,778,241	10,150	865,110	815	25,356,374	14,578,133	14,578,133	1.00	14,578,133	1.00	14,578,133	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	HVAC	Ductless Mini Split Heat Pumps (DAC)	11	32,880	2,989	3,654	332	107,088	74,208	97,642	0.76	74,208	1.00	74,208	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	HVAC	Ductless Mini Split Heat Pumps	12	44,986	3,749	5,285	440	154,895	109,909	144,617	0.76	109,909	0.80	87,927	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	HVAC	Central Air Source Heat Pumps (DAC)	91	446,985	4,912	37,270	410	1,092,395	645,410	849,223	0.76	645,410	1.00	645,410	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	HVAC	Central Air Source Heat Pumps	17	97,344	5,726	9,069	533	265,802	168,458	221,656	0.76	168,458	0.80	134,766	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	Appliances	Efficient Appliances-Dryer-Electrification (DAC)	49	12,181	249	575	12	16,857	4,676	4,676	1.00	4,676	1.00	4,676	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	Appliances	Efficient Appliances-Dryer-Electrification	17	3,698	218	175	10	5,117	1,419	1,419	1.00	1,419	0.80	1,136	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	Appliances	Efficient Appliances-Residential Induction Stoves-Electrification (DAC)	23	3,770	164	284	12	8,328	4,559	4,558	1.00	4,559	1.00	4,559	16	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	Appliances	Efficient Appliances-Residential Induction Stoves-Electrification	6	983	164	74	12	2,172	1,188	1,189	1.00	1,188	0.80	951	16	\$0	\$0	\$0	\$0
Retail/Online	APR - MR	FALSE	Appliances	Electric Clothes Dryer EEE DAC MR	17	(583)	(34)	10	1	3,063	3,646	3,646	1.00	3,646	1.00	3,646	16	\$2,365	\$921	\$139	\$54
Retail/Online	APR - MR	FALSE	Appliances	Electric Clothes Dryer EEE MR	136	(4,622)	(34)	83	1	24,265	28,887	28,894	1.00	28,887	0.80	23,110	16	\$21,230	\$8,271	\$156	\$61
Retail/Online	APR - MR	FALSE	Appliances	Heat Pump Dryer EEE DAC MR	16	(1,161)	(73)	21	1	6,094	7,255	7,255	1.00	7,255	1.00	7,255	16	\$2,432	\$947	\$152	\$59
Retail/Online	APR - MR	FALSE	Appliances	Heat Pump Dryer EEE MR	96	(7,328)	(76)	131	1	38,474	45,802	45,802	1.00	45,802	0.80	36,642	16	\$35,021	\$13,643	\$365	\$142
Retail/Online	APR - MR	FALSE	Appliances	Induction Cooktop EEE DAC MR	37	8,225	222	68	2	19,821	10,274	7,661	1.34	10,274	1.00	10,274	16	\$35,463	\$13,815	\$958	\$373
Retail/Online	APR - MR	FALSE	Appliances	Induction Cooktop EEE MR	354	78,934	223	648	2	189,988	98,448	73,296	1.34	98,448	0.80	78,759	16	\$354,216	\$137,994	\$1,001	\$390
Retail/Online	ESRPP	FALSE	Appliances	Induction Cooktops-Gas Fuel Switch	42	4,690	111	300	7	8,800	4,111	4,111	1.00	4,111	1.00	4,111	16	\$453	\$176	\$11	\$4

Program	Component	IE	End Use Type	Savings Category	Quantity	Increase in Electricity Consumption (kWh)	Average Increase in Electricity Consumption (kWh)	Decrease in Gas Consumption (therms)	Average Decrease in Gas Consumption (therms)	Decrease in Gas Consumption (kWh)	Net Change in Electricity Consumption (kWh)	Ex Ante Gross Savings (kWh)	Program Gross Realization Rate	Verified Gross Savings (kWh)	Program Net-to-Gross Ratio (NTG)	Verified Net Savings (kWh)	EUL	Total Cost	Total Utility Cost	Average Cost	Average Utility Cost
Contractor/Midstream Rebates	Midstream	FALSE	HVAC	Midstream DMSHP - Electrification (Non - Income Eligible)	376	1,301,377	3,460	168,064	447	4,925,959	3,624,581	3,624,581	1.00	3,624,581	0.93	3,370,861	15	\$0	\$0	\$0	\$0
Contractor/Midstream Rebates	Midstream	FALSE	HVAC	Midstream DMSHP - Electrification - DAC (Non - Income Eligible)	229	942,469	4,110	118,256	516	3,466,096	2,523,627	2,523,627	1.00	2,523,627	1.00	2,523,627	15	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	Hot Water	High-Performance Water Heating Equipment-Electrification (DAC)	54	47,448	879	9,906	183	290,333	242,885	238,123	1.02	242,885	1.00	242,885	15	\$0	\$0	\$0	\$0
Electric Homes New Construction	EHNC	FALSE	Hot Water	High-Performance Water Heating Equipment-Electrification	16	14,343	896	2,620	164	76,780	62,437	61,212	1.02	62,437	0.80	49,950	15	\$0	\$0	\$0	\$0
Midstream/Upstream	Instant Discounts	FALSE	Other	Fork Truck EEE	121	6,231,633	51,447	76,086	628	22,299,470	16,067,838	16,068,272	1.00	16,067,838	0.80	12,854,270	15	\$3,001,657	\$2,280,848	\$24,781	\$18,830
Midstream/Upstream	Instant Discounts	FALSE	Other	Fork Truck DAC EEE	1	32,487	39,426	397	481	116,252	83,765	83,765	1.00	83,765	1.00	83,765	15	\$18,637	\$14,162	\$22,618	\$17,187
Midstream/Upstream	Instant Discounts	FALSE	HVAC	ASHP HVAC EEE	3	15,959	5,031	171	54	50,255	34,296	36,573	0.94	34,296	0.80	27,437	15	\$37,185	\$28,255	\$11,721	\$8,907
Midstream/Upstream	Instant Discounts	FALSE	HVAC	ASHP HVAC DAC EEE	3	14,197	5,221	158	58	46,327	32,130	34,715	0.93	32,130	1.00	32,130	15	\$17,052	\$12,957	\$6,271	\$4,765
Midstream/Upstream	Instant Discounts	FALSE	HVAC	MSHP HVAC EEE	16	42,948	2,632	771	47	226,100	183,153	195,265	0.94	183,153	0.80	146,522	15	\$153,854	\$116,908	\$9,430	\$7,166
Midstream/Upstream	Instant Discounts	FALSE	HVAC	MSHP HVAC DAC EEE	16	30,183	1,903	576	36	168,769	138,586	153,649	0.90	138,586	1.00	138,586	15	\$138,316	\$105,101	\$8,720	\$6,626
Midstream/Upstream	Instant Discounts	FALSE	HVAC	VRF HVAC EEE	6	110,630	18,778	1,648	280	483,104	372,474	367,355	1.01	372,474	0.80	297,979	15	\$63,509	\$48,258	\$10,780	\$8,191
Midstream/Upstream	Instant Discounts	FALSE	HVAC	VRF HVAC DAC EEE	7	69,501	10,224	1,087	160	318,685	249,184	249,149	1.00	249,184	1.00	249,184	15	\$42,488	\$32,285	\$6,250	\$4,749
Retail/Online	ESRPP	FALSE	Water Heating	Heat Pump Water Heaters-Gas Fuel Switch	7	5,094	761	571	85	16,735	11,640	11,640	1.00	11,640	1.00	11,640	15	\$28,757	\$11,203	\$1,432	\$558
Retail/Online	APR - MR	FALSE	Appliances	All-in-One Washer Elec Dryer EEE DAC MR	5	(322)	(64)	3	1	957	1,279	1,560	0.82	1,279	1.00	1,279	14	\$204	\$79	\$41	\$16
Retail/Online	APR - MR	FALSE	Appliances	All-in-One Washer Elec Dryer EEE MR	9	(102)	(11)	7	1	1,909	2,012	1,937	1.04	2,012	0.80	1,609	14	\$467	\$182	\$52	\$20
Retail/Online	APR - MR	FALSE	Appliances	All-in-One Washer HP Dryer EEE DAC MR	36	(2,595)	(72)	47	1	13,856	16,451	18,416	0.89	16,451	1.00	16,451	14	\$2,949	\$1,149	\$82	\$32
Retail/Online	APR - MR	FALSE	Appliances	All-in-One Washer HP Dryer EEE MR	224	(16,815)	(75)	295	1	86,488	103,303	114,553	0.90	103,303	0.80	82,642	14	\$21,401	\$8,337	\$96	\$37
Total					7,569	46,381,760	530,761	3,550,141	34,700	130,338,142	83,941,663	84,035,956	1.00	84,070,774	0.94	79,152,858	16	\$11,582,224	\$18,348,614	\$542,190	\$285,797

Source: Guidehouse analysis

Table 3-4. ComEd Program-Level Electrification Benefits, Costs, and Illinois TRC without Gas Data from Joint Programs (\$ Thousands)

Program	Benefits							Costs							IL Total Resource Cost (TRC) Test (NPV replacement cost as benefit)						
	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Incremental Costs (Net)	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Non-Incentive Costs	Incentive Costs	Incremental Costs (Net)	IL TRC Benefits (w/o NEI)	IL TRC Costs (w/o NEI)	IL TRC Test Net Benefits (w/o NEI)	IL TRC Test (w/NEI)	IL TRC Test (w/o NEI)
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	(q) = a+b+c+d+f+g	(r) = h+i+j+k+m+n+p	(s) = q-r	(t) = (q+r)/(r+1)	(u) = q / r
Contractor/Midstream Rebates	\$8,356	\$12,696	\$0	\$4,299	\$33,387	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,947	\$0	\$0	\$25,351	\$2,947	\$22,404	19.93	8.60
Electric Homes New Construction	\$353	\$459	\$0	\$247	\$1,158	\$0	\$0	\$5	\$0	\$0	\$4	\$4	\$0	\$534	\$0	\$0	\$1,059	\$543	\$515	4.05	1.95
Midstream/Upstream	\$6,380	\$0	\$0	\$4,405	\$16,041	\$4,760	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,025	\$3,174	\$3,524	\$15,545	\$8,549	\$6,996	3.69	1.82
New Construction - Bus/Pub	\$43	\$37	\$0	\$31	\$108	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,902	\$17	\$126	\$111	\$2,028	(\$1,917)	0.11	0.05
New Construction - IE	\$2,830	\$2,107	\$0	\$1,947	\$6,849	\$0	\$0	\$66	\$0	\$0	\$47	\$51	\$0	\$1,625	\$439	\$130	\$6,883	\$1,868	\$5,016	7.16	3.69
Retail/Online	\$170	\$14	\$0	\$109	\$301	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$216	\$499	\$294	\$499	\$499	(\$205)	1.19	0.59
Whole Home Electric	\$2,924	\$2,675	\$0	\$2,007	\$7,660	\$0	\$0	\$39	\$0	\$0	\$27	\$30	\$0	\$3,290	\$7,129	\$6,093	\$7,605	\$9,449	(\$1,844)	1.61	0.80
Portfolio Total	\$21,055	\$17,988	\$0	\$13,045	\$65,504	\$4,760	\$0	\$111	\$0	\$0	\$78	\$85	\$0	\$15,324	\$10,975	\$10,371	\$56,848	\$25,884	\$30,964	4.71	2.20

Source: Guidehouse analysis

Table 3-5. ComEd Program-Level Electrification Benefits, Costs, and UCT without Gas Data from Joint Programs (\$ Thousands)

Program	Benefits							Costs							IL Utility Cost Test (UCT)						
	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Incremental Costs (Net)	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Non-Incentive Costs	Incentive Costs	Incremental Costs (Net)	IL UCT Benefits	IL UCT Costs	IL UCT Test Net Benefits	IL UCT Test	
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	(v) = a+b+c	(w) = h+i+n+o	(x) = v-w	(y) = v/w	
Contractor/Midstream Rebates	\$8,356	\$12,696	\$0	\$4,299	\$33,387	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,947	\$0	\$21,052	\$2,947	\$18,105	7.14	
Electric Homes New Construction	\$353	\$459	\$0	\$247	\$1,158	\$0	\$0	\$5	\$0	\$0	\$4	\$4	\$0	\$534	\$0	\$0	\$812	\$540	\$272	1.50	
Midstream/Upstream	\$6,380	\$0	\$0	\$4,405	\$16,041	\$4,760	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,025	\$3,174	\$3,524	\$6,380	\$8,199	(\$1,820)	0.78	
New Construction - Bus/Pub	\$43	\$37	\$0	\$31	\$108	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,902	\$17	\$126	\$80	\$1,919	(\$1,839)	0.04	
New Construction - IE	\$2,830	\$2,107	\$0	\$1,947	\$6,849	\$0	\$0	\$66	\$0	\$0	\$47	\$51	\$0	\$1,625	\$439	\$130	\$4,937	\$2,130	\$2,807	2.32	
Retail/Online	\$170	\$14	\$0	\$109	\$301	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$216	\$499	\$294	\$499	\$185	\$217	(\$32)	0.85
Whole Home Electric	\$2,924	\$2,675	\$0	\$2,007	\$7,660	\$0	\$0	\$39	\$0	\$0	\$27	\$30	\$0	\$3,290	\$7,129	\$6,093	\$5,598	\$10,458	(\$4,860)	0.54	
Portfolio Total	\$21,055	\$17,988	\$0	\$13,045	\$65,504	\$4,760	\$0	\$111	\$0	\$0	\$78	\$85	\$0	\$15,324	\$10,975	\$10,371	\$39,043	\$26,410	\$12,633	1.48	

Source: Guidehouse analysis

Table 3-6. ComEd Program-Level Income Eligible Benefits, Costs, and Illinois TRC without Gas Data from Joint Programs (\$ Thousands)

Program	Benefits							Costs							IL Total Resource Cost (TRC) Test (NPV replacement cost as benefit)						
	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Incremental Costs (Net)	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Non-Incentive Costs	Incentive Costs	Incremental Costs (Net)	IL TRC Benefits (w/o NEI)	IL TRC Costs (w/o NEI)	IL TRC Test Net Benefits (w/o NEI)	IL TRC Test (w/NEI)	IL TRC Test (w/o NEI)
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	(q) = a+b+c+d+f+g	(r) = h+i+j+k+m+n+p	(s) = q-r	(t) = (q+e)/(r+1)	(u) = q / r
Contractor/Midstream Rebates	\$1,498	\$2,262	\$0	\$770	\$5,972	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,947	\$0	\$0	\$4,530	\$2,947	\$1,583	3.56	1.54
Midstream/Upstream	\$1,327	\$0	\$0	\$922	\$3,361	\$912	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,025	\$534	\$703	\$3,160	\$5,728	(\$2,567)	1.14	0.55
Multifamily Upgrades	\$26,846	\$14,626	\$3,104	\$16,145	\$32,806	\$234	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,686	\$24,709	\$19,323	\$60,955	\$30,008	\$30,947	3.12	2.03
New Construction - IE	\$6,546	\$2,982	\$424	\$4,034	\$11,346	\$2	\$0	\$66	\$11	\$0	\$47	\$51	\$0	\$1,625	\$3,616	\$1,069	\$13,989	\$2,818	\$11,171	8.83	4.96
Product Distribution	\$129,346	\$22,347	\$3,337	\$65,045	\$175,154	\$18,589	\$0	\$0	\$966	\$0	\$0	\$0	\$0	\$5,095	\$11,809	\$12,013	\$238,663	\$18,075	\$220,589	22.89	13.20
Retail/Online	\$146,293	\$95,173	\$3,197	\$78,463	\$180,730	\$35,702	\$0	\$0	\$13,087	\$0	\$0	\$0	\$0	\$353	\$21,007	\$56,794	\$358,827	\$70,234	\$288,593	7.68	5.11
Single-Family Upgrades	\$9,297	\$9,946	\$800	\$4,173	\$9,714	\$349	\$0	\$0	\$284	\$0	\$0	\$0	\$0	\$8,687	\$17,420	\$20,248	\$24,565	\$29,219	(\$4,653)	1.17	0.84
Whole Home Electric	\$5,663	\$2,675	\$4	\$3,555	\$11,051	\$0	\$0	\$267	\$0	\$0	\$29	\$31	\$0	\$3,290	\$13,722	\$11,728	\$11,897	\$15,314	(\$3,417)	1.50	0.78
IE Sector Admin Cost														\$1,126			\$1,126				
Portfolio Total	\$326,815	\$150,011	\$10,866	\$173,109	\$430,135	\$55,787	\$0	\$333	\$14,349	\$0	\$75	\$82	\$0	\$38,834	\$92,817	\$121,877	\$716,587	\$175,468	\$541,119	6.53	4.08

Source: Guidehouse analysis

Table 3-7. ComEd Program-Level Income Eligible Benefits, Costs, and UCT without Gas Data from Joint Programs (\$ Thousands)

Program	Benefits							Costs							IL Utility Cost Test (UCT)					
	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Incremental Costs (Net)	Electricity Cost Changes	Fossil Fuel Cost Changes	Water Cost Changes	Environmental Adder (GHGs)	Societal NEI	NPV Replacement costs	Non-Incentive Costs	Incentive Costs	Incremental Costs (Net)	IL UCT Benefits	IL UCT Costs	IL UCT Test Net Benefits	IL UCT Test
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	(v) = a+b+c	(w) = h+i+n+o	(x) = v-w	(y) = v/w
Contractor/Midstream Rebates	\$1,498	\$2,262	\$0	\$770	\$5,972	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,947	\$0	\$0	\$3,760	\$2,947	\$813	1.28
Midstream/Upstream	\$1,327	\$0	\$0	\$922	\$3,361	\$912	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,025	\$534	\$703	\$1,327	\$5,559	(\$4,233)	0.24
Multifamily Upgrades	\$26,846	\$14,626	\$3,104	\$16,145	\$32,806	\$234	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,686	\$24,709	\$19,323	\$44,576	\$35,394	\$9,182	1.26
New Construction - IE	\$6,546	\$2,982	\$424	\$4,034	\$11,346	\$2	\$0	\$66	\$11	\$0	\$47	\$51	\$0	\$1,625	\$3,616	\$1,069	\$9,952	\$5,318	\$4,634	1.87
Product Distribution	\$129,346	\$22,347	\$3,337	\$65,045	\$175,154	\$18,589	\$0	\$0	\$966	\$0	\$0	\$0	\$0	\$5,095	\$11,809	\$12,013	\$155,029	\$17,870	\$137,159	8.68
Retail/Online	\$146,293	\$95,173	\$3,197	\$78,463	\$180,730	\$35,702	\$0	\$0	\$13,087	\$0	\$0	\$0	\$0	\$353	\$21,007	\$56,794	\$244,662	\$34,447	\$210,215	7.10
Single-Family Upgrades	\$9,297	\$9,946	\$800	\$4,173	\$9,714	\$349	\$0	\$0	\$284	\$0	\$0	\$0	\$0	\$8,687	\$17,420	\$20,248	\$20,043	\$26,391	(\$6,348)	0.76
Whole Home Electric	\$5,663	\$2,675	\$4	\$3,555	\$11,051	\$0	\$0	\$267	\$0	\$0	\$29	\$31	\$0	\$3,290	\$13,722	\$11,728	\$8,342	\$17,280	(\$8,938)	0.48
IE Sector Admin Cost														\$1,126			\$1,126			
Portfolio Total	\$326,815	\$150,011	\$10,866	\$173,109	\$430,135	\$55,787	\$0	\$333	\$14,349	\$0	\$75	\$82	\$0	\$38,834	\$92,817	\$121,877	\$487,692	\$146,333	\$341,358	3.33

Source: Guidehouse analysis

3.1 Incremental and Actual Measure Costs

The guidance from the IL TRM and Policy Manual 3.0 indicates that it is appropriate to use actual measure-specific costs in the analysis. As a result, Guidehouse compiled the actual cost information from implementer invoices and the program tracking data provided by ComEd and identified any missing information. The team sourced incremental measure costs from IL TRM v13.0 and workpapers provided by the implementation contractor.

While conducting the cost review, Guidehouse found instances where the program tracking data and the incremental cost value from the reference sources do not align due to differing definitions of program unit. Guidehouse made appropriate assumptions to account for these differences. Guidehouse also included O&M costs when there was a difference between the efficient measure and the baseline measure based on the guidance provided in IL TRM v13.0. Where the efficient measure has a significantly shorter or longer life than the relevant baseline measure (e.g., LEDs versus halogens), Guidehouse used the avoided baseline replacement measure costs in the TRC analysis. The incremental cost input in the TRC analysis was not reduced by the amount of incentives. Some of the methodologies used to estimate the measure costs for different programs are listed below:

- **Custom, Industrial Systems, and Retro-Commissioning:** Guidehouse analyzed a sample of all the projects to determine if the actual measure cost or an incremental cost should be used for each project. Based on this analysis, the team developed a \$/kWh value that was applied to the entire population of measures installed as a part of this program.
- **Prescriptive Programs (Small Business, Standard, Single Family Upgrades, etc.):** Guidehouse researched the incremental measure cost data from IL TRM v13.0, tracking data, and program invoices. For joint programs, only the ComEd portion of the costs were included.
- **Contractor/Midstream Rebates:** The early replacement HVAC measures installed as a part of this program were treated based on the guidance provided in IL TRM v13.0. The full installation cost subtracted by the NPV deferred future replacement costs was calculated for the analysis.
- **Product Distribution Program (and other similar programs):** Guidehouse used the per measure cost in each kit to perform the analysis.
- **New Construction – IE:** Guidehouse researched the incremental measure cost data from IL TRM v13.0 and cost data from TRMs in surrounding jurisdictions.
- **Non-Residential New Construction:** Guidehouse calculated the measure cost based on ASHRAE Standard 90.1 2019-Illinois⁹ assuming similar cost to one code cycle improvement.

⁹ https://www.energycodes.gov/sites/default/files/2021-07/Cost-effectiveness_of_ASHRAE_Standard_90-1-2019-Illinois.pdf

3.2 Data Sources and Assumptions

The analysis used the following sources to compile the relevant data:

- **Program tracking data and evaluation reports** to compile program-level savings, quantity, and realization rate values
- **IL TRM v13.0** to compile measure life and incremental cost data
- **Project invoices** to compile actual cost data (if available)
- **Project-level costs**, including utility incentives and non-incentive costs provided by ComEd

Error! Reference source not found. provides the sources and assumptions for the measure costs by program.

Table 3-8. CY2025 Program Cost Data Sources and Assumptions

Program	Component	Data Source	Note
ASI kWh Purchase	ASI kWh Purchase	ComEd Electrification Cost Data	Used total IMC \$/kWh of ASI from ComEd Electrification Cost data sheet
Automated System Optimization	Automated System Optimization Project	ComEd Pilot Data	Guidehouse assumed measure cost equals incentives.
Behavior - Res/IE	Behavior - Res-IE	Tracking Data	Guidehouse assumes no measure incremental costs.
Behavior Bus/Pub	Strategic Energy Management	Tracking Data	Guidehouse assumed measure cost equals incentives.
Business Energy Analyzer (BEA)	Business Energy Analyzer (BEA)	ComEd Project Data	Guidehouse assumed the same \$/kwh measure costs as RCx pathways in the Targeted Systems Program
Contractor/Midstream Rebates	Midstream	IL TRM v13.0 & ComEd Electrification Cost Data	IL TRM v13.0 deemed values and cost from ComEd Electrification Cost data were used for the analysis.
Electric Homes New Construction	EHNC	IL TRM v13.0	IL TRM v13.0 deemed values were used for the analysis.
Incentives	Custom	ComEd Project Files	Sample of project files, total \$/kWh
Incentives	Standard	IL TRM v13.0, RI resource workpapers	IL TRM v13.0 deemed measure costs were used for TRM measures with consistent units as ComEd tracking data. The workpapers provided reference for incremental measure cost. Guidehouse made assumptions regarding unit definition based on program data.
Midstream/Upstream	CFS	IL TRM v13.0	IL TRM v13.0 deemed values were used for the analysis.
Midstream/Upstream	Instant Discounts	IL TRM v13.0	IL TRM v13.0 deemed values were used for the analysis.
Multifamily Upgrades	IHWAP	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs. Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Multifamily Upgrades	MCA	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs.

Program	Component	Data Source	Note
			Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Multifamily Upgrades	MFLI	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs. Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Multifamily Upgrades	PHA	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs.
New Construction - Bus/Pub	Non-Residential New Construction	CY2025 Data	IL TRM v13.0 deemed values were used for individual measures, which were aggregated to the project level for sampled projects.
New Construction - IE	Affordable Housing New Construction	ComEd	Guidehouse used an average of the Incremental Capital Cost per project derived from TRM v13.0 costs.
Product Distribution	Elementary Ed	Tracking Data and Project Invoices	Implementer invoices were used to obtain the ComEd allocated costs of joint measures, which were then applied to the incremental costs for each measure within the kits.
Product Distribution	Food Bank	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs.
Product Distribution	IE Kits	Tracking Data and Project Invoices	Implementer invoices were used to obtain the ComEd allocated costs of joint measures, which were then applied to the incremental costs for each measure within the kits.
Retail/Online	APR - IE	IL TRM v13.0	IL TRM v13.0 deemed values were used for the analysis.
Retail/Online	APR - MR	IL TRM v13.0	IL TRM v13.0 deemed values were used for the analysis.
Retail/Online	ESRPP	IL TRM v13.0	IL TRM v13.0 deemed values were used for the analysis.
Retail/Online	Lighting Discounts	IL TRM v13.0	IL TRM v13.0 deemed values were used for the analysis.
Single-Family Upgrades	HEA	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs. Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Single-Family Upgrades	IHWAP-SF	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs. Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Single-Family Upgrades	SAP IE	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs. Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Single-Family Upgrades	SAP MR	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs. Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Single-Family Upgrades	SFLI	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs.

Program	Component	Data Source	Note
			Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Small Business	Small Business	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs.
Targeted Systems	Industrial Systems	Tracking Data	Sample of project files, total \$/kWh
Targeted Systems	RetroCommissioning (RCx)	ComEd Project Files	Sample of project files, total \$/kWh
Targeted Systems	Virtual Commissioning (VCx)	ComEd Project Files	Sample of project files, total \$/kWh
Virtual Energy Coach	Virtual Energy Coach	ComEd Project Data	Guidehouse assumed the same \$/kwh measure costs as RCx pathways in the Targeted Systems Program
Voltage Optimization	VO	Project Files	Total costs obtained from ComEd provided documentation.
Whole Home Electric	MFU	Tracking Data	Guidehouse assumed the program tracking data incentive amounts should equal measure costs. Guidehouse found these incentive amounts accounted for the ComEd allocated costs of joint measures.
Whole Home Electric	SFHU	ComEd Provided Data Files	Guidehouse assumed the Total EEE Incentive Cost should equal the measure costs. Guidehouse brought out specific costs of measures grouped together using a percentage of savings.

Source: Guidehouse analysis

3.3 Findings

Guidehouse performed a bottom-up analysis for each program in ComEd’s CY2025 portfolio and offers the following findings:

- Finding 1.** The portfolio TRC (excluding NEIs) increased substantially from 2.83 in CY2024 to 3.62 in CY2025. With NEIs included, the TRC improved from 4.88 in CY2024 to 5.86 in CY2025. This improvement was primarily driven by higher avoided costs, resulting in increased electric benefits, alongside increased fossil fuel, societal benefits, and greater lifetime energy savings.
- Finding 2:** With NEIs included, all programs achieved TRC cost-effectiveness in CY2025. Excluding NEIs, both Single Family Upgrades and Whole Home Electric did not achieve TRC cost-effectiveness, with TRC ratios of 0.85 and 0.78, respectively. These same programs also did not meet UCT cost-effectiveness, with UCT ratios of 0.77 for Single Family Upgrades and 0.48 for Whole Home Electric primarily due to high incentive and incremental costs, and the exclusion of substantial NEI benefits. Both programs, however, have shown improved cost-effectiveness ratios as compared to CY2024 due to increased electric benefits.
- Finding 3:** Within the Residential and Income-Eligible (Res & IE) sector, Product Distribution and Retail Online programs continued to have the highest TRC values in CY2025, consistent with CY2024.

- **Finding 4:** Within the Business and Public Sector, Midstream/Upstream program continued to have the highest TRC values in CY2025, consistent with CY2024 performance, and demonstrated improvement in cost-effectiveness. Specifically, the TRC (with NEIs) increased from 10.11 in CY2024 to 11.86 in CY2025. Other Business and Public Sector programs exhibited relatively stable cost-effectiveness ratios compared to CY2024.
- **Finding 5.** Total TRC costs decreased from \$643M in CY2024 to \$569M in CY2025, while TRC benefits increased significantly from \$1,818M to \$2,062M. Both these factors contributed to higher TRC and UCT scores across both the residential and business sectors. The largest increase in benefits is attributable to electricity avoided costs, which rose from \$757M in CY2024 to \$1,074M in CY2025, primarily due to higher kWh and kW level nominal avoided cost values.
- **Finding 6:** The significant increase in benefits was driven primarily by the residential sector, particularly Product Distribution. This program experienced the largest growth in total benefits (excluding NEIs), increasing from \$167M in CY2024 to \$241M in CY2025, primarily driven by higher electricity cost savings. At the same time, total costs declined from \$24M in CY2024 to \$18M in CY2025, driven by lower incremental costs. Similarly, New Construction–IE programs saw a substantial improvement in cost-effectiveness, increasing from 2.11 in CY2024 to 8.83 in CY2025. This was driven by higher benefits (rising from \$8.7M to \$13M) and reduced costs due to lower incremental expenditures.
- **Finding 7.** Cost effectiveness for many programs including Product Distribution and Retail/Online continues to be driven largely by lighting measures which can accumulate significant energy savings at low cost. Additionally, shell measures such as spray foam and insulation and water-saving measures such as showerheads were able to take advantage of additional TRC benefit streams such as societal and water, and low customer incremental costs to achieve high TRC outcomes.
- **Finding 8:** IE components of applicable programs contribute \$541M in net utility benefits to ComEd’s CY2025 portfolio. Excluding IE programs, the portfolio cost-effectiveness drops to 5.56 (with NEIs) and 3.41 (without NEIs).
- **Finding 9.** The electric cost change benefit stream increased relatively in CY2025, growing from 24% to 34% of total TRC benefits. This benefit stream is the primary driver of overall improved cost effectiveness. However, societal benefits declined from \$1,322M to \$1,278M, with their share of total TRC benefits decreasing from 42% to 39% percent.
- **Finding 10:** Electrification measures achieved a TRC (with NEIs) of 4.71, up from 2.84 in CY2024 and met UCT cost-effectiveness (UCT = 1.48). Despite most electrification measures having a TRC above 1.0, electrification measures generally had lower TRC values than non-electrification measures causing a downward impact on the overall TRC value.
- **Finding 11:** Voltage Optimization (VO) costs declined substantially in CY2025 compared to prior years while continuing to deliver strong benefits. ComEd attributed the reduction in VO costs primarily to lower software expenses and a more efficient implementation approach in CY2025. As a result, VO cost effectiveness improved markedly, with TRC ratios

increasing to 3.75 with NEIs and 2.21 without NEIs in CY2025, compared to 1.94 with NEIs and 0.95 without NEIs in CY2024.