



December 18, 2025

# ComEd Energy Efficiency Program Revised Plan 7 (2027- 2029)

Presented to the Illinois Energy Efficiency Stakeholder Advisory Group

ComEd Offers This Preliminary Draft Plan For Discussion And Negotiation Purposes Only; Not Admissible For Any Purposes In An Adversarial Proceeding; Facts And Figures Contained Herein Are Subject To Change

# Agenda

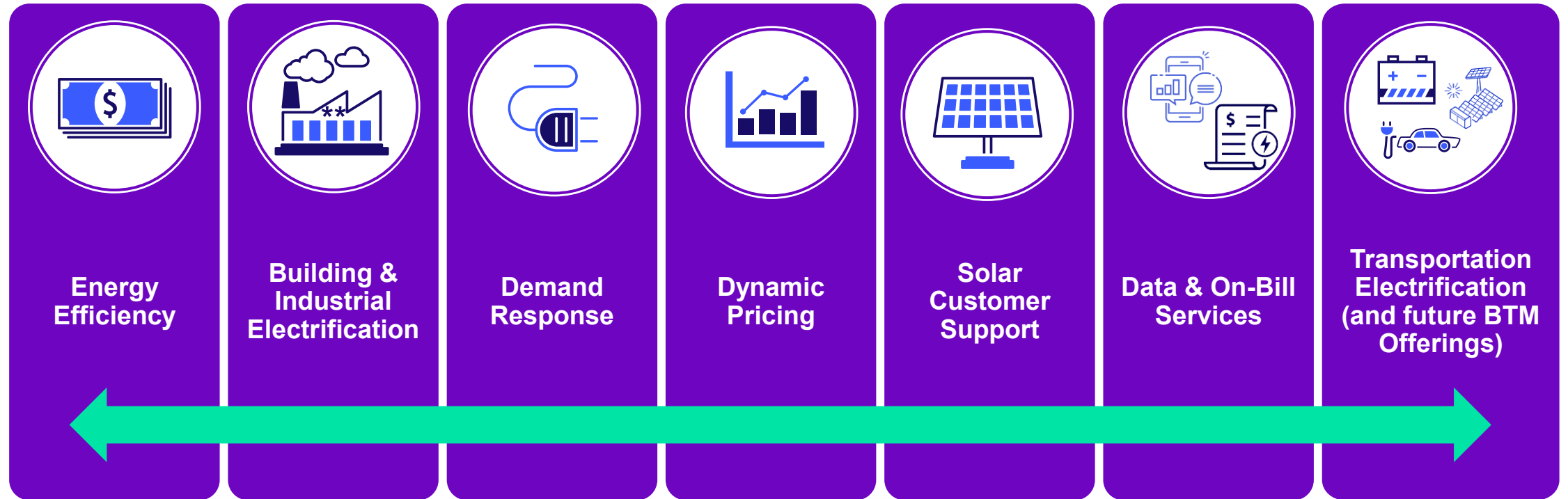
- **Opening Remarks**
- **Team Overview**
- **Portfolio Achievements**
- **Plan 7 & CRGA Impacts**
- **CRGA Considerations**
- **Program Offerings by Category**
- **Portfolio Targets**
- **Additional Topics & Closing Remarks**
- **Appendix**

# Opening Remarks

# ComEd Clean Energy Solutions

We help customers interact with energy to save money and help the planet.

With a comprehensive suite of demand side management (DSM) solutions, we aim to deliver environmental impact while driving equitable outcomes and seamless customer experience.



# Team Overview

# Clean Energy Solutions Structure & Programs: 2025



**Director, Energy Efficiency**  
*Philip Roy*



**Director, Flexible Load & Business Services**  
*Nick Bafaloukos*

 **EE Residential Implementation**  
*Kara Jonas*

**Direct to Consumers**  
Home Energy Savings, Multi-Family Energy Savings, Whole Home

**Channels**  
Retail, Product Distribution., HVAC, New Constr., Home Energy Reports

**Journey Coordination**  
Data Insights, Marketing Coordination

 **EE C&I Implementation**  
*Teri Lewand*

**Business Programs**  
Small Business, Standard

**Technical Programs**  
Custom, Retro-Commissioning


**Engineering**  
Facility Assessments, PSCFA, Benchmarking

**Journey Coordination**  
BEA, Channel Management

 **EE Strategy & Planning**  
*Kim Swan*

**EE Planning & Evaluation**

**Reporting & Data Mgmt.**  
Compliance Reporting, Data Requests

 **Transportation Electrification & Flexible Load Management**  
*Cristina Botero*

**Residential BE Programs**  
EV Charger and Installation

**C&I and Public Sector**  
Fleet EV and Make-Ready

**Customer Education & Awareness; C&I Fleet Assessments & Campaigns**

**Community of Future**  
Bronzeville, Rockford, Pilots

**Transportation Electrification & Flexible Load Management**  
*Cristina Botero*

**Residential DR Programs**  
Peak Time Savings, A/C Cycling, Virtual Power Plant

**C&I DR Programs**  
Voluntary & Mandatory Load Reduction, CS + Storage

**Residential Rates**  
Hourly Pricing, Distribution TOU, Supply TOU\*

**DR/DP Planning & Evaluation**

 **Innovation & New Programs**  
*Brian Kirchman*

**Energy Efficiency R&D**

**Innovation**

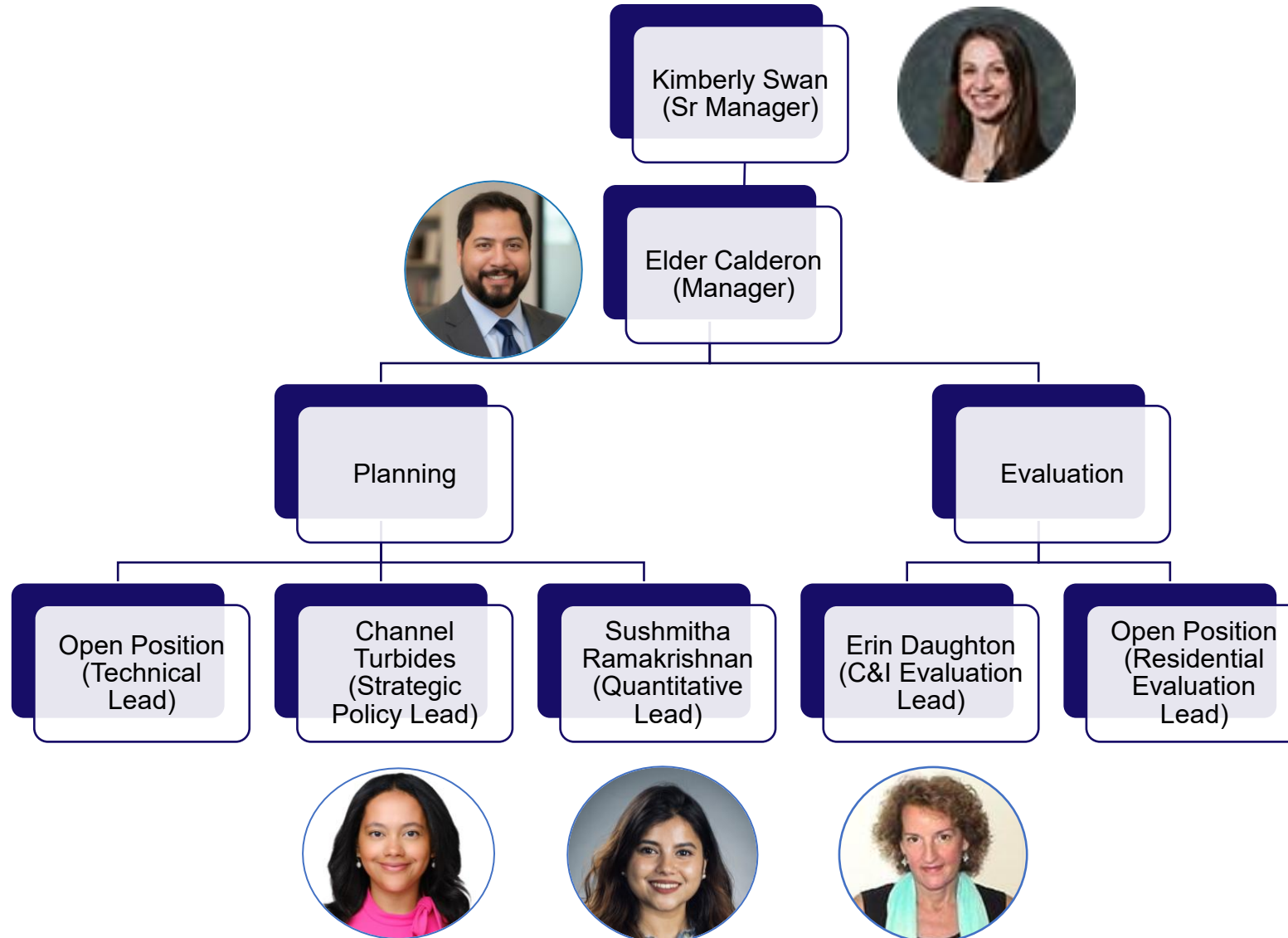
**Strategic Programs & Pilots**

**Financial Planning & Support**  
Budgeting, Forecasting, Annual Filings

**Business Operations**  
Contracting / Invoicing, QA/QC, Safety, BESP/EESP Network Management, MDI

**Customer Support**  
Green Power Connection, Data Services

# Clean Energy Solutions: Energy Efficiency Planning & Evaluation



# ComEd Energy Efficiency Portfolio Achievements

# Portfolio Lifetime Achievements



**\$12.74**  
billion on customer bills saved

**107.59**  
million Net MWh saved

**8.51**  
million cars off the road for a year



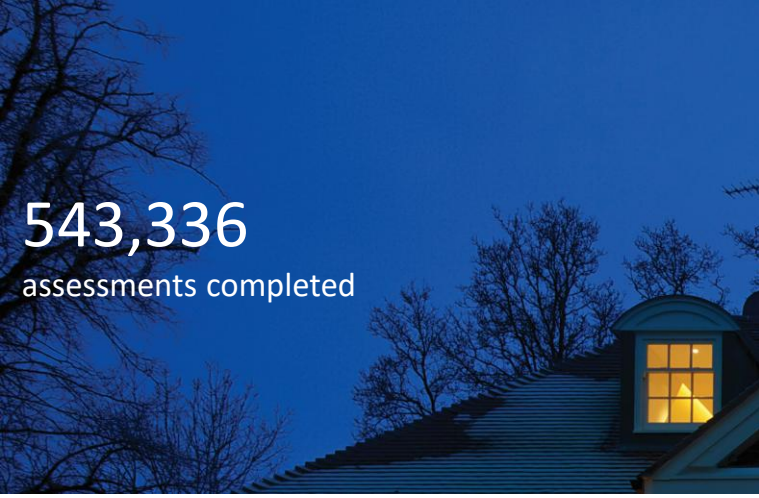
**36.51**  
million acres of trees planted

**80.49**  
billion pounds of CO<sub>2</sub> reduced

**167.62**  
million efficient bulbs sold



**\$2.53**  
billion in incentives provided to customers\*



**543,336**  
assessments completed

**182,177**  
business projects completed

**14,815,538**  
rebates & incentives provided



**12.47**  
million homes powered for one year

\*Based on lifetime net MWh savings realized through CY2024. Incentives for the ongoing year is based on applied percentage of about 65%

# Portfolio Plan 6 Achievements



7 New  
Electrification Measures

- New Industrial offerings:
- Industrial Energy Management
  - Advanced Refrigeration Controls

Continued optimization of portfolio through growth of Midstream offerings



- New Commercial Offerings:
- Building Operator Certification
  - Commercial Food Service Joint Offering



Over \$491.5 M in IQ Spend

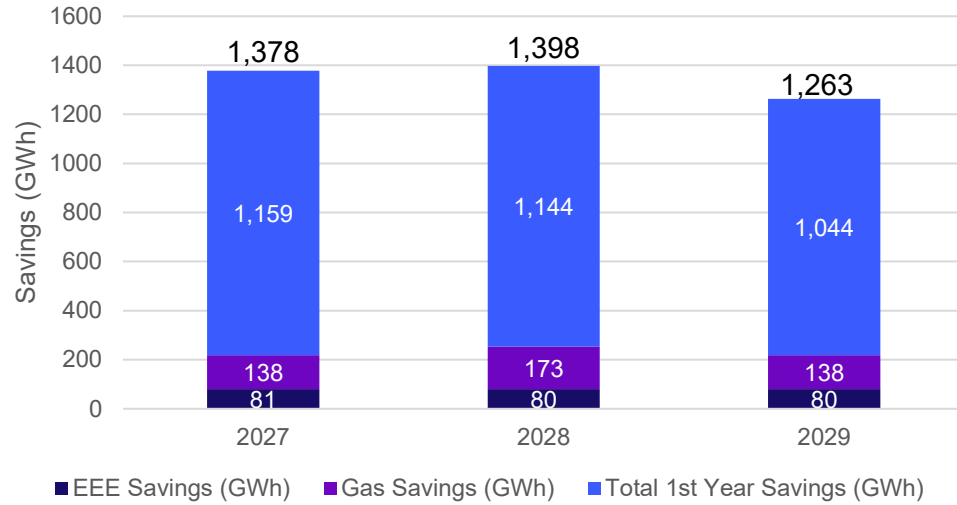
- Market Transformation:
- Retail Products Online
  - Stretch Codes



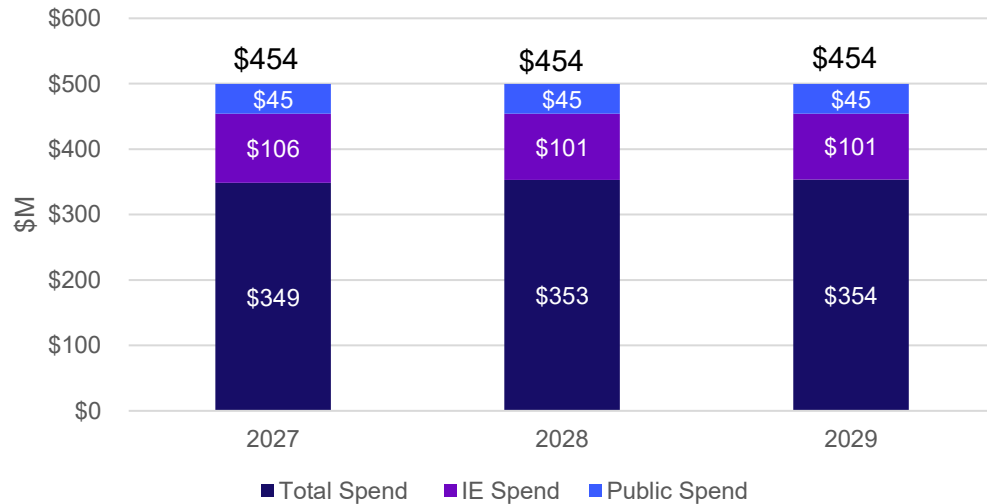
# Plan 7 & CRGA Impacts

# Approved EE Plan 7 (27-29)

Total Claimed 1<sup>st</sup> Year Savings



Annual Spend



	2027	2028	2029
Savings Achieved Toward CPAS (GWh)	15,734	16,144	16,770
AAIG Savings Achieved (GWh)	747	410	626
Total Spend (Million \$)	\$454	\$454	\$454
IE Spend Total (Million \$)	\$106	\$101	\$101
IE Spend % of Total	23%	22%	22%
Total 1st Year Savings (GWh)	1,378	1,398	1,263
WAML (Years)	14.0	14.0	13.8

# CRGA Energy Efficiency Requirements

- **Adjusted Budgets & Savings Goal**

- CPAS is retiring, meaning no more expiring savings
- Switch to 1<sup>st</sup> year incremental goals with a minimum lifetime of 12 years
  - No greater than 20% of savings can come from measures of 5-years or less
- Incremental annual savings dramatically increased to 2% of annual revenue over (~1% CEJA)
- The budget methodology in CRGA has no change (4.25% annual revenue)
  - Reference year changes from 2015 to 2023

- **Increased focus on IE**

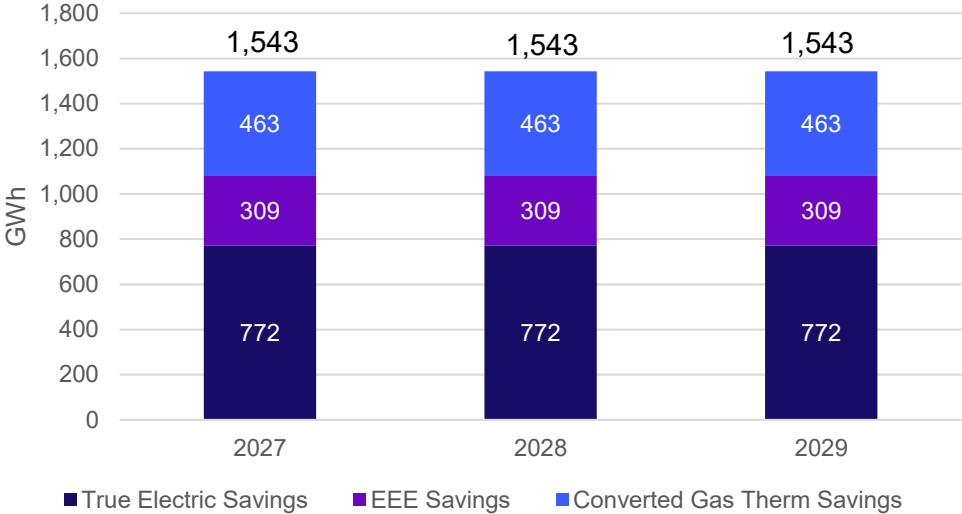
- Requires 25% spend allocation to IE, increasing minimum IE spend from \$40M to \$135M
- Maintains 80% Whole Building Weatherization investment requirement for IE
- Provides goal reduction opportunity by increasing IE spend, reducing savings goal by 0.025% for every 1% increase of IE Spend (Capped at 0.25%)

- **Adjusted Non-Electric Caps**

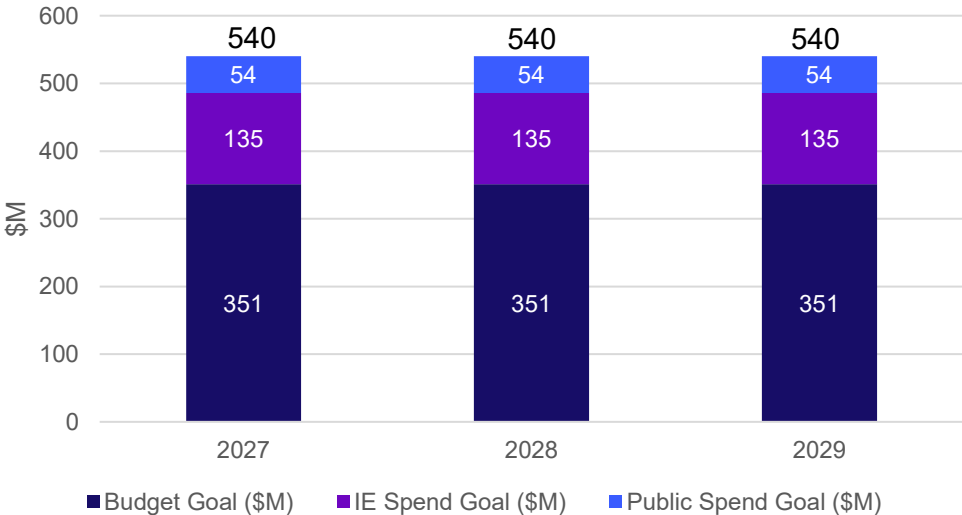
- 50% of savings can be achieved from non-electric fuels
  - EEE Cap increased to 20% (33% IE Spend)
  - Therm cap increased to 30% (Weatherization & Mechanical Insulation only)

# CRGA EE Spend & Savings Targets

Annual Incremental Savings



Portfolio Spend Goals



	2027	2028	2029
Annual Incremental Savings (GWh)	1,543	1,543	1,543
Total Spend (Million \$)	\$540	\$540	\$540
IE Spend Total (Million \$)	\$135	\$135	\$135
IE Spend % of Total	25%	25%	25%
Average Lifetime	12.0	12.0	12.0
% Savings < 5-year Lifetime	5%	5%	5%

# CRGA Considerations

# CRGA Impacts

**CRGA reshapes the Energy Efficiency landscape, introducing changes that demand innovation and opening new opportunities to deliver greater value for all customers.**

- **Scaling Portfolio Offerings**

- The 2024 potential study highlights that we cannot meet savings goals under a similar structure (Stip+) as established by CRGA. Additional funds, paired higher savings targets, will not resolve existing delivery constraints, making flexible, innovative, and collaborative approaches essential to scale resources effectively.

- **Expanding Income Eligible Offerings**

- We plan to increase Income Eligible spending by 35% by leveraging community partners and our network of qualified service providers to manage higher project volumes. This growth will require strengthening delivery channels and collaboration with all our Energy Efficiency partners to address existing capacity constraints across both networks.

- **Increased Caps for Gas, Electrification & Impacting Market Transformation**

- CRGA allow us to claim non-electric savings to an extent not previously possible, creating new opportunities but also introducing complexity. Gas utilities may expand or develop similar offerings, which could lead to overlapping efforts for the same customer base. While plans for our partner utilities are still in early stages of exploration, our approach is grounded in what we know today and focused on delivering value within this scope.

# Navigating Additional CRGA Requirements

- **Under Stretch Energy Code & Municipal IRP Support, SB 0025 Art. 1 directs municipalities and co-ops to produce IRPs and allows them to adopt the Illinois Stretch Energy Code. During Plan 2027-2029, how will ComEd's Codes & Standards market-transformation budget (Plan §5.4.3) be re-prioritized to: (a) help cities within the territory adopt the Stretch Code, and (b) incorporate resulting load-shape changes into Plan 2027-2029 savings forecasts?**
  - ComEd's Stretch Code offering provides funding for municipal engagement, technical assistance, and outreach to support Stretch Code adoption. Savings analysis will be performed to the extent required to claim through established evaluation framework.
- **Under Beneficial Electrification Act Revisions, CRGA extensively amends the EV Act (20 ILCS 627/45), adding new targets (e.g., 1 million EVs by 2030) and storage-for-all coordination. During Plan 2027-2029, how will ComEd reconcile these new BE targets with Plan 2027-2029's 10% EEE savings cap (§2.1.3) and portfolio electrification budgets?**
  - EV adoption targets fall outside the EE portfolio scope and TRM deemed savings framework. Plan 7 will claim electrification savings within the allowable cap through measures allowed within the EE framework while supporting statewide EV adoption through education and referral materials.

# Navigating Additional CRGA Requirements Continued

- **Under Utility-Owned Storage Coordination, CRGA's expansion of battery-storage funding (20 ILCS 730/5-60; EV Act §55) could change behind-the-meter economics. During Plan 7, does ComEd plan to adjust the Whole Home Electric and Small-Business storage measures to reflect new external rebates or loans?**
  - ComEd's EE portfolio does not include storage measures, and no adjustments are planned for Whole Home Electric or Small-Business offerings related to external rebates or loans.
- **Under Self-Direct RPS Credits – Interaction with EEUP Financing, large customers may shift to self-direct REC compliance (20 ILCS 3855/1-75 (R)). During Plan 2027-2029, could those same customers still access EEUP on-bill financing for Plan 7 energy-efficiency measures, and how will ComEd mitigate any free-rider risk?**
  - EEUP financing is outside the EE portfolio scope. Participation in RPS programs does not affect EE engagement, and free-ridership risk is not a concern.
- **Under the New Geothermal Homes & Businesses Program, SB 0025 adds a geothermal REC block (§1-75 (S)) starting PY2028. During Plan 2027-2029, does ComEd anticipate reallocating Residential incentive funds (e.g., Contractor/Midstream) to coordinate heat-pump ground-loop offerings?**
  - Currently, ComEd does not plan to reallocate residential incentives to coordinate heat-pump ground-loop offerings. We will monitor the PY2028 geothermal program launch and assess coordination opportunities.

# Revised Plan 7 Program Offerings by Category

Sector

C&I

Program

Small Business

Incentives

Targeted Systems

Midstream Offerings

Behavioral

Energy Advising

New Construction

Sub Program

Small Business



Custom



Standard



Retro-Commis-sioning



Industrial Systems



Midstream/Upstream



Commercial Foodservice



Strategic Energy Mgmt



Business Energy Analyzer

Energy Advising



New Construction

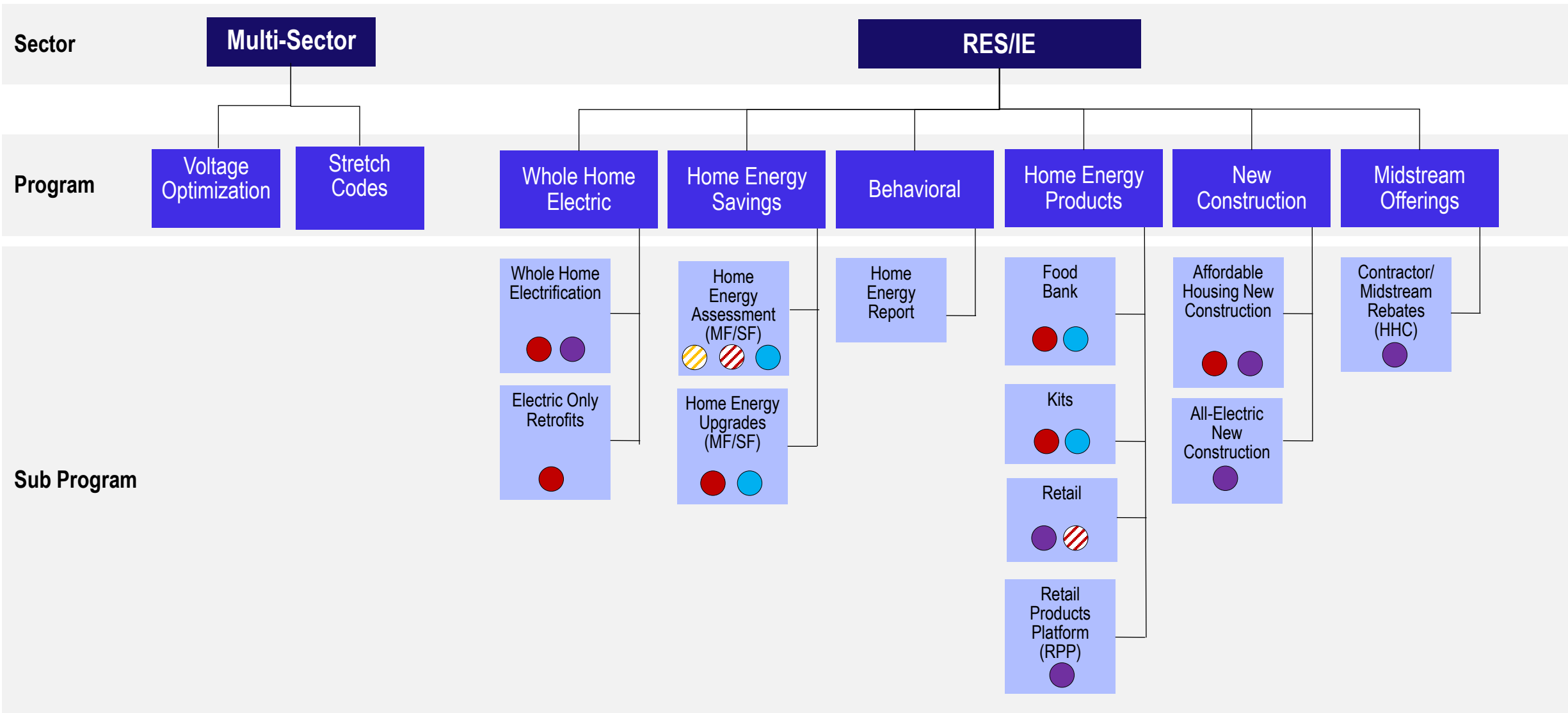


Indicators:

● EEE Savings

● Partial Public

● Coordinated Program

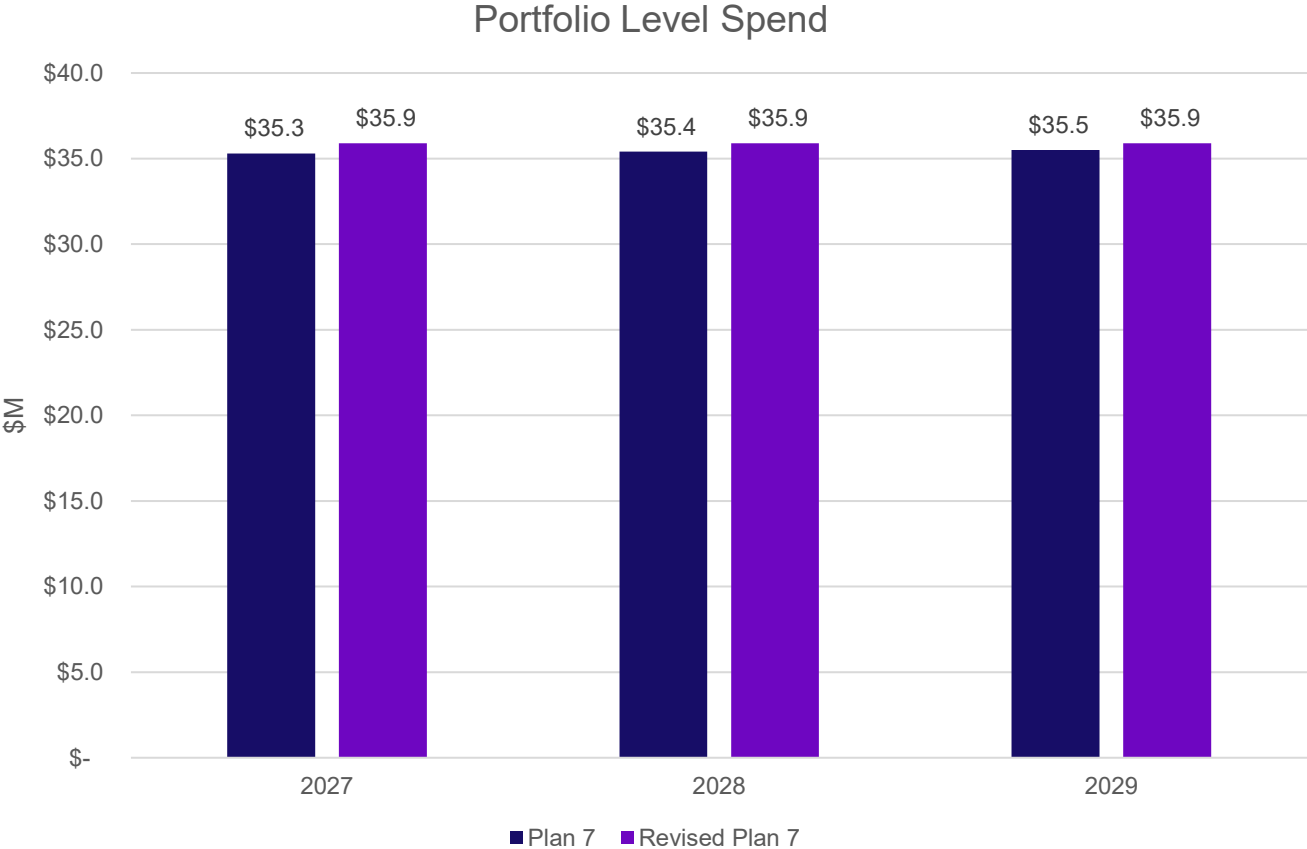


**Indicators:**

- IE (Red circle)
- EEE Savings (Purple circle)
- Joint Program (Blue circle)
- Partial IE (Red and white striped circle)
- Partial Public (Yellow and white striped circle)

# Portfolio Targets

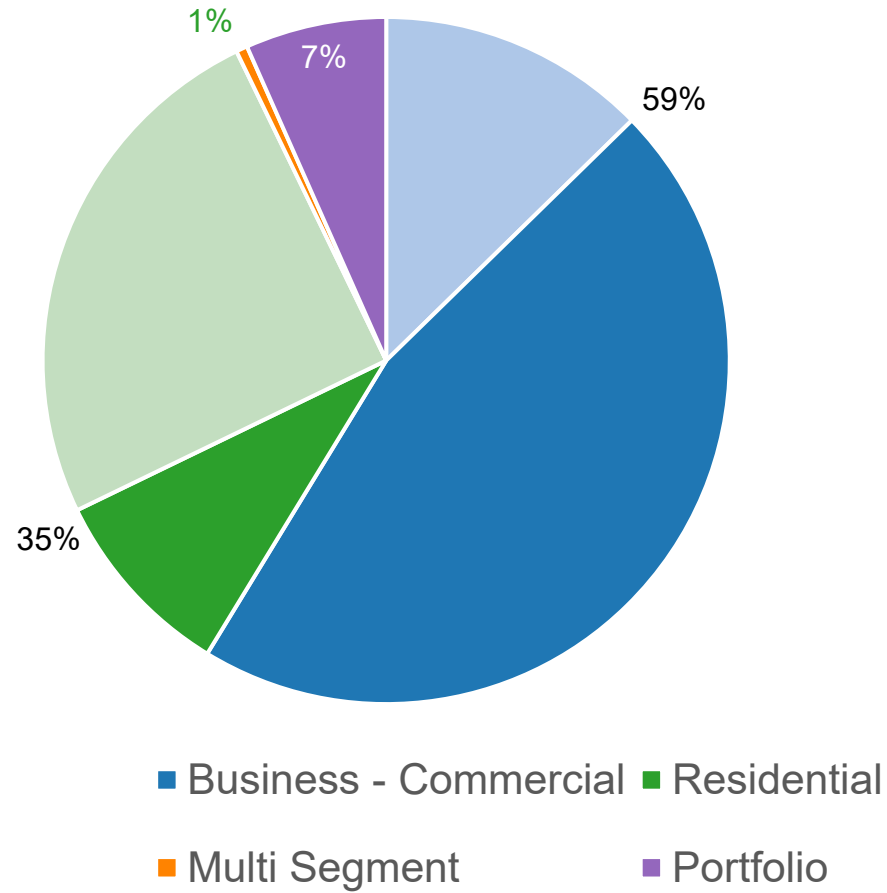
# Portfolio Level Costs



- While the overall portfolio budget has increased by nearly 20%, portfolio-level costs have only grown by about by nearly 2%, reflecting a commitment to increasing portfolio efficiency.
  - This reduction is driven by ComEd’s efforts to streamline data systems, marketing, and other overhead costs.
  - These efficiencies help offset anticipated increases in evaluation costs, ensuring resources remain focused on delivering customer value.

# Spend by Segment

% Portfolio Spend by Segment



- Total IE Spend has increased to 25% of portfolio spend while maintaining minimum Whole Home Weatherization spend requirements
- Public spend exceeding minimum (10%) spend requirements by increasing targeted focus on public buildings through Energy Advising offering
- Remaining budget increase focused on expanding market rate residential and business-commercial programs

# Additional Topics & Closing Remarks

# Plan 7 Coordination: Inflation Reduction Act (IRA) Attribution

- **Background**

- Two years of collaboration with IEPA; MOU near completion
- IRA funds will flow through IHWAP channels, same as current IHWAP braided projects

- **Current Practice**

- ComEd receives 100% savings attribution for utilities jointly funding 50% of project costs braided with IHWAP funds
- IHWAP braided projects are already the most expensive in the portfolio

- **IRA Impact**

- IRA braided projects may be even more costly, due to initial targeting of Multi-Family which has historically been the more expensive segment
- IRA design critically relies on braiding with utility incentives for impactful delivery

- **ComEd Position**

- ComEd is committed to trying to work with IEPA and Stakeholders to potentially leverage IRA braiding.
- 100% attribution is a threshold issue. ComEd aims to support state goals and braid IRA dollars, but cannot if doing so jeopardizes meeting targets or delivering a prudent, effective portfolio.

# Closing & Next Steps

## Comprehensive Solutions for a Dynamic Future

- CRGA introduces significant challenges, including evolving statutory caps, uncertain impact from shifting gas utility plans, scaling comprehensive offerings through already volume-strained channels and all with higher incremental savings goals.
- Revised Plan 7 streamlines the portfolio with a bottoms-up approach, ComEd is committed to meeting all challenges and delivering comprehensive, dynamic solutions tailored to customer needs across every segment.

## Timeline

- A timeline for the revised planning process has been established and shared with stakeholders who have expressed interest in participating under the stipulation.
- As part of this process, we encourage stakeholders who wish to engage more deeply to sign the NDA so we can collaborate effectively.
- ComEd is required to file a revised plan by June 1, 2026, and we are beginning work now to ensure we meet this milestone together.

## Feedback & Collaboration

- Given the shorter timeframe for collaboration and design, timely and informed feedback is essential to shaping an effective plan.
- We must move forward using the best information available.
- ComEd is excited to work together again, and we appreciate the effort this process requires. By working together, we can meet challenges head-on and deliver greater benefits to customers while achieving the state's goals.



Thank you

# Appendix: Program Overview



# Commercial Programs

# Behavioral



Partial Public

- **Program Description:** Strategic Energy Management cohorts and an opt-in analytics tool to reveal interval usage, drive O&M changes, and sustain behaviors.
- **Collaboration:** Where applicable, coordinates with gas utilities for SEM cohorts or cross-referrals; BEA may recommend joint offerings.
- **Marketing Strategy:** Direct outreach, trade-ally networks, email campaigns, and web channels to recruit cohorts and tool users.
- **Eligible Measures:** Behavioral savings only (supported by analytics and SEM actions).



# Midstream Offerings



Partial Public



EEE Savings



Coordinated  
Program

- **Program Description:** Instant discounts for C&I equipment (HVAC rooftops, forklift chargers/trucks, food service equipment) through distributors.
- **Collaboration:** Commercial food service component is jointly offered with gas utilities.
- **Marketing Strategy:** Channel-partner marketing, trade promotions, and targeted outreach to specifiers/installers.
- **Eligible Measures:** Rooftop HVAC units, refrigeration, food service equipment, forklift chargers, basic lighting & controls



# Energy Advising



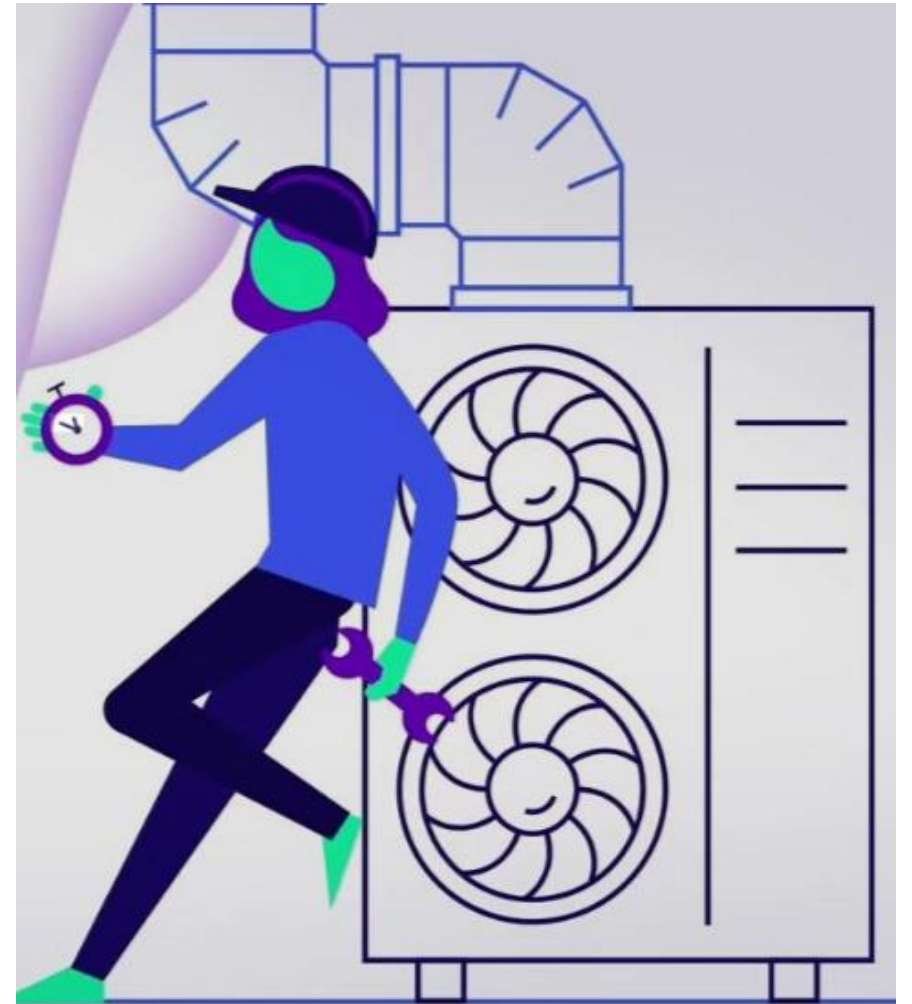
- **Program Description:** Energy Advising delivers tailored energy coaching for C&I customers using virtual analytics to onboard and create long-term efficiency plans.
- **Collaboration:** Integrates offerings across ComEd programs with alignment to gas utility insights and other partners where applicable.
- **Marketing Strategy:** Targeted outreach through a network of expert energy advisors with advanced technical knowledge.
- **Eligible Measures:** Operational and behavioral improvements identified through analytics, plus pathways for capital upgrades and process efficiency solutions.



# Incentives



- **Program Description:** Standard and custom incentives for qualified EE upgrades across major end-uses with technical support as needed.
- **Collaboration:** Delivered by ComEd with service providers; projects may align with gas programs when measures overlap.
- **Marketing Strategy:** Direct email, trade-ally promotion, and targeted campaigns by sector and measure category.
- **Eligible Measures:** HVAC, VFDs, refrigeration, industrial equipment, compressed air, building controls, ER lighting & advanced controls



# New Construction



Partial Public

- **Program Description:** Incentives and technical assistance for commercial/industrial buildings exceeding code, with efficiency-forward design support.
- **Collaboration:** Coordinates with Market Transformation and municipal stretch-code initiatives.
- **Marketing Strategy:** Direct outreach to owners/AE firms; trainings and association partnerships.
- **Eligible Measures:** High-efficiency HVAC, heat pumps, advanced building envelope, lighting systems.



# Small Business



Partial Public



Coordinated  
Program

- **Program Description:** Turnkey assessments and incentives via a closed service-provider network for medium to small facilities
- **Collaboration:** Delivered by ComEd; may coordinate where gas retro-commissioning or offerings overlap locally.
- **Marketing Strategy:** Provider-led development supported by ComEd co-branded materials and outreach.
- **Eligible Measures:** HVAC, refrigeration, building controls, compressed air, advanced lighting controls with limited lighting



# Targeted Systems



Partial Public



Coordinated  
Program

- **Program Description:** Engineering studies and retro-commissioning to optimize whole-building and industrial systems, plus operator certification.
- **Collaboration:** Retro-commissioning coordinated with gas utilities where applicable.
- **Marketing Strategy:** Provider-driven recruitment, supplemented by program marketing to priority sectors.
- **Eligible Measures:** Building automation, basic to advanced retro-commissioning actions with monitoring solutions





# Residential & Income Eligible Programs

# Behavioral

- **Program Description:** Opt-out Home Energy Reports deliver usage insights, social-norm comparisons, and tips to drive everyday energy-saving behaviors.
- **Collaboration:** Delivered as a utility program; coordination is internal, not joint with gas.
- **Marketing Strategy:** Reports themselves serve as the primary channel, with digital alerts and My Account touchpoints.
- **Eligible Measures:** Behavioral savings only (no physical measures).





# Midstream Offerings

## EEE Savings

- **Program Description:** Midstream discounts for air-source, ductless, and geothermal heat pumps; downstream rebates for geothermal installs.
- **Collaboration:** Delivered by ComEd with market partners; no formal gas joint component.
- **Marketing Strategy:** Trade-ally outreach, trainings, and targeted campaigns to drive stocking and installs.
- **Eligible Measures:** Air-source heat pumps, ductless mini-splits, geothermal heat pumps.



# Home Energy Savings

 IE & MR  Partial Public  Joint Program  Converted Gas

- **Program Description:** IE and None-IE assessments, direct-install measures, and comprehensive upgrades including air sealing, insulation, and HVAC. IE verification methodology in compliance with policy manual.
- **Collaboration:** Coordinated/joint delivery with gas utilities and braided funding via IHWAP and community partners.
- **Marketing Strategy:** Community partner outreach, CAA channels, targeted mail/digital, and events in IE communities.
- **Eligible Measures:** Air sealing, insulation, smart thermostats, HVAC upgrades, lighting, health & safety upgrades.







# New Construction



- **Program Description:** Incentives and technical assistance for homeowners and developers that exceed code, with emphasis on efficient electrification. IE verification in compliance with policy manual.
- **Collaboration:** Coordinated with Market Transformation (Stretch Code) and aligned with statewide efforts.
- **Marketing Strategy:** Direct outreach to builders and trade allies; education via industry associations and trainings.
- **Eligible Measures:** High-efficiency HVAC, heat pumps, advanced building envelope, ENERGY STAR appliances.



# Home Energy Products

 IE & MR  EEE Savings  Joint Program  Converted Gas

- **Program Description:** Rebates and instant discounts on ENERGY STAR appliances and home products, plus free kits via IE channels. IE verification based on geographical and customer financial data.
- **Collaboration:** Midstream ENERGY STAR Retail Products Platform with national retailer partners; thermostat incentives coordinated with gas where feasible.
- **Marketing Strategy:** Retail POP, mass media, digital/email, and co-branding with ENERGY STAR to drive adoption.
- **Eligible Measures:** ENERGY STAR appliances, smart thermostats, advanced lighting, water-saving devices and air sealing products



# Whole Home Electric

● IE Only   ● EEE Savings

- **Program Description:** IE whole-home upgrades that replace fossil-fuel end-uses with electric technologies and weatherization solutions. IE verification in compliance with policy manual.
- **Collaboration:** Pursues braided external funding to expand reach and reduce per-project costs.
- **Marketing Strategy:** Community-based outreach, direct mail/digital, and referrals through assistance programs.
- **Eligible Measures:** Heat pumps, electric water heaters, induction stoves, insulation, air sealing and health & safety upgrades.

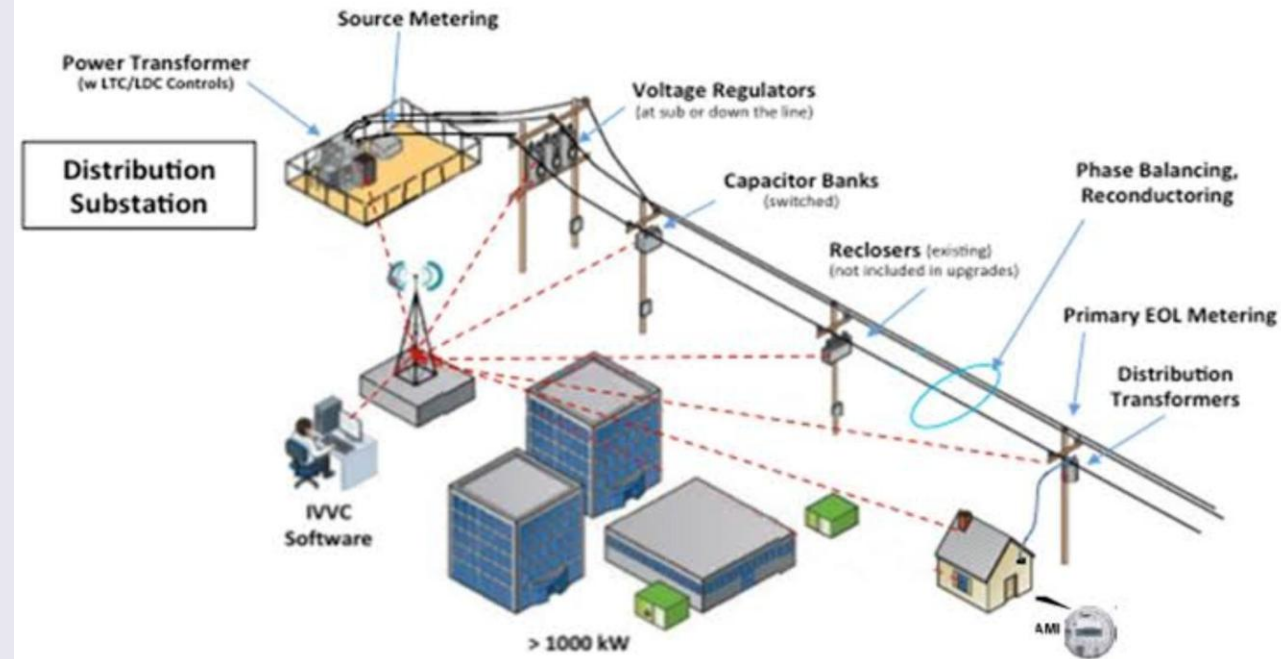




# Multi Segment Programs

# Voltage Optimization

- **Program Description:** Utility-side CVR/VVO deployment to reduce end-use consumption across feeders and substations—no customer action required.
- **Collaboration:** Internal utility delivery; not a customer-facing joint program.
- **Marketing Strategy:** Not applicable; savings are achieved via system optimization.
- **Eligible Measures:** Voltage regulation equipment, capacitor banks, smart grid controls.



# Stretch Codes

Converted Gas

- **Program Description:** Supports municipal adoption of the Illinois Stretch Energy Code through engagement and technical assistance, with savings tied to new construction.
- **Collaboration:** Aligns with ComEd New Construction programs and partners with municipalities and state agencies.
- **Marketing Strategy:** Engages municipal leaders and reaches builders through trainings, webinars, and associations.
- **Eligible Measures:** Efficiency improvements required by the stretch code beyond baseline, including envelope, HVAC and lighting.





comed<sup>SM</sup>

AN EXELON COMPANY