



OCTOBER 6, 2026
IL SAG MT WG MEETING

ComEd ESRPP NMB Revisions

outwit complexity™

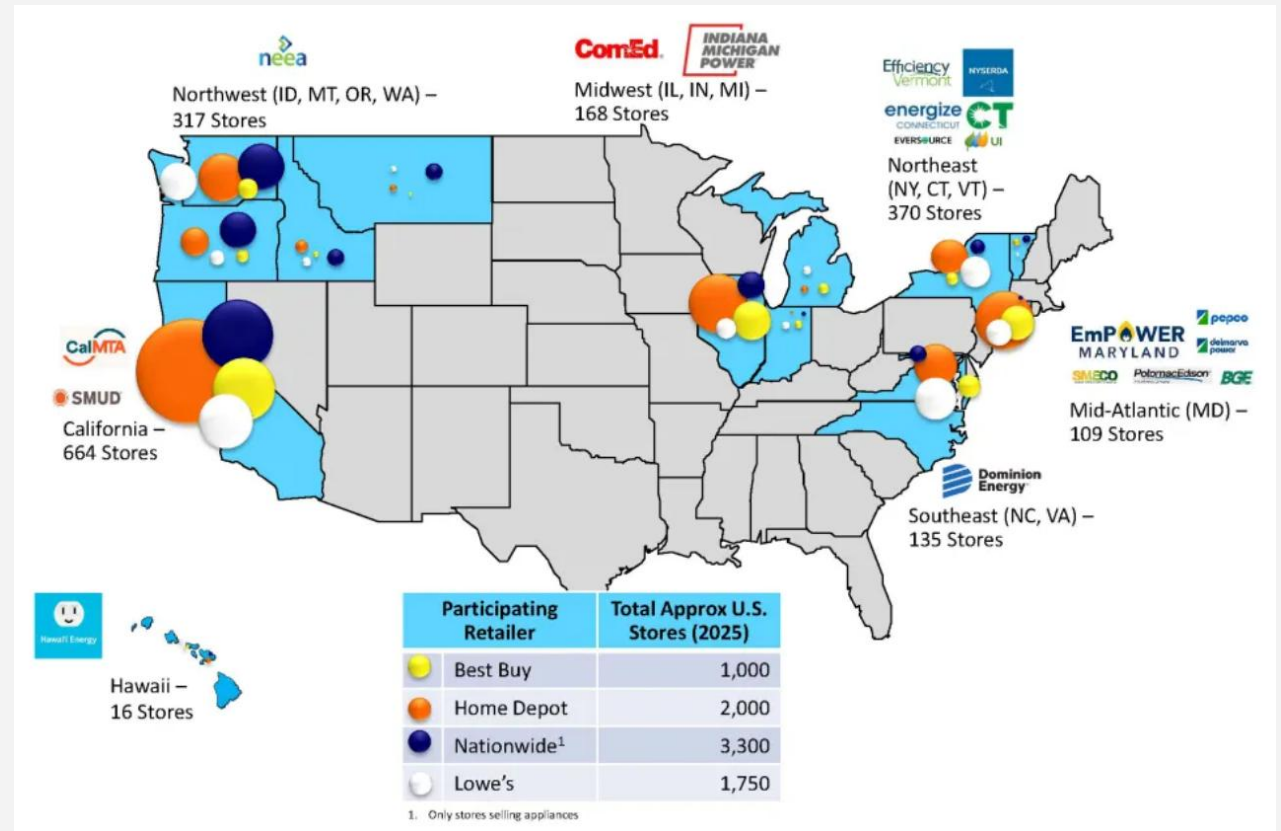


Program Background

ENERGY STAR Retail Products Platform Program (ESRPP)

ESRPP is a national collaborative midstream initiative across 15 states and 17 utilities.

- Kickstarted in 2016
- ComEd joined in 2020 (as a pilot program)
- Facilitated nationally by Northwest Energy Efficiency Alliance (NEEA)
- NEAA is also the former implementor of ComEd's ESRPP



The ESRPP and PY timelines do not align- can lead to mid-year NMB revisions that apply to current year

ComEd PY: January 1st – December 31st

National ESRPP PY: April 1st – March 31st

ESRPP Program Timeline





Clothes Washers

NMB Revisions

Measure: Top and Front Load Clothes Washers

In April 2026, ComEd introduced incentives for ES v8.1 and ESME front-load clothes washers. Previously, ComEd only incentivized top-load clothes washers, which were historically all categorized to the ES v8.1 tier.

The revision to the clothes washers NMB is supported by two criteria listed in IL TRM Attachment C:

- *3. Changes in exogenous conditions affecting the target market have altered the initial trajectory of the Natural Market Baseline.*
 - Since the last NMB adjustment, there have been several developments:
 1. A recently finalized federal efficiency standard update with a 2028 compliance date.
 2. An actively ongoing ENERGY STAR specification revision process.
 3. An evolving trade policy impacting imports and US-based manufacturing.

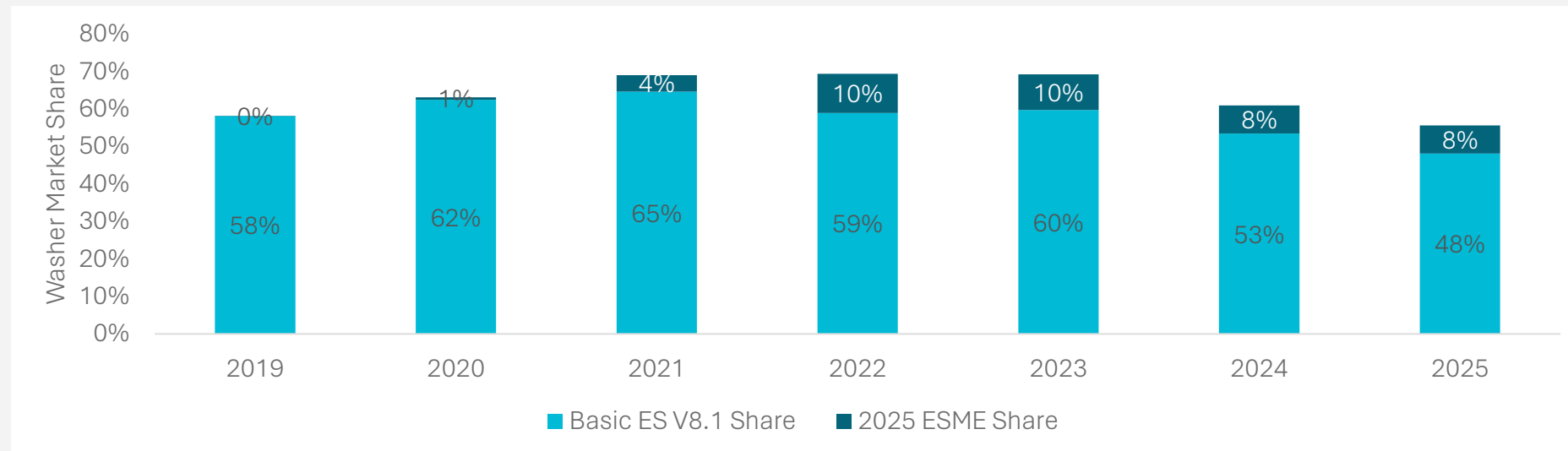
- *6. Substitute products or innovations have been introduced that change the energy consumption profile of an entire product category.*
 - The ComEd ESRPP team added Front-Load clothes washers to the list of qualified products and front-load washers have materially higher ENERGY STAR qualification rates than top-load washers.

ENERGY STAR Clothes Washers in the Market

The market share of ENERGY STAR certified washers has shown a declining trend since 2023.

- Tariffs resulted in the two largest top-load washer manufacturers building US-based manufacturing plants. These companies shifted their focus from higher efficiency models to lower-cost, conventional models.
- As a result, there has been an increase of low-cost, non-qualified top-load models at retail, gradually displacing ENERGY STAR mid-tier impeller models.

Historical ComEd ESRPP ENERGY STAR Qualified Washer Market Share

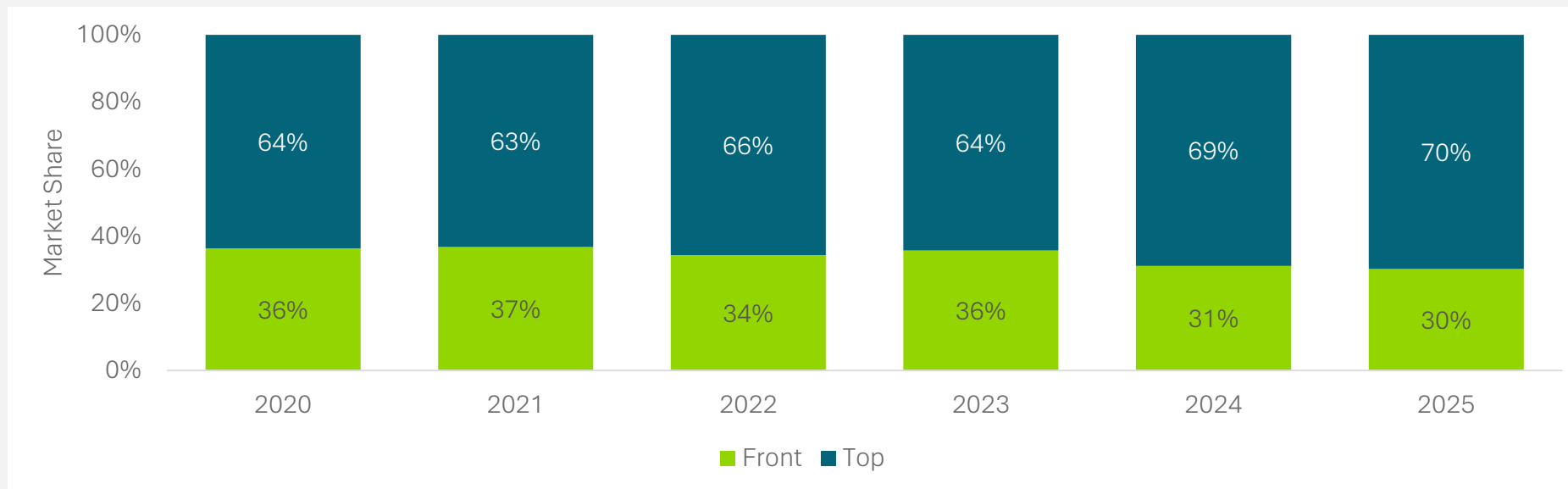


Source: Apex Analytics

Even with declining ENERGY STAR market share, market share between top and front load has remained stable

- Front-load washers entered the U.S. consumer market in the early 2000s and grew rapidly through the 2000s. After some backlash with mold issues, market share of front-loaders has since stabilized at ~30% of total washer sales.

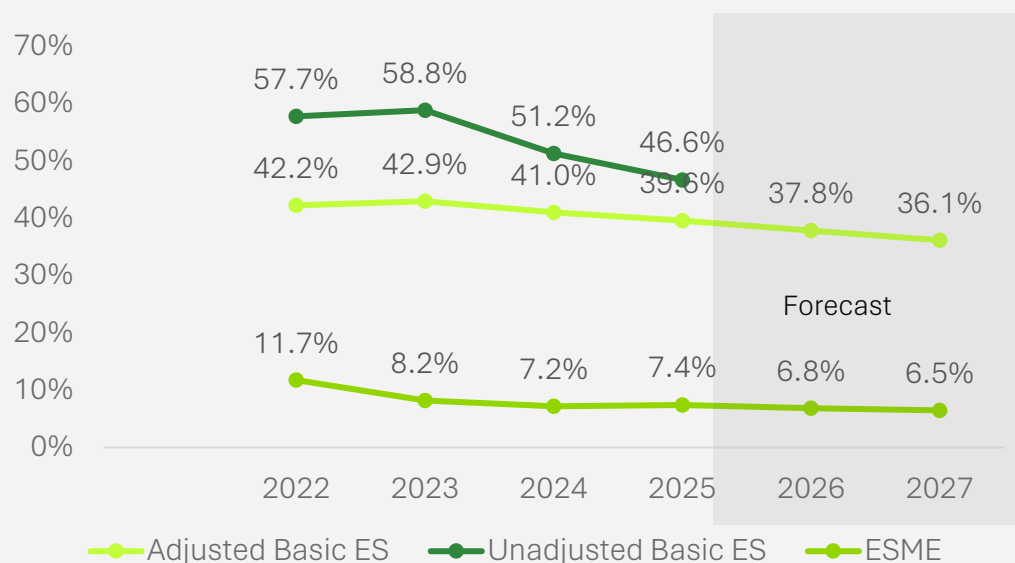
Historical ComEd ESRPP Top vs Front Washer Market Share (all tiers)



Source: Apex Analytics

Combined Clothes Washers NMB Revision

- The revision is designed to accommodate the distinct dynamics of clothes washers only over the next few years, including:
 - Observed trends in top-load ENERGY STAR market share
 - Structural difference between top-load and front-load qualification rates
 - Looming compliance date for the 2028 federal standard update



Source: Apex Analytics

Historical top-load data was adjusted by evaluated ESRPP program influence to develop a linear trend projection for 2026 and 2027

Year	Original Top-Mount ESv8.1/ESME NMB	NEW Combined ESv8.1 NMB	NEW Combined ESME NMB
2025	24.4%	39.6%	7.4%
2026	24.4%	37.8%	6.8%
2027	24.4%	36.1%	6.5%



Bottom-Mount Refrigerators NMB Revisions

Measure: ETA Bottom-Mount Refrigerators

ComEd introduced the Bottom-Mount (BM) ENERGY STAR Emerging Technology Award (ETA) efficiency tier to ESRPP. The team utilized the 2020 and 2021 ETA qualified product lists (QPLs) to assume continued growth in market share and develop the initial NMB. Then, starting in 2022 the QPL was no longer updated for BM refrigerators.

The revision to the bottom mount refrigerator NMB is generally supported by three criteria listed in IL TRM Attachment C:

- *1. Key assumptions underlying the initial forecast have proven to be incorrect; AND 2. The timing of key anticipated events has changed.*
 - In 2020 and 2021, the EPA offered an ETA for models with advanced adaptive compressors. The NMB assumed that EPA would allow for continued tracking of this tier of product. However, after the ETA for advanced adaptive compressors ended in 2021, the EPA no longer updated a QPL of refrigerators using the technology. Ongoing ENERGY STAR and federal reporting requirements do not allow for qualification under the alternate test procedure, nor do they identify models with advanced adaptive compressors.
- *4. Significant improvements in the availability of sales data demonstrate that the initial forecast can be improved without introducing a significant risk of over- or under-estimating program impacts.*
 - It is not currently feasible to systematically identify new ETA refrigerator models that have entered the market since 2021, making it nearly impossible to effectively assess market progress against the existing baseline.
 - Guidehouse interprets that the deterioration of data quality, inverse of improvement, also warrants updates to the NMB forecast.

ETA Bottom-Mount NMB Revisions

- The revised NMB is based upon a model of decay in ETA market share that is likely to occur through natural product turnover.
 - The model is built upon a decay rate from a random sample of refrigerator models between 2021 and 2025 as seen in the ESRPP data
 - The forecast only extends through 2028 as a federal standard update is expected in 2029.
- Guidehouse **recommends** updating the NMB within one year of any reporting, testing, or standards changes that could impact market share.
 - If EPA or ENERGY STAR later adopt test procedures or reporting requirements that make these models identifiable it may result in a notably higher market share for ETA-qualified models that is not attributable to ESRPP

Year	Original NMB	Updated NMB (CY25)	NEW Updated NMB (CY26)	Evaluated Market Share
2022	24%	24%	23%	40%
2023	24%	23%	17%	29%
2024	24%	22%	4%	7%
2025	24%	21%	2%	4%
2026	24%	21%	2%	-
2027	27%	20%	1%	-
2028	33%	19%	0%	-

Product Definitions

Product	Configuration	Tier	Criteria	Qualified Products List (QPL)
Clothes Washers	Top-Load Front-Load	ENERGY STAR v8.1	Link	Link
Clothes Washers	Front-Load	ENERGY STAR Most Efficient (ESME)	Link	Link
Refrigerators	Bottom Mount	ENERGY STAR Emerging Technology Award (ETA)	Link	Link

Next Steps

- Guidehouse will consider all comments in development of the final NMBs for CY26 evaluation.
- Please provide feedback within two weeks from when the slides are posted [online](#).

Please provide all written comments or questions to Celia Johnson (Celia@CeliaJohnsonConsulting.com).





Thank you!

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