

Thank you for the opportunity to comment on ComEd's Energy Efficiency Plan (2027-2029). Below are high level comments and questions on the proposed plan. Although the Preservation Compact is not a negotiating party, we look forward to hopefully coordinating where possible as the plan is finalized.

- **Plan Budget**

- With the possibility that **Nicor and People's/NSG may file new plans** increase their budgets, it is critical to understand how this influx of funding for all programming, particularly Income Eligible programs, may be impacted. Filing a plan without this information or without considering how this funding may impact programs will negatively impact program implementation.
- **Rebates** available via IRA may be incorporated into braided offerings for IE programs may also impact program implementation, despite the uncertainty surrounding this funding, it is critical to understand how this funding could impact utility program implementation.
  - Will this increase amount able to spend on property or just stretch dollars out to more properties?
  - More measures per building? Increase rebates?

- **Solar as Energy Efficiency**

- Energy Efficiency should come first – Solar as EE should have specific parameters to ensure energy efficiency – Maximize therm conversion savings first
- Although the petition to include Solar as Energy Efficiency in the Illinois Technical Reference Manual is an open docket at the ICC, the implication of the outcome is critical to ComEd's energy efficiency planning. If this is to be approved, more information is needed on how this will impact ComEd's programming.

- **Programming**

- Prior to CRGA passing, ComEd solicited comments on an Income Eligible pathway for the Residential New Construction Program (ResNC), will this new pathway to this program be included in the new EE plan? If so, what is the planned budget and savings affiliated with that pathway? How will it be incorporated into customer experience.

- **Coordination with non-plan related programs**

- Although **Storage for All** is not under the control of ComEd's program implementation, this marks an important additional pathway for solar and renewable energy to reach customers, particularly for customers interested

in solar and who may participate in electrification programs exclusively delivered by ComEd – how will ComEd plan for this potential overlapping opportunity?

- **Echoing Comments from Stakeholders**

- Encourage ComEd to deliver Market Rate electric-only retrofits - at the very least for multi-family condos and apartments. At minimum could be a direct to consumer offering for cold climate heat pumps to displace electric resistance heat.
- Program spending and kWh savings claimed by sector and program. We'd like to see a breakdown at the individual program level, with IE shown separately from non- IE residential.
- Request breakdown of kWh savings for each program by
  - Electric efficiency
  - Gas Therm conversion
  - Electrification conversion
- How will the statutory requirement for 80% on whole building programs be met? What mix of programs? What IE programs are considered “whole building”?
- For whole building weatherization, separately for single-family and multifamily, what fraction of spending and savings are from:
  - Weatherization of already electrically heated buildings
  - Weatherization of buildings that are also electrified under EE
  - Weatherization of gas-heated buildings through joint delivery with gas utilities
  - Weatherization of gas-heated buildings by ComEd alone
- Income eligibility verification. Can the Company share a breakdown of how they plan to verify income for program qualification purposes by program channel? Specifically, how does the Company plan to utilize “disadvantaged community”/DAC qualification for IE programs in the amended plan?