



ELEVATE

773.269.4037
ElevateNP.org

322 S. Green St.
Suite 300
Chicago, IL 60607

Comments to SAG on ComEd Proposed Draft Resolution – November 2024

Elevate is a 501(c)(3) nonprofit organization that works nationally and is headquartered in Chicago. Elevate seeks to create a just and equitable world in which everyone has clean and affordable heat, cooling, power, and water in their homes and communities — prioritizing frontline communities. Elevate is also an active implementation partner for the ComEd Energy Efficiency Program serving customers in affordable housing, public housing, and low-income communities.

In June of 2024, ComEd proposed policy changes in an effort to recognize savings and maintain momentum for important and meaningful energy efficiency electrification (EEE) programs. Elevate submitted comments at that time largely focused on Policy Proposal 1, which forwarded a methodology for allocating savings from midstream electrification programs to the income-eligible (IE) EEE category. Elevate’s comments raised questions and offered observations intended to improve ComEd’s proposed methodology, with a goal of ensuring that energy savings – and particularly IE savings – would be allocated appropriately. Various other stakeholders raised concerns about the proposal.

In September of 2024, ComEd presented a new proposal around midstream electrification program savings, specifically to count 10% of savings as IE. Elevate attended the September 16th meeting and learned that ComEd was basing this updated proposal off of a new analysis showing that 10% of customers benefitting from its midstream program from 2022 to 2024 lived in IE tracts. Furthermore, Elevate understood a general consensus coming out of that meeting was that there are additional approaches that could more accurately identify IE customers benefitting from the midstream programs and that ComEd and stakeholders were committed to continued work on attribution refinement. In other words, Elevate understood ComEd’s September proposal was to use the 10% assumption as an interim solution but also to commit to further methodology improvement in the future. Elevate had no concerns about this proposal and did not submit comments at that time.

The proposed draft resolution language circulated this month reflects consensus from the September meeting and, in particular, stakeholders’ willingness to use ComEd’s proposed 10% assumption for the 2024 program year. However, as drafted, the resolution does not clearly identify stakeholder commitment to continue refining that methodology should there be a continued or new desire to count midstream electrification savings as IE in the future. Elevate recommends that this oversight be corrected.

Finally, Elevate notes that ComEd’s draft resolution language stating that

“A statistically significant portion of the data collected was used to identify income eligible participation, it was found that 10% of heat pumps sold through midstream were from IE Homes.” (Page 1)

appears to slightly misstate the updated September analysis. Elevate’s understanding is that

...it was found that 10% of heat pumps sold through midstream were from *homes located in IE census tracts*.

Elevate welcomes correction of any mistaken understanding on this point, but otherwise suggests that the resolution language be updated to more correctly describe the analysis performed.