

ICC Staff and OGC Feedback to ComEd

1. To facilitate an efficient review, the Company is requested to provide the following materials as part of its initial filing:
 1. A redlined version of the stipulation reflecting any proposed changes, detailed budget requirements, all relevant batch files
 2. A clear outline of spending requirements
 3. Explicit documentation of attribution practices for joint programs, including identification of whether such documentation will appear in the stipulation, or a statewide policy
 4. Additionally, we note that certain aspects of the spending plan will remain under review until the Company supplies further information
2. As a condition of agreeing to an expedited negotiation schedule, we ask that the Company commit to file the plan early so that parties who will be participating in the EE dockets stagger filings in the proceedings more easily; and
3. The Company should propose a spending plan that complies with the TRM. The Company confirmed at a recent hearing in Docket 25-01066 that it intends to incorporate solar as an EE measure in its EE Plan. Staff was not made aware of this intention for purposes of EE negotiations and requests that the Company affirmatively indicate whether it intends to incorporate solar as an EE measure in its EE Plan to the parties in this proceeding. Given that the Company has proposed to expedite the negotiations in this proceeding so that they will end in March and is not anticipated to have a decision in Docket 25-01066 prior to April of 2026 at the earliest, Staff is concerned that the schedule appears to have been designed so as to prevent the parties from being able substantively discuss the Company's proposed spending plan, to the extent the Company is not planning on basing its spending plan on the current version of the TRM. If the Company intends to incorporate solar as an EE measure in its EE Plan, Staff recommends the Company provide a version of the spending plan that does comply with the TRM for the parties to negotiate, so as to make effective use of the negotiation schedule proposed by the Company, especially in the event the Company is unsuccessful in adopting changes to the TRM.