

IL EE Stakeholder Advisory Group (SAG) Request for Comments on New Construction Eligibility Policy Proposal

Instructions:

- Using this template, send written comments to the SAG Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com **by Wednesday, August 20.**
- Include “New Construction Policy Feedback” in the subject line of the email.
- All comments will be posted on the [SAG website](#), and circulated to SAG.

Background Information:

- At the [July 23, 2025](#) Q3 Large Group SAG meeting, ComEd presented a proposed policy regarding income eligibility verification guidelines for the Electric Homes New Construction Program: [ComEd Policy Proposal Presentation](#).
- Following the July 23rd meeting, ComEd shared proposed policy language for review: [Income Eligibility Verification Guidelines for Electric Homes New Construction \(EHNC\) Program](#).
- A follow-up meeting in the SAG Reporting Working Group is scheduled on **Monday, September 8 (2:30 – 4:30 pm)**. If you plan to participate and do not have the September 8th meeting invite, please reach out to the Facilitator.

Comments Submitted By:

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Question 1: Please describe comments and /or questions on the proposed policy: [Income Eligibility Verification Guidelines for Electric Homes New Construction \(EHNC\) Program](#)

Response: ILOAG opposes the expansion of the Electric Homes New Construction (“EHNC”) Program to Income Eligible (“IE”) customers. While we broadly support the development of affordable housing and the widest array of energy efficiency (“EE”) offerings to IE customers possible, it is not feasible to guarantee that the EE resources will benefit IE customers when homes are not yet occupied and income verification occurs after the fact. It is critical to ensure that the budget the Company committed to IE customers in its EE Plan reaches that population.

ILOAG does support the expansion of the EHNC Program to IE customers so long as the construction project is designated as affordable housing for low-income residents by the U.S. Department of Housing and Urban Development (“HUD”), or alternatively by the State of Illinois or local unit of government, including counties and municipalities.