

Initial Feedback to IL Utilities on 2022-2025 EE Plans (IQ portions)

From non-financially interested stakeholders
(NRDC, CUB, NCLC, AG, Staff, City of Chicago)

November 16, 2020

Caveats

- Initial “high-level” feedback
- Likely more after we delve into details
 - Time constraints
 - Incomplete batch files
 - Would like to receive comparative data between current plans and proposed plans
- May not yet be consensus from all non-financially interested parties on all items listed
- Focusing on broad themes common to all utilities
 - Recognize that some may apply more to one utility than another
- City of Chicago feedback only applies to ComEd, Peoples

IQ Suggestions Across all Utilities

Supportive of IQ budget increases and greater attention to deep whole building work where that has occurred. Despite this, we would like to see...

- Additional IQ budget increases as a portion of total portfolio funds
 - Including a fair, equitable distribution between IQ SF and IQ MF spending that mirrors demographics of service territory.
- All programs that can be should be joint
 - Applies to all non-braided programs (braided are by definition “joint” with State/Federal, and cover all fuels)
 - This should include true one-stop-shopping approaches for all multifamily work beyond just DI – including for mixed use
- Would like to see maximum braiding of programs with IHWAP
 - At a minimum, once gas funds are exhausted and have achieved 100% of gas conversions, the rest of electric IQ deep retrofit whole building efforts should be braided

IQ Suggestions Across all Utilities (2)

- Would like to see more investment in deep retrofit whole building programs
 - Preference for depth in per customer savings vs. breadth of customers touched
 - Reduced emphasis on Home Energy Reports, kits
 - Need to understand drivers for some large decreases in costs per unit of savings
- Ensure aggressive focus on multifamily – in some cases multifamily funds need to be increased given service territory demographics
- Single point of contact portal needed for MF programs to ease the journey and ensure maximum benefits
- Ensure public sector IQ sufficiently targeted and funded (Why the decrease in budget?)
- Would like to see better communication, coordination and planning with CAAs/CBOs (How if at all did you consult with them in preparing program changes and budget amounts?)

IQ Suggestions Across all Utilities (3)

- Support targeting of those most in need (<200% FPL) but not restricting eligibility
 - Despite targeting, should not eliminate any customers below 80% AMI from eligibility for all non-braided programs
 - Any targeting by neighborhood needs to be well coordinated and planned with CAAs/CBOs
 - Focus on targeting areas/customers where disconnections have occurred/with arrearages and/or high energy burden (Mapping is needed relative to new zip code data now being filed with the ICC.)
 - Need to better understand approaches for moderate income
 - Need to better understand ComEd approach
- 3rd Party Programs
 - Generally support focus on specific areas and fewer programs
 - Want to preserve opportunities for innovation and creative proposals, consistent with the intent of FEJA provision
 - Include specific requests for new IQ community-based proposals (both SF and MF)
 - Better vet bidders to ensure likelihood of success

IQ Suggestions Across all Utilities (4)

- Supportive of competitive bidding for implementation contracts
 - Increase focus on diverse and community-based contractors
 - Specific plan, metrics and evaluation process are needed to develop and increase diverse contracting to achieve the promises of FEJA (part of market transformation)
 - Encourage bids from CAAs and CBOs to be higher-tiered implementers
- Support Manufactured housing efforts
- Would like to see greater effort on targeting electric resistance heating for conversions to HPs – particularly in multifamily
- Allocation of portion of R&D funds specifically for IQ
- Gas utilities shift some R&D/MT funds to IQ programs and diverse hiring goals
- Gas utilities less emphasis on large gas equipment and more on building shell improvements