



NOVEMBER 12, 2025

# Midstream IE Policy Analysis

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**Prepared For:**  
ComEd



# SAG Policy Directive

- For CY2024, the policy directed evaluators to apply a 10% assumption of income-eligible (IE) EEE savings for Midstream programs.
- For CY2025, the policy language states that:

**For the 2025 Program Year and beyond, ComEd EE Portfolio Evaluators will seek to develop an updated IE EEE savings estimate from using a combination of Low-Income Discount (LID) rate participation data (the ratio of actual LID participants to LID eligible customers) and Midstream HVAC Program Data at the Income Eligible Census Tract level. ComEd evaluators will conduct a study initiated in 2025 to use both LID and Midstream HVAC program data to estimate overall IE participation and savings. Evaluators will apply the updated methodology if they determine it will produce a more reliable estimate.**

*SAG Policy Resolution: Income Eligible Efficient Electrification Attribution for Midstream Programs Final (2/17/2025)*

- Midstream HP program participant data was available; Low-Income Discount (LID) Rate data unavailable.

**The goal is to produce a revised IE midstream analysis**

# Methodology

ComEd provided the midstream heat pump participant data for January - July of 2025.

- 1 Reviewed available participant data
- 2 Mapped each participant to census tract Area Median Income (AMI) data
- 3 Aggregated findings and key considerations

# Participant Overview

3,182 data rows

- 2,477 ASHPs
- 685 DMSHPs
- 20 GSPHs

324 non-existent  
addresses

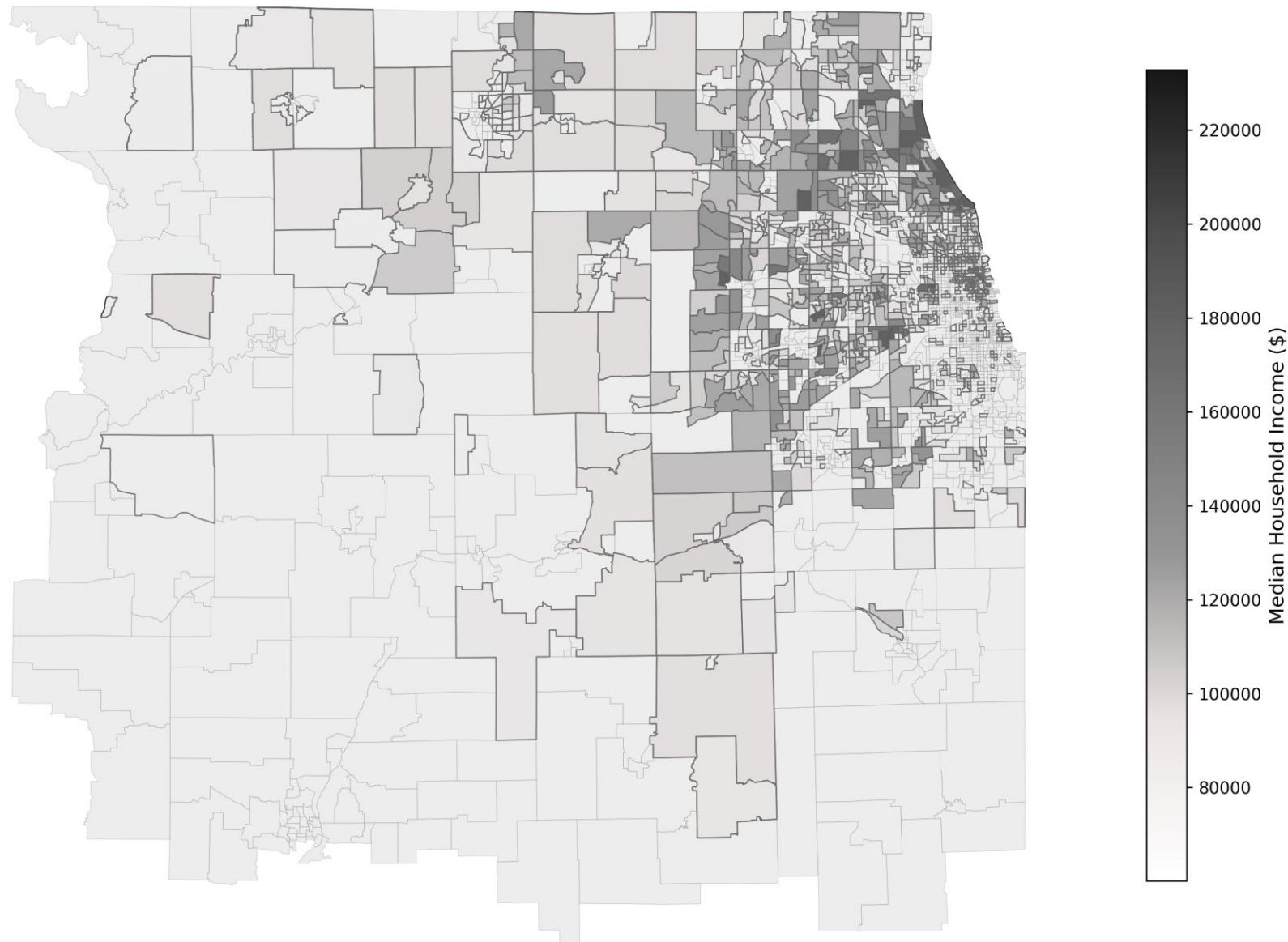
264 addresses  
with multiple  
measures

2,594 unique  
addresses  
mapped to 1,083  
census tracts

ComEd Service Territory - Median Income by Census Tract

# Census Tract and AMI Mapping

Each address was assigned to its census tract according to 2024 Census Bureau data.



ComEd Service Territory - Median Income by Census Tract

# Transaction Mapping

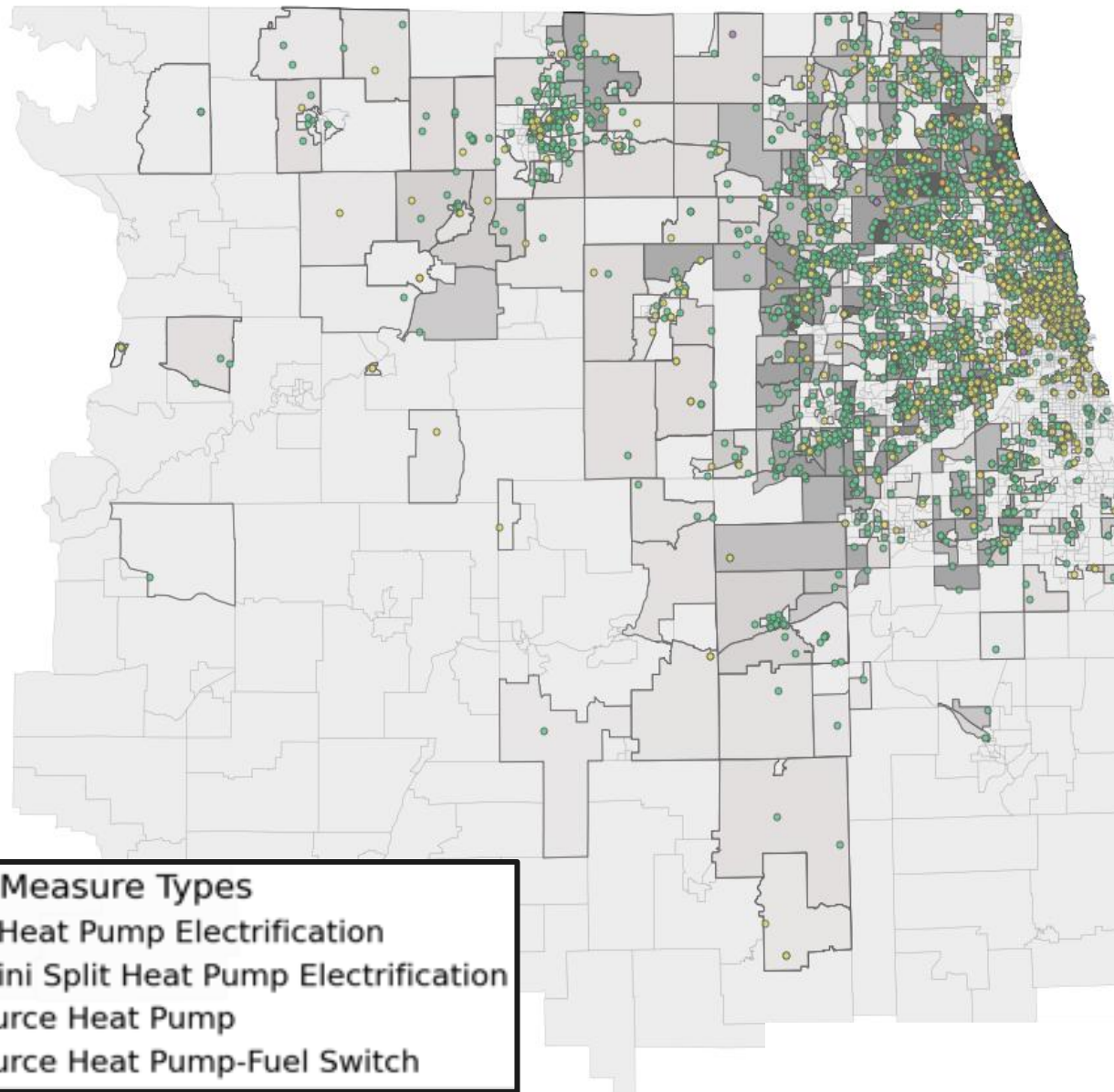
Installations are concentrated in the Cook County region, where majority of participants reside.

1,083

census tracts

2,594

addresses



# Income Eligible Definition

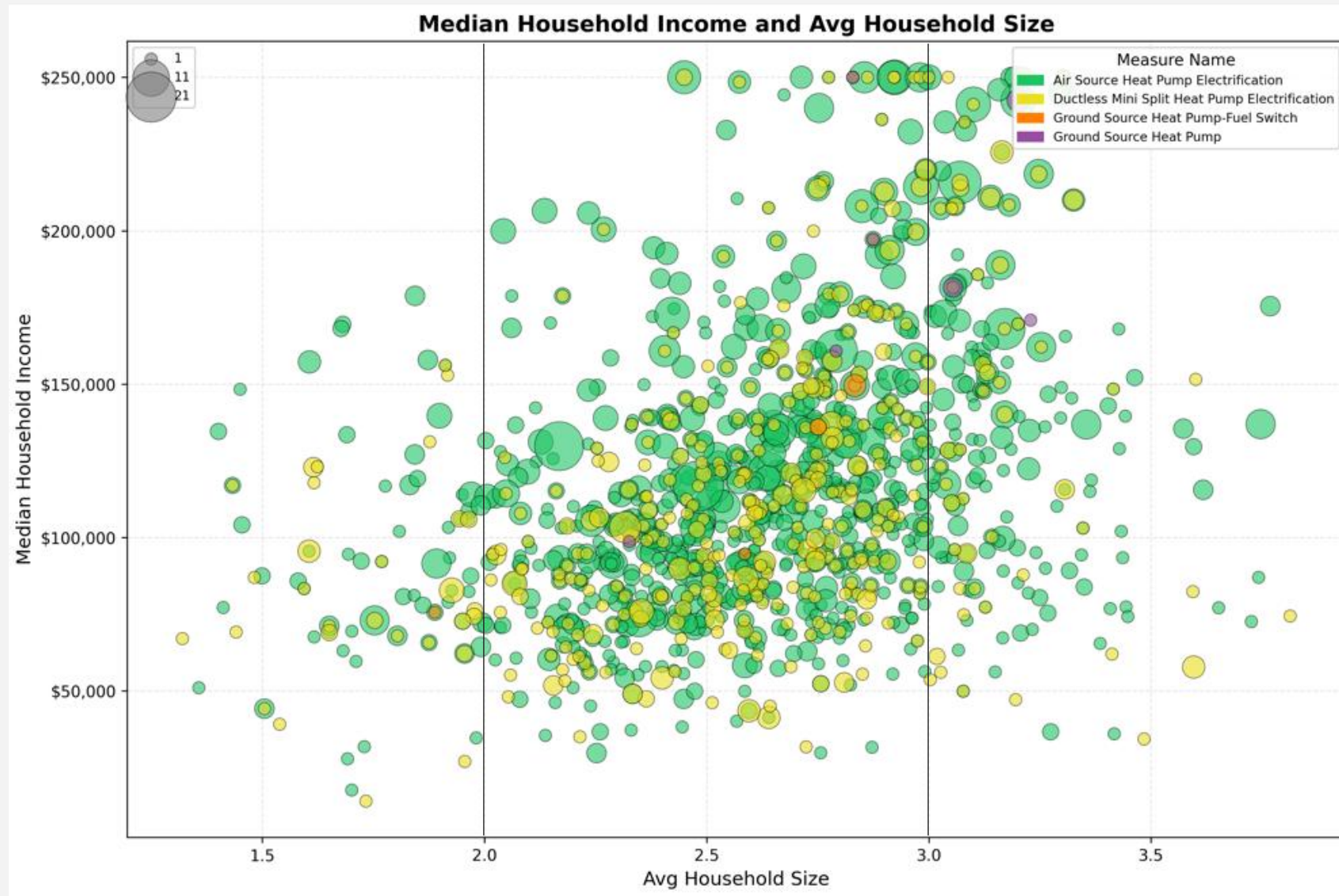
Low-income: A customer of a participating utility with a household income...at or below eighty percent (80%) of the Area Median Income.

80% AMI Income Limits increase nearly linearly as household size grows.

Household Size	Area Median Income Limits 2025 (Effective April 1, 2025)							
	30%	40%	50%	60%	80%	100%	120%	140%
1	\$25,200	\$33,600	\$42,000	\$50,400	\$67,100	\$84,000	\$100,800	\$117,600
2	\$28,800	\$38,400	\$48,000	\$57,600	\$76,750	\$96,000	\$115,200	\$134,400
3	\$32,400	\$43,200	\$54,000	\$64,800	\$86,350	\$108,000	\$129,600	\$151,200
4	\$35,970	\$47,960	\$59,950	\$71,940	\$95,900	\$119,900	\$143,880	\$167,860
5	\$38,850	\$51,800	\$64,750	\$77,700	\$103,600	\$129,500	\$155,400	\$181,300
6	\$41,730	\$55,640	\$69,550	\$83,460	\$111,250	\$139,100	\$166,920	\$194,740
7	\$44,610	\$59,480	\$74,350	\$89,220	\$118,950	\$148,700	\$178,440	\$208,180
8	\$47,490	\$63,320	\$79,150	\$94,980	\$126,600	\$158,300	\$189,960	\$221,620

Published by the City of Chicago. Covers the Chicago-Naperville-Joliet HUD Metro Fair Market Rent (FMR) area.

# Household Size



**2.64** Average household size of mapped addresses according to Census Bureau data

**2.52** Household size for unknown household types according to the IL TRM v13.0 (effective 1/1/25)

# Result

In CY2024, the policy applied a 10% assumption of IE EEE savings for Midstream programs, applied to Contractor/Midstream and Instant Discounts.

Since the policy doesn't specify household size, we propose to use the TRM v13 household unknown value of 2.52, which leads to a 17.6% assumption of IE EEE savings for Midstream programs for CY2025 and CY2026 evaluation.

Household Size (participants)	80% Income Limit	Percent of households that meet the IE definition
2	76,750	14.0
2.52*	81,742	17.6
3	86,350	21.8
3.5	91,125	25.1

\*Household size for unknown household types according to the IL TRM v13.0 (effective 1/1/25)



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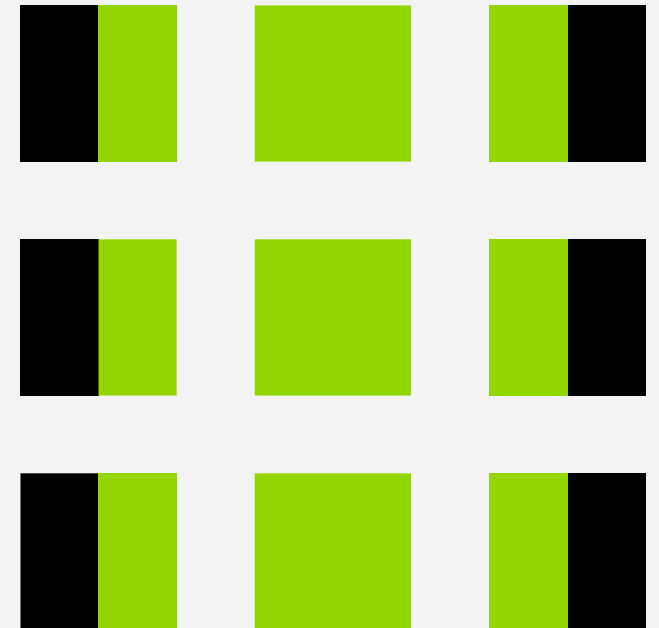
# Thank You

**Prepared For:**

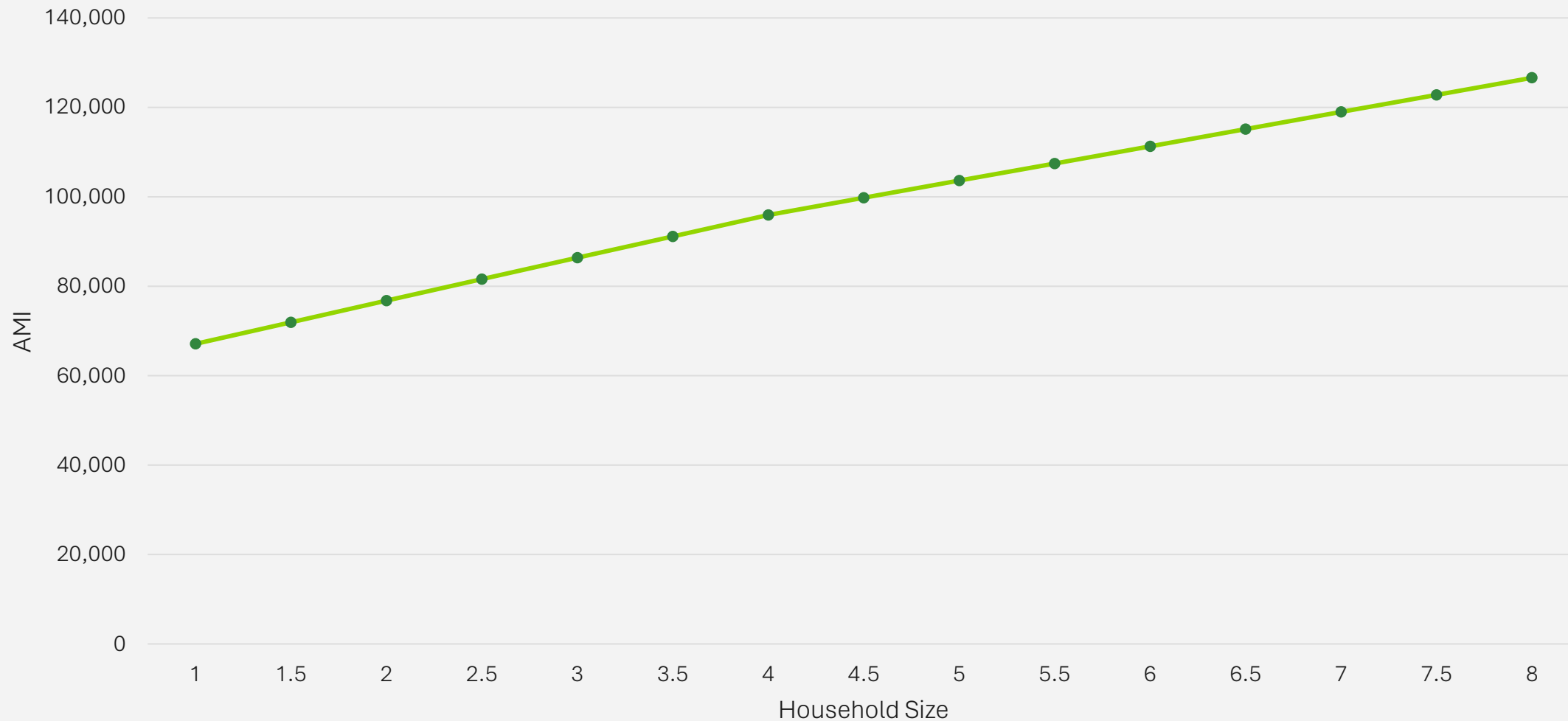
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# 80% AMI Income Eligibility by Household Size



# TRM Household Size Assumption

Household = Average number of people per household

Household Unit Type	Household <sup>613</sup>		
	IQ Participants	Non-IQ Participants	All Participants
Single-Family - Deemed	2.76	2.62	2.67
Multifamily - Deemed	2.3	2.09	2.18
Household type unknown			2.52 <sup>614</sup>
Custom	Actual Occupancy or Number of Bedrooms <sup>615</sup>		

Use Multifamily if: Building meets utility's definition for multifamily

TRM v13.0 Page 187