

Initial Response to ComEd Proposed Income Eligible Budget Numbers

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Income Eligible Budget Changes

- ComEd has not provided a breakdown of Residential vs. IE budgets on its Home Energy Savings program – this is critical to understanding what IE investment in whole building weatherization is being proposed.

- NEW DRAFT PLAN Just-Approved Plan

• Multifamily HES	\$37M, \$38M, \$36M (+10M)	(Was \$27M)
• Single Family HES.	\$29M, \$29M, \$30M (+\$22M)	(Was \$7.6M)
• Whole Home Electric	\$40M, \$38M, \$38M (-\$1M)	(Was \$41M)

- Need better understanding of the basis for and breakdown of these numbers
- Need more information about increases coming from gas utilities given they are joint programs
- Need information on additional budget for braided weatherization program (implemented with community action agencies via state weatherization program)

Other Income-Eligible Programs

2027-2029

- Home Energy Products. \$35M \$36M \$37M
- Behavioral \$7M \$6M \$6M

Former Plan (2027-2029)

- Home Energy Products \$18.4M \$13.7M \$13.8M
- Behavioral \$Zero

Other Income-Eligible Programs

- Near doubling of IE Kits is concerning...why? (Easy savings?)
- Significant increase (from zero spend) on Behavioral programs, which no SAG advocate has championed...why? (Easy savings?)

Bottom Line Takeaways/Questions

- Increase in IE spending now required under law.
- New IE number (25% of total budget) represents statutory minimum.
- Can you increase IE whole building (MF and SF) weatherization and still hit savings targets?
- Need more information on breakdown of programs and gas spending for joint weatherization programs
- How much will be allocated to the braided weatherization program?
- Why the increases in kits and behavioral programs given prior stakeholder feedback?
- What does ComEd's interest in declaring solar as EE mean for the overall portfolio?