
SAG Feedback on ComEd's revised 2027-29 EE Plan presentation from 12/18



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Feedback on Material Presented 12/18



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Market Rate Residential Programs

- Encourage ComEd to deliver Market Rate electric-only retrofits - at the very least for multi-family condos and apartments. At minimum could be a direct to consumer offering for cold climate heat pumps to displace electric resistance heat.
- Encourage ComEd to re-engage on Market Rate weatherization (joint with gas utilities).
- Encourage ComEd to plan for a segment of the Whole Home Electrification channel be offered to Market Rate. Not only to support a diverse portfolio, but to also help expand the market in IL for cold climate heat pumps.

Misc. Feedback

- Appreciate that Portfolio Level Costs efficiencies where there's only 2% growth in said costs.
- Concerned about the potential amount of Home Energy Report and Kits investment above status quo levels.
- Encourage a robust All-Electric New Construction offering.
- Would like more detail on the new Stretch Code offering and how it differs in terms of energy savings from status quo.

Outstanding Questions on Revised Plan 7

(re-raising questions submitted to ComEd on 12/5)

Need more detail on: Savings

Program spending and kWh savings claimed by sector and program. We'd like to see a breakdown at the individual program level, with IE shown separately from non- IE residential.

Breakdown of kWh savings for each program (IE and non-IE res split out) and for the portfolio as a whole by:

- Electric efficiency
- Gas therm conversions
- Electrification conversions

Estimated annual peak demand savings. While ComEd does not have statutory peak demand savings goals, we would like to understand how peak demand savings are expected to change, relative to the currently approved 2026-29 plan, under the new plan. We'd like to see forecast savings by program by year in MW.

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Need more detail on: IE Programs

How will the statutory requirement for 80% on whole building programs be met? What mix of programs?

What IE programs are considered “whole building”?

For whole building weatherization, separately for single-family and multi-family, what fraction of spending and savings are from:

- Weatherization of already *electrically heated buildings*
- Weatherization of buildings that are also *electrified under EE*
- Weatherization of *gas-heated buildings through joint delivery with gas utilities*
- Weatherization of *gas-heated buildings by ComEd alone*

Income eligibility verification. Can the Company share a breakdown of how they plan to verify income for program qualification purposes by program channel? Specifically, how does the Company plan to utilize “disadvantaged community”/DAC qualification for IE programs in the amended plan?

Need more detail on: Electrification

In addition to portion of savings expected from electrification and programs in which it will be concentrated, we are interested in the following:

- What program designs will ComEd use to promote electrification measures? IE whole building assessments? Target marketing to communities with high propane use? Midstream rebates? Custom C&I offers? Etc.
- Regarding heat pumps, will ComEd limit its promotions to cold climate models (whether full electrification or hybrid electrification)? If not, why not?
- Does ComEd plan to support any industrial electrification? What will that initiative look like?
- Does ComEd plan to include ground-source heat pumps in its measure mix?

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Need more detail on: Program Integration

Integration with delivery of other non-EE offerings. How does ComEd plan to integrate delivery of EE with promotion of demand response (DR), solar PV, and other demand-energy resources (DERs) like the new Storage for All program? How will such integration work? How will costs be shared or allocated between EE and other initiatives (e.g., between smart t-stats as EE and leveraging of smart t-stats for DR)?

Integrating marketing of EE and new low-income discount rates (LIDR). How does ComEd plan to market IE EE programs to new LIDR customers (whose income falls below 300% FPL) and vice versa?

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Thank you

