

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, October 1.**
- Include “New Construction Policy Feedback” in the subject line of the email.
- All comments will be posted on the [SAG website](#), and circulated to the SAG Reporting Working Group.

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. Comments were due August 20th. Comments received are posted on the [Policy webpage](#).
- A follow-up discussion was held in the SAG Reporting Working Group on [Monday, September 8](#).
- Following the September 8th meeting, ComEd shared updated redline edits for final review:
 - [Income Eligibility Verification Guidelines for Residential New Construction \(RNC\) Program \(Redline 9/16/25\)](#)
 - [Income Eligibility Verification Guidelines for Residential New Construction \(RNC\) Program \(Clean 9/16/25\)](#)

Comments Submitted By:

Name: Abigail Miner, Senior Program Specialist, Public Interest Division

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Company or Organization: Office of the Illinois Attorney General

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Question 1: Please describe comments and /or questions on the updated proposed policy:

- [Income Eligibility Verification Guidelines for Residential New Construction \(RNC\) Program \(Redline 9/16/25\)](#)
- [Income Eligibility Verification Guidelines for Residential New Construction \(RNC\) Program \(Clean 9/16/25\)](#)

Response:

ILOAG opposes the expansion of the Residential New Construction (“ResNC”) 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, the Company’s proposal is, by its own admission in the September 8, 2025 Stakeholder Advisory Group (“SAG”) Reporting Working Group meeting, not enforceable by the Company. It is critical to ensure that the budget the Company committed to IE customers in its EE Plan reaches that population.

ILOAG recognizes and appreciates the Company's consideration and response to stakeholder feedback, and especially appreciates the elimination of the sixth income eligibility verification pathway (Alternative Approaches for Income Eligible Verification), which was overly broad.

ILOAG does support the expansion of the ResNC 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.