

Proposed Policy for Version 3.0: Framework for Claiming Savings from Co-Funding Programs **Submitted By: ComEd**

Question 1: Proposed Policy and Rationale

Briefly describe the policy proposed to be included in Policy Manual Version 3.0, including rationale for why this policy is necessary in Illinois.

Questions to consider:

- 1. Why does this policy require inclusion in Policy Manual Version 3.0?*
- 2. What unresolved policy issue(s) will be resolved by inclusion in the Policy Manual Version 3.0?*

Please be as specific as you can. If you have specific policy language to propose at this time, please include in this template. It is not a requirement to draft policy language in the proposal template. If draft policy language is not included here, you may be assigned to draft proposed policy language for review by the Subcommittee at a future meeting.

The proposal is to discuss the framework for claiming savings from co-funded building and industrial electrification programs and from ComEd's role in helping state, municipal, and other public partners apply for and access federal and/or state funds for co-funded EE opportunities (e.g., Infrastructure Investment & Jobs Act). It was agreed to do so amongst the Parties to ComEd's Revised Plan 6 Stipulation, via the SAG Policy Manual subcommittee, to ensure this is addressed as part of Illinois Energy Efficiency Policy Manual Version 3.0.

Question 2: Utility Impact

Describe whether the proposed policy impacts Illinois gas utilities, electric utilities, or both.

The Revised Stipulation only applies to ComEd, but this type of policy could potentially apply to all utilities.

Question 3: Background Research

Provide any background research completed in preparing this template, including source references and links, as applicable.

Questions to consider:

- 1. Are you aware of other jurisdictions or utilities that address this policy issue?*
- 2. Have any national or regional energy efficiency organizations addressed this policy topic? If so, please provide reports and any other relevant sources.*

There is an existing MOU on this for IHWAP braided projects here in Illinois (*Claiming Savings from Income Qualified Weatherization Programs Where Multiple Entities Provide Funding Settlement Stipulation*), and it has been informally discussed for other sources of funding through the SAG before (although we do not believe any policies have formally been established). We have not yet researched other jurisdictional policies but can do so ahead of policy discussions.

Optional Question 4: Commission Decision

Has the Illinois Commerce Commission previously addressed this policy or issue? If so, please provide language and specific citations, including the ICC docket number.

Yes, the ICC approved this directive as a part of ComEd's Revised Plan 6 Stipulation, in ICC Docket 21-0155. Re co-funding policies in practice, they have, to date, approved savings claimed according to the policy contained in the IHWAP braided MOU in 2019-2021 FRUs.

Optional Question 5: Statutory Consistency

Have you reviewed your proposed policy against applicable Illinois law? Are there any possible conflicts? If so, please explain and provide statutory citation(s).

Yes, we have reviewed, and we do not believe there are any possible conflicts.

Optional Question 6: Additional Information

Provide additional information, as needed, to assist with understanding the proposed policy issue and your request to include it in the Policy Manual Version 3.0. For example, have any memos been drafted to the SAG related to this policy proposal?

N/A