

Questions Submitted to Inform ComEd’s Draft EE Plan Presentation to SAG

The Large Group SAG will meet on [Thursday, December 18 \(10:00 am – 12:00 pm\)](#) by teleconference, for ComEd to present an overview of the updated draft 2027-2029 EE Plan. ComEd is required to file an updated EE Plan by June 1, 2026 for the program years 2027-2029 due to the Clean and Reliability Grid Affordability (CRGA) Act.

- [Click here](#) to review a presentation describing legislative changes to EE from the [November 12 SAG meeting](#).
- SAG participants had an opportunity to raise questions for ComEd to consider in preparing the December 18 presentation to SAG. ComEd will not respond in writing to questions. Questions will be shared with ComEd and posted on the SAG website.

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Arvey Mechanical Questions

Submitted by: Forrest Robinson (forobinson74@hotmail.com)

1. Will there be funds available for middle class customers for EE projects? It seems like more and more of their utility bill goes to fund these programs and all the funding goes to low income programs that few contractors are part of. Should we really be forced to pay into these social justice programs?

Community Investment Corp. Questions

Submitted by: Cassidy Kraimer (cassidy.kraimer@icccchicago.com)

1. Does someone (ComEd or the ICC) have a clear legal interpretation on whether utilities can submit plans ahead of the June 1 effective date?
2. How is ComEd addressing joint programs, particularly if Nicor or other gas utilities plan to file updated plans?
3. What changes is ComEd planning to the electrification programs given the new 20% cap on savings from electrification and the shift away from requiring 25% of electrification savings to come from low-income programs?
4. How does ComEd plan to preserve and grow the whole home electric program in light of the change in the 25% savings requirement in electrification savings shifting to a 33% spend requirement?
5. What is the status of including the proposed Residential Electric New Construction Program (ResNC) in the next EE Plan?
6. What is ComEd's planning around how the Storage for All program will be incorporated into their planning and overall coordination with EE adjacent programs?

Elevate Questions

Submitted by: Mark Milby (mark.milby@elevatenp.org)

1. Does someone (ComEd or the ICC) have a clear legal interpretation on whether utilities can submit plans ahead of the June 1 effective date?
2. Can you clarify procurement/RFP timelines for 2026?
3. How is ComEd addressing planning for joint programs, particularly if Nicor or other gas utilities plan to file updated plans?
4. What changes is ComEd planning to the electrification programs given the new 20% cap on savings from electrification and the shift away from requiring 25% of electrification savings to come from low-income programs?
5. How does ComEd plan to preserve and grow the Whole Home Electric program in light of the change in the 25% savings requirement in electrification savings shifting to a 33% spend requirement?
6. IE retrofit programs have historically prioritized weatherization, but rising savings goals continue to push portfolios to focus on maximizing savings, which can lead to tension between these objectives. How will ComEd balance these priorities to maintain investment in weatherization? With a requirement of 90% of incentives for major measures like weatherization and health/safety, how will ComEd ensure holistic service so IE customers aren't left with missed energy-saving opportunities?
7. Provisions of 220 ILCS 5/8-103B(c) requires ComEd to design and implement low-income energy efficiency measures that "coordinate" with other programs to maximize benefits and minimize administrative burdens for customers. How will coordination and cross-promotion with programs like Illinois Solar for All and billing assistance programs be conducted in Plan 7 and will additional efforts be made than what happened during Plan 6? Also noting that CRGA calls for new non-EE programs that could fall into this category like Illinois Storage for All, new electricity rates, etc.
8. Can ComEd provide more details on the funding provided for technical assistance or other support beyond the assessments provided under the Public Schools Carbon Free Assessments program and any plans to increase the funding for this program or associated incentives in Plan 7?
9. How does ComEd intend to support heat pump contractor training as part of the EE portfolio in Plan 7? Does anything change with the passage of CRGA, like greater emphasis?

National Consumer Law Center Questions

Submitted by: Karen Lusson (klusson@nclc.org)

Income Qualified Spending:

1. What is the total annual budget and 2027-2029 plan total budget in light of the new statutory minimum for IQ budget (25% of total budget) and the provision allowing for lower annual goals for increased spending up to 35% of total budget, what % and dollar amount does ComEd propose will be spent annually on IQ programs? (NCLC's preference is for a 35% minimum spend, particularly in light of increased rates and data center growth concerns.) Please provide stakeholders all workpapers justifying this level.
2. What percentage and dollar amount of annual IQ spending will be dedicated to:
 - a. Braided (IHWAP) SF weatherization
 - b. Braided (IHWAP) MF weatherization
 - c. SF/MF Electrification/All-Electric programs

- d. Joint Gas SF weatherization (Have you contacted Nicor Gas to determine what increased level of IQ spending they will be proposing? What is that amount? How did that enter into ComEd's proposed budgeted amount?)
 - e. Joint Gas MF weatherization (Have you contacted Nicor Gas to determine what increased level of IQ spending they will be proposing? If not, why not? What is that amount? How did that enter into ComEd's proposed budgeted amount? Our understanding is that Peoples Gas/NShore will not be revising their plan per the new statute. Have you confirmed that?)
 - f. Market-rate Residential programs, with a breakout by program
3. What percentage of gas therm conversions are assumed in these proposed program spending levels?
 4. What percentage of electric efficiency savings are assumed for each of these program spending levels?
 5. What percentage of electrification conversions are assumed for these program spending levels?

Implementation Contracts:

1. Will ComEd be entering into new implementation contracts for the programs in light of the CRGA amendment that recognizes additional points for IL-based companies? If so, which programs? If not, why not?

Impact of New ComEd Low-Income Discount Rates

1. Beginning January 1, 2026, ComEd will be offering five-tiered low-income discount rates to customers whose income falls between 0% and 300% of the federal poverty level. How will these new discount be incorporated into the marketing of your programs?
2. How do you plan to ensure that low-income customers are not marketed to finance measures through any new EEUP program that is developed in the coming year(s)?

NRDC Questions

Submitted by: Kari Ross (kross@nrdc.org)

1. **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.
2. **Breakdown of kWh savings for each program (IE and non-IE res split out) and for the portfolio as a whole by:**
 - a. Electric efficiency
 - b. Gas therm conversions
 - c. Electrification conversions
3. **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 (perhaps as part of same table as in response to #2 above).
4. **Level of IE spending.** There is a statutory minimum equal to 25% of total program spending, but also an opportunity to lower goals for increased spending on IE and moderate-income customers up to 35%.
 - a. What level of IE spending is ComEd proposing? Annually, by program channel, and inclusive of braided funds with IHWAP single-family and multifamily initiatives.

- b. How did it arrive at that level?
 - c. Did the Company do an analysis of the tradeoffs inherent in spending more than 25% on IE and ability to meet or exceed goals? Can that analysis be shared?
5. **Breakdown of IE program spending.**
- a. How will the statutory requirement for 80% on whole building programs be met? What mix of programs?
 - b. Related to the above, what IE programs are considered “whole building”?
 - c. For whole building weatherization, separately for single-family and multi-family, what fraction of spending and savings are from:
 - i. Weatherization of already electrically heated buildings
 - ii. Weatherization of buildings that are also electrified under EE
 - iii. Weatherization of gas-heated buildings through joint delivery with gas utilities
 - iv. Weatherization of gas-heated buildings by ComEd alone
6. **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?
7. **Assumptions about joint delivery with gas utilities.** CRGA allows northern gas utilities to voluntarily significantly increase their level of spending and savings – at least a 250% increase is required if the gas utilities want to ask for a shareholder incentive mechanism. It is our understanding that Nicor plans to file a revised plan that significantly increases their spending but will not have a draft plan until at least February; we are unsure about what Peoples/North Shore will do. Given that ComEd will have a draft program plan before plans from the gas utilities are available:
- a. What has ComEd assumed about opportunities for joint delivery with the gas utilities in its initial plan? What was that based on?
 - b. How has ComEd considered the potential for joint delivery, particularly for IE, in its assumptions about the amount of gas therm conversions it is planning to claim?
 - c. What would happen if ComEd assumes less opportunity for joint delivery with gas than becomes possible once gas utilities announce their plans?
8. **Non-IE home weatherization.** In recent years, ComEd has not offered weatherization programs for non-IE customers. Will that change under the new plan given the ability to significantly increase gas therm conversions? If so, what will the offering look like? If not, why not?
9. **Specifics on electrification offerings.** In addition to portion of savings expected from electrification and programs in which it will be concentrated (per question #3 above), we are interested in the following:
- a. 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.
 - b. Regarding heat pumps, will ComEd limit its promotions to cold climate models (whether full electrification or hybrid electrification)? If not, why not?
 - c. Does ComEd plan to support any industrial electrification? What will that initiative look like?
 - d. Does ComEd plan to include ground-source heat pumps in its measure mix?
10. **Integration with delivery of other non-EE offerings.** How does ComEd plan to integrate delivery of EE with promotion of DR, solar PV, and other 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)?

11. **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?
12. **Focus of R&D funding.** What initiatives does ComEd plan to fund?
13. **Summary of major differences in program offerings relative to currently approved 2026-29 plan.** Any new programs or measures? Programs or measures with significant increases or decreases in budget? For example, what is the status of the proposed Residential Electric New Construction Program (ResNC) for the amended plan?

Office of the Illinois Attorney General

Submitted by: Abby Miner (abigail.miner@ilaq.gov)

1. How does ComEd plan to change each component of portfolio level/non-incentive spend? Please specify how much ComEd proposes to change each category of portfolio level/non-incentive spend (e.g. MDI, R&D, portfolio administration, marketing and outreach, etc.) and represent each change in absolute dollars and as percentage of total budget.

Power TakeOff

Submitted by: Erin Kempster (erin.kempster@powertakeoff.com)

1. In what ways, if any, does ComEd anticipate modifying its portfolio to reflect the shift away from CPAS to incremental annual energy savings - and what impact may this have on programs like Business Energy Analyzer, both in terms of savings goals and the methodology for claiming savings over measure life?

ICC Staff Questions

Submitted by: Elizabeth Horne (elizabeth.horne@illinois.gov)

1. Under the Utility Data Access Act – Whole-Building Data, CRGA (Art. 5) requires utilities to deliver aggregated whole-building usage data to owners by January 2027. During Plan 2027-2029, what internal IT investments, cost allocations, and program design changes will ComEd make to feed that data into the Multi-Family Energy Savings and Contractor/Midstream offerings, and to support Plan 7’s commitment to “streamline joint programs” (Stipulation p. 17)?
2. Under Stretch Energy Code & Municipal IRP Support, SB 0025 Art. 1 directs municipalities and co-ops to produce IRPs and allows them to adopt the Illinois Stretch Energy Code. During Plan 2027-2029, how will ComEd’s Codes & Standards market-transformation budget (Plan §5.4.3) be re-prioritized to: (a) help cities within the territory adopt the Stretch Code, and (b) incorporate resulting load-shape changes into Plan 2027-2029 savings forecasts?
3. Under Beneficial Electrification Act Revisions, CRGA extensively amends the EV Act (20 ILCS 627/45), adding new targets (e.g., 1 million EVs by 2030) and storage-for-all coordination. During Plan 2027-2029, how will ComEd reconcile these new BE targets with Plan 2027-2029’s 10% EEE savings cap (§2.1.3) and portfolio electrification budgets?
4. Under Utility-Owned Storage Coordination, CRGA’s expansion of battery-storage funding (20 ILCS 730/5-60; EV Act §55) could change behind-the-meter economics. During Plan

- 7, does ComEd plan to adjust the Whole Home Electric and Small-Business storage measures to reflect new external rebates or loans?
5. Under Self-Direct RPS Credits – Interaction with EEUP Financing, large customers may shift to self-direct REC compliance (20 ILCS 3855/1-75 (R)). During Plan 2027-2029, could those same customers still access EEUP on-bill financing for Plan 7 energy-efficiency measures, and how will ComEd mitigate any free-rider risk?
 6. Under the New Geothermal Homes & Businesses Program, SB 0025 adds a geothermal REC block (§1-75 (S)) starting PY2028. During Plan 2027-2029, does ComEd anticipate reallocating Residential incentive funds (e.g., Contractor/Midstream) to coordinate heat-pump ground-loop offerings?