

Comments Submitted By:

Name: Kimberly Swan

Company or Organization: ComEd

Website (if applicable): www.Comed.Com

Email: kimberly.swan@ComEd.com

Phone: (779) 231-2438

Question: Should the location of a Trade Ally in a utility's service territory be considered when applying the NTG for Disadvantaged Areas policy? Response:

Answer:

ComEd supports applying the Disadvantaged Areas NTG policy primarily based on the location of the end-use customer and installed measure, consistent with the customer-focused language in Section 7.4 of the Illinois Energy Efficiency Policy Manual. When customer or project location information is available, DAC eligibility should be determined using that information.

ComEd recognizes that end-use customer location information is not always available or feasible to collect across all program designs and delivery channels. In those circumstances, ComEd agrees that business or service provider location may serve as a reasonable proxy when the end-use customer location is unknown and cannot reasonably be determined from available program tracking data. Use of service provider location in these circumstances provides a practical and administratively feasible approach that supports consistent implementation while recognizing existing data limitations.

To support consistent application of this approach, service provider location may be used to validate DAC eligibility and a NTG = 1.0 should be applied if all the following conditions are met:

- the end-use customer or installed measure location is unknown or cannot be reasonably determined from available program data;
- the Trade Ally is located within a designated disadvantaged area;
- the Program Administrator and Evaluator document the underlying data limitations and the methodology used to identify the Trade Ally's disadvantaged area status; and
- the Program Administrator and Evaluator conduct periodic reasonableness reviews or audits, where practicable.

These conditions help ensure that service provider location serves as a secondary proxy only when customer location information is unavailable, while maintaining transparency and consistency in implementation.

ComEd believes this interpretation provides a clear, workable, and transparent framework for program administrators and evaluators. It appropriately prioritizes customer and project location when known, while allowing for the use of Trade Ally location as a secondary proxy when customer location information is unavailable.