

**Illinois EE Stakeholder Advisory Group
Large Group SAG Meeting**

Thursday, December 18, 2025

10:00 am – 12:00 pm

Teleconference

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Meeting Materials

- December 18, 2025 Large Group SAG Agenda
- SAG Facilitator Introduction to December 18 Meeting
- Questions Submitted to Inform ComEd’s Draft EE Plan Presentation to SAG
- Guidehouse Presentation: ComEd Income Eligible Multi-Family Process Evaluation
- ComEd Presentation: Revised EE Plan 7 (2027-2029)

Attendees

Name	Company or Organization
Celia Johnson	Facilitator (Celia Johnson Consulting)
Zoe Knaus	SAG Facilitation Support (Inova Energy Group)
Abbigail Penk	ICC Office of General Counsel (ICC OGC)
Abigail Miner	IL Attorney General's Office
Adam Roche	Cascade Energy
Adel Wehbi	The Will Group
Amy Jewel	Elevate
Andrea McKenna	Cascade Energy
Andrew Cottrell	ScottMadden
Andrew Plenge	ComEd
Andrey Gribovich	DNV
Andy Braatz	Franklin
Andy Vaughn	Leidos
Anthony Albano	Resource Innovations
Antonia Ornelas	Elevate
Ashley Bukowski	ICC OGC
Ashley Palladino	Inova Energy Group
Blaine Fox	CMC Energy Services
Bobbi Fey	ICF

Name	Company or Organization
Brad Warrenburg	CMC Energy Services
Brad Fortson	ICF
Bradley Ryba	City of Chicago
Brandi Taylor	CLEAResult
Brent Nakayama	Leidos
Brian Barry	Guidehouse
Briana Moore	Will County Land Use Dept.
Brittany Mock	Resource Innovations
Caleb Simpson	ComEd
Cameron Seeley	Walker-Miller
Carl Samuelson	Michaels Energy
Carmine Tucci	Nicor Gas
Cassidy Kraimer	Community Investment Corp. (CIC)
Caty Lamadrid	Inova Energy Group
Chad Balthazor	Cascade Energy
Channel Turbides	ComEd
Charles Ampong	Guidehouse
Charles Schreier	Go Sustainable Energy, representing IL AG
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Christian Hartgrove	ICF
Christina Frank	Peoples Gas and North Shore Gas
Colin Santel	Ameren Illinois
Courtney Golino	Guidehouse
Dan Merchant	CLEAResult
Dan Ringo	SEEL
Daniel Luna-Fuller	Luna Lighting
David Salmonson	CLEAResult
Deb Dynako	Slipstream
Dena Jefferson	Franklin Energy
Denise Munoz	DMT Consulting
Diana Dorman	Energy Solutions
Elder Calderon	ComEd
Elena Savona	ES Consulting
Elizabeth Horne	ICC Staff
Eljona Fiorita	CLEAResult
Emily Pauli	ComEd
Eric Robertson	Lueders, Robertson & Konzen
Erika Dominick	Walker-Miller
Erin Daughton	ComEd
Erin Kempster	Power TakeOff
Evan Tincknell	Opinion Dynamics

Name	Company or Organization
Eve Pytel	Franklin Energy
Fernando Morales	Ameren Illinois
Fred Maher	CMC Energy Services
Hassan Khurshid	DNV
Ian VanArsdall	Nicor Gas
Ishita Kekare	Resource Innovations
Jaleesa Scott	ComEd
Jarred Nordhus	Peoples Gas and North Shore Gas
Jason Fegley	Ameren Illinois
Jason Steinbock	Willdan
Jean Gibson	Peoples Gas and North Shore Gas
Jeff Erickson	Guidehouse
Jeff Mitchell	Resource Innovations
Jessica Minor-Baetens	Guidehouse
Jim Heffron	Walker-Miller
Jim O'Shaughnessy	Energy Infrastructure Partners
Joe Arcus	City of Chicago
Joe Mays	Cascade Energy
Joel Freehling	APTIM
Joel McManus	TRC Companies
John Dakarian	Nicor Gas
John Lavallee	Leidos
John Mascarenhas	CLEAResult
John Yi	CEDA
Jon Lanning	SEEL
Jonathan Skarzynski	Nicor Gas
Joshua Asiyanbi	Nicor Gas
Joshua Ramos	Nicor Gas
Julia Friedman	Opower
Julie Hollensbe	Walker-Miller
Kanchan Swaroop	Resource Innovations
Kara Jonas	ComEd
Karen Lusson	National Consumer Law Center (NCLC)
Kari McCue	Nicor Gas
Kari Ross	NRDC
Karys Moreno	No Organization Identified
Keely Hughes	The JPI Group
Kegan Daugherty	Resource Innovations
Kirke, Fletcher	Peoples Gas and North Shore Gas
Kit White	Midwest Energy Efficiency Alliance (MEEA)
Kristen Kalaman	Resource Innovations
Lance Escue	Ameren Illinois

Name	Company or Organization
Laura Pettersen	Cascade Energy
Lauren Gage	Apex Analytics
Lee Ringo	Energy Infrastructure Partners
Lisa Obear	BrightLine Group
Lloyd Kass	Franklin Energy
Lynda Powers	Resource Innovations
Maddie Wazowicz	MEEA
Madhu Bhargava	ComEd
Maria Onesto Moran	Green Home Experts
Mark Milby	Elevate
Mark Szczygiel	Nicor Gas
Matt Armstrong	Ameren Illinois
Matt Clark	CLEAResult
Melissa Helphingstine	Primera Engineering
Michele McSwain	SEEDS
Mike Dazy	No Organization Identified
Mike King	Nicor Gas
Minya Coleman	ComEd
Misty Gibbons	Walker-Miller
Mitch Peret	No Organization Identified
Molly Graham	MEEA
Murtaza, Danish	Peoples Gas and North Shore Gas
Natasha Herring	Guidehouse
Nate Baer	i3 Energy
Nayan Patel	Nicor Gas
Neb Kistic	Erthe Energy Solutions
Neil Curtis	Guidehouse
Nic Crowder	Ameren Illinois
Nick Burstein	CMC Energy Services
Nick Warnecke	Ameren Illinois
Nicole Popejoy	IL Association of Community Action Agencies
Nikki Pacific	Ameren Illinois
Nishant Mehta	Guidehouse
Omayra Garcia	Peoples Gas and North Shore Gas
Paige G. Knutsen	MEEA
Parini Shah	Guidehouse
Patrice McFarlin	Encolor
Paul Grimyser	ComEd
Peter Widmer	Power TakeOff
Philip Roy	ComEd
Rachel Norman	SEEL
Randy Opdyke	Nicor Gas

Name	Company or Organization
Rashaan Keeton	Center for Energy & Environment
Roger Baker	No Organization Identified
Ryan Wall	Guidehouse
Sabarish Vinod	Lincus
Sagar Phalke	Guidehouse
Sanjyot Varade	Resource Innovations
Sarah Evans	DNV
Scott Mallory	Brubaker & Associates, representing ABATE, CMTC, IBEC, IIEC, LEUG, NLCG, TIEC
Selena Worster Walde	Erthe Energy Solutions
Seth Craigo-Snell	SCS Analytics
Shannon Brooks	CMC Energy Services
Shawn Haas	Peoples Gas and North Shore Gas
Shelby Smith	IL Attorney General's Office
Stephen Linkous	Bellawatt
Sushmitha Ramakrishnan	ComEd
Ted Weaver	Dunsky Climate + Energy Advisors, representing Nicor Gas
Thomas Manjarres	Peoples Gas and North Shore Gas
Tom Aridas	Peoples Gas and North Shore Gas
Ty Carter	No Organization Identified
Victoria Nielsen	ScottMadden
Wendy Jaehn	Resource Innovations
Zach Ross	Opinion Dynamics
Zoe Huspen	Citizens Utility Board (CUB)

Meeting Notes

See **red text** for follow-up items.

Introduction to Large Group SAG Meeting

Celia Johnson, SAG Facilitator

Purpose of December 18th meeting:

1. For Guidehouse to present an overview of a multi-family income eligible research study for ComEd; and
2. For ComEd to present the draft 2027-2029 EE Plan

Background on ComEd Presentation

- ComEd is presenting an updated EE Plan for 2027-2029 due to the passage of the Clean and Reliable Grid Affordability (CRGA) Act in October 2025 (pending signature by Governor Pritzker)
- SAG participants had an opportunity to raise questions for ComEd to consider in preparing the December 18 presentation to SAG
 - Questions were due December 4

- Submitted questions are posted on the [December 18 meeting page: Questions Submitted to Inform ComEd's Draft EE Plan Presentation to SAG](#)
- SAG Facilitator did not ask ComEd to respond on writing; questions are intended to inform the presentation.

Next Steps for ComEd EE Plan

- Opportunity to Present Feedback to ComEd
 - Large Group SAG meeting on Tuesday, January 13 (9:30 – 12:30)
 - Notify the SAG Facilitator (Celia@CeliaJohnsonConsulting.com) by Monday, January 5 if you plan to present feedback on the ComEd 2027-2029 draft EE Plan
- Participating in EE Plan Negotiations with ComEd
 - Before ComEd files the updated 2027-2029 EE Plan with the ICC for approval, there will be negotiations between ComEd and non-financially interested stakeholders
 - The goal is to reach consensus before ComEd files its updated EE Plan with the ICC
 - If consensus is reached, it will be documented in a stipulated agreement
 - If you are a non-financially interested stakeholder interested in participating in confidential EE Plan negotiations with ComEd, please email the SAG Facilitator (Celia@CeliaJohnsonConsulting.com) by Monday, January 5
 - Please review the SAG Financial Conflict of Interest Policy, excerpted from the SAG Process Guidance document, for the definition of “financially interested party”: SAG Financial Conflict of Interest Policy – 2024 Update (clean final)
 - ComEd legal will review negotiation participation requests
 - Negotiations with ComEd begin in January, and require signing a Non-Disclosure Agreement (NDA)

Next Steps for Other Illinois Utilities

- SAG Facilitator is meeting with individual utilities to discuss potential timeline for updated 2027-2029 EE Plans
 - Ameren Illinois will re-file
 - Nicor Gas – optional re-filing
 - Peoples Gas and North Shore Gas – optional re-filing

ComEd Income Eligible Multi-Family Process Evaluation

Brian Barry, Guidehouse

Program and Evaluation Overview

- ComEd Income Eligible Multi-Family (IE MF) Program Mission
 - Help IE MF buildings implement energy efficiency upgrades by providing financial support and technical assistance.
- Purpose of Evaluation
 - Independently assess how effectively the ComEd IE MF Program delivers energy efficiency upgrades, using interviews and data analysis to identify strengths and areas for improvement of the one-stop-shop model.
- Evaluation Process
 - ComEd PM Interview
 - Evaluate Metrics

- Interviewing Champions and Non-Participants
- Synthesize Findings
- Resources
 - Guidehouse staff led the evaluation with support from ComEd for coordination and execution. Insights were provided by stakeholders through interviews conducted by Guidehouse.

Research Objectives

- Evaluate Metrics
 - Evaluate Metrics of ComEd's IE MF Program.
 - Determine if efforts are trending to more comprehensive solutions.
 - Review Plan 6 Impact Evaluation and Quarterly Report Findings.
- Effectiveness of One-Stop-Shop Model
 - Interview program champions and non-participants.
- Identify Opportunities to Increase Efficiency & Reduce Barriers
 - Using interviews, understand property manager and tenant pain-points.
 - Identify opportunities to reduce barriers to participation.
- Program Strengths and Improvements
 - Identify program improvement opportunities.
 - Explore opportunities for new program designs.
- Synthesize and Report Findings
 - Combine insights and recommendations.
 - Focus on effectiveness of delivery model and identify participation barriers and program improvement opportunities.

Metrics Evaluation

- Metrics Evaluation Purpose
 - Evaluate Program Performance: Understand how the program is performing and progressing over time.
 - Assess Comprehensiveness and Coordination: Determine whether measures are becoming more comprehensive and determine how coordination efforts contribute to program outcomes.
 - Track Program Evolution: Gain insight into the program's growth, trajectory, and its ability to support equity, accessibility, and emerging customer and EESP priorities.
- Metrics Evaluation Methodology
 - Q2 2025 Utility Report Review: Examine the ComEd Q2 2025 report and associated metrics.
 - Historical Report Review: Analyze prior years' quarterly reports and annual reports from the Plan 6 period.
 - Impact Report Integration: Incorporate insights from the 2022, 2023, and 2024 impact reports and memos.

Metrics Evaluation Findings

- Program Coordination and Delivery
 - Program delivery has shifted to a single intake and contact point model, improving clarity and coordination, while integrating with the whole-home electric pathway for smoother transitions. New partnerships are expanding reach and service.
- Health and Safety Barrier Remediation

- The program identified numerous health and safety barriers, with very low or zero deferral rate for MF projects.
- Equity and Accessibility
 - Across the Plan 6 period, the program prioritized IE and public housing properties, directing most incentives to these communities, while increasing diverse business EESP participation, expanding partnerships with PHAs and community organizations
- Data and Reporting Consistency
 - Reporting consistency has improved over the Plan 6 period, with 2024 realization rates reaching 1.0 for electric savings and 0.99 for gas savings, indicating stronger data accuracy and better alignment between the implementer and the evaluation team
- Measure Comprehensiveness and Impact
 - Measure comprehensiveness from 2022 to 2024 shifted from broad variety (many unique measures and widespread upgrades) to concentrated impact (fewer buildings and fewer unique measures, but larger projects). 2024 signaled this impact-driven shift with a strategic focus on electrification and a sharp rise in heat pump and AC installations.

Q2 2025 Utility Report: Metrics

- Income Eligible
 - 385 electric resistance heating systems converted to high-efficient heat pumps achieving 5,265 MWh savings.
 - 978 IE and PHA buildings served across 126 unique zip codes, and 22,259 tenant units receiving free products LEDs and faucet aerators.
 - 11,579 MWh savings YTD (36% of forecast).
- Public Housing
 - 47 PHA building upgrades completed YTD, achieving 952 MWh savings (56% of forecast).
 - A major Chicago Housing Authority Bronzeville project replaced 1,300 AC units across 668 apartments, investing \$1.09M in incentives saving 352 MWh.
 - \$1.04 in incentives and \$450k in non-incentive spend.
- Market Rate
 - Market Rate achieved 1,360 MWh savings YTD (34% of forecast).
- Health & Safety
 - \$793,544 in health and safety spending through Q2 2025, with 23% directed to ceiling reinforcement, venting, and exhaust.
 - Across IE sites, 593 properties were assessed, with 107 requiring health and safety interventions, including electrical upgrades, venting, ceiling reinforcement and mold remediation.
- Trends
 - Bigger, deeper projects emphasizing a push for large-scale retrofits, while maintaining comprehensive measure offerings.
 - 4,336 IE tenant unit direct installs, down from 7,084 in 2024 and 4,815 in 2023.
 - 126 zip codes served in 2025, down from 151 in 2024 and 161 in 2023.
 - Increased Public Housing investment and savings.

Q2 2025 Utility Report: Program Coordination & Delivery

- Program Delivery and Customer Journey

- Single intake and point of contact model: The program assigns each property owner/manager a dedicated project lead to guide them through assessments, upgrades, and rebate applications.
- Integration with Whole-Home Electric: MF building owners interested in electrification are now directed into the Whole Home Electric pathway for eligibility review, creating stronger linkages across ComEd's portfolio.
- Partnerships and Outreach
 - New Outreach partners added in 2025: ComEd brought in Utility Energy Services and the Metropolitan Mayors Caucus to strengthen outreach and support the Whole Home Electric offering.
- Program Innovations and Pilots
 - Passive House Integration Pilot: Integration of a Passive House Institute US incentive tier into the Affordable Housing New Construction offering. Five MF projects are on course to achieve Integration of a Passive House Institute US certification when complete.

Q2 2025 Utility Report: Equity and Accessibility

- Diverse Business Enterprise (DBE) Focus
 - ComEd continues to engage diverse service providers, ensuring meaningful participation and allocation of incentives to Diverse Business Enterprises.
- Program Design for Accessibility
 - Single point of contact and intake forms Introduced to simplify access for property owners, property managers, and tenants.
 - The program assigns each property owner/manager a dedicated project lead to guide them through assessments, upgrades, and rebate applications.
- Health and Safety Barrier Remediation
 - The program addresses health and safety barriers by funding remediation efforts, ensuring that low-income customers can fully participate in energy-efficiency upgrades.

Measure Savings Over Plan 6 Period

- Lighting continues to deliver the highest verified net savings in the ComEd MF Upgrades program. Shell and heat pump installations also contributed significantly, with heat pumps seeing a sharp rise in adoption and impact in 2024 due to ComEd's efforts in reaching and serving properties with electric resistance heating systems. Installations of consumer electronics and air conditioners also increased notably.

IE Measures Installed Over Plan 6 Period

- 2023 Peak: The program was most comprehensive in 2023. Many buildings received full assessments and major upgrades, showing strong reach and improvement over 2022.
- 2024 Decline: In 2024, overall comprehensiveness declined. The percentage served for most major measures decreased, particularly for whole-building assessments and in-unit upgrades. Although the program reached more buildings than in 2023, each building received fewer upgrades, reducing overall comprehensiveness.

Measure Data/Comprehensiveness of Treatment (2022-2024):

	2022	2022	2023	2023	2024	2024
	Quantity of buildings	% of Total Buildings Served	Quantity of Buildings	% of Total Buildings Served	Quantity of Buildings	% of Total Buildings Served
Buildings that received a whole building assessment	893	26%	797	34%	356	12%
Buildings that received only direct install measures	515	15%	328	14%	327	11%
Buildings that received in-unit (tenant) upgrades	1,281	38%	871	37%	511	17%
Buildings that received one or more:						
Air Sealing	589	17%	373	16%	185	6%
Insulation	892	26%	829	35%	798	26%
Water Heating Equipment	447	13%	430	18%	190	6%
Refrigerator Replacements	24	1%	50	2%	46	1%
Capital HVAC	439	13%	479	20%	123	4%
Total Buildings Served	3395		2337		3070	

Chris Neme: A higher percentage of buildings were served in 2023 than in 2024. You also made the point that 2024 got deeper savings. Can you clarify?

- Cassidy Kraimer (via chat): Is 2023 considered the most comprehensive year, even with deeper retrofits addressed in 2024?
- Brian Barry: The savings were comparable between years. The number of buildings declined, but the number of buildings in 2024 does not capture the number of units served.
- Chris Neme: If we highlighted percent of units, the 2024 numbers would be comparable to 2023?
- Brian Barry: Sure, adding units served would be helpful in the future. We are showing total savings by category, and the number of buildings decreased overall. This could be a difference in units, we can look into it.
- Chris Neme: Are heat pumps included in the HVAC numbers?
- Brian Barry: Yes, I believe so.
- Chris Neme: It would be helpful to see the table shown on slide 12 with the number of units. This shows that shell savings are down substantially, even though you served more buildings. It is impossible to interpret if we do not know how many units are served.
- Brian Barry: This is something we can look into.
- Chris Neme: Do you have the information to understand why comprehensiveness declined?
- Brian Barry: I do not have the answer now, but we can follow up and look into it. This is a comparison of publicly available metrics year over year.
- Chris Neme: Thank you, it would be useful to see and understand why comprehensiveness changed. Is it a change to program design; the nature of the buildings (newer buildings with fewer opportunities), etc.
- Charles Schreier (via chat): To the degree the associated savings could be incorporated into an updated slide 12, that would be helpful as well. Shift to units instead of buildings to include more data.

Cassidy Kraimer: Do these numbers include public housing units as well?

- Brian Barry: Yes.

Non-Participant Interviews – Context

- Four non-participants identified barriers to participation and areas for program improvement.
- Non-Participant Interview Purpose
 - Gather insights from community stakeholders who are familiar with the program but decided not to pursue the offering.
 - Learn what prevented them from participating in the program and identify opportunities for improving the one-stop-shop approach and increasing customer participation.
- Non-Participant Interview Methodology
 - Recruited and interviewed 4 knowledgeable stakeholders via email, were offered a \$50 incentive for participation in 45-minute interview, including two property managers and two sustainability and/or rebates coordinators.
 - Developed a structured interview guide focused on program operations, customer barriers, and enhancement ideas.
 - Conducted interviews between July - August 2025
 - Analyzed findings from interviews to identify trends and make recommendations.

Non-Participant Interview Findings

- Perceived Value and Program Experience
 - Non-participants expressed interest in the ComEd program post-interview, including a request to learn about additional program measures and work with more comprehensive projects.
- Barriers to Participation
 - Non-participants reported difficulty learning about program offerings and benefits, incompatible measures, and lack of resident participation as barriers to participation.
- Opportunities for Improvement
 - Non-participants suggest improved marketing materials, more concise communication pathways, and additional comprehensive measures to improve the program.
- Program Communication
 - Non-participants primarily learned about the program from Elevate Energy or from inquiring directly to ComEd.
- Program Coordination and Support
 - Two of four non-participants reported difficulty enrolling in the program or coordinating project implementation.

MF Program Champion Interviews – Context

- Eight program champions identified opportunities for program improvement
- Champion Interview Purpose
 - Gather insights from community stakeholders familiar with the program.
 - Learn from their experience in the program and identify strengths, challenges, and opportunities for improving the one-stop-shop approach and increasing customer participation.
- Champion Interview Methodology

- Recruited and interviewed 8 knowledgeable stakeholders from lists provided by ComEd via email, were offered a \$50 incentive for participation in 45-minute interview:
 - 4 EESPs, 2 PMs, 1 CAA, and 1 PHA.
- Developed a structured interview guide focused on program operations, customer barriers, and enhancement ideas.
- Conducted interviews between July and September 2025.
- Analyzed findings from interviews to identify trends and make recommendations.

Program Strengths

- Extensive Measures
 - Broad range of energy efficiency measures available.
 - ComEd provides extensive low- and no-cost measures.
 - 100% of respondents (n=7) were satisfied or very satisfied with the cost of delivering services.
- Joint Program Delivery
 - Scope and impact of program was expanded as program coordinated jointly with utilities.
- Clear Communication
 - 86% of respondents (n=7) were satisfied or very satisfied with communication from ComEd.
 - Those with prior experience in energy programs found eligibility and benefits to be clearly communicated.
- Time and Availability
 - Most interviewees had the time and availability to engage with the program.
 - 86% of respondents (n=7) were satisfied or very satisfied with amount of time it took to participate in the program.
 - Several felt that scheduling and facilitating installations was smooth.
 - Installations were most successful when conducted in evenings (outside 9-5).

Champion Interview Findings

- Perceived Value and Program Experience
 - 100% of participants were satisfied or extremely satisfied with the cost to deliver program and felt program excelled in providing variety of measures at low- to no-cost.
- Barriers to Participation
 - Common complaints included issues with program navigation, unclear roles, confusion over eligibility, as well as delayed application approvals or difficulty in tracking progress.
- Effectiveness of the One-Stop Shop Model
 - 67% viewed the program as operating under a one-stop-shop model. This was pronounced amongst interviewees who indicated their point of contact was clearly established and received timely assistance
- Program Coordination and Outreach
 - 86% of participants were satisfied or very satisfied with program communication, especially amongst veterans of the program.
- Program Coordination and Support
 - 60% of participants felt the program was well coordinated but believed that definition of roles and responsibilities could have been made clearer.

Abigail Miner (via chat): What is an EESP?

- Cassidy Kraimer (via chat): Energy Efficiency Service Provider.
- Dan Merchant (via chat): Here is more information: <https://comed.edgeenergy.io/eesp/>

One-Stop-Shop Model

- Participants were read a description of the One-Stop-Shop model then asked Yes or No questions regarding elements of program participation.
- Majority of Participants View MF IE as One-Stop-Shop Model
- "The Multi-Family Energy Savings Program is designed to provide coordinated services: customers can go to a single place to select the services they need, regardless of the type of service, whether it be mechanical systems, weatherization, or fuel type. Customers work with a single program point of contact who coordinates all aspects of the services required. This approach is designed to simplify the process, making it easier to access and benefit from the program's offerings."
- 67% considered the program to be a one-stop-shop model, indicating that most participants felt the program delivered on its integrated service promise.

One-Stop-Shop Continued

- Strong Support for Participation: 86% of respondents said they received support to participate in the program.
- Single Utility Contact: 83% reported they interfaced with a single utility contact, suggesting streamlined communication with the utility.
- Few Had Only One Point of Contact: Only 33% interfaced with just one person overall, meaning most participants had to deal with multiple contacts, which could lead to confusion or inefficiency.
- Significant Coordination Issues: A large majority (83%) reported that the one-stop-shop model was not absent of gaps, redundancies, or coordination issues. This highlights persistent problems with program coordination and process integration.

Cassidy Kraimer (via chat): Can you elaborate on how 67% found the program to have a one-stop shop, but only a few experienced having a single point of contact?

- Brian Barry: Peoples were asked about the one-stop-shop approach and whether they felt it was aligned to the description. In the interviews they said they believed they were operating under something similar. They said they did have to engage with several people. It didn't necessarily seem that it was a barrier to them.

Key Findings

- Champion Interviews
 - Program perceived as affordable and accessible, with a broad range of no and low-cost measures offered.
 - Opportunities exist to enhance clarity around eligibility, roles, and available measures.
 - Additional tools like trackers, FAQs, print and digital marketing materials, and eligibility data could strengthen outreach and support.
 - Respondents were largely satisfied with the amount of time to participate in program.
- Non-Participant Interviews
 - Increasing outreach and clarifying contact points can ensure stakeholders feel informed and supported, reducing the need for extra effort on their part.

- Expanding and tailoring measure offerings can make them more relevant and comprehensive, creating greater impact for stakeholders.
- Improving tenant entry, scheduling, and logistics coordination can remove barriers and deliver a smoother experience.
- Metrics Evaluation
 - Projects focus is shifting to depth over breadth, expanding heat pump and AC installations while advancing electrification.
 - Health and safety barrier mitigation achieved uniquely high success in this program, creating approaches that can inform other programs.
 - Emphasis on public housing savings continues to grow, with significant increases from the beginning to the end of Plan 6.

ComEd 2027-2029 Draft EE Plan Portfolio

Elder Calderon, ComEd (with others from the ComEd EE Planning Team)

ComEd Energy Efficiency Portfolio Achievements

- Portfolio Lifetime Achievements
 - 167.62 million efficient bulbs sold
 - 543,336 assessments completed
 - \$12.74 billion on customer bills saved
 - 107.59 million Net MWh saved
 - 8.51 million cars off the road for a year
 - 182,177 business projects completed
 - 14,815,538 rebates and incentives provided
 - 36.51 million acres of trees planted
 - 80.49 billion pounds of CO2 reduced
 - \$2.53 billion in incentives provided to customers
 - 12.47 million homes powered for one year
- Portfolio Plan 6 Achievements
 - Continued optimization of portfolio through growth of Midstream offerings
 - 7 new electrification measures
 - New industrial offerings:
 - Industrial Energy Management
 - Advanced Refrigeration Controls
 - Over \$491.5 M in IQ spend
 - Market Transformation:
 - Retail Products Online
 - Stretch Codes
 - New Commercial Offerings:
 - Building Operator Certification
 - Commercial Food Service Joint Offering

Approved EE Plan 7 (27-29):

	2027	2028	2029
Savings Achieved Toward CPAS (GWh)	15,734	16,144	16,770
AAIG Savings Achieved (GWh)	747	410	626
Total Spend (Million \$)	\$454	\$454	\$454
IE Spend Total (Million \$)	\$106	\$101	\$101
IE Spend % of Total	23%	22%	22%
Total 1st Year Savings (GWh)	1,378	1,398	1,263
WAML (Years)	14.0	14.0	13.8

CRGA Energy Efficiency Requirements

- Adjusted Budgets & Savings Goal
 - CPAS is retiring, meaning no more expiring savings
 - Switch to 1st year incremental goals with a minimum lifetime of 12 years
 - No greater than 20% of savings can come from measures of 5-years or less
 - Incremental annual savings dramatically increased to 2% of annual revenue over (~1% CEJA)
 - The budget methodology in CRGA has no change (4.25% annual revenue)
 - Reference year changes from 2015 to 2023
- Increased Focus on IE
 - Requires 25% spend allocation to IE, increasing minimum IE spend from \$40M to \$135M
 - Maintains 80% Whole Building Weatherization investment requirement for IE
 - Provides goal reduction opportunity by increasing IE spend, reducing savings goal by 0.025% for every 1% increase of IE Spend (Capped at 0.25%)
- Adjusted Non-Electric Caps
 - 50% of savings can be achieved from non-electric fuels
 - Cap increased to 20% (33% IE Spend)
 - Therm cap increased to 30% (Weatherization & Mechanical Insulation only)

CRGA EE Spend & Savings Targets:

	2027	2028	2029
Annual Incremental Savings (GWh)	1,543	1,543	1,543
Total Spend (Million \$)	\$540	\$540	\$540
IE Spend Total (Million \$)	\$135	\$135	\$135
IE Spend % of Total	25%	25%	25%
Average Lifetime	12.0	12.0	12.0
% Savings < 5-year Lifetime	5%	5%	5%

CRGA Considerations

- CRGA reshapes the EE landscape, introducing changes that demand innovation and opening new opportunities to deliver greater value for all customers.
- Scaling Portfolio Offerings
 - The 2024 potential study highlights that we cannot meet savings goals under a similar structure (Stip+) as established by CRGA. Additional funds, paired higher savings targets, will not resolve existing delivery constraints, making flexible, innovative, and collaborative approaches essential to scale resources effectively.
- Expanding Income Eligible Offerings
 - We plan to increase Income Eligible spending by 35% by leveraging community partners and our network of qualified service providers to manage higher project volumes. This growth will require strengthening delivery channels and collaboration with all our Energy Efficiency partners to address existing capacity constraints across both networks.
- Increased Caps for Gas, Electrification & Impacting Market Transformation
 - CRGA allow us to claim non-electric savings to an extent not previously possible, creating new opportunities but also introducing complexity. Gas utilities may expand or develop similar offerings, which could lead to overlapping efforts for the same customer base. While plans for our partner utilities are still in early stages of exploration, our approach is grounded in what we know today and focused on delivering value within this scope.

Navigating Additional CRGA Requirements

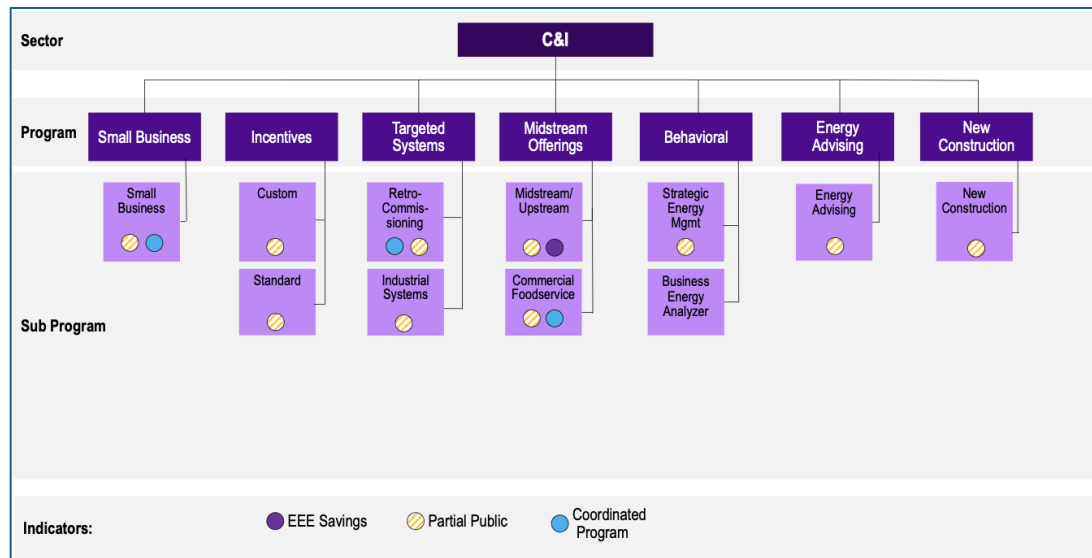
- Under Stretch Energy Code & Municipal IRP Support, SB 0025 Art. 1 directs municipalities and co-ops to produce IRPs and allows them to adopt the Illinois Stretch Energy Code. During Plan 2027-2029, how will ComEd's Codes & Standards market-transformation budget (Plan §5.4.3) be re-prioritized to: (a) help cities within the territory adopt the Stretch Code, and (b) incorporate resulting load-shape changes into Plan 2027-2029 savings forecasts?
 - ComEd's Stretch Code offering provides funding for municipal engagement, technical assistance, and outreach to support Stretch Code adoption. Savings analysis will be performed to the extent required to claim through established evaluation framework.
- 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?
 - EV adoption targets fall outside the EE portfolio scope and TRM deemed savings framework. Plan 7 will claim electrification savings within the allowable cap through measures allowed within the EE framework while supporting statewide EV adoption through education and referral materials.

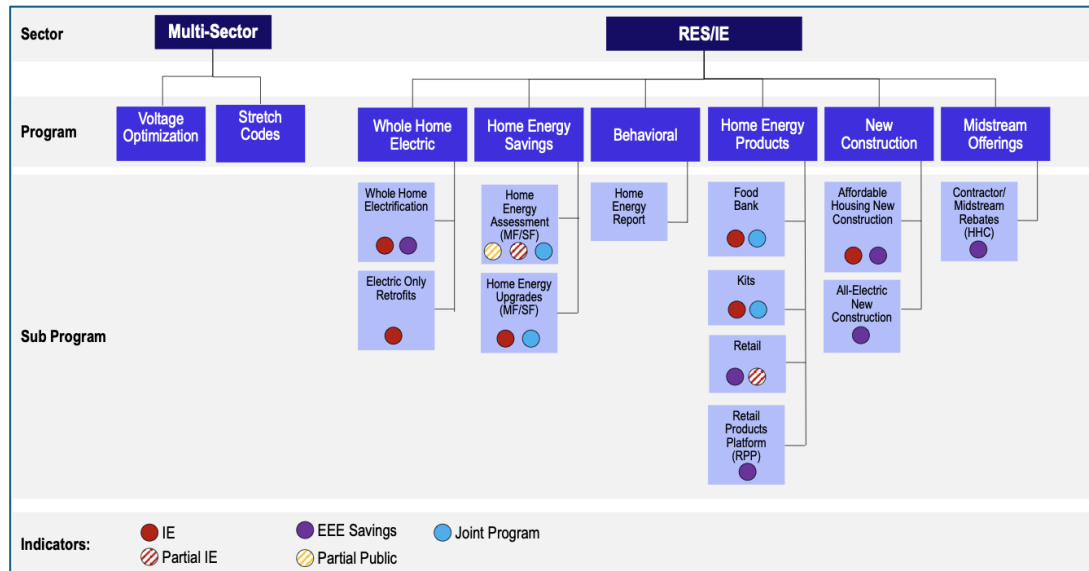
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- Under Utility-Owned Storage Coordination, CRGA's expansion of battery-storage funding (20 ILCS 730/5-60; EV Act §55) could change behind-the-meter economics. During Plan 7, does ComEd plan to adjust the Whole Home Electric and Small-Business storage measures to reflect new external rebates or loans?

- ComEd's EE portfolio does not include storage measures, and no adjustments are planned for Whole Home Electric or Small-Business offerings related to external rebates or loans.
- 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?
 - EEUP financing is outside the EE portfolio scope. Participation in RPS programs does not affect EE engagement, and free-ridership risk is not a concern.
- 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?
 - Currently, ComEd does not plan to reallocate residential incentives to coordinate heat-pump ground-loop offerings. We will monitor the PY2028 geothermal program launch and assess coordination opportunities.

Revised Plan 7 Program Offerings by Category:





Portfolio Level Costs

- While the overall portfolio budget has increased by nearly 20%, portfolio-level costs have only grown by about by nearly 2%, reflecting a commitment to increasing portfolio efficiency.
 - This reduction is driven by ComEd's efforts to streamline data systems, marketing, and other overhead costs.
 - These efficiencies help offset anticipated increases in evaluation costs, ensuring resources remain focused on delivering customer value.

Dan Ringo (via chat): Is the income eligible (IE) expansion \$35m or 35%? Slide said 35% and want to make sure which number is accurate.

- *Abigail Miner: When you say increased IE spending by 35%, is that a 35% increase from the current plan or a commitment to allocate 35% of the budget to IE?*
- *Elder Calderon: This is an increase by 35% of existing commitments – which comes out to \$35 million per year.*
- *Chris Neme: The statute allows for you to spend more on income eligible, and allows you to lower goals up to a %. Has ComEd done internal analysis that led you to decide you are better off at the statutory minimum of 25%? Has ComEd looked at bumping it up to 35%? You have a lot of choices on where to put your dollars. I'm trying to understand how you landed at 25%.*
- *Elder Calderon: We will further address in negotiations. Our current plan is to meet statutory requirements.*
- *Karen Lusson (via chat): Agreed with Chris, particularly since maximum IE spending has been a particular interest of negotiating stakeholders.*

Chris Neme: Regarding the Equitable Energy Upgrade Program (EEUP) on slide 18 – to the extent that customers might use EEUP on-bill financing for measures they might also get rebates for through Plan 7, how do you anticipate addressing attribution in that case? If a customer took a rebate for a measure, but also financed the balance of their costs with EEUP financing, do you see ComEd taking 100% of the credit?

- *Elder Calderon: We haven't answered those questions yet. EEUP is an open docket. You mentioned financing structures for EE Programs Financing does not reduce the cost*

of a project like other funding sources do that we braid with. Financing merely spreads the cost over several years. I don't see a reason why there should be any less savings.

- Karen Lusson (via chat): It is NCLC's position that under both Section 8-103B (EE) and 16-111.10 (EEUP) statutes, ComEd cannot take savings credit of measures covered by any EEUP financing arrangement. The EEUP program will be paid for through a separate tariff. ComEd cannot hit savings targets via different statutory budgets.
- Karen Lusson (via chat): I would also note that allowing ComEd (or Ameren) to hit and exceed energy savings targets via the EEUP has the potential to create perverse incentives to market EE financing to its residential customers rather than free or low-cost measure opportunities offered through their EE programs.

Karen Lusson: Has ComEd had conversations with Nicor Gas in regard to their joint IQ weatherization programs? And how that will impact the ability to increase the budget for those programs relative to the plan that was just approved?

- Elder Calderon: We have been in consistent coordination with our partner gas utilities on potential exploration with the options laid out by CRGA. We understand the potential areas. They are in very early exploration in their planning stages. We have some of those potential scenarios modeled into our current approach.
- Chris Neme: Does that mean your current plan assumes Nicor will significantly bump their heat programs and therefore increase joint funding?
- Elder Calderon: Our current design assumes growth in the joint programs to the extent current scenarios are known. How that growth happens and the details on how that scales over the years is currently unknown.
- Chris Neme: Given the timeframe for these agreements, how do you anticipate managing plan alignment?
- Elder Calderon: We must work with the information that we have. Our timeline is specific, and we are committed to collaboration. We will be as dynamic as we can.

Spend by Segment

- Total IE Spend has increased to 25% of portfolio spend while maintaining minimum Whole Home Weatherization spend requirements
- Public spend exceeding minimum (10%) spend requirements by increasing targeted focus on public buildings through Energy Advising offering
- Remaining budget increase focused on expanding market rate residential and business-commercial programs

Karen Lusson: Can you give more information on how these budgets are changing (on the residential slide)? I'm trying to get a sense of where ComEd is adding budgets to get to the increase of 35%.

- Elder Calderon: We are planning on increasing the IE budget by 35% or \$35 million. There is an assumption of increased coordination of our partner gas utilities. Other details are still being finalized.

Chris Neme: I'm trying to make sure I am understanding the color-coding dots. Whole-home electrification is only available to income-eligible customers and not market-rate?

- Elder Calderon: Yes, that is correct.
- Chris Neme: Have you considered expanding? You could be running into condos in Chicago with inefficient electric heating systems that could benefit from higher efficiency heat pumps. Have you considered whether that is a market worth expanding to given additional budget?

- *Elder Calderon: Market rate customers can receive incentives on electrification (heat pumps) through midstream offerings. We do plan on expanding access and resources.*
- *Chris Neme: Got it, it would be through market channels as opposed to the whole-home electrification program?*
- *Elder Calderon: Correct.*
- *Chris Neme: Have you considered taking a more direct outreach approach to market rate MF buildings?*
- *Elder Calderon: Home Energy Savings can serve as a gateway.*
- *Chris Neme: I was talking about existing, inefficient electric heat but I take your point the same would apply. What about the home energy upgrade initiative? Gas utilities have market-rate gas offerings, but not in the last few years. Will you be jointly delivering market-rate incentives with Nicor Gas and Peoples Gas?*
- *Elder Calderon: Not at this time, but we are open to discussing.*

Wendy Jaehn (via chat): For "home energy savings", is ComEd proposing deviating from the HES vs MFES structure?

- *Elder Calderon: We are not. To clarify, this structure is illustrative of what solutions that we provide, not the structure of delivery.*

Kari Ross: For stretch codes, can you describe high level some of the changes?

- *Elder Calderon: We took a look at our approach and where the market was in a comprehensive stretch code design for customers. We saw a strong need for direct-to-consumer service; technical assistance, etc. We separated the offering to support where the market is and support driving changes in municipal engagement approaches.*
- *Kari Ross: In practice, it might look like the HES program, then moving the stretch code technical assistance and potentially incentives through the program?*
- *Elder Calderon: Yes, we are pursuing parallel efforts on the municipal level to transform markets. Strong collaboration between offerings and customer actions.*

Kari Ross: You mentioned revisions to the market rate segment under Home Energy Savings. Can you expand?

- *Elder Calderon: The distinction is that the market rate home energy savings solution was retired in our approved Plan 7. If it is being introduced under the same structure, they are being brought back.*

Chris Neme: The behavior program (home energy reports) is new, what is the expected scale?

- *Elder Calderon: This is not new; we have offered it before. It is in our approved EE Plan.*
- *Chris Neme: Are you thinking a similar scale or a change?*
- *Elder Calderon: Similar scale.*

Chris Neme: You have had other market transformation initiatives in the past. Are those still on the table, or is stretch codes the only MT initiative you anticipate pursuing?

- *Elder Calderon: We are still pursuing multifamily or residential in the home energy products platform. The goal is to bring new stretch codes to construction offerings.*

Karen Lusson (via chat): NCLC supports keeping (and growing) the Home Energy Upgrades budget in the IQ portfolio only. Market rate customers have other options for affording weatherization opportunities to which IQ customers may not have access. The need is greatest among IQ customers.

Plan 7 Coordination: Inflation Reduction Act (IRA) Attribution

- Background
 - Two years of collaboration with IEPA; MOU near completion
 - IRA funds will flow through IHWAP channels, same as current IHWAP braided projects
- Current Practice
 - ComEd receives 100% savings attribution for utilities jointly funding 50% of project costs braided with IHWAP funds
 - IHWAP braided projects are already the most expensive in the portfolio
- IRA Impact
 - IRA braided projects may be even more costly, due to initial targeting of Multi-Family which has historically been the more expensive segment
 - IRA design critically relies on braiding with utility incentives for impactful delivery
- ComEd Position
 - ComEd is committed to trying to work with IEPA and Stakeholders to potentially leverage IRA braiding.
 - 100% attribution is a threshold issue. ComEd aims to support state goals and braid IRA dollars, but cannot if doing so jeopardizes meeting targets or delivering a prudent, effective portfolio.

Closing & Next Steps

- Comprehensive Solutions for a Dynamic Future
 - CRGA introduces significant challenges, including evolving statutory caps, uncertain impact from shifting gas utility plans, scaling comprehensive offerings through already volume-strained channels and all with higher incremental savings goals.
 - Revised Plan 7 streamlines the portfolio with a bottoms-up approach, ComEd is committed to meeting all challenges and
 - delivering comprehensive, dynamic solutions tailored to customer needs across every segment.
- Timeline
 - A timeline for the revised planning process has been established and shared with stakeholders who have expressed interest in participating under the stipulation.
 - As part of this process, we encourage stakeholders who wish to engage more deeply to sign the NDA so we can collaborate effectively.
 - ComEd is required to file a revised plan by June 1, 2026, and we are beginning work now to ensure we meet this milestone together.
- Feedback & Collaboration
 - Given the shorter timeframe for collaboration and design, timely and informed feedback is essential to shaping an effective plan.
 - We must move forward using the best information available.
 - ComEd is excited to work together again, and we appreciate the effort this process requires. By working together, we can meet challenges head-on and deliver greater benefits to customers while achieving the state's goals.

Elizabeth Horne: Is there a timeline for the IRA attribution discussion?

- *Celia Johnson: Yes, DCEO and IEPA will present at the Jan. 13 SAG meeting.*
- *Elder Calderon: These conversations will be happening outside of utility negotiation processes. We look forward to collaborating, but we do have a timeline in mind for filing.*

Kari Ross: Can you say anything about the estimated annual peak demand savings that ComEd is targeting? While ComEd does not have a statutory peak demand savings goal like Ameren has, a big focus of the bill that was passed is targeting peak demand.

- *Elder Calderon: We can discuss further in the negotiations process. Peak demand savings are not a focus on our portfolio, nor are they a structure of focus in our design. The statute laid out peak demand goals and structure outside of the EE portfolio for ComEd. They are managed within a different regulatory structure and will be designed to meet the state's goals.*
- *Kari Ross: For the broader large SAG group, it feels like we need to focus on programs that can help reduce peak demand... general emissions reduction, etc. We will raise this again.*

Chris Neme: When will the SAG meet next? Is it to provide feedback on the draft plan?

- *Celia Johnson: Yes, the next SAG meeting on January 13 will be an opportunity for stakeholders to present feedback to ComEd. Negotiations begin Friday, January 23rd.*
- *Chris Neme: There are no budgets, no breakdowns by program. It's not really a plan that we can react to. Unless that is in the detailed appendix slides that we did not talk through today. Is something more detailed going to be shared? That we can react to in providing more feedback on Jan. 13?*
- *Karen Lusson: I support Chris' question and concern. This is not a criticism of ComEd, I know it's early on since the law passed. Prior to engaging in negotiations last time, we had specific numbers to react to. If ComEd wants more public feedback from the parties, I think it would be helpful to provide more detail before the feedback is presented.*
- *Elder Calderon: I believe we provided enough information about the goals and requirements to react to. We have provided stakeholders with the best possible picture. When preparing competitive RFPs for next year, specific figures will be shared with stakeholders who sign the NDA.*
- *Chris Neme: Will you share details after the 5th and before the 13th? As you know from past years, we will have interest in a lot of more broad topics including budgets, savings, and others for comprehensive feedback.*
- *Elder Calderon: I cannot provide more details at this time.*
- *Celia Johnson: We would not be able to discuss batch files on January 13 because they are confidential, and January 13 is a public large group SAG meeting.*
- *Elder Calderon: We want to stress the equitable and competitive nature of our RFPs. We can discuss internal deadlines, and we understand needing additional details for stakeholders to focus feedback internally.*
- *Chris Neme: I understand. If you provided additional detail, we would have to be careful that our feedback did not reveal anything inappropriate.*

Closing and Next Steps

Follow-up Items:

- Guidehouse Presentation
 - Update the table on slide 12 to include the number of units served, and the associated savings.
 - Review why comprehensiveness declined and if possible, provide an explanation.
- ComEd Presentation
 - ComEd will consider stakeholders' request for additional details on the draft EE Plan.

Next Steps: Opportunity to Present Feedback to ComEd

A Large Group SAG meeting will be held on **Tuesday, January 13 (9:30 – 12:30)**, including:

1. An update on Inflation Reduction Act (IRA) attribution from DCEO and IL EPA; and
2. An opportunity for interested SAG participants to present feedback to ComEd on the draft 2027-2029 EE Plan presented to SAG on December 18th.

Please email Celia@CeliaJohnsonConsulting.com) **by Monday, January 5** if you plan to present feedback on ComEd's draft 2027-2029 EE Plan on January 13th.

Next Steps: Participating in EE Plan Negotiations with ComEd

Before ComEd files the updated 2027-2029 EE Plan with the ICC for approval, there will be negotiations between ComEd and non-financially interested stakeholders.

- The goal is to reach consensus before ComEd files its updated EE Plan with the ICC. If consensus is reached, it will be documented in a stipulated agreement.
- If you are a non-financially interested stakeholder interested in participating in confidential EE Plan negotiations with ComEd, please email Celia@CeliaJohnsonConsulting.com **by Monday, January 5**.
- Please review the SAG Financial Conflict of Interest Policy, excerpted from the [SAG Process Guidance document](#), for the definition of "financially interested party": [SAG Financial Conflict of Interest Policy – 2024 Update \(clean final\)](#)
 - ComEd legal will review negotiation participation requests.
 - Negotiations with ComEd begin in January, and require signing a Non-Disclosure Agreement (NDA).