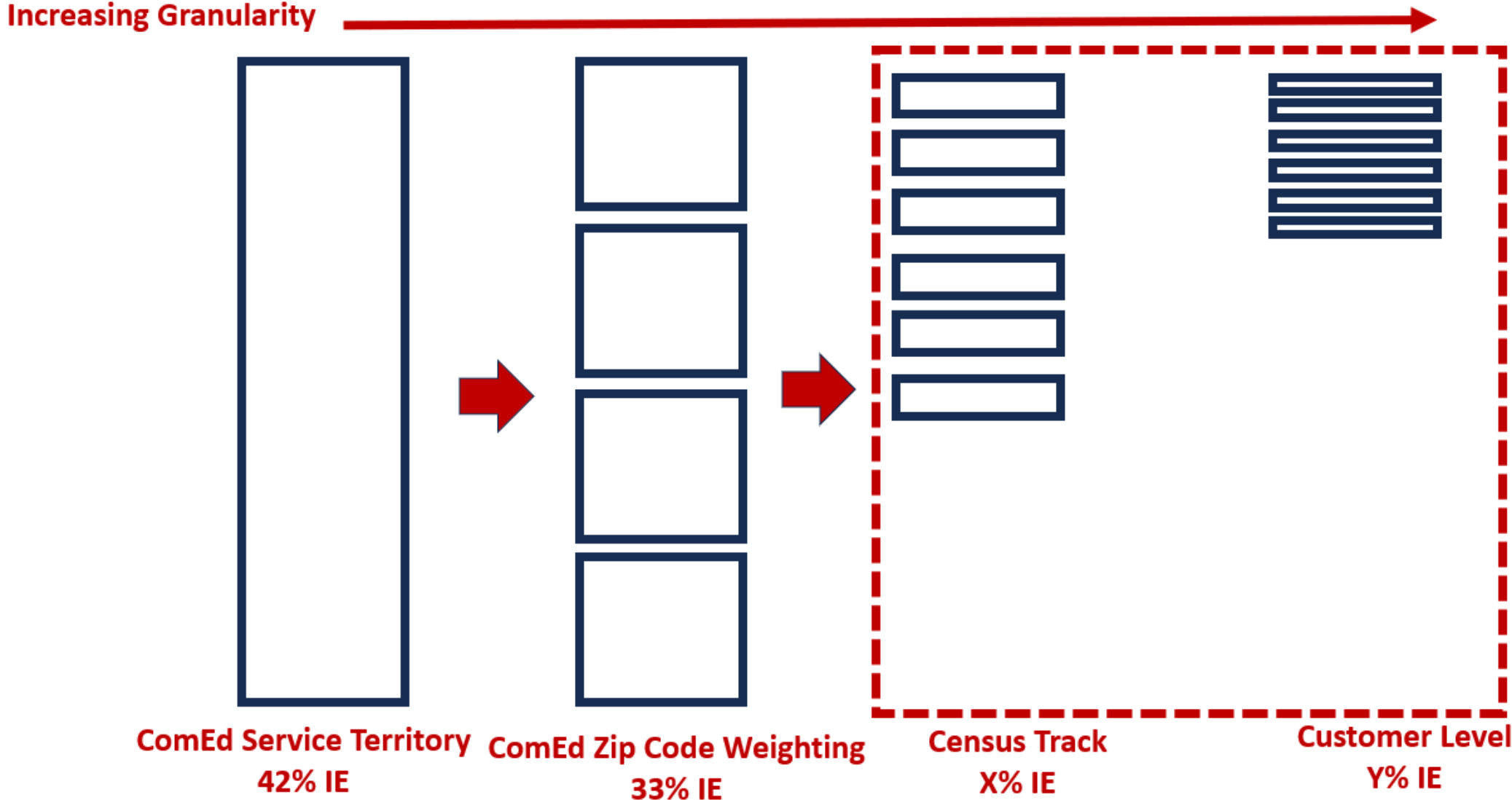


ComEd Policy Proposals: IE EEE Allocation & EEE Baseline Adjustment

IE EEE Allocation: 2025 and Beyond

- For 2025 as well as the Plan 7 period, ComEd proposes that IE EEE allocation be performed on a project level based on an IE Census Tract allocation
- The Illinois Commerce Commission has already approved an allocation methodology to determine IE for other purposes on at least two occasions:
 - For purposes of IE income verification for **Illinois Solar For All (“ILSFA”)**.
 - For purposes of IE income verification for **Bright Neighborhoods Pilot Program**
- There is existing equivalent methodology within the EE Policy Manual:
 - Section 4.4: **Single Family Income Qualified Eligibility Verification Guidelines**
 - **IV:** For tenant-occupied single family and two (2)-unit homes, location in a census tract identified by the Program Administrator as low-income
- Cannot obtain attestation or install address through midstream
- Zip +4 is just as granular as Census Tract and can be used to identify Census Tract
- The utility shall use zip+4 data to allocate an appropriate percentage of EEE savings to IE in that year

Census Tract Granularity



Quantifying Income Eligible Participation for 2024

- 2024 midstream program data collected does not include collection of Zip+4 or Census tract data
- ComEd reviewed midstream evaluation data sets for heat pump measures from 2022 to 2024, this is the same data set that program evaluators have been collecting from ComEd
- A statistically significant portion of the data set was found to include enough unique customer identifiers that could be tied back to our billing system to identify unique customer premises
- 10% of the matched customer premises were found to be in income eligible tracts
- Based on the data analysis performed on midstream heat pump participation, ComEd suggests that an IE Allocation for midstream EEE savings be set at 10% for 2024

Proposed Baseline Approach

- ComEd has shared a legal interpretation of legislation which supports this policy
- IL TRM provides an electric baseline for unknown existing conditions
- Refer to IL TRM Version 12.0 5.3.1: **Air Source Heat Pumps (Centrally Ducted and Ductless)**
 - This measure addresses savings methodology for ductless and ducted ASHP
 - Provides a **Time of Sale** baseline
 - This baseline includes an unknown ducted and ductless category
- ComEd recommends following the TRM methodology for proposed electric baseline scenario



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Thank you

