



ELEVATE

773.269.4037
ElevateNP.org

322 S. Green St.
Suite 300
Chicago, IL 60607

Comments to SAG on ComEd Proposed Draft Resolution – January 2025

Elevate is a 501(c)(3) nonprofit organization that works nationally and is headquartered in Chicago. Elevate seeks to create a just and equitable world in which everyone has clean and affordable heat, cooling, power, and water in their homes and communities — prioritizing frontline communities. Elevate is also an active implementation partner for the ComEd Energy Efficiency Program serving customers in affordable housing, public housing, and low-income communities.

In June of 2024, ComEd proposed policy changes in an effort to recognize savings and maintain momentum for important and meaningful energy efficiency electrification (EEE) programs. Elevate submitted comments at that time largely focused on Policy Proposal 1, which forwarded a methodology for allocating savings from midstream electrification programs to the income-eligible (IE) EEE category. Elevate’s comments raised questions and offered observations intended to improve ComEd’s proposed methodology, with a goal of ensuring that energy savings – and particularly IE savings – would be allocated appropriately. Various other stakeholders raised concerns about the proposal.

In September of 2024, ComEd presented a new proposal around midstream electrification program savings, specifically to count 10% of savings as IE. Elevate attended the September 16th meeting and learned that ComEd was basing this updated proposal off of a new analysis showing that 10% of customers benefitting from its midstream program from 2022 to 2024 lived in IE tracts. Elevate understood a general consensus coming out of that meeting was that there are additional approaches that could more accurately identify IE customers benefitting from the midstream programs and that ComEd and stakeholders were committed to continued work on attribution refinement in the future. Elevate had no concerns about the 2024 proposal and its commitment to further methodology improvement in the future and did not submit comments at that time.

In November 2024, ComEd proposed draft resolution language that would enact the methodology proposed for 2024 but did not clearly identify stakeholder commitment to continue refining that methodology in the future. Elevate commented to recommend that that oversight be corrected and also offered a technical edit to correct an inaccuracy in ComEd’s draft resolution language. And in December, ComEd offered edits to correct the oversight, but not the inaccuracy. Elevate supports the resolution, as-is, but notes that it still contains an inaccuracy and urges ComEd to correct that inaccuracy in the event there are further rounds of edits on the resolution.

Specifically, Elevate notes that ComEd’s December draft resolution language appears to slightly mischaracterize the analysis completed. That draft resolution states:

“It was estimated that 10% of heat pumps incentivized through the Midstream Program channel were installed in IE Homes.” (Page 1).

However, Elevate’s understanding is that:

It was estimated that 10% of heat pumps incentivized through the Midstream channel were installed in *homes located in IE census tracts*.

This understanding appears to be in line with the [presentation](#) ComEd shared in September discussing its updated analysis. That presentation states:

“10% of the matched customer premises were found to be in income eligible tracts” (Slide 4).

Elevate welcomes correction of any mistaken understanding on this point.