

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

**Tuesday, October 29, 2024
10:00 am – 12:00 pm
Teleconference**

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Meeting Materials

- [Tuesday, October 29 SAG Agenda](#)
- [Feedback Presented to ComEd by Non-Financially Interested Negotiating Stakeholders](#)

Attendees

Name	Company or Organization
Celia Johnson	SAG Facilitator (Celia Johnson Consulting)
Jane Anderson	SAG Meeting Support (Inova Energy Group)
AJ Young	U.S. Greenlink
Andrew Cottrell	ScottMadden
Andrey Gribovich	DNV
Arvind Singh	DNV
Becca McNish	DNV
Ben Heymer	Slipstream
Bill Risley	Franklin Energy
Bruce Liu	Nicor Gas
Bryan Haney	Erthe Energy Solutions
Cailee	Recurve
Caryn Denny	Recurve
Cassidy Kraimer	Community Investment Corp.
Chris Neme	Energy Futures Group, representing NRDC
Chris Vaughn	Nicor Gas
Christina Frank	Peoples Gas & North Shore Gas
Clayton Schroeder	Resource Innovations
Corey Grace	Resource Innovations
Crystal Warner	Michaels Energy
Darnell Johnson	Urban Efficiency Group

Name	Company or Organization
Dave Hernandez	ComEd
Dave Kilgore	Ameren Illinois
David Brightwell	ICC Staff
David Lemmon	Utility Energy Services
Denise Munoz	ComEd
Devin Wall	Louvers International
Ebony Buchanan	CEDA
Elder Calderon	ComEd
Elizabeth Applegate	Applied Energy Group
Elizabeth Horne	ICC Staff
Eljona Fiorita	CLEAReslut
Emily Golen	Resource Innovations
Emma Salustro	ComEd
Eric O'Neill	Michaels Energy
Erin Daughton	ComEd
Fallon Lilly	City of Chicago
Fernando Morales	Ameren Illinois
George Joseph	Cascade Energy
Grey Staples	Mendota Group
Hannah Howard	Opinion Dynamics
Hassan Khurshid	DNV
Heidi Gorrill	Slipstream
Hira Majeed	ComEd
Jaleesa Scott	ComEd
Jean Gibson	Peoples Gas & North Shore Gas
Jeff Erickson	GUIDEHOUSE
Jeffrey Carroll	DNV
Jim Fay	ComEd
Jim Heffron	Energy Solution
Jim O'Shaughnessy	Energy Infrastructure Partners
Joe Mays	Cascade Energy
John Carroll	Ameren Illinois
John Lavallee	Ameren Illinois
John Pady	CEDA
John Yi	CEDA
Jonathan Kleinman	Brillion
Jonathan Skarzynski	Nicor Gas
Josh Schreck	The JPI Group
Josh Sharon	ComEd
Julia Friedman	Opower
Julie Hollensbe	ComEd
Kara Jonas	ComEd

Name	Company or Organization
Karen Lusson	National Consumer Law Center
Kari Ross	NRDC
Kate Moore	AnnDyl
Kathryn Brewer	CLEAReslut
Keely Hughes	The JPI Group
Kegan Daugherty	Resource Innovations
Kellen McSweeney	Slipstream
Ken Walczak	Dark Sky International
Kim Brown	ComEd
Kim Janas	IL Attorney General's Office
Kim Swan	ComEd
Kit White	MEEA
LaJuana Garrett	Nicor Gas
Larry Kotewa	Elevate
Laura Pettersen	Cascade Energy
Lauren Gage	Apex Analytics
Lawrence Kotewa	Elevate
Leyah Williams	ICC Staff
Linda Zabors	Energy Infrastructure Partners
Lisa Obear	Brightline Group
Lisa Pucelik	Slipstream
Liz Connolly	ComEd
Lloyd Kass	Franklin Energy
Mark Hamann	ComEd
Mark Milby	Elevate
Mary Ellen Guest	Chicago Bungalow Association
Mary Johnson	Resource Innovations
Matt Armstrong	Ameren Illinois
Matt Ludwig	ComEd
Melissa Helphingstine	Primera Engineering
Mia Berrios	People for Community Recovery
Michele McSwain	SEEDS
Mike Frischmann	Ecometric Consulting
Mike King	Nicor Gas
Minya Coleman	ComEd
Nick Horras	CEDA
Nick Warnecke	Ameren Illinois
Nicole Popejoy	IL Association of Community Action Agencies
Nishant Mehta	Guidehouse
Omayra Garcia	Peoples Gas & North Shore Gas
Pat Justis	Ameren Illinois
Patrice McFarlin	Encolor Consulting

Name	Company or Organization
Paul Grimyser	ComEd
Philip Halliburton	ComEd
Philip Mosenthal	Optimali Energy, representing NCLC
Randy Opdyke	Nicor Gas
Rashaan Keeton	Center for Energy & Environment
Ronna Abshure	ICC
Ryan Kroll	Driftless Energy
Salina Colon	CEDA
Samuel Morris	The Will Group
Sarah Amspacher	Resource Innovations
Sarah Evans	DNV
Scott Yee	Resource Innovations
Seth Craig-Snell	SCS Analytics
Shawn Haas	Peoples Gas & North Shore Gas
Shonda Biddle	Center for Energy & Environment
Sophie Frey	Brightline Group
Steve Baab	DNV
Steven LaBarge	ComEd
Stu Slote	Skytop Consulting
Tamika J. Cole	Walker-Miller Energy Services
Ted Thomas	Energize Strategies
Ted Weaver	First Tracks Consulting, representing Nicor Gas
Tina Grebner	Ameren Illinois
Todd Banks	No Organization Identified
Tony Shay	Recurve
Tori Woolbright	Metropolitan Mayors Caucus
Valencia Roner	Energy Infrastructure Partners
Victoria Nielsen	ScottMadden
Wael El-Sharif	360 Energy Group
Wisit Kumphai	Resource Innovations
Yangsung Kim	ICC
Zach Ross	Opinion Dynamics
Zachary Froio	Applied Energy Group

Meeting Notes

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

Opening and Introductions

Purpose of October 29th meeting: For interested stakeholders to present feedback to ComEd on the preliminary draft 2026-2029 EE Plan Portfolio, presented to SAG on October 8.

- [SAG Facilitator Introduction to October 29 Meeting](#)

Feedback from Non-Financially Interested Negotiating Parties

Kari Ross, NRDC, and other Negotiating Parties for ComEd

Context

Kari Ross, NRDC

- Feedback is preliminary and high level
 - Not all stakeholders were able to carefully review ComEd's materials given schedules
 - We have not had the chance yet to fully discuss questions/concerns with ComEd
 - This is a non-exhaustive list of feedback that will change pending more conversations
 - Included in this list are items stakeholders raised in our "Initial Asks" due to ComEd on 9/11 that were not specifically covered during the 10/8 portfolio presentation
- Feedback is from the following Non-Financially Interested Stakeholders:
 - Natural Resources Defense Council (NRDC)
 - National Consumer Law Center (NCLC)
 - City of Chicago
 - Dark Sky Initiative
 - People for Community Recovery (PCR)
 - Blacks in Green (BIG)
 - Illinois Attorney General
 - ICC Staff**
 - **ICC Staff participating in discussion and negotiations only as a non-stakeholder, and will not be a signatory to any stipulation coming out of negotiations.

Key Areas We Liked

- Portfolio Level costs have been minimized from current plan
- Focus on comprehensive offerings, at least for some programs
- Commitment of a 13.2 or 13.3 weighted average measure life (WAML) each year of the plan
 - Two years at 13.2 and two years at 13.3

Savings Goal

Kim Janas, IL Attorney General's Office

- Stakeholders request ComEd re-run the proposed portfolio for 26-29 with \$106M/year for IE budgets (\$100M from current plan + 6% increase)
 - Consider potential study STIP+ scenario to help inform this
 - Understand there are different levers in the statute right now, but want to understand where we are at to make an informed choice for the next four years
- Goals ultimately must assume some leveraging of IRA heat pump rebates
 - Conversations on leveraging to follow; we respect there are some unknowns
- CPAS Achievement (Achieved as % of Goal) incorrect on slide 27 (should be 101%, not 99%)

Chris Neme: I want to build on Kim's point to ask ComEd to rerun their analysis with a higher budget to understand implications for their savings goal. There are probably multiple ways it can be done—would like to see what you come up with.

Income Eligible (IE) Programs

Kari Ross, NRDC

- The drastic reduction in overall Res IE spend from the current plan is concerning (\$100M/year to \$60M/year).
 - Interrupts momentum of existing programs, leaving IQ SF homeowners/renters without significant weatherization opportunities.
 - Significant impacts on subcontractors, CAAs and the workforce that will be affected by this cut.
 - For NCLC this is a non-starter for the four year plan.
- Distribution of spending between Multifamily program and Single-family program is too wide (for MF, allocated \$42-45M/year: for SF, allocated \$1M/year). How and why did the company land on these figures?
- From Initial Asks: Plan/budget for at least 90% of IQ measure spending to be on “major measures”. In no event will the Company spend less than 85% of IQ budget on such measures. Major measures are defined as:
 - Weatherization/building envelope measures,
 - HVAC distribution system and/or ventilation measures,
 - Major HVAC equipment measures (including heat pumps to displace electric resistance heat and/or for electrification),
 - Water heating equipment measures (including heat pump water heaters to displace electric resistance heat and/or for electrification),
 - Appliance replacement measures (including induction cooktops and/or Energy Star dryers installed as part of electrification projects),
 - Health and safety improvements.
- Note: Negotiating parties will have additional feedback once we dive deeper into program details.

Yangsu Kim: What does Income Qualified mean and does that align with the upcoming LDI docket?

- *Karen Lusson: Income Eligible in context of EE is defined in statute as anyone whose income is at or below 80% AMI. There are tiers: Tiers 1-4 cover persons whose income is at or below 0-200% of the federal poverty level; Tier 5 cover persons whose income is 201-300% federal poverty level. Tier 5 reflects customers who don't qualify for financial assistance programs but still are financially struggling*
- *Yangsu Kim: Will those customers who do not qualify for LIHEAP or HIP still qualify as part of IQ?*
- *Karen Lusson: Yes.*
- *Kari Ross: We use both Income Eligible (IE) and Income Qualified (IQ) [in the slides]. IE is what ComEd uses and IQ is the term other utilities use.*
- *Elder Calderon: That tracks with ComEd's understanding.*
- *Kim Janas (via chat): I just wanted to note that Section 8-103B does not use the terms "income qualified" or "income eligible," but rather "low-income," in case you were looking for it.*

Cassidy Kraimer: Would it be possible for ComEd to speak to the MF vs SF question?

- *Distribution of spending between Multifamily program and Single-family program is too wide (\$42-45M/year: \$1M/year). How and why did the company land on these figures?*
- *Elder Calderon: ComEd will follow-up.*

IE Program: Single-family

Mia Berrios, People for Community Recovery

- It's stakeholders' understanding that ComEd is planning to contribute 0% of IE budget to IHWAP braided programs. Is that correct? Was this discussed with gas companies, who did propose continuation of SF IE weatherization braiding?
- From Initial Asks: Continue/expand IE mobile home support under the Home Energy Savings offering.
- Note: will have additional feedback once we dive deeper into program details

IE Program: Multifamily

- All From Initial Asks:
 - Retrofit heat pumps to displace electric resistance heat in at least 70% of electric resistance-heated participating apartments each year continue
 - Installations must be accompanied by customer education on how to operate the systems to maximize bill savings
 - Comprehensively assess building envelope efficiency upgrade opportunities, as well as all likely cost-effective central HVAC system and common-area lighting systems, in all IQ multifamily buildings served by the program. Achieve building envelope and central HVAC system improvements in at least 67% of buildings for which such upgrades are found to be economic. Share draft protocols on how such opportunities will be assessed with signatory parties for discussion before the 2026 program year.
- Note: will have additional feedback once we dive deeper into program details

John Pady: Why is the term cost effective associated with the IE portfolio when the statute states IE is not required to have cost effectiveness?

- *Karen Lusson: Good point. That phrase does not belong there. We are talking about weatherization, and the statute does say low income programs do not need to be cost-effective.*
- *Chris Neme: We sometimes use terms in different ways and we can be more careful about that. Intention is not to think about cost effectiveness in a way of the standard benefit cost test in the statute, rather more from the angle of that we getting a reasonable bang for the buck. We want to look at understanding all the significant opportunities in these buildings and pursue all of them in the extent that we can when there is enough material savings without unreasonable costs to pursue.*
- *John Pady: It helps, but furthers my argument. As we should bill the SOW comprehensively, and then do the work that is most impactful.*
- *Chris Neme: I think you're right. We have nothing in conflict with that. But the issue is then where does one draw the line. In some of the utility IQ programs, the amount of savings are tiny compared to the cost of a certain project, and that money can go further in a larger project in another building. I acknowledge the term cost effective is not the right term in this context. For all the utilities in these situations, there are reasons beyond economics that make sense to do a certain type of work (like a new central AC in for an older person who is unable to do so otherwise). There's a lot of nuances that needs to be considered in these situations.*

Caryn Denny: My assumptions on the bill impact—especially when there is a change in resistance heat to heat pump—is that there can be an increase in electricity. Will bill impact analyses and education be part of the evaluation, especially when there are going to be

improvements so that there are no increases to the IQ household? Is there any type of bill impact that's done to ensure the upgrade does not increase a household's economic burden?

- *Chris Neme: I think you're asking an evaluation question, and ComEd can speak more than this. There is an ongoing evaluation process for all programs, and this includes bill impact analysis sometimes. There is an evaluation planning process as well.*
- *Celia Johnson: Evaluation plans will be presented to SAG on December 3 and 4.*
- *Karen Lusson: When converting from gas to electric, there can be an increase in bills, and we don't want that. In past stipulations—and we will push in upcoming ones—there is an assessment before installation on what the bill impact will be. After, we then leave that decision in the hands of the client and that information needs to be provided to the household so they can make that determination on whether to proceed with the project.*

Elder Calderon: On point #1 "Retrofit heat pumps to displace electric resistance heat in at least 70% of electric resistance-heated participating apartments each year continue", what is that quantitatively? 70% of the ones participating or 70% of total market?

- *Kari Ross: Of the participating apartments.*
- *Elder Calderon: Do you have a number in your mind of what that is per year?*
- *Kari Ross: 70% was the initial figure we put forward and we would like to better understand in future conversations with ComEd what you're proposing, and work from there.*
- *Phil Mosenthal: The recent baseline study results show that about 20% of MF IE units have electric resistance heat right now. So we want to make sure that as those buildings participate, you are capturing the bulk of them since it's one of the highest bill savings measures you can provide.*
- *Chris Neme: We are saying that of the MF buildings that you serve that have electric resistance heat, of that subset, we want the vast majority of them to have heat pumps installed to displace the inefficient electric resistant heat because of the substantial bill savings opportunity. It would make sense for you to proportionally address apartment buildings that have electric resistant heat, since it's a bigger opportunity for you as an electric utility.*

Electrification

Kari Ross, NRDC

- Decreasing spend over the four years of the plan is problematic.
- Stakeholders recommend a targeted neighborhood approach for both IE and market rate electrification (e.g. propane communities, neighborhood/census tract level, etc.).
- From Initial Asks:
 - Require Manual J load calculations – and sizing based on estimated design heating loads – for all heat pump retrofits.
 - Launch pilot that includes (1) annual clean and check service for at least three years for a sample of participants; (2) monitoring of performance and energy bills for that clean and check sample, as well as for a control group; (3) conduct evaluation of impacts of clean and check contracts. This pilot should be funded through a potential mix of R&D and EM&V budgets.
- Note: will have additional feedback once we dive deeper into program details

Phil Mosenthal: I'd also like to add that it's a particular concern that ComEd has zeroed out all low-cost IE SF electrification—particularly counting on midstream HVAC to provide electrification. While we did agree to let you count some of that as IE electrification for 2024, it's

not planned for next period. We want to see research that that in fact is happening. In addition to increasing regular IE SF Wx, we would like to see some electrification there too.

Rashaan Keeton (via chat): Second the requirement for design & sizing based on Manual J.

Income Eligible (IE) Electrification

- Because spend is decreasing over the years, must assume leveraging of IRA heat pump rebates to reduce costs.
 - Can be electrifying more homes through leveraging the rebates
- From Initial Asks:
 - For ComEd's Whole Home Electric program, the Income-Eligible SF portion is limited to homeowners only. Propose opening this offering to non-owner-occupied SF homes as well, with approval from the homeowner and education materials for the renter.
 - Develop tenant rent protections when MF (and SF non-owner-occupied) properties receive electrification measures. ComEd to commit to working with stakeholders on this.
- Note: will have additional feedback once we dive deeper into program details

Cassidy Kraimer (via chat): Would it be possible to expand on the tenant rent protections proposed?

- *Rashaan Keeton (via chat): Also curious to hear more about this. Hoping there are municipalities or utilities elsewhere that have already cracked this nut.*
- *Karen Lusson: We fully support the tenant protections in the MF program. We intend to push those in plan negotiations. The guidance as I understand it from DOE on IRA rebate encourages to incorporate tenant protections when there is braiding and leveraging. By tenant protections, we mean no rent increases because the building has been weatherized, electrified or improved. The WI program does incorporate those significant tenant protections as part of the IRA rebate program.*

Karen Lusson: The discontinuation of the IE SF program is a non-starter from NCLC's perspective. As we dig into ComEd's batch files, the conversation will continue. But ending a program the company has built up over the last several years is really a non-starter. SF Wx has grown from 11.5 mil to 34.8 mil in 2023. We have seen investment in Wx increase, and to end it after such a steady buildup of an important program is incomprehensible. The program includes braiding from CAAs and the trade allies that program and implementors hire to deliver the program. The program is impactful to communities and vulnerable populations, but also the agencies and businesses and trade allies trained and hired to deliver programs.

Business and Public Sector Programs

- Stakeholders need more detail on the Third Party program
 - Why is the Company modeling \$52M/year for PYs 2028 and 2029, but savings is projected at 243 GWh in 2028 but 124 GWh in 2029?
- Stakeholders want to better understand the impact of the Bus/Pub Behavior program and the cost/KWh of savings
- Stakeholders are interested in a breakdown of intended public sector building types by budget (e.g. libraries, schools, community centers, etc.)
- From Initial Asks:
 - Stop C&I market rebates for TLEDs. NOTE: OK to continue retrofitting TLEDs as part of small C&I direct install and IQ multi-family DI efforts

- Need to better understand mix of lighting measures proposed
 - Expand small business direct install programs to promote more comprehensive treatment of larger (non-lighting) savings opportunities, including weatherization where applicable. There are likely to be significant building envelope efficiency upgrade opportunities in many small businesses that are not being assessed in current programs. Such major measures have higher barriers than lighting retrofits so are much less likely to be addressed in the future. ComEd to consider this as a joint program offering (as mentioned above).
- Note: will have additional feedback once we dive deeper into program details

Market Development Initiative (MDI)

Karen Lusson, National Consumer Law Center

- Stakeholders appreciate the continued commitment to the MDI program. However, as structured, stakeholders and customers have no understanding of achievements relative to goals or metrics.
- Recommend that northern IL utilities (ComEd, PGL/NS, and Nicor) create a joint MDI program with specific metrics and goals relative to budget and new metrics to be created with stakeholder input
- *Need for ombudsman role, as previously requested*
- *Note: will have additional feedback once we dive deeper into program details*

Elder Calderon: Is the ombudsman role just within the MDI space?

- *Karen Lusson: We are open to figuring out how to make this work. We believe it's necessary and important. It can be an aspect of the MDI or separate and apart from the initiative.*
- *Chris Neme: The idea is that ombudsman role would be there to support subcontractors regardless of what program they're delivering, but housed or funded through MDI.*

Inflation Reduction Act (IRA) Leveraging

- Stakeholders need to better understand the implications and legality of treating IRA EE as a Peak Load Reduction (PLR) resource.
- The company made a comment during the presentation that DOE wants to claim the first 30% of energy savings through IRA programs before utilities can begin to claim savings. Stakeholders have not heard this and need more information on savings attribution.
- Stakeholders would like to see ComEd work with IHWAP to maximize braiding and IRA leveraging opportunities. IHWAP has suggested that braided utility funds would enable them to cover the full cost of electrification and other measure rebate amounts from the HOMES and HEERA programs that cannot be combined with other federal dollars.
- Stakeholders request ComEd work with municipalities and stakeholders in conversations on IRA leveraging challenges and opportunities.
- Note: will have additional feedback once we dive deeper into program details

Other Comments

Kari Ross, NRDC

- Exterior Lighting
 - The potential study shows there is no opportunity for exterior lighting control savings. Does ComEd agree with that?
 - Why does the proposed plan not include streetlighting incentives? Especially for municipalities outside of the City of Chicago?
 - With any exterior lighting, limit measures to “dark sky” compliant models

- Residential
 - Stakeholders want to better understand the impact of the Res/IE Behavior program and the cost/KWh of savings
- Joint Programs
 - Discontinue all joint electric & gas new construction programs. Continue ComEd's residential all-electric new construction program.
 - Add a commercial all electric new construction program.

Ken Walczak: For exterior lighting, I can provide the limited case studies and examples that have implemented dimming schedules with controlled lighting and examples of energy savings as needed.

Karen Lusson: On ComEd's decision to reduce IE spending from \$100 million to \$60 million—I want to highlight from the statute that it requires a utility that in addition to hitting goals, the EE Plan has to show that it represents a cross section of opportunities from all rate classes. We would argue that ending the SF Wx contradicts that requirement. Subsection F of the statute requires to take into account the unique circumstances of the territory—46-48% of customers fit the definition of low-income under the statute. We think that the plan has to acknowledge that and provide programs that serve that population.

- *Kim Swan: Can you provide the citations in the chat?*
- *Karen Lusson (via chat):*
 - *RE: requirements for utility plan filings:*
 - *8-103B(g)(3) Demonstrate that its overall portfolio of measures, not including low-income programs described in subsection (c) of this Section, is cost-effective using the total resource cost test or complies with paragraphs (1) through (3) of subsection (f) of this Section and represents a diverse cross-section of opportunities for customers of all rate classes, ...*
 - *Re: taking into account the unique characteristics of the utility's service territory: See 8-103B(f):*
 - *"Each utility's plan shall set forth the utility's proposals to meet the energy efficiency standards identified in subsection (b-5) or (b-15), as applicable and as such standards may have been modified under this subsection (f), taking into account the unique circumstances of the utility's service territory."*

Ben Heymer (via chat): The Commercial and Industrial New Construction does provide a pathway for all-electric (and electric-ready) commercial new construction projects. This is a new offering as of 2024.

- *Kari Ross (via chat): Thanks Ben, good to know. Commercial New Construction was not included in ComEd's proposed portfolio (to our understanding) so sifting through the challenges and opportunities with this program will be key.*

Feedback from Income Qualified Single Family Contractor Network

Representative(s) of Income Qualified Single Family Contractor Network: Chicago Bungalow Association (Mary Ellen Guest), CEDA (Nick Horras), Urban Efficiency Group (Darnell Johnson)

Nick Horras, CEDA

- I'd like to share a couple statistics from CEDAs standpoint:
 - We've served over 1,100 SF clients with braided IHWAP utility funds.

- An investment of \$8 million has resulted in real measured benefits.
- In the recent fiscal year, 281 households were IHWAP utility jointly funded products.
- Would not be able to serve additional 141 clients if we didn't have the funding. Utility funds have been super valuable to provide comprehensive work to clients in need.
- In total, CEDA invested \$24 million in material and labor in SF and MF clients.
- Leveraging of DOE funds is critical to help get more investment.

Mary Ellen Guest, Chicago Bungalow Association

- Would like to speak on the elimination of SF IE Wx and retrofits. We have done work in this space since 2010. From 2010-2017, we provided Wx to 530 homes.
- From 2017-2024 to date, we have weatherized 9,400 homes with investment of \$55.2 million of ComEd and PGL funding. In total, we have brought services thanks to utility dollars to 14,530 homes—a total of \$67million.
- Key benefits of the program and work
 - Reducing the energy burden is very important. LI households spend 15-20% on energy causes, significantly above the 6% threshold of energy burden for higher income households
 - Enhances air quality and health—continuous bathroom fans and mold remediation has huge impact
 - Increases resilience to climate impacts
 - Adds property value
- If this work stops, the Bungalow Association will close. We are 25 years old this year and have worked for years to build up this pipeline and the relationships we have.

Darnell Johnson, Urban Efficiency Group

- I believe in the impacts of the IQ initiative. As a minority firm, we were one of few that were actually in that space. Adoption of the technologies for these communities has been a huge win—they are aware of programs and are seeking to utilize them.
- I am very concerned with impact of removing this program.
- Very important to recognize that IE and LMI are highlighted and prioritized in SAG presentations, but it's conflicting that these programs see the deepest cuts when cuts need to be made.
- MDI money invested and training opportunities to get individuals BPI certified is great. But the sustainment of investments to get individuals to enter into the space will be severely hindered by this downturn in budget. What is the return on investment made in BPI and MDI training if not allowing the individual certified to get into the clean energy economy? I know ComEd is not singularly responsible for that; however, the direct cut will directly impact the small businesses and contractors.

Todd Banks: I've worked with Darnell in the past and have worked at ComEd, so I understand the benefit, people and passion around supporting MDI. To Darnell's point, having had worked on the inception of the MDI process, and having worked with contractors getting into EE space and encouraged by legislation, we provided a real pathway for contractors to get involved. I would ask the utilities to take a hard look at the adverse impacts and do an adverse impact analysis of what cutting the funding will look like for customers, businesses and community based organizations. The adverse impact will not impact everybody but will impact businesses and customers in the minority space.

- *Darnell Johnson: Todd brings up a valid point to emphasize – I personally know a couple of small businesses that have launched because of the opportunities available through these programs. Removing the opportunities leaves start-up businesses who have gotten to the space without opportunities to generate revenue, repay loans and increase earning potential. I encourage ComEd to look at the complete impact on what this move can have.*

Closing and Next Steps

Next Steps for ComEd EE Plan:

- Negotiation meetings on ComEd's EE Plan with non-financially interested parties begin the week of November 11th.
- ComEd will file the 2026-2029 EE Plan with the ICC for approval by March 1, 2025