

## **IPA Integrated Resource Planning Workshop #3: Customer Cost Impacts Methodology**

May 26, 2026

**Respondent Name:** Brett Sproul

**Respondent Organization:** Advanced Energy United

**Respondent Email Address:** bsproul@advancedenergyunited.org

**Respondent Zip Code:** 60622

### **Question 1**

*How should “commercial” versus “industrial” customer classes be defined for purposes of reporting customer cost impacts?*

Advanced Energy United (United) does not have an opinion on how “commercial” and “industrial” customer classes are defined for purposes of reporting customer cost impacts at this current time.

### **Question 2**

*If “commercial” and “industrial” are defined using load thresholds, what threshold(s) do you recommend and why?*

As stated above, United does not have an opinion on how “commercial” and “industrial” customer classes are defined at this current time.

### **Question 3**

*For the stakeholder group(s) that you are representing in the IRP process, what are you hoping to learn from the cost impact analysis specific to the customer group you are interested in?*

United is the only national trade association that represents a broad spectrum of clean energy providers and facilitators. Members include front-of-meter and behind-the-meter renewable energy and battery storage manufacturers and developers, electric vehicle (“EV”) and EV charging equipment suppliers, electric heat pump manufacturers, providers of energy efficiency, demand response, and virtual power plants, as well as larger users of energy wanting to ensure that clean energy is available on the grid to facilitate corporate sustainability goals. Given this broad scope of technology areas focused on the clean energy sector, United is primarily interested in receiving up-to-date customer cost information that fairly evaluates the cost of renewables and other advanced energy technologies compared to the cost of fossil fuel resources for all customer groups. Any cost impact analysis should also reflect the societal cost of fossil fuel use (such as health impacts resulting from pollution and damages resulting from climate change) when considering customer cost impacts in this IRP process. Information on how to consider Societal Costs can be found at

both the National Association of State Energy Officials (NASEO) 2026 National Standards Practice Manual (NSPM) and the California Public Utility Commission's 2022 Report on the impact of a societal cost test on resource procurement produced by E3.

#### **Question 4**

*E3 proposes to estimate the future delivery revenue requirement by starting with the current delivery revenue requirement and applying a growth rate based on historical authorized revenue requirement increases over the past 10 years, along with modeled additions for new transmission and distribution investments. Do you believe this is a reasonable approach for projections?*

Yes, but should be adjusted

#### **Question 5**

*If "Yes, but should be adjusted" or "No" was selected in the previous question, what adjustment is most appropriate?*

Align growth rate with recent multi-year rate plans (e.g., using recent approved increases as a forward-looking proxy)

#### **Question 6**

*If "Use a different historical window" was selected in the previous question, what lookback period should be used to estimate the growth rate and why?*

N/A

#### **Question 7**

*Energy burden is defined as the percentage of a household's annual income spent on household energy bills. What baseline would be most useful for examining energy burden in the IRP (e.g., historical, business-as-usual, etc.)?*

Advanced Energy United does not have a strong opinion on the proper calculation and approach that should be used for determining "Energy Burden" at this current time.

#### **Question 8**

*Are there data sources available at the community or census-tract level in Illinois that should inform how EJ and equity investment eligible communities are identified and characterized?*

Advanced Energy United does not have a strong opinion at this time on the data sources that are available at the community or census-tract level in Illinois that can inform how EJ and equity investment eligible communities are identified and characterized.

**Question 9**

*What are the most significant barriers to participation in existing programs for EJ and/or equity investment eligible communities, e.g. upfront costs, eligibility restrictions, lack of information, or structural factors like renter status?*

Advanced Energy United does not have a strong opinion on the existing barriers to participation in existing programs for EJ and/or equity investment eligible communities.