

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

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Question 1

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

N/A

Question 2

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

N/A

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?

As a CEJA Workforce Development Hub serving Will County and the Chicagoland area within the ComEd service territory, we are interested in understanding three things from the cost impact analysis. First, how the scenarios selected for the detailed customer cost analysis are chosen, and whether the subset will include a scenario that tests what happens to customer costs when project timelines are delayed. We raised this in our Workshop 1 comments as Sensitivity 1 and believe it is relevant to the cost methodology. Second, whether the capacity cost projections account for the possibility that resources take longer to build than the model assumes. Construction delays, regardless of cause, can change what customers end up paying. Third, how the cost analysis treats scenarios that depend heavily on customer-side resources like smart thermostats and behind-the-meter batteries. Both the program incentive costs to encourage adoption and the installation labor needed to deploy that equipment are factors that could affect projected rates in those scenarios. We also submitted a supplemental attachment with additional detail on each of these points.

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?

Other, See answer in question 6

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?

Our comment relates to Question 5. E3's approach of starting with the current delivery revenue requirement and applying a historical growth rate is a reasonable starting point. Our concern is with the treatment of program fees, which are held flat in real dollars across all scenarios as a default assumption. During the Workshop 3 Q&A, multiple stakeholders raised questions about whether this default is appropriate, particularly for scenarios that depend heavily on customer-side resources and programs. In those scenarios, program costs may need to increase to drive adoption at the levels the model assumes. We request that E3 consider varying program fee assumptions by scenario where the modeled resource mix depends on expanded customer programs.

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.)?

A business-as-usual baseline would be most useful. This would reflect current energy burden levels for households in environmental justice and equity investment eligible communities under today's rate structure. It gives a clear reference point for comparing how different IRP scenarios might increase or decrease energy burden for those communities over 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?

Two publicly available sources are relevant. First, DCEO's Illinois Clean Jobs Workforce Network Program Annual Report (April 1, 2026) contains demographic and geographic data on clean energy

workforce program participants, including breakdowns by equity investment eligible and environmental justice community status. This data is available at dceo.illinois.gov/ceja.html. Second, the IPA's Energy Workforce Equity Portal at energyequity.illinois.gov contains data on Equity Eligible Contractor certification and participation. Both provide community-level information that could help identify and characterize EJ and equity investment eligible communities in the context of the IRP.

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?

From our direct experience serving Will County and the Chicagoland area, the most significant barriers we see are: Affordability. Many of the households in the communities we serve are struggling to pay their electric bills as they are. If someone cannot afford their monthly utility payment, they are not in a position to participate in programs like rooftop solar, even with subsidies. The gap between what a program covers and what a household has to pay out of pocket is still too much for many families. Awareness. Many people in the communities we serve are not aware of the clean energy programs available to them. Programs like Illinois Shines and ILSFA exist, but the information does not always reach the communities that could benefit most. Competing priorities. For households focused on meeting basic needs like rent, groceries, and childcare, clean energy programs are not a priority. It is not that people are uninterested. It is that other things have to come first when resources are limited. Renter status. Many residents in equity investment eligible and environmental justice communities are renters. Renters cannot make decisions about building modifications like installing solar panels or replacing heating systems, because they do not own the property. Landlords, who do own the property, often have little incentive to invest in energy upgrades because they are not the ones paying the utility bill. This gap means that even when programs exist, a large share of the population in these communities cannot take advantage of them. We would also note two additional considerations. At a national level, contractor availability in underserved areas has been identified as a barrier to program delivery in contexts like the Department of Energy's Weatherization Assistance Program, where funding has sometimes outpaced the capacity to deploy services. While we cannot confirm the extent of this issue in our specific service area, it is a factor worth examining in the IRP. Relatedly, workforce availability may function as a barrier to program participation in underserved communities more broadly. If there are not enough trained HVAC technicians, energy auditors, and electricians to serve these areas, program participation may be constrained regardless of incentive levels. Approximately 79% of 2025 applicants to the CEJA hub network are from equity investment eligible or environmental justice communities (DCEO Annual Report, pp. 4-5). Our hub is designed to help address this gap, but the IRP does not currently factor workforce supply into its projections for program delivery.