

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

May 26, 2026

Respondent Name: Andrew Plenge

Respondent Organization: ComEd

Respondent Email Address: andrew.plenge@exeloncorp.com

Respondent Zip Code: 60523

Question 1

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

ComEd recommends aligning definitions of “commercial” and “industrial” customers with existing tariff-based rate classes, to ensure comparability with historical rate design and avoid introducing arbitrary segmentation. ComEd also recommends aligning with current cost allocation methodologies approved under the current ComEd Rate Design Investigation completed and approved in 2025 (ICC 24-0378), and the associated embedded cost of service study (ECOSS). There are also a recently completed (ICC 25-0677) and forthcoming (ICC 26-0364) proceedings on large load customers, which should also be considered in the analysis, but may not be able to be fully incorporated, due to timing.

Question 2

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

ComEd recommend using load thresholds aligned with tariff breakdowns. See General Terms and Conditions in ComEd’s tariff (Sheets No. 135-137) for description of delivery classes.

- 100kW or less: Residential/Small Commercial
- 100kW- 1MW: Medium/Large Commercial
- 1MW: Very Large/Extra Large Commercial
- Hold for 50MW+

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?

ComEd, who considers its stakeholders all of its customers, is hoping to learn from the cost impact analysis the projected rate impacts of the proposed scenarios, specific to its customers, by customer class, as well as broken out for residential by all residential and low-income customers specifically. ComEd would like to see an energy burden analysis for all residential and low-income customers, and rate comparison analysis for commercial and industrial customers, aligned with the approved affordability framework, in ComEd's 2024 Refiled Grid Plan. ComEd is also interested in understanding to what extent different cost allocation approaches around new large loads might impact the analysis (e.g. as considered in PJM's Reliability Backstop Procurement, recent FERC directives, etc.). Lastly, ComEd would like to understand more specifically how out-of-market payments for above-market resources (e.g. new nuclear build) will be determined and allocated.

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, ComEd believes that E3's proposal is reasonable, but should be adjusted to align growth rate with recent and proposed multi-year rate and/or grid plans, as well as, depending on the scenario, taking into account additional investments that may be needed to cover more aggressive assumptions around DERs, load growth, etc. On the transmission side, beyond incorporating modeled additions, recommend incorporating recent and historical ComEd transmission formula rate filings (done separately from referenced multi-year rate plans).

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.)?

The baseline that would be most useful for examining energy burden in the IRP, for the ComEd territory, would be the projected energy burden, as included in ComEd's 2028-2031 Grid Plan,

which employs the energy burden methodology approved by the ICC in ComEd's 2024 Refiled Grid Plan.

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?

Yes, Equity Investment Eligible Communities (EIECs) (or EJ/R3 communities) are defined in CEJA as geographic areas throughout Illinois that represent combined (and often overlapping) communities identified as "Restore, Reinvest, Renew" or "R3" communities or environmental justice (EJ) communities. R3 communities are established pursuant to Section 10-40 of the Cannabis Regulation Tax Act, where residents have historically been excluded from economic opportunities, including opportunities in the energy sector. EJ communities are defined by the Illinois Power Agency pursuant to the Illinois Power Agency Act, where residents have historically been subject to disproportionate burdens of pollution, including pollution from the energy sector. 20 ILCS 3855/1-10. The specific areas designated as EIECs change over time. The EJ and R3 maps and lists used for ComEd's proposed 2028-2031 Grid Plan are based on the 2020 Census, whereas the prior lists were based on the 2010 Census. The list of identified EIECs, by census tract as of October 2022, is provided in the ComEd Rider PIM Information Sheet. See Performance Incentive Metrics, Supplement to Rider PIM, ILL.C.C. No. 10, 49th Revised Informational Sheet No. 42; Rider PIM — Performance Incentive Metrics ComEd Census Block ID and Equity Investment Eligible Community (EIEC), Environmental Justice Community (EJ) and Low-income Community Eligibility for Grant Funding (R3) Status, available at ComEd.com/CensusBlocks. The EIECs identified in the PIM Information Sheet are applicable through 2027, an updated list of EIECs are expected to be implemented in 2028 and will replace the current list.

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?

The most significant barriers include

- Financial – upfront costs and/or credit constraints
- Multifamily housing limitations – renters lack authority to make upgrades, misaligned investments versus benefits in multitenant arrangements
- Condition of housing (health and safety repairs needed prior to energy upgrades)
- Complex eligibility requirements
- Navigating many piecemeal programs
- Lack of awareness
- Language barriers
- Digital access limitations