ComEd Responses to IPA's Request for Information #1
on Development of the Storage for All Program
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ComEd appreciates the opportunity to provide feedback to inform the development of the IPA's Storage for All program. ComEd submits these Responses to the IPA's September 30, 2026, Request for Information #1.

Program Funding

1. **CRGA provides that the Agency may utilize up to 25% of the funds currently allocated to the low-income single-family and multifamily subprograms, and the subprogram for nonprofit and public facilities of the ILSFA program for the Storage for All program. As a frame of reference, in Program Year 27, the ILSFA program budget is approximately $50 million meaning a 25% utilization would result in not more than about $7.6 million being pulled from the ILSFA program to support the Storage for All program. Please provide feedback on what percentage of funding would be most appropriate to start with for the Storage for All program. Include supporting insights, data or other information supporting your recommendation into how this initial funding sum may affect program outcomes in the near and long-term.**
    - **1.1. Please find data and assumptions to support your response to Question 1 above in Appendix A to this document.**
    - **1.2. Additionally, if you find the assumptions the IPA made in Appendix A to be inconsistent with current market conditions, please provide feedback as to the correct assumptions the Agency can review and the sources for those assumptions.**

ComEd recommends that the Agency initially allocate a percentage less than 25% - perhaps more appropriately 5-10% - of eligible Illinois Solar for All (ILSFA) funding to support the launch of the Storage for All program. While distributed storage can provide meaningful value to customers and the electric system, particularly through peak demand reduction and support of resource adequacy objectives, Storage for All will be funded using resources that would otherwise support existing ILSFA subprograms. As a result, the Agency should carefully balance the benefits of expanding storage deployment with the continued need to fund low-income solar development.

Storage offers the potential to reduce peak system demand and capacity-related costs, which may ultimately benefit customers through lower overall system costs. However, because the long-term participation levels, operational performance, and customer benefits of a new Storage for All program are currently uncertain, ComEd believes a measured initial investment is appropriate. An initial allocation in the 5-10% range would provide sufficient funding to establish the program, evaluate customer demand, assess project economics, and measure realized customer and system benefits without significantly reducing the funding available for solar deployments that provide similar benefits to storage as well as energy production benefits. The Agency should retain flexibility to increase funding in future years if program participation, cost-effectiveness, and demonstrated grid benefits support additional investment.

2. **If applicable, please expand on any answer provided to Question 1 above. For example, should the IPA start by utilizing a smaller amount of the permissible budget in the first iteration of this program (<25%)? Alternatively, should the Agency utilize the full budget allowance under the law (25%), or somewhere in between? Please provide any supporting reasoning for the specified preferred budget percentage in your response.**

   As stated above in response to Question 1, ComEd does not recommend utilizing the full 25% funding authorization at program launch. Instead, the Agency should begin with a funding allocation below the statutory maximum and consider increasing the allocation over time based on program performance and market demand. A phased implementation will allow the Agency to evaluate the effectiveness of Storage for All before committing a larger share of existing ILSFA funding. This is particularly important because the statutory funding authority represents a transfer of resources from an already established and subscribed program that directly supports low-income solar deployment and customer bill savings.

   ComEd also believes the Agency should consider the status of the existing ILSFA project pipeline and waitlist when determining funding levels for Storage for All. The presence of a significant waitlist may indicate continued strong demand for low-income solar projects and suggest that maintaining robust ILSFA funding should remain a priority. Conversely, if available ILSFA funding exceeds project demand, there may be greater opportunity to expand Storage for All funding. ComEd believes this will allow the Agency to preserve strong support for solar deployment while expanding storage deployment as experience, customer interest, and demonstrated benefits warrant.

   Lastly, while distributed storage can provide resiliency benefits for individual customers and communities, ComEd believes the primary objectives of the program should be customer affordability and resource adequacy. To the extent

program funding is limited, priority should be given to outcomes that lower customer costs, support efficient utilization of distributed energy resources, and reduce system peak demand, thereby creating benefits that can be shared broadly across customers.

Integration with the Illinois Solar for All Program

3. **When in the application process should the storage portion of a solar + storage project be selected for incentivization? Said another way, how should the Storage for All program best intertwine itself with the already established processes of the ILSFA program?**
    - 3.1. **Should the Agency consider different approaches, depending on whether it is a current or future ILSFA participant? Meaning, should there be an application process for already approved ILSFA solar projects to add a storage component to the system through the Storage for All program and then a separate, distinct application process for projects that are wanting to install solar and storage together at once and looking to apply to both the ILSFA and Storage for All programs?**
    - 3.2. **Please consider any existing processes, such as the ILSFA application submission process, project selection process, as well as contracting processes that are inflexible, such as REC payment timing, etc.**

ComEd recommends that participation in the Storage for All program occurs only after a project has successfully qualified for participation in the ILSFA program and has received the necessary approvals associated with the underlying solar project. Because eligibility for Storage for All is dependent upon participation in ILSFA, establishing the solar project's eligibility first will provide a clear and administratively efficient pathway for both program administrators and participants. This approach will help avoid duplicative eligibility reviews, reduce administrative complexity, and ensure that Storage for All incentives are directed toward projects that have already satisfied ILSFA program requirements.

Storage for All should leverage existing ILSFA processes wherever practical while remaining administratively distinct. Requiring projects to first obtain ILSFA approval before seeking Storage for All incentives would create a consistent and efficient process that builds upon the existing program framework. Because solar generation and battery storage provide different services and are subject to different performance expectations, the Agency should maintain separate incentives, contracting, and compliance structures for each program. This approach provides administrative clarity while preserving flexibility for future program modifications.

With respect to Question 3.1, ComEd does not believe separate application frameworks are necessary for existing and future ILSFA participants. Rather than creating distinct application pathways, ComEd recommends a common approach

whereby any project seeking Storage for All incentives must first obtain approval under the ILSFA program. Once that prerequisite is met, the project could then apply for Storage for All incentives, regardless of whether the solar project was previously approved through ILSFA or is newly approved and proceeding toward construction. This approach will allow both existing and new ILSFA participants to access Storage for All incentives while avoiding the administrative burden associated with maintaining multiple application processes, eligibility standards, and review procedures. A single application pathway would also provide consistency for participants, reduce customer confusion, and simplify program administration. Previously approved ILSFA projects could submit a supplemental Storage for All application, while new projects could indicate their intent to pursue storage during the ILSFA application process and seek Storage for All approval after solar eligibility is confirmed. This balances customer flexibility with administrative efficiency.

With respect to Question 3.2, ComEd encourages the Agency to design the Storage for All program in a manner that minimizes disruption to existing ILSFA processes, particularly where program structures are tied to statutory and contractual requirements. To the extent practicable, the Agency should avoid modifications to established ILSFA application review, project selection, Renewable Energy Credit (REC) contracting, and REC payment procedures. The existing ILSFA framework is familiar to participants and developers and has been designed around the unique characteristics of solar renewable energy credits. Introducing storage-related requirements into those processes may create unnecessary complexity and administrative burden. Maintaining separate contractual and payment structures will further reduce administrative complexity while avoiding potential complications associated with linking storage incentives to REC payment schedules and solar production obligations.

More broadly, the Agency should prioritize a straightforward program design that minimizes disruption to existing ILSFA processes. A "solar-first, storage-second" framework will leverage the success of ILSFA, avoid duplicative reviews and contracting requirements, and allow each program to evolve according to its own objectives.

Program Focus

4. **Should the Storage for All program be developed in such a way as to specifically focus on one or more "focus" areas, or alternatively, should the Agency seek to incentivize as many storage projects as possible? Potential areas of program focus could be supporting community energy resilience, disaster preparedness, or energy bill reductions (particularly for residents of low-income and environmental justice communities).**

ComEd recommends that the Agency initially implement the Storage for All program as a broadly accessible program that emphasizes learning, participation, and data

collection rather than narrowly targeting a specific program focus area. As a new program, Storage for All presents an opportunity to better understand customer adoption patterns, technology performance, operational benefits, customer bill impacts, and interactions with the ILSFA program. Establishing restrictive focus-area requirements at the outset may unnecessarily limit participation or result in the exclusion of projects that provide meaningful customer and system benefits.

Accordingly, ComEd believes the initial phase of the program should operate similarly to a pilot, allowing projects across a variety of customer types, geographies, and use cases to participate. This will provide the Agency with valuable information regarding which applications of distributed storage deliver the greatest customer and system value and will inform future program refinements. Over the long term, the Agency may identify one or more focus areas that warrant additional emphasis based on demonstrated outcomes. However, at program launch, ComEd believes maximizing opportunities to evaluate a broad range of projects will provide a stronger foundation for future program development than attempting to predetermine the most beneficial use cases.

Additionally, if funding remains limited and must be allocated among competing objectives, ComEd believes customer affordability and resource adequacy benefits should generally receive greater emphasis than resiliency objectives. While resiliency may provide meaningful benefits in certain circumstances, affordability and peak demand reduction have the potential to create broader customer and system-wide value.

5. **Should the program focus - if one is selected - be a criterion that is evaluated during project review and selection? If yes, please provide details on how focus areas can be translated to evaluation criteria and applied in a fair and equitable manner necessary for project selection**

   As stated above in ComEd's response to Question 4, ComEd generally does not recommend making specific program focus areas a primary project selection criterion during the initial years of the Storage for All program. Because the program is new and limited experience exists regarding customer participation and realized benefits, adding qualitative focus-area scoring criteria during project selection might introduce unnecessary administrative complexity and subjectivity at a stage when the Agency's primary objective should be developing a broad understanding of program performance.

   Instead, ComEd recommends that the Agency initially prioritize straightforward and transparent eligibility requirements while collecting data that can be used to evaluate the effectiveness of different project types over time. This reduces administrative burden for both applicants and program administrators while allowing the Agency to build an evidence-based understanding of which storage applications provide the greatest benefits.

ComEd believes the Agency should avoid creating project selection processes that require extensive qualitative review or place significant administrative burdens on applicants. During the initial years of the program, it may be more valuable to gather information from a diverse set of participating projects and use the resulting data to determine whether future program years should incorporate targeted focus areas or differentiated incentives.

In summary, ComEd recommends that the Agency initially treat Storage for All as a learning-oriented program with broad eligibility and minimal focus-area screening, while collecting the data necessary to determine whether targeted program priorities should be adopted in future years. This preserves flexibility, encourages participation, and allows future program design decisions to be informed by demonstrated customer and system benefits rather than assumptions made prior to program deployment.

Rebate, Grant, or Other Incentive Mechanism

6. **CRGA allows for flexibility in the way the incentive for this program is paid out to participants, noting that the Agency can utilize grants, rebates, or other incentives to encourage storage development. With this in mind, what incentive approach works best for this program – an ongoing REC adder to the already established ILSFA REC price for a project or is a one-time payment such as a rebate or a grant a better option?**

ComEd believes a one-time incentive paid upon successful completion of program requirements will be the most effective and administratively efficient approach for the Storage for All program. Whether structured as a grant, rebate, or similar incentive mechanism, the storage incentive should remain separate from the Illinois Solar for All REC contract and REC pricing structure.

ComEd does not recommend creating an ongoing REC adder tied to the existing ILSFA REC payment framework. Solar renewable energy credits compensate participating projects for renewable energy production, while the Storage for All program is designed to incentivize the deployment of a distinct technology with different operational characteristics and program objectives. Linking storage incentives to REC contracts will create unnecessary administrative complexity and may require modifications to established ILSFA contracting, payment, and compliance structures. Instead, a one-time incentive provides a straightforward mechanism for program administration and creates a clear distinction between the solar and storage programs. Once a storage system has been installed and demonstrated compliance with applicable program requirements, the incentive can be paid and the project can move forward without creating ongoing interdependencies between the REC contract and the storage incentive. Maintaining a standalone storage incentive preserves the integrity of existing ILSFA

processes while allowing Storage for All to evolve independently as market experience and program performance data become available.

7. **Is there a situation where a solar + storage project in development would be reduced to just the solar installation? For example, if a customer originally intends to have a solar + storage project installed, then after application to ILSFA and Storage for All determine that they no longer want to install the storage portion of the project.**

    7.1. Considering situations like this are likely to arise - how linked should the storage and solar incentives be? If the storage portion of a project is not completed, should the solar incentive also be considered at risk? If a project approved for solar + storage incentives is built with just a solar installation, what consequences are appropriate at the contract and program levels?

Yes. ComEd believes it is reasonable to expect that some projects initially proposed as solar-plus-storage projects may ultimately be constructed as solar-only projects. Changes in customer preferences, project economics, equipment availability, installation timelines, financing considerations, or other project-specific factors could lead a participant to move forward with the solar installation while electing not to install storage. For this reason, the Agency should anticipate that some level of attrition between storage application approval and storage system installation will occur over time. Program requirements should be designed with sufficient flexibility to accommodate these situations without creating unintended consequences for otherwise viable solar projects. Because the underlying solar installation is capable of independently providing customer benefits and satisfying ILSFA program objectives, ComEd does not believe the absence of a storage installation should automatically jeopardize participation in the Illinois Solar for All program.

With respect to Question 7.1, ComEd believes the solar and storage incentives should remain largely independent of one another, with storage eligibility contingent upon participation in Illinois Solar for All, but not vice versa. A project that has satisfied all applicable Illinois Solar for All requirements should not lose access to its solar incentive because a storage component is subsequently removed from the project. The solar system and associated REC contract continue to provide the customer and the State with the benefits originally contemplated under the ILSFA program, regardless of whether storage is ultimately installed. ComEd does not recommend placing ILSFA incentives at risk if a customer elects not to proceed with storage. If an approved storage project is not completed, the consequence should generally be limited to forfeiture of the Storage for All incentive. This preserves the value delivered by the underlying solar project while maintaining accountability for storage incentives through the Storage for All program.

8. **What opportunities or challenges should the Agency consider with one approach or another? Please explain in detail the impacts of the preferred approach.**

   The principal advantage of a standalone storage incentive structure is administrative simplicity. Maintaining separate incentive, contracting, and compliance frameworks allows the Agency to leverage existing ILSFA processes without introducing unnecessary complexity or creating interdependencies between the programs. A separate framework also provides flexibility to modify storage program requirements as technologies, operating practices, and market conditions evolve. By contrast, integrating storage incentives into REC contracts could complicate administration, compliance, and future program modifications. For these reasons, ComEd supports a model under which participation in Storage for All requires an approved ILSFA project, while storage incentives are administered through separate program mechanisms.

Ensuring No Upfront Costs and Understanding Customer Benefits

9. **Is there anything specific the Agency should keep in mind while working to ensure that no upfront costs are paid by participants in the Storage for All program?**

   ComEd believes ensuring that participants incur no upfront costs should remain a foundational element of the Storage for All program. To achieve this objective, the Agency should seek to minimize financial, administrative, and contractual obligations that create barriers to participation for eligible customers. Consistent with the existing Illinois Solar for All program, participants should not be required to make upfront payments, provide collateral, or assume significant financial risk in order to receive the benefits of storage. The Agency should also seek to avoid program structures that require customers to participate in complex operational arrangements or ongoing compliance activities that may be difficult for participants to understand or manage.

   ComEd believes a straightforward program in which an incentive is paid after installation and verification of an eligible storage system would best support customer participation and program accessibility. Once a storage system has satisfied applicable program requirements and been placed into service, the participant should receive the approved incentive without being subject to ongoing performance tracking, operational obligations, or other requirements that create uncertainty regarding continued eligibility. This supports customer participation, simplify program administration, and provides greater certainty regarding both customer benefits and program costs.

10. **How should Storage for All identify, quantify, and prioritize the various benefits of storage to the customer, including household energy burden reduction, household and local reliability improvements, and disaster preparedness?**

ComEd believes the Agency should evaluate storage benefits through the lens of the program's primary objectives and focus initially on benefits that can be measured consistently and experienced broadly across participating customers.
In particular, customer affordability and reductions in energy burden should be prioritized because these benefits align closely with the goals of Illinois Solar for All and can generally be quantified using estimated customer bill impacts. In addition to direct customer savings, the Agency should consider broader system benefits associated with peak demand reduction and resource adequacy, particularly to the extent storage deployment can help reduce overall system costs borne by customers.

Reliability and resiliency benefits may also be relevant considerations, but they are likely to vary significantly across customers and project configurations and may be more difficult to measure consistently. During the program's initial years, the Agency should prioritize affordability, peak demand reduction, and resource adequacy outcomes while collecting data to better assess the value of resiliency benefits over time.

11. **How can the Agency ensure that the ILSFA program's 50% savings requirement remains unimpacted or is augmented by the addition of an energy storage component to a solar project participating in the ILSFA program?**
    11.1. **Please consider that the ILSFA program prioritizes no-cost offers for Residential Solar (Small) customers and the vast majority of existing ILSFA Residential Solar (Small) projects utilize no-cost leases.**

ComEd believes the addition of storage should not diminish the customer savings currently required under the Illinois Solar for All program. Any Storage for All program design should preserve the existing Illinois Solar for All savings requirements and ensure that customers continue to receive the benefits expected under their underlying solar arrangements. To the extent storage is incorporated into a project, the Agency should require program structures that either maintain or improve customer economics rather than introducing new costs that erode existing savings. Customers should not bear additional costs associated with the storage component unless those costs are more than offset by incremental benefits delivered through the storage system. Importantly, ComEd does not believe the addition of storage should require modifications to existing Illinois Solar for All savings calculations or alter the fundamental customer protections that currently exist within the program. Storage should be viewed as an enhancement to an already qualifying solar project rather than a justification for reducing performance standards or customer savings expectations.

With respect to Question 11.1, ComEd believes this existing program structure further supports maintaining a strong separation between the Illinois Solar for All and Storage for All programs. The prevalence of no-cost participation models within ILSFA further underscores the importance of ensuring that storage does not introduce new customer expenses or contractual burdens. Any Storage for All incentive structure should preserve customer protection and accessibility that have supported successful participation in ILSFA.

12. **The Agency is requesting that project developers provide data related to costs for developing and installing solar + storage projects in Illinois, especially as it relates to the storage portion of the project. Please mark any cost data shared with the Agency as confidential per the Feedback Submission Process outlined above.**

    ComEd does not develop, own, or install customer-sited distributed storage systems and therefore is generally not positioned to provide project-specific cost data related to the development and installation of solar-plus-storage projects. ComEd encourages the Agency to obtain such information directly from program developers, installers, equipment providers, and other market participants that have direct experience with project design, procurement, installation, and operation. To the extent cost information is collected, ComEd believes it may prove useful in evaluating the overall cost-effectiveness of various incentive structures and informing future adjustments to Storage for All funding levels and program design.

13. **The Agency is also requesting that project developers provide data related to the ongoing benefits seen by customers with storage as a part of their solar installation. The Agency anticipates that in addition to quantifiable bill analysis, other benefits may be quantifiable as avoided outages in minutes or hours, and community benefit of reduced local grid burden associated with service disruptions.**

    13.1. **Does the reduction of energy burden by a customer's LIDR impact the benefits seen from the addition of storage to a customer's solar installation?**

    ComEd does not possess customer-level operating data associated with solar-plus-storage projects that would enable it to quantify ongoing participant benefits. However, ComEd believes the Agency should seek to evaluate outcomes using measures that are objective, transparent, and reasonably comparable across projects. In particular, the Agency should examine customer bill impacts, peak demand reduction, and other indicators of customer affordability and resource adequacy benefits. To the extent that data is available, the Agency may also consider evaluating resiliency-related outcomes such as backup power availability

during service interruptions. However, ComEd believes affordability and peak demand impacts are likely to provide the most broadly applicable measures of program success.

With respect to Question 13.1, ComEd believes reductions in customer energy burden achieved through participation in Low-Income Discount (LID) program or other customer affordability initiatives should be evaluated independently from the benefits associated with storage deployment. While bill discount programs may affect a customer's overall bill and therefore the magnitude of observed bill savings, they do not alter the operational capabilities of a storage system or its potential to provide customer and system benefits. Accordingly, ComEd recommends that the Agency evaluate storage benefits based on the incremental value provided by the storage resource itself while recognizing that separate affordability programs may also influence overall customer bill outcomes. This will provide a clearer understanding of the benefits directly attributable to Storage for All participation and support more accurate program evaluation over time.

Avoiding Double Counting of Incentives

14. **What should the Agency consider to ensure incentives aren't double counted, especially keeping in mind that Storage for All projects are required to be colocated with Illinois Solar for All projects?**

ComEd believes the Agency should establish clear program rules to ensure that benefits associated with Storage for All are distinct from and not duplicative of benefits already compensated through Illinois Solar for All or other applicable programs. Because Storage for All systems will be co-located with Illinois Solar for All solar installations, the Agency should carefully consider the metering, measurement, and verification requirements necessary to distinguish the storage component from the underlying solar resource. Clear technical requirements will help ensure that incentives are appropriately attributed to the storage system and that program benefits are not counted more than once across multiple incentive mechanisms. ComEd believes it may be beneficial for the Agency to work with utilities, developers, and other technical stakeholders to evaluate potential metering and system configuration requirements that allow program administrators to clearly identify the storage resource and verify eligibility. While the specific technical requirements will depend on final program design, the objective should be to ensure that compensated storage benefits can be reasonably distinguished from benefits already recognized through participation in Illinois Solar for All or other programs.

ComEd also recommends that the Agency establish transparent program rules identifying which benefits are being compensated through Storage for All and how those benefits differ from the incentives and attributes already associated with the co-located solar project. This will provide greater certainty for participants,

developers, and program administrators while reducing the risk of overlapping incentives or unintended double counting.

15. What assumptions should be made about other sources of funding for solar + storage projects that would participate in this program? (CRGA's VPP program, existing solar + storage rebate, etc.)

ComEd believes the Agency should clearly define how Storage for All interacts with other available incentive programs and should establish program rules that prevent the same storage-related benefit from being compensated multiple times. At the outset, the Agency should identify which other state, utility, or federally supported programs may be available to participating projects and determine whether participation in those programs is complementary to, or duplicative of, Storage for All incentives. The Agency should also provide clear guidance regarding incentive stacking so that participants, developers, and program administrators have a common understanding of which combinations of incentives are permitted.

Participation in other incentive programs should not automatically preclude participation in Storage for All, provided that each program compensates a distinct benefit or policy objective. The Agency should establish clear rules regarding incentive stacking and benefit attribution to prevent duplicate compensation while preserving customer value. As additional distributed energy resource and storage programs emerge, maintaining transparent and adaptable program rules will help ensure administrative simplicity and efficient use of program funding.