

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)	
On Its Own Motion)	
)	20-NOI-01
Notice of Inquiry Regarding)	
Energy Affordability)	

INITIAL COMMENTS OF COMMONWEALTH EDISON COMPANY

Introduction

Commonwealth Edison Company (“ComEd” or “the Company”) submits these Initial Comments in response to the Illinois Commerce Commission’s (“ICC”) *Notice of Inquiry Regarding Energy Affordability* in Illinois (“20-NOI-01”, the “Affordability NOI” or “NOI”). ComEd appreciates the opportunity to share its comments and information with the Commission, Staff and fellow NOI respondents, and looks forward to the continuing dialogue that this process enables.

ComEd is committed to providing safe, reliable and affordable energy service for every customer in every community. ComEd also strives to ensure equity in economic opportunity and health benefits in our communities. That is why we are partnering with communities that have been inequitably denied vital investment for decades to help enable and empower them to gain fair access to technologies, opportunities, and outcomes that are sustainable and fuel long-term financial growth and prosperity.

ComEd endeavors to provide its customers with equitable access to affordable electric service and promote community prosperity through its income eligible programs and offerings. Since the enactment of the Future Energy Jobs Act in 2018, ComEd has provided more than \$150 million to its income qualified customers in the form of payment assistance grants, arrearage forgiveness funds and energy efficiency program offerings. For example, ComEd provides financial assistance grants and arrearage forgiveness programs for income-eligible residential customers through ComEd Customer Affordability and Reliable Energy (“CARE”) programs and the new ComEd Bill Payment Assistance Program. ComEd’s Energy Efficiency (“EE”) Program empowers low-income residential customers to save through home retrofits, weatherization programs, product rebates, and usage assessments, while simultaneously helping to revitalize the community. ComEd’s Initial Comments to 20-NOI-01 provides details about these particular programs and offerings, and more.

The extent of financial need in many communities is significant and will require focused collaboration and partnership to address. To that end, ComEd’s offerings are designed to complement programs, such as the Low Income Home Energy Assistance Program (“LIHEAP”) and the Percentage of Income Payment Plan (“PIPP”), which are offered and administered by community and government partners, like the Illinois Department of Commerce & Economic Opportunity (“DCEO”) and Local Administrative Agencies (“LAAs”). Together, ComEd and these public partner programs have helped customers make ends meet during tough times. The

issuance of the Affordability NOI in March 2020 was prescient, however. While ComEd believes that PIPP remains the gold standard for customer assistance programs, recent events have emphasized certain design and structural changes needed to ensure that the reach and impact of available PIPP assistance dollars are maximized. ComEd's Initial Comments provide suggestions on how PIPP could be modified to better reach and serve those most in need. ComEd recognizes that it will not be possible to enact PIPP reforms unless all interested parties, including DCEO, the LAAs, Illinois gas and electric utilities and the targeted community and customer groups, coordinate their efforts,

We look forward to our continued work with the Commission and interested parties on this critical and timely issue through the NOI process. However, we recognize that the Affordability NOI is only one part of a much larger conversation about residential affordability and social equity happening in various forums across Illinois, including the recently concluded ICC Docket No. 20-0309 with its stipulation agreements negotiated among diverse stakeholders, the ongoing Energy Affordability Discussion Series facilitated by former ICC Commissioner John Colgan, and Governor Pritzker's Working Group on Energy Policy. ComEd is deeply committed and actively engaged in all of these discussions.

Each NOI question is restated below in bold italics in the order provided by the NOI and is followed by ComEd's response. It is ComEd's understanding that the scope of 20-NOI-01 is residential customers; therefore, ComEd's responses do not provide information specific to non-residential customers, such as commercial and industrial customers.

Public Utilities

A. Information and Reporting

1. *Please provide the following information. Please provide the information by month and calendar year for periods beginning with January 1, 2013 and through December 31, 2019. If the information is not available, please address the feasibility of providing the information and include any recommendations regarding the format and other relevant parameters related to filing the information.*

ComEd believes that service disconnection truly is a last resort. As we discuss in these Initial Comments, ComEd employs a variety of tools, processes and procedures to encourage customers to make payments and avoid disconnections. ComEd also engages in extensive customer communications, education and outreach to inform customers with outstanding balances about available payment arrangements and bill payment assistance options. See, e.g., ComEd Responses to 20-NOI-01 B5, B6 and E.

- a. *the number of residential customer accounts that were disconnected during the period for non-payment and that remained disconnected (displacement) during the entire period;*

The table below labeled as “ComEd Table 01” provides a summary of the number of residential customer accounts that were disconnected for non-payment during the indicated calendar year and remained disconnected (displacement) through December 31, 2019.

The spreadsheet containing data for 2013 – 2019 is provided as the attachment labeled as “Attach 01” and is provided by region and zip code.

ComEd Table 01

Year	2013	2014	2015	2016	2017	2018	2019
# of Residential customers that were disconnected and remained disconnected through 12/31/19	27,290	23,598	33,917	35,713	34,012	35,731	35,558

b. the number of residential customer accounts that were disconnected during the period and reconnected within 12 months;

The table below labeled as “ComEd Table 02” provides a summary of the number of residential customer accounts that were disconnected for nonpayment during the calendar years, January 1, 2013 and through December 31, 2019 and reconnected within 12 months.

The spreadsheet containing data for 2013 – 2019 is provided as the attachment labeled as “Attach 02”, by region and zip code.

ComEd Table 02

Year	2013	2014	2015	2016	2017	2018	2019
# of Residential Customers that Disconnected for Non-Payment and Reconnected Within 12 Months	47,631	45,757	70,972	101,299	108,915	133,546	169,278*

* Note that the reconnected data provided is current through August 2020; therefore, there may be some customer accounts that have been reconnected since August 2020, which are not captured in this response.

c. the number of residential customer accounts that received service and had past due balances;

The table below labeled as “ComEd Table 03” provides the average number of residential past due accounts by calendar year from 2013 and through 2019.

The spreadsheet containing data, by month, for the years 2013 – 2019, of the total number of past due residential accounts is provided as the attachment labeled as “Attach 03”.

ComEd Table 03

Year	2013	2014	2015	2016	2017	2018	2019
Average of the # Past Due Accounts at the end of each month for the year	745,479	732,759	724,603	712,737	709,295	723,760	692,600
# of Residential Accounts (as of 12/31)	3,480,398	3,502,386	3,550,239	3,595,376	3,624,372	3,647,752	3,669,957
% of Average Residential Accounts Past Due at the end of each month for the year	21%	21%	20%	20%	20%	20%	19%

d. the number of residential customer accounts that were on deferred payment arrangements;

ComEd provides deferred payment arrangements (also known as “DPAs”) in accordance with the applicable provisions of 83 Ill. Admin. Code Section 280 (commonly referred to as “Part 280”). In 2020, in light of the economic challenges facing our customers, ComEd worked with a broad array of Illinois utilities and other stakeholders to offer more generous DPA terms for residential customers, such as DPAs up to 24 months in length and DPAs with no or limited down payments, for a limited time. *See In re Moratorium on Disconnection of Utility Servs.*, ICC Docket No. 20-0309, Emergency Interim Order (March 18, 2020) and Final Order (June 18, 2020) at Appendix 1, Para. 8 (“Stipulation Agreement”). The Stipulation Agreement offerings are not reflected in the data provided herein because they were offered in 2020, which is outside of the requested time period (2013-2019).

The table below labeled as “ComEd Table 04” provides the average number of residential customer accounts that were on a DPA, by calendar year, from 2013 through 2019.

The spreadsheet containing data, by month, for the years 2013 – 2019, of the total number of residential accounts on active deferred payment arrangements, is provided as the attachment labeled as “Attach 04”.

ComEd Table 04

Year	2013	2014	2015	2016	2017	2018	2019
Average of the # of Residential accounts on DPAs	53,463	51,777	51,856	47,265	46,135	50,326	50,403
# of Residential Accounts (as of 12/31)	3,480,398	3,502,386	3,550,239	3,595,376	3,624,372	3,647,752	3,669,957
% of Average Residential Accounts on DPAs	1.54%	1.48%	1.46%	1.31%	1.27%	1.38%	1.37%

e. the number of residential customer accounts that were on an arrearage reduction program;

ComEd offered two arrearage reduction programs during the 2013-2019 period: PIPP and Supplemental Arrearage Reduction Program (“SARP”). See ComEd’s Response to 20-NOI-01 B6 for a description of both programs.

See the attachment labeled as “Attach 07” provided as part of ComEd’s Response to 20-NOI-01 A1h for the number of customers on PIPP during the 2013-2019 period.

ComEd implemented SARP in November 2019. In November 2019, there were 90 SARP participants; in December 2019, there were 144 SARP participants.

f. the number of residential customer accounts for which the utility required a deposit and the average size of residential deposits;

The table below labeled as “ComEd Table 05-01” shows the average number of residential accounts for which ComEd required a deposit by calendar year from 2013 through 2019.

ComEd Table 05-01

Year	2013	2014	2015	2016	2017	2018	2019
Average # of Residential accounts with deposits	476,310	465,828	432,200	452,165	461,347	532,376	503,738
# of Residential Accounts (as of 12/31)	3,480,398	3,502,386	3,550,239	3,595,376	3,624,372	3,647,752	3,669,957
% of Average Residential Accounts with deposits	14%	13%	12%	13%	13%	15%	14%

The table below labeled as “ComEd Table 05-02” shows the average residential customer deposit amount by calendar year from 2013 through 2019.

ComEd Table 05-02

Year	2013	2014	2015	2016	2017	2018	2019
Average amount of the Residential account deposit	\$ 142.69	\$ 139.30	\$ 138.69	\$ 141.95	\$ 145.99	\$ 144.59	\$ 150.44

The spreadsheets containing data for calendar years 2013 – 2019, by month, for the number of residential accounts with associated deposits, and the average amount of those deposits, are provided as the attachment labeled as “Attach 05”. ComEd clarifies that it is providing the requested information for all residential accounts that had an associated deposit requirement during the time period, which includes new residential accounts established during the time period that required a deposit.

- g. the number of residential customer accounts that provided a medical certificate in response to a disconnection notice;***

The table below labeled as “ComEd Table 06” shows the number of residential customer accounts that provided a medical certificate in response to a disconnection notice by calendar year from 2013 through 2019.

ComEd Table 06

Year	2013	2014	2015	2016	2017	2018	2019
# of Customer Accounts that Provided a Medical Certificate	709	1,475	2,084	2,480	2,378	2,807	2,683

The spreadsheet containing data for calendar years 2013 – 2019, by month, of the number of residential customer accounts that provided a medical certificate in response to a disconnection notice, is provided as the attachment labeled as “Attach 06”.

- h. the amount of payment and the number of residential customer accounts that received bill payment assistance, including but not limited to low-income energy assistance programs such as the Low-Income Home Energy Assistance Program (LIHEAP), state programs such as the Percentage of Income Payment Program (PIPP), utility programs, and social service programs such as Catholic Charities, Salvation Army or other charitable service organizations.***

During calendar years 2013 through 2019, ComEd residential customers received bill payment assistance from LIHEAP, PIPP and ComEd CARE programs. The table below labeled as “ComEd Table 07” shows the number of residential customer accounts that received bill payment assistance and the total grant amount by calendar year from 2013 through 2019 for each of the three programs.

ComEd Table 07

Assistance Program	Year	2013	2014	2015	2016	2017	2018	2019
LIHEAP	Total Grant (\$)	\$ 53,472,398	\$ 56,379,595	\$ 42,865,780	\$ 34,458,887	\$ 37,575,383	\$ 49,086,263	\$ 46,510,300
	# of Accounts	246,227	218,156	176,874	144,419	162,987	202,812	160,788
PIPP*	Total Grant (\$)	\$ 16,256,712	\$ 18,735,389	\$ 10,333,035	\$ 2,150,984	\$ 9,623,237	\$ 8,063,139	\$ 7,967,897
	# of Accounts	* PIPP is a monthly benefit program so a yearly total number of accounts receiving a benefit is not provided.						
ComEd CARE (residential programs only)	Total Grant (\$)	\$ 8,586,294	\$ 8,031,384	\$ 7,114,953	\$ 8,046,498	\$ 8,677,059	\$ 8,607,887	\$ 8,629,761
	# of Accounts	24,644	14,344	15,118	18,039	16,542	22,999	20,137

The spreadsheets containing data for calendar years 2013 – 2019, by month, of the total benefit provided that month to ComEd customers through LIHEAP, PIPP and ComEd CARE, and the number of ComEd residential customers receiving such a benefit through each program, are provided the attachment labeled as “Attach 07”. ComEd cannot and does not track bill payment assistance provided by social service programs, such as “social service programs such as Catholic Charities, Salvation Army or other charitable service organizations” on behalf of a ComEd customer.

2. *Please provide the following information. Please provide this information by census block, census block group, census tract, zip code, zip code plus four and/or as many categories as you have available. Please provide the information both by month and calendar year for periods beginning with January 1, 2013 and through December 31, 2019. If the information is not available, please address the feasibility of providing the information and include any recommendations regarding the format and other relevant parameters related to filing the information.*

a. Number of accounts that received:

a. LIHEAP –Direct Vendor Payment

The summary table below labeled “ComEd Table 08” provides the number of LIHEAP Direct Vendor Payments that were made, by calendar year, for LIHEAP Direct Vendor Payments and LIHEAP Check Type 8 Payments from 2013 through 2019. The LIHEAP Check Type 8 Payments were only dispersed in the years that DCEO administered a Summer Cooling program (2013-2015).

The attachment labeled as “Attach 08 01” contains separate tabs for each year (2013-2019) with the number of ComEd accounts, by month, that received LIHEAP Direct Vendor Payments by region and zip code.

The attachment labeled as “Attach 08 02” contains separate tabs for each year (2013-2015) with the number of ComEd accounts, by month, that received LIHEAP Check Type 8 Payments by region and zip code. LIHEAP Check Type 8 Payments were made from Summer Cooling LIHEAP funds during the months funding was available.

ComEd Table 08

Year	2013	2014	2015	2016	2017	2018	2019
Number of accounts that received LIHEAP Direct Vendor Payments	205,617	195,162	162,024	143,880	162,204	202,159	159,944
Number of accounts that received LIHEAP Check Type 8 Payments	40,402	22,638	14,204	0	0	0	0
Total	246,019	217,800	176,228	143,880	162,204	202,159	159,944

b. LIHEAP Reconnection/Emergency Assistance

The summary table below labeled as “ComEd Table 09” provides the number of accounts that received LIHEAP Reconnection/Emergency Assistance (also commonly referred to as “LIHEAP Emergency Services” or “ES”), by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 09” contains separate tabs for each year (2013-2019) with the number of ComEd accounts, by month, that received LIHEAP Emergency Services payments by region and zip code.

ComEd Table 09

Year	2013	2014	2015	2016	2017	2018	2019
Number of Residential Accounts Participating in LIHEAP Emergency Services (“ES”)	40,402	21,868	13,898	12,205	12,870	15,846	15,287

c. Participated in PIPP

The summary table below labeled as “ComEd Table 10” provides the number of monthly ComEd PIPP Benefits dispersed, by calendar year, from 2013 through 2019.

ComEd Table 10

Year	2013	2014	2015	2016	2017	2018	2019
Total ComEd PIPP Benefits Dispersed	378,245	442,790	222,288	49,841	220,097	180,257	166,975

The attachment labeled as “Attach 10” contains separate tabs for each year (2013-2019) with the number of ComEd accounts, by month, that participated in PIPP by region and zip code.

b. Number of accounts that entered into a Deferred Payment Arrangement (“DPA”) and:

a. Average arrearage amount

The summary table below labeled as “ComEd Table 11” provides the average arrearage amount for newly established DPAs, by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 11” contains separate tabs for each year (2013-2019) with the average arrearage amount of newly established DPAs, by month, provided by region and zip code.

ComEd Table 11

Year	2013	2014	2015	2016	2017	2018	2019
Average DPA Arrearage Amount	\$ 501.02	\$ 523.92	\$ 565.33	\$ 536.78	\$ 536.18	\$ 585.05	\$ 576.12

b. Average monthly installment payment amount

The summary table below labeled as “ComEd Table 12” provides the average monthly installment payment amount for newly established DPAs, by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 12” contains separate tabs for each year (2013-2019) with the average monthly installment payment amount for newly established DPAs, by month, provided by region and zip code.

ComEd Table 12

Year	2013	2014	2015	2016	2017	2018	2019
Average DPA Installment Amount	\$ 58.41	\$ 59.25	\$ 65.85	\$ 61.19	\$ 59.90	\$ 58.85	\$ 56.60

c. Average length of DPA

The summary table labeled as “ComEd Table 13” below provides the average new DPA length in terms of months, initiated by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 13” separate tabs for each year (2013-2019) with the average newly established DPA length in terms of months, provided by month, and by region and zip code.

ComEd Table 13

Year	2013	2014	2015	2016	2017	2018	2019
Average DPA Installment Length (months)	8.6	8.8	8.7	8.6	8.7	9.2	9.2

d. Number of DPAs by length of DPA (number of months)

The summary table below labeled as “ComEd Table 14” provides the number of DPAs, by DPA length (number of installments), initiated by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 14” contains separate tabs for each year (2013-2019) with the number of DPAs, by DPA length (number of installments) provided by month, and by region and zip code.

ComEd Table 14

Year/Installments	Number of DPA by Length (number of installments)												Total
	1	2	3	4	5	6	7	8	9	10	11	12	
2013	0	12,583	12,099	11,255	5,334	38,231	1,991	6,057	2,652	4,587	871	103,311	198,971
% of Total	0%	6%	6%	6%	3%	19%	1%	3%	1%	2%	0%	52%	100%
2014	0	9,459	10,837	10,927	5,403	39,241	2,307	6,853	2,858	5,107	1,140	108,623	202,755
% of Total	0%	5%	5%	5%	3%	19%	1%	3%	1%	3%	1%	54%	100%
2015	0	9,706	11,079	10,958	5,559	38,192	2,223	6,314	2,789	4,391	440	105,019	196,670
% of Total	0%	5%	6%	6%	3%	19%	1%	3%	1%	2%	0%	53%	100%
2016	0	9,084	11,133	10,689	5,867	35,312	2,236	6,347	2,687	4,437	437	104,552	192,781
% of Total	0%	5%	6%	6%	3%	18%	1%	3%	1%	2%	0%	54%	100%
2017	0	8,701	10,762	10,719	5,530	34,522	2,170	6,289	2,580	4,237	424	105,905	191,839
% of Total	0%	5%	6%	6%	3%	18%	1%	3%	1%	2%	0%	55%	100%
2018	0	8,051	9,906	10,251	5,513	35,478	2,334	6,936	2,794	5,011	579	126,721	213,574
% of Total	0%	4%	5%	5%	3%	17%	1%	3%	1%	2%	0%	59%	100%
2019	0	8,720	9,479	9,784	5,370	35,326	2,400	6,412	2,934	4,734	676	129,836	215,671
% of Total	0%	4%	4%	5%	2%	16%	1%	3%	1%	2%	0%	60%	100%
Total	0	66,304	75,295	74,583	38,576	256,303	15,661	45,208	19,294	32,504	4,567	783,970	1,412,267
% of Total	0%	5%	5%	5%	3%	18%	1%	3%	1%	2%	0%	56%	100%

e. Number of DPA defaults

The summary table below labeled as “ComEd Table 15” provides the number of DPA defaults, by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 15” contains separate tabs for each year (2013-2019) with the number of DPA defaults, by month, provided by region and zip code.

ComEd Table 15

Year	2013	2014	2015	2016	2017	2018	2019
Total DPA defaults	648,213	607,928	554,192	559,389	583,454	610,467	631,422

f. Number of DPA reinstatements

The summary table labeled as “ComEd Table 16” below provides the number of DPA reinstatements, by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 16” contains separate tabs for each year (2013-2019) with the number of DPA reinstatements, by month, provided by region and zip code.

ComEd Table 16

Year	2013	2014	2015	2016	2017	2018	2019
Total DPA Reinstatements	127,396	122,384	228,008	313,793	327,168	337,315	348,436

g. Number of DPA renegotiations

The summary table below labeled as “ComEd Table 17” provides the number of DPA renegotiations, by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 17” contains separate tabs for each year (2013-2019) with the number of DPA renegotiations, by month, provided by region and zip code.

ComEd Table 17

Year	2013	2014	2015	2016	2017	2018	2019
Total DPA Renegotiations	36,661	36,927	36,008	48,361	51,653	57,238	56,828

h. Number of DPAs successfully completed

The summary table below labeled as “ComEd Table 18” provides the number of DPAs successfully completed, by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 18” contains separate tabs for each year (2013-2019) with the number of DPAs successfully completed, by month, provided by region and zip code.

ComEd Table 18

Year	2013	2014	2015	2016	2017	2018	2019
Total DPAs successfully completed	22,135	20,791	32,748	52,681	72,053	71,635	83,814

i. Number of accounts that received energy service from an independent (natural gas or electricity) provider.

For purposes of this response, ComEd defines an “independent (Natural gas or utility) provider” to mean a Retail Electric Supplier (commonly referred to as a “RES”).

The summary table below labeled as “ComEd Table 19” provides the number of accounts that received service from a RES, by calendar year, from 2013 through 2019.

The attachment labeled as “Attach 19” contains separate tabs for each year (2013-2019) with the number of accounts that received service from a RES, by month, provided by region and zip code.

ComEd Table 19

Year	2013	2014	2015	2016	2017	2018	2019
Number of Accounts with a RES on DPA	120,055	126,758	105,317	79,828	76,757	86,977	85,082

- c. *Number of accounts that were involuntarily disconnected for non-payment, including the number of such accounts that received energy service from a competitive retail (natural gas or electricity) provider.*

For purposes of this response, ComEd defines an “independent (Natural gas or utility) provider” to mean a Retail Electric Supplier, or RES. For purposes of this response, ComEd is defining “accounts that were involuntarily disconnected” as accounts that were disconnected for nonpayment.

The summary table below labeled as “ComEd Table 20” provides the number of accounts that were disconnected for nonpayment, by provider (ComEd or RES) and by calendar year, from 2013 through 2019.

ComEd Table 20

Accounts Disconnected by Year	2013	2014	2015	2016	2017	2018	2019
ComEd	31,422	31,146	57,847	87,743	96,406	110,873	131,025
% of Total	38%	40%	52%	60%	62%	60%	60%
RES	51,602	45,958	54,472	59,126	58,501	73,360	88,052
% of Total	62%	60%	48%	40%	38%	40%	40%
TOTAL	83,024	77,104	112,319	146,869	154,907	184,233	219,077

The attachment labeled “Attach 20” contains separate tabs for each year (2013-2019) with the number of total disconnections for nonpayment, by provider (ComEd or RES), by month, and by region and zip code.

- d. Number of accounts that were involuntarily disconnected during the period and that also had been disconnected previously within 24 months for non-payment.***

For purposes of this response, ComEd is defining “accounts that were involuntarily disconnected” as accounts that were disconnected for nonpayment.

The summary table below labeled as “ComEd Table 21” provides the number of residential accounts that were disconnected for nonpayment during the period, which had been disconnected previously within 24 months for nonpayment, by calendar year, from 2013 through 2019.

ComEd Table 21

Year	2013	2014	2015	2016	2017	2018	2019
Residential accounts disconnected for nonpayment that had previously been disconnected within 24 months for nonpayment	17,042	14,599	18,066	37,271	47,022	59,079	85,180

The attachment labeled as “Attach 21” contains separate tabs for each year (2013-2019) with the number of residential accounts that were disconnected for nonpayment, by month, which had been previously disconnected within 24 months for non-payment, by zip code.

- e. Number of accounts that were involuntarily disconnected for furnace red-tag.***

Not Applicable. “Furnace ted-tag” does not apply to ComEd, an electric utility.

- f. Number of accounts that were on an arrearage reduction program.***

For purposes of this response, ComEd understands “arrearage reduction program” to refer to PIPP and SARP.

See ComEd’s Response to 20-NOI-01 A2ac for the number of customers on PIPP for the period 2013-2019.

SARP is an income-eligible program that stabilizes the monthly bill amount through required Budget Billing enrollment and incentivizes positive payment behavior through arrearage reduction credits along with monthly billing amount stabilization achieved through required Budget Billing enrollment. SARP commenced in November 2019 and had 90 participants in the initial (November 2019) month, and 144 participants in December 2019.

While not within the requested response timeframe (2013-2019), ComEd is providing information about additional arrearage reduction programs it is offering during 2020:

- **Bill Payment Assistance Program**, as approved by the Commission in ICC Docket 20-0309, provides up to \$500 arrearage reduction for income eligible residential customers. As of September 18, 2020, the program has provided \$6.05 million of its \$18.23 million fund to over 18,000 customers.
- **All Clear Program** dispersed a total of \$619,133 in one-time debt relief grants in September 2020 to 105 low-income residential customers with account balances of \$4,000 or more. This program is designed to provide residential customers with the highest balances a clean slate leading into the winter moratorium. The program was funded through ComEd CARE.
- **Fresh Start Program** incentivized payment during the winter disconnection moratorium (January 2020 through March 2020) for eligible low-income customers who established DPAs for balances of \$100 to \$400. Customers who made on-time and in-full DPA payments during the 2019-2020 winter moratorium received a one-time 25% to 100% arrearage forgiveness credit in May 2020, based on the number of on-time and in-full payments during the January 2020 to March 2020 period. The program was funded through ComEd CARE.

- g. *Number of chapter 7 or chapter 13 bankruptcies notices received where the utility is listed as a creditor.***

The summary table below labeled as “ComEd Table 22” provides the number of Chapter 7 and Chapter 13 bankruptcy notices received where ComEd is listed as a creditor, by calendar year, from 2013 through 2019.

ComEd Table 22

Year	2013	2014	2015	2016	2017	2018	2019
Total Chapter 7 and Chapter 13 bankruptcies	11,873	10,591	10,962	10,840	9,430	8,368	8,105

The attachment labeled as “Attach 22” contains separate tabs for each year (2013-2019), broken out by month, with the number of Chapter 7 and Chapter 13 bankruptcy notices received where ComEd is listed as a creditor. The information is not available by zip code or region in ComEd’s systems. Multiple customer accounts may be associated with a single bankruptcy case, which could result in double counting of zip code data.

- h. *Is the above information by census block, census block group, census tract, zip code, or zip code plus four available electronically for mapping purposes? If not, why not and how can mapping be enabled with the information maintained by the utility?***

To the extent that ComEd keeps the responsive information by zip code or region, ComEd has provided the requested information by zip code and/or region.

B. Credit and Collections Practices

1. *Please identify and describe formal, written, and informal collection practice procedures.*

For purposes of this response, ComEd understands “collection [sic] practice and procedures” to refer generally to credit and collections practices and procedures.

ComEd adheres to the requirements set forth in Part 280 concerning credit and collections practices and procedures. ComEd also engages in additional credit and collections practices and procedures beyond what is provided in Part 280, as described in ComEd’s Response to 20-NOI-01 B5 (tools used to encourage payment). ComEd is also implementing the temporary credit and collections practices and procedures approved by the Commission in ICC Docket No. 20-0309 in March 2020 and June 2020. *See In the Matter of Moratorium on Disconnections*, ICC Docket No. 20-0309, Emergency Interim Order (March 18, 2020) and Final Order (June 18, 2020) at Appendix 1; *see also* ComEd Response to the Emergency Interim Order, ICC Docket No. 20-0309 (March 27, 2020).

ComEd provides descriptions of its collections practices and procedures in testimony accompanying its annual Rider UF – Uncollectibles petition proceeding. *See, e.g.*, ICC Docket No. 20-0667, Chu Dir., ComEd Ex. 3.0 (filed August 31, 2020) for a description of ComEd’s collections practices and procedures in place during 2018.

See ComEd Responses to 20-NOI-01 B5 and B6 for examples of tools that ComEd uses as part of its credit and collections practices and procedures to encourage payment and reduce delinquencies and disconnections.

2. *If actual collection practices are different from formal or written procedures, explain the rationale for the modification.*

For purposes of this response, ComEd understands “collection [sic] practices” to refer generally to credit and collections practices and procedures.

See ComEd’s Response to 20-NOI-01 B1 regarding ComEd’s credit and collections practices and procedures.

3. *Identify how you can improve your existing collection practices and any plans for doing so.*

For purposes of this response, ComEd understands “collection [sic] practices” to refer generally to credit and collections practices and procedures.

ComEd has robust credit and collections practices in place that are designed to obtain payment, if possible, or to minimize the uncollectible amount through disconnection. ComEd’s efforts to minimize and collect uncollectible costs benefit all customers by reducing uncollectible expenses. The Commission has routinely found ComEd’s practices to be reasonable and prudent. *See, e.g.*, Commonwealth Edison Co., Docket No. 17-0369, Final Order at 19 (April 3, 2018) (finding ComEd’s actions to pursue minimization and collection of uncollectibles during the 2015 reconciliation period to be reasonable and prudent).

With that said, ComEd is always looking to improve its credit and collections processes and procedures. ComEd looks forward to reviewing comments on this topic submitted by other parties engaged in this NOI.

4. *Please identify and describe the training for utility representatives who interact with consumers (Customer Services Representatives or CSRs) and the tools available for consumers who have billing issues, such as:*

For purposes of this response, ComEd understands “billing issues” to refer generally to questions that customers have about their bill or their ComEd account balance, including financial assistance options.

When CSRs are first hired by ComEd they receive four weeks of training. The initial training consists of classroom lectures, and hands-on and on-the-job trainings. The trainings cover many topics including, but not limited to, general billing issues, billing rates, credit collections, budget billing and high bills. New hires are required to pass the initial training with at least an 80% score. Once they successfully complete the initial training, new CSRs field customer calls while working with a mentor and floorwalkers for an additional four weeks. During this period, if the new CSR is having difficulty with a customer request, the mentor will assist the representative. All new CSRs also have daily huddles with their mentor/supervisors and other team members to reflect on the calls they took and discuss processes and procedures.

All CSRs receive continuous information and trainings. They receive notices and written materials with information about procedures and processes to help them handle customer calls. For example, CSRs receive Focus Alerts, which are email communications that describe new processes, updates to processes, announcements, marketing materials and Exelon/ComEd daily news. Just like new hire CSRs, senior CSR teams have frequent huddles with their supervisors. These huddles are used to discuss information that came out in alerts or new information that will assist the CSRs with their day-to-day activities. With many ComEd CSRs currently working remotely, ComEd utilizes Microsoft Teams to conduct daily virtual huddles and team meetings. ComEd also uses a knowledge-based tool called The Knowledge Center, which is a cloud-based tool that houses job aids and key information about ComEd processes and procedures that CSRs can easily access remotely.

a. determining consumers' ability to pay their bills and challenges for consumers in doing so

See above regarding the trainings that CSRs receive and resources available to CSRs.

b. eligibility for public or private bill assistance

Currently ComEd does not complete income verification in-house to determine a customer's eligibility for bill assistance programs. Customers who contact ComEd to inquire about bill assistance who have not yet been income verified are referred to a variety of resources (i.e., local administering agencies or charitable organizations) to have their income verified for eligibility in bill assistance programs and to apply for certain bill assistance programs, like LIHEAP. Customers who are verified as income eligible by the local administering agencies and have received assistance from LIHEAP, PIPP, ComEd's Residential Special Hardship or the ComEd Bill Payment Assistance Program are flagged as "income eligible" in ComEd's system.

ComEd is investigating opportunities to provide support to local administering agencies and/or to perform income verification in-house in the future. ComEd also looks forward to reviewing the comments submitted by other NOI respondents on the topic of income verification by utilities.

c. referrals to assistance programs and community services

CSRs refer customers who express hardship to local resources, such as local administering agencies, to apply for LIHEAP, PIPP or ComEd's Residential Special Hardship. Customers are also given the contact information for community services agencies, such as Red Cross, Catholic Charities and Salvation Army, if applicable. CSRs may also refer customers to ComEd.com to find contact information for community agencies or to submit applications for programs, such as ComEd CARE programs or the ComEd Bill Payment Assistance Program.

d. consumer communication impediments.

ComEd has bilingual CSRs who can take Spanish speaking customer calls in-house. If a CSR receives a call from a customer who requires assistance in a language other than English or Spanish, the representative will call the Language Line and request assistance in the customer's preferred language (i.e., Mandarin, Polish, Greek). The interpreter joins the CSR and the customer in the call to provide real-time translation services.

ComEd also has accommodations for customers who are visually or audibly impaired. ComEd provides a TTY service as well as a Video Relay Service ("VRS") in support of customers with hearing or speech impairments. VRS allows customers with hearing and speech impairments to communicate through video conferencing through the Internet, a web camera or video phone. This secure service uses certified Video Interpreters to sign conversations, in real time, between the customer and the interpreter.

ComEd's website adheres to the ADA level of compliance for Web Content Accessibility Guidelines 2.0 (<https://www.w3.org/WAI/GL/WCAG20/>) and 2.1 (<https://www.w3.org/TR/WCAG21/>) guidelines. Text can be manipulated visually to make the type larger or use site readers to read the information to a customer. In addition, all images are tagged with descriptors, PDF documents are tagged for accessibility, and there are transcripts available for all videos for the audibly impaired.

5. ***Please identify and describe tools used to encourage payment, including but not limited to detailed terms of deferred payment arrangements (including length of pay-back period and amount of payments), waiver of fees, and other discretionary accommodations.***

ComEd's response to this request is limited to identifying and describing those tools used to encourage *residential* customers to make payments.

ComEd uses a variety of tools to encourage residential customers to make payments, as outlined by Part 280. ComEd also engages in additional credit and collections practices and procedures beyond what is provided in Part 280. ComEd provides descriptions of its collections practices and procedures in testimony accompanying its annual Rider UF – Uncollectibles petition proceeding. *See, e.g.,* ICC Docket No. 20-0667, Chu Dir., ComEd Ex. 3.0 (filed August 31, 2020) for a description of ComEd's collections practices and procedures in place during 2018. Those tools include, but are not limited to:

- Collection Arrangements: Collection Arrangements are used to assist residential customers who do not have a final notice but need an additional 21 days to pay their current balance.
- Red/Blue Rules: Red/Blue Rules are processes to assist the customer with their bill if they need assistance with their bill. The Red/Blue Rule Collection Arrangement provides those customers with a final bill of less than \$300 with an additional 21 days to pay the past due balance. Another process under the Red/Blue Rules is the Partial Payment Credit Restoral. This process is for a customer whose power is cut for non-payment. If they have not been previously disconnected within the past 24 months, they can have their service restored if they make a partial payment of 75% of the balance.
- Deferred Payment Arrangements: The customer can pay accumulated past due amounts in installments over several months on a DPA. If the customer misses an installment payment (i.e., defaults on the DPA), they can (1) reinstate the DPA, or (2) renegotiate the terms of the DPA.
- Providing customers information about bill payment assistance programs: ComEd informs customers with past due amounts about bill payment assistance programs, such as LIHEAP, PIPP or ComEd CARE programs, for which the customer may be eligible.

- Late Payment Charges (“LPCs”): Generally, accounts are assessed late payment charges if they are past due. The possibility of such a charge helps drive on-time payments by customers. ComEd recognizes that for low income customers late fees can be a disproportionate challenge. That is why ComEd does not assess late payment fees when a customer is qualified as a low-income customer. In addition, LPCs can be waived by CSRs when the customer expresses hardship.

Customer late fees are not kept by ComEd as revenue. Instead, late fees collected by ComEd benefit the vast majority of our customers because they are used to lower our annual revenue requirement through the formula rate and thereby reduce rates for all customers. Currently, the impact is about \$0.37 per month on the average customer bill.

- Deposits and Deposit Reviews: Past due accounts can trigger a review of whether a deposit should be assessed (or increased). The possibility of such a deposit helps drive on-time payments by customers. For low income customers, ComEd does not assess deposits as a result of the customer’s history of late payments or based on their credit scores. Moreover, to support customers who have paid a deposit and then demonstrate positive payment behavior for a year, ComEd refunds the deposit and credits the customer’s account with 12 months of accumulated interest.
- Disconnect Notice: A disconnection notice letter is sent as required by Part 280, advising the customer of the possibility that service will be discontinued. The letter contains information about available financial assistance arrangements (such as DPAs) and bill payment assistance programs. The possibility of a service disconnection helps drive customers to contact ComEd to make payment arrangements and find out more about bill payment assistance programs to avoid a service disconnection. Customer data indicates that 62% of customers either make a payment or set up a payment plan after receiving a disconnect notice. Many of these payments or payment arrangements are made in the early spring following the winter moratorium, when customers begin to take action on their past due accounts.
- Winter Contact Letter: A letter is sent to residential customers who were previously disconnected if the account is past due during the winter moratorium (December 1 through and including March 31), as required by

Part 280. Once the customer receives the Winter Contact Letter and contacts ComEd, the customer is offered a new DPA.

- Field Notification Call: A reminder call is made three days prior to the account becoming eligible for disconnection. The call encourages the customer to contact ComEd to make payment arrangements and find out more about bill payment assistance programs to avoid a service disconnection.
- 24-Hour Call: If ComEd did not reach the customer through the field notification call, a final, “last chance” call is attempted one day prior to the account becoming eligible for disconnection. The call encourages the customer to contact ComEd to make payment arrangements and find out more about bill payment assistance programs to avoid a service disconnection.

See, e.g., ICC Docket No. 20-0667, Chu Dir., ComEd Ex. 3.0 at 10:207-11:225 for a description of these tools as used in 2018.

In 2020, ComEd has also implemented the temporary credit and collections practices and procedures approved by the Commission in ICC Docket No. 20-0309 in March 2020 and June 2020. *See generally Stipulation Agreement; see also ComEd Response to the Emergency Interim Order, (March 27, 2020).* Some of these temporary credit and collections practices and procedures go beyond what is required by Part 280, or what is normally provided by ComEd. For example, ComEd is temporarily offering longer DPAs (up to eighteen (18) months for (nonfinancial hardship) residential customers and twenty-four (24) months for residential customers expressing financial hardship) from March 18, 2020 through December 25, 2020. *See Stipulation Agreement at Para.8.b.*

6. ***Please identify and describe tools to reduce delinquencies and disconnections, including new or expanded bill affordability programs such as percentage of income payment plans, discount rates, consumer education, expanding existing shutoff protections, customer payment plans, and flexible bill due dates.***

ComEd’s response to this request is limited to those tools used to reduce delinquencies and disconnections of *residential* customers.

In response to the specific “tools to reduce delinquencies and disconnections” mentioned in the Request, ComEd states as follows:

- **Bill Affordability Programs:** ComEd offers a variety of new and expanded customer assistance programs in five categories to qualifying customers: (1) the ComEd CARE programs, (2) SARP, (3) LIHEAP, (4) PIPP; and (5) the ComEd Bill Payment Assistance Program:
 - **ComEd CARE programs:** ComEd provides \$10 million in shareholder funding every year for the program and administrative costs of several financial assistance programs, including, but not limited to:
 - **Residential Special Hardship:** Residential customers who demonstrated a hardship and household income of less than 250% of the household federal poverty level (“FPL”) can receive a one-time grant of up to \$500, once every 2 years. The applicant must provide proof of income and hardship based on one of the following criteria: medical, military, senior, disability, loss of income, family crisis, property damage, or victimization by criminal activity.
 - **ComEd Helps Activated Military Personnel (C.H.A.M.P.):** ComEd designed this program to assist actively deployed members and veterans of the Military, National Guard, and Reserves with managing their electric bills. Eligible customers – veterans who received an honorable discharge and to any active/deployed military personnel (including National Guard and Reservist Military personnel) – can receive assistance of up to \$1,000, once every 2 years.
 - **Hospital Based Energy Assistance and Long-Term Health (H.E.A.L.):** ComEd has partnered with several hospital networks to provide financial assistance related to the energy bills of low-income patients and/or those who experience a hardship due to an extended stay in the hospital and/or long-term outpatient care for an acute/complex medical condition. Due to HIPAA regulation, CSRs do not offer this program directly to customers over the phone.

- **All Clear** (new in 2019): This financial assistance program that launched in September 2019 provides a one-time debt forgiveness credit to income eligible customers who have balances of \$4,000 or more. The goal is to provide relief to customers with a one-time grant and provide a path to payment as the customers enter the winter moratorium.
- **Fresh Start** (new in 2019): This financial assistance program offers tiered arrearage forgiveness credits to income eligible customers who establish DPAs by December 2019 and made monthly payments during January 2020 to March 2020. Customers who made one payment received 25% arrearage forgiveness, two payments received 50% arrearage forgiveness and three payments were provided 100% arrearage forgiveness.

Several of the ComEd CARE programs listed above are described in more detail in the testimony of Ms. Jie Chu, ComEd Ex. 3.0, ICC Docket No. 20-0667 (filed August 31, 2020) at 22-23.

- **Supplemental Arrearage Reduction Program** (new in 2019): SARP is an income-eligible program that stabilizes the monthly bill amount through required Budget Billing enrollment and incentivizes positive payment behavior through arrearage reduction credits along with monthly billing amount stabilization achieved through required Budget Billing enrollment. This program launched in November 2019.
- **State and Federal LIHEAP**: LIHEAP is a Government assistance program through which the state pays a portion of the energy service bill for individuals who show need during the program year. The LIHEAP programs are administered by DCEO to assist households whose household income is less than 150% FPL, although this year the level has been temporarily modified to 200% FPL. The current LIHEAP program year runs from July 27, 2020 to June 30, 2021, or until funds are exhausted. Customers can apply for LIHEAP through their LAA.

- **Percentage of Income Payment Plan:** The PIPP program began in 2011 and is designed to ease financial hardship for low-income customers. The PIPP program also promotes positive payment behavior by incentivizing monthly bill payments by providing an arrearage reduction credit, when applicable. Customers enroll in the PIPP program through an LAA. The target energy share of wallet for the customer’s electric and gas service bills is approximately 6% of their monthly household income, which is accomplished through a combination of the customer’s automatically enrollment in Budget Billing, and the provision of a monthly PIPP benefit for each customer, which is capped at \$150 a month, per household. The customer is required to pay the difference of the Budget Billing amount and the PIPP Benefit, on time and in full, to receive an arrearage reduction credit. ICC Docket No. 20-0667, Chu Dir., ComEd Ex. 3.0 (filed August 31, 2020) at 22.

- **ComEd Bill Payment Assistance Program** (new in 2020): Income eligible customers can receive a one-time arrearage credit, up to \$500. ComEd’s Bill Payment Assistance Program is described in more detail in ComEd’s Bill Payment Assistance Program Report in ICC Docket No. 20-0309 (filed July 18, 2020).

- **Budget Billing:** The Budget Billing plan calculates an average monthly payment based on the customer’s last 12 months of usage, and charges that same, average amount each month until a “true up” occurs. This offers customers a consistent and predictable monthly payment that is conducive to preparing a household budget. The customer’s Budget Billing plan will be “trued up” at a 12-month interval, meaning that ComEd will review the customer’s most recent 12 months of usage to determine if the customer’s actual average monthly usage has increased or decreased as compared to the original calculation of the Budget Bill. If the average usage has decreased, the monthly payment amount will decrease; if the average usage has increased, the monthly payment amount will increase.

- **Discount Rates:** ComEd tariffed retail rates do not offer a discount.

- **Consumer Education:** ComEd engages in a variety of customer outreach and education to raise awareness of its assistance programs through different communication channels (e.g., email, mail, social media, website, traditional media), print, internet and radio advertisements, collaborations

with community organizations and local administrative agencies, in-person events (when possible), virtual events, speaker's bureaus, and meetings with consumer and low-income advocates. *See* ComEd Response to 20-NOI-01 F3 (communications/outreach).

- **Expanding Existing Shutoff Protections:** ComEd implements the shutoff protections provided in Part 280. In addition, in March 2020, in response to the COVID-19 pandemic and related gubernatorial actions, ComEd announced that it was already, and voluntarily, in compliance with the March 18, 2020 Illinois Commerce Commission *Emergency Interim Order*, which required Illinois utilities to cease disconnections for non-payment and suspend new late fees and penalties as of March 18, 2020. ComEd continued its suspension of residential disconnections for non-payment and suspension of new late fees in accordance with the applicable terms of the Commission-approved Stipulation Agreement, which required their suspension until July 26, 2020. *See* Stipulation Agreement at Para. 5a. ComEd voluntarily continued to suspend late payment fees for nonpayment through August 31, 2020. ComEd voluntarily continued to suspend residential disconnections for nonpayment through September 24, 2020 and is further voluntarily suspending disconnections for nonpayment for low income customers and customers expressing financial hardship through March 31, 2021.
- **Customer Payment Plans:** ComEd offers DPAs. In accordance with the Commission-approved Stipulation Agreement in ICC Docket No. 20-0309, ComEd is offering extended DPAs of up to 24 months for certain customers through December 25, 2020, and more generous deposit and DPA reinstatement terms for a temporary period. *See* Stipulation Agreement at Para. 8.
- **Flexible Bill Due Dates:** ComEd does not offer flexible bill due dates.

All Interested Persons

C. Definitions

1. *How should the following terms be defined? Are there federal or other state standards or guidelines that more clearly define these terms?*

a. *Affordability*

ComEd is not aware of any codified or universally accepted definition of “affordability” in the context of Illinois electric utility service. As an electric utility, ComEd uses the term “electric share of wallet” to capture the concept of the ability to afford one’s electricity bills. “Electric share of wallet” (also known as “wallet share”) is defined as a customer’s average annual electricity cost divided by annual income.

b. *Low-Income*

Pursuant to 83 Illinois Administrative Code Part 280.20, “‘Low Income Customer’ means a residential customer who has qualified under the income criteria of Section 6 of the Energy Assistance Act of 1989 [305 ILCS 20/6]”, which provides the eligibility criteria as “Any person who is a resident of the State of Illinois and whose household income is not greater than an amount determined annually by [DCEO], in consultation with the Policy Advisory Council . . .”

c. *Critical Medical Needs Customers*

“Critical medical needs customers” are flagged in ComEd’s systems as those customers who have been identified by a medical professional as requiring life support services. Such customers are included in ComEd’s internal list of Vulnerable Customer categories. *See* ComEd Response to subpart (h) below.

d. *Delinquency*

Failure to make an on-time payment for services provided.

e. Disconnection

To discontinue electric service to a retail customer.

f. Displacement

Accounts disconnected for non-payment that remain disconnected.

g. Reconnection

To continue electric service to a retail customer who had previously been disconnected.

h. Vulnerable Customers

The Commission has defined “vulnerable customers” as the following customer groups:

- (1) Low income
- (2) Very young (from birth to age 5)
- (3) Older individuals (age 65 and older)
- (4) Those who have limited English proficiency or literacy
- (5) Individuals with a functional disability, such as impaired mobility
- (6) Persons who are socially isolated.

See ICC Docket No. 12-0298, Order (June 22, 2012) at 58.

This definition has proven to be logistically difficult for ComEd to implement because ComEd’s customer account files do not contain information necessary to identify a customer as “vulnerable.” For example, ComEd does not track a customer’s age, English fluency or sociability. *See* ComEd 2013 AIPR, Appendix A at 10-16 (discussing the difficulty identifying and tracking vulnerable customers, as defined in Docket No. 12-0298); ComEd 2014 AIPR, Appendix A at A-8 to A-9 (same).

As a result, ComEd relies on customers to self-identify as “vulnerable.” For example, during a storm, ComEd customers can self-identify as “vulnerable” to escalate their outage tickets if they meet one of the following criteria:

- On life support
- Has medical equipment that requires electricity
- Nursing facilities/senior citizen facilities
- Household with small children
- Livestock at risk
- Part out with no cooling and air conditioning

As a result of the difficulty implementing the 2012 definition of “vulnerable customer” ComEd looks forward to reviewing other NOI respondents’ proposed updated definitions of the term.

2. *Are there other undefined terms that are critical to understanding utility service affordability and/or the ability of customers to receive essential levels of electric, natural gas, water and sewer services and, if so, how should such terms be defined?*

ComEd is interested in revising the definition of “vulnerable customers” in a way that would allow utilities to more easily identify and track such customers. ComEd does not have a specific definition to propose but looks forward to reviewing the other NOI respondents’ proposed definitions for this term. *See* ComEd Response to 20-NOI-01 C1.

While not technically a “definition” within the purview of the Illinois Commerce Commission, ComEd respectfully requests that DCEO consider permanently altering the eligibility criteria for LIHEAP-eligible customers from 150% FPL to 200% FPL. DCEO temporarily increased the criteria to 200% FPL in 2020 for LIHEAP and PIPP recertification only, which has allowed more customers to qualify for LIHEAP. ComEd believes the increase to 200% for all LIHEAP and PIPP customers should become permanent to allow more customers to receive the program’s benefits. *See* ComEd Response to 20-NOI-01 E2 for a discussion of proposed changes to LIHEAP and PIPP.

D. Information Collection and Reporting

1. *Please identify any changes that could be made to current information reporting requirements that would better inform the Commission regarding service affordability and/or the ability of customers to receive essential levels of utility services including the entities that should be required to provide the information. In your response please also address the format of such information collection, the authority for compelling the production of such information, and how the information should be publicly reported.*

ComEd currently provides the Commission and interested parties with such information in several proceedings and reports including, but not limited to:

- Monthly Credit and Collection Reports, ICC Docket No. 20-0309.
- Quarterly Bill Payment Assistance Reports, ICC Docket No. 20-0309.
- Annual Customer Assistance Summary Report, submitted annually to the Commission, *available* at <https://www.icc.illinois.gov/utility/filings.aspx?id=295-146467-0-0&ft=2&ct=9&dt=230&ddt=139>; *see also*, e.g., ComEd Ex. 4.01, ICC Docket No. 20-0393 (filed April 16, 2020) (2019 Report previously submitted to the Commission);
- Annual Distribution Services Formula Rate Update Proceeding (for low income assistance and support programs); *see, e.g.*, Owens Dir., ComEd Ex. 4.0, ICC Docket No. 20-0393 (filed April 16, 2020);
- Annual Rider UF (Uncollectibles) Reconciliation Proceeding; *see, e.g.*, Chu Dir., ComEd Ex. 3.0, ICC Docket No. 20-0667 (filed August 31, 2020);
- Quarterly and Annual Energy Efficiency Reports, ICC Docket 17-0312 (for income-eligible energy efficiency measures and related spend); and
- Annual Energy Efficiency Formula Rate Update Proceeding (for income-eligible energy efficiency measures and related spend); *see, e.g.*, Lunn Dir., ComEd Ex. 2.0, ICC Docket No. 20-0475 (filed May 21, 2020).

ComEd takes no position on whether changes are needed regarding any of these Commission-ordered reporting requirements or proceedings before the Commission.

2. ***Please identify any additional information that might be collected that would better inform the Commission regarding service affordability and/or the ability of customers to receive essential levels of utility services including the entities that should be required to provide the information. In your response please also address the format of such information collection, the authority for compelling the production of such information, and how the information should be publicly reported.***

See ComEd Response to 20-NOI-01 D1. ComEd takes no position on whether changes are needed regarding any of the identified Commission-ordered reporting requirements or required proceedings. ComEd looks forward to reviewing the comments by the other NOI respondents in response to this prompt.

E. Assistance Programs

- 1. *What assistance programs are available to residential customers that help them pay for utility service and receive a continuous supply of essential utility services and how effective are these programs?***

There are a variety of energy assistance programs available to qualifying ComEd customers: (1) the ComEd CARE programs, (2) SARP, (3) LIHEAP, (4) PIPP; and (5) the ComEd Bill Payment Assistance Program.

See ComEd's Response to 20-NOI-01 B6 for a description of each type of program.

See the following responses for information about the effectiveness of the programs:

- ComEd Response to 20-NOI-01 A1e (number of residential customers that were on an arrearage reduction program);
- ComEd Response to 20-NOI-01 A1h (number of residential customers/accounts that received bill payment assistance);
- ComEd Response to 20-NOI-01 Ba (number of accounts that received LIHEAP and PIPP); and
- ComEd Response to 20-NOI-01 Bf (number of accounts that were on an arrearage reduction program).

- 2. *What changes could make the programs more effective?***

Any changes to existing programs should be undertaken with the aim of reaching one or more of the following goals: (1) guaranteeing that all assistance funding is available and used by customers; (2) ensuring sufficient administrative funding is available for LAAs to provide intake and case management for PIPP; (3) promoting customer awareness of the programs available to utility customers; and (4) maintaining program benefit levels to sure that the right level of support is provided to customers in need. With those overarching goals in mind, ComEd has identified several design and structural changes it believes could increase the effectiveness of several of the customer assistance programs identified in ComEd's Response to 20-NOI-01 E1:

- **Income Eligible Assistance Programs (Generally)**
 - **Allow ComEd to support application intake and the verification of eligibility:** Currently, LAAs shoulder the enormous task of

processing income-eligible assistance programs (namely LIHEAP, PIPP and ComEd's Residential Special Hardship programs). Their efforts are constrained by their limited administrative funds, which then results in a limited number of appointments and back office processing capacity. Their administrative hurdles have been further exacerbated by a shift from an in-person to a largely virtual intake process during the COVID-19 pandemic. One option to help alleviate LAAs' resource limitations and facilitate their critical work in our communities would be for ComEd (and other electric and gas utilities) to supplement LAAs' administration tasks by performing application intake and verification of customer eligibility (e.g., income level, household size) for various income eligible assistance programs.

- **Allow year-round program enrollment:** Historically, the enrollment period for federal- and state-administered financial assistance programs was limited to October through May of each calendar year. Many customers in need who miss this enrollment period, either of their own accord or due to lack of appointment availability, were forced to pursue alternative assistance options or wait until the next year's enrollment period. DCEO temporarily expanded the enrollment period for customers in 2020, beginning in July 2020. While DCEO has temporarily expanded the enrollment window, each LAA determines their individual enrollment window based on administrative capacity, which means enrollment is not necessarily year-round in 2020. ComEd recommends that both DCEO and the LAAs be involved in discussions about making year-round enrollment permanent and increasing available administrative funding to allow the LAAs to effectuate year-round enrollment.
- **Upgrade State IT systems to better integrate existing systems:** The current LIHEAP.net and STARS systems that LAAs utilize to manage LIHEAP and PIPP income verification and enrollment are not integrated, which creates a technological barrier. LAAs, customers and utilities would benefit from an interconnected system where program status and grant applications information resided in a centralized location, which would provide improved efficiencies, transparency, tracking and reporting.

- **State-Funded Program Proposals (PIPP, State Supplemental LIHEAP)**
 - **Increase income eligibility to 200% FPL:** Historically, PIPP and LIHEAP programs were restricted to customers with an income at or below 150% of the FPL. In response to the current pandemic, this limitation has been temporarily expanded to 200% FPL for LIHEAP and PIPP recertifications, thereby expanding access to additional ComEd customers. Making the 200% FPL eligible requirement permanent would expand program access for customers who are experiencing financial hardships.
 - **Expand access to undocumented customers by relaxing the social security number requirement:** Generally, PIPP and LIHEAP programs require applicants to provide proof of citizenship status in the form of a Social Security Number or an Individual Tax Identification Number. Relaxing this requirement for PIPP and state supplemental LIHEAP programs would provide access to PIPP and state supplemental LIHEAP to the estimated 400,000¹ undocumented residents in Illinois.
 - **Address current constraints that limit customer enrollment:** Currently, customer enrollment in state financial assistance programs is constrained for several reasons. ComEd suggests that several barriers to program enrollment and funding disbursement can be overcome by (1) decoupling PIPP funding for gas and electric service and (2) increasing the allocation of administrative funding for LAAs:
 - **Decouple PIPP funding for gas and electric service:** Currently the so-called “dual utility constraint” limits ComEd electric customers from enrolling in PIPP when the customers’ gas utility PIPP dollars are depleted. ComEd estimates that most customers (approximately 95%) are “dual utility” customers because they currently have gas as the primary household heating source. PIPP funding for gas

¹ PEW Research Center, *U.S. unauthorized immigrant population estimates by state*, 2016 (February 5, 2019), available at <https://www.pewresearch.org/hispanic/interactives/u-s-unauthorized-immigrants-by-state/> (estimating 400,000 unauthorized immigrants reside in Illinois based on 2016 U.S. Census Bureau data).

utility bill assistance is typically exhausted before funding for electric utility assistance, especially in the City of Chicago. ComEd believes that there are two possible solutions to the “dual utility constraint” and looks forward to future discussions regarding both options:

- (1) Currently, electric utility customers provide 60% of all Supplemental Low-Income Energy Assistance Fund (“SLEAF”) revenue into the state’s 550 fund (i.e., for PIPP and state supplemental LIHEAP benefits) but receive only 33% of the benefit (i.e., monthly PIPP bill credits, monthly PIPP arrearage credits, state LIHEAP payments). Gas utility customers provide 40% of the revenue but receive 67% of the benefit. One possible solution would be to increase the SLEAF charge for gas companies, which would increase 550 fund revenues to adjust for the higher cost of gas bills compared to electric.
- (2) Alternatively, changes to DCEO’s Rules and IT systems could overcome this dual utility barrier. Due to current DCEO IT limitations and DCEO Business Rule #1.2.4 (Combination Households),² PIPP funds for electric bill assistance cannot be disbursed after funds for gas bill assistance are exhausted, even if electric utility funding is still available. One possible approach would be to enact a DCEO business rule change to relax this “dual utility” requirement and implement the necessary IT system changes required to eliminate this dependency, so that PIPP funding for electric bill assistance is fully utilized. This would expand the overall amount of PIPP financial assistance provided to customers in need each year.
- **Increase proportion of administrative funding allocated to LAAs:** Currently, LAAs face significant funding constraints given the current 10% cap on administrative expenses for the PIPP program. This constraint has created

² Illinois Department for Commerce, Office of Energy Assistance, Business Rules For The Statewide PIPP (last updated 2017).

a bottleneck for customer application intake and enrollment. Currently, 50% of the administrative funding allocation goes to the LAAs to administer federal- and state-run assistance programs. While ComEd believes the current 10% funding allocation for administrative costs should not change, it believes that an increased proportion (i.e., more than 50%) could go to LAAs to help increase program intake and administration.

- **Incentivize PIPP enrollment:** Currently, customers who apply for financial assistance in Illinois for the first time must choose between federally funded LIHEAP and state funded PIPP. Customers often choose the LIHEAP Direct Vendor Payment (“DVP”) option instead of PIPP in part because the LIHEAP DVP option provides a larger “up-front” benefit with fewer restrictions. However, most customers would probably receive greater benefits over time from PIPP, which provides customers with, on average, a larger long-term benefit that is accrued over time. PIPP also promotes healthier, more sustainable payment behavior through earned arrearage reductions for customers that make on-time payments. In addition, ComEd believes that more customers enroll in LIHEAP because LAAs are incentivized to enroll customers in LIHEAP rather than PIPP, as PIPP applications take up to three times as long to process while yielding the same compensation for the LAA. ComEd invites future discussions about how the customer choice between PIPP and LIHEAP can be leveled. ComEd is also interested to hear from the LAAs and other interested parties how the LIHEAP and PIPP application process could be equalized for the agencies.
- **Ensure energy financial assistance is available for, and used by, customers:** In 2019, approximately 630,000 ComEd customers were eligible for financial assistance (under 150% FPL), yet only approximately 170,000 of these customers (27%) were enrolled in LIHEAP, PIPP and/or ComEd CARE programs. ComEd looks forward to future discussions on how we can ensure that all available funding is made available for, and used by, customers in need.
- **Ensure benefits are provided at levels necessary to reach targets:** The PIPP program is designed to lower a participant’s energy share of wallet to 6% of the customer’s income for electric heat customers and 2.4% of the customer’s income for gas heat customers. It is ComEd’s understanding that

the average wallet share for PIPP customers is currently more than 6%. ComEd invites future discussions on how to ensure that PIPP benefits are provided at levels necessary to reach the targeted energy share of wallet.

- **ComEd-Administered Program Proposals**

Expand bill assistance and arrearage relief: ComEd is currently administering two separate arrearage reduction programs for residential customers:

- **Supplemental Arrearage Reduction Program (“SARP”):** ComEd currently offers the Supplemental Arrearage Reduction Program (“SARP”), which helps provide relief for customers with an arrearage balance at or below 150% FPL. ComEd’s goal for SARP in 2021 is to provide up to \$3.6M in overall assistance for 3,600 customers. Even if ComEd is able to reach this goal, ComEd believes it will be insufficient to address all outstanding residential customer arrearages.
- **Bill Payment Assistance Program:** Approved by the Commission in ICC Docket No. 20-0309, the ComEd Bill Payment Assistance Program provides one-time arrearage reduction grants of up to \$500 to customers at or below 200% FPL with past due balances on their ComEd accounts. The Program is funded up to \$18.23 million in 2020 through the uncollectible rate components collected from residential customers from July 2020 through May 2021. The Program runs through the end of 2020, or until funds are exhausted, whichever occurs first. The Program started providing grants to customers in late July 2020; as of September 18, 2020, the program has provided \$6.05 million of its \$18.23 million fund to over 18,000 customers. The Program’s funding is expected to be exhausted before the end of 2020.

Historically, ComEd sees an increase in average customer arrearage balances when the winter moratorium ends, ultimately resulting in bad debt expenses that are passed along to all customers. In response to the ongoing pandemic and related Commission orders and requests, ComEd implemented extended suspensions on residential service disconnections from March 2020 through September 24, 2020. In addition, it has voluntarily suspended residential disconnections through March 31, 2021

for low-income customers and those customers experiencing financial hardship.

ComEd anticipates that customer arrearages will be higher than normal in April 2021 following the 2020-2021 winter moratorium and the prolonged disconnection moratorium periods in 2020. In addition, many otherwise eligible customers will not be able to access LIHEAP until summer 2021 because they already used their 2020-2021 LIHEAP benefit during the extended 2020 enrollment period. Therefore, ComEd expects there to be a significant need for arrearage reduction programs in Spring 2021. ComEd welcomes thoughts about new and/or expanded residential arrearage forgiveness programs from other NOI respondents.

3. *Identify appropriate criteria for evaluating program effectiveness.*

Measures of Program Effectiveness

Measures of program success should clearly tie to the core outcomes of financial assistance programs. As ComEd continues to address the evolving needs of our limited income customers, the measure of effectiveness also evolves. Effectiveness measures are anchored in customer affordability outcomes including, but not limited to: (1) ensuring that the *reach* of available assistance dollars is maximized; (2) maximizing the *impact* of available assistance dollars; and (3) ensuring that programs promote healthy and *sustainable* payment behavior by customers.

(1) Ensure the *reach* of available assistance dollars are maximized:

- **Metric:** Federal and state financial assistance disbursement (LIHEAP and PIPP)
 - Baseline: In 2019, ComEd customers received approximately \$46.4 million in LIHEAP grants and approximately \$8.7 million in PIPP grants.
- **Metric:** Eligible customers enrolled in financial assistance programs
 - Baseline: In 2019, ComEd customers received approximately 160,000 LIHEAP grants and approximately 17,000 PIPP grants.

(2) Ensure the *impact* of available assistance dollars are maximized:

- **Metric:** Percentage of customers in extreme poverty receiving assistance (0-50% FPL)
- **Metric:** Decreased share of wallet for income eligible customers

- **Metric:** Reduced average customer arrearage balance for income-eligible customers
 - **Metric:** Reduced uncollectible bad-debt expense
- (3) Ensure that programs promote *sustainable* payment behavior
- **Metric:** Reduced percentage of income-eligible customers disconnected for non-payment after receiving financial assistance

Reporting and Tracking

In order to enable clear tracking and reporting of the metrics listed above, especially for federal and state financial assistance programs, there is a need for enhanced transparency regarding program enrollment and funding disbursement status. Currently, DCEO report on yearly program enrollments and funding allocations (1) on an ad-hoc basis by request and (2) at an aggregate level for the entire state. In order to promote transparency and assess program effectiveness, ComEd proposes that both LAAs and DCEO provide the following reports:

- LAAs should automate reporting to provide a clear breakdown of enrollments and funding allocations by utility.
- DCEO should report (i) the funds collected by each utility, (ii) program spend per utility, (iii) allocation to each LAA, (iv) administrative spend at both the state level and LAA level, and (v) amount retained in the 550 fund reserve as contingency for both PIPP and state supplemental LIHEAP. This report should be made available quarterly to each utility and all Low Income Energy Assistance Policy Advisory Council (“PAC”) members.

4. What portion of the eligible population is served by existing assistance programs?

In 2019, ComEd estimates that approximately 27% of eligible customers received energy assistance through ComEd CARE, LIHEAP and/or PIPP.

This estimate is based on data from a third-party data provider, which estimated that in 2019 there were approximately 630,000 households at or below 150% FPL within ComEd’s service territory, and that approximately 170,000 (27%) ComEd customers received energy assistance.

5. ***What outside sources of funding other than the identified assistance programs do residential customers use to pay past due utility bills, such as tax refunds, credit cards or personal loans?***

ComEd residential customers have the option to pay their ComEd bills with (1) cash or check at a payment agent, for an additional convenience fee; (2) mailed check payment; (3) credit or debit card, for an additional convenience fee, or (4) ACH transfer.

ComEd does not, and cannot, track where customers obtain funds to pay their utility bills.

6. ***Are there programs not currently available in Illinois, including programs adopted in other states, that could increase affordability and/or the ability of customers to receive essential levels of electric, natural gas, water and sewer services?***

ComEd is not aware of any particular programs. ComEd looks forward to reviewing suggestions made by other NOI respondents.

F. Credit and Collections Practices

- 1. *Please identify and describe best collection practices and how existing collection practices can be improved.***

See ComEd's Responses to 20-NOI-01 B1 (collections practices and procedures) and 20-NOI-01 B3 (ways to improve collections practices and procedures).

- 2. *Please identify and describe any concerns regarding privacy associated with collecting, storing and/or sharing of consumer information.***

ComEd collects, stores and shares data in compliance with Exelon policies and with state and federal regulations, legislation, Commission orders, and approved tariffs. We actively monitor laws and regulations for changes to ensure we remain compliant with our privacy obligations. Though no issues have been raised, if a customer has a privacy concern, it is investigated and will result in corrective actions, as necessary and appropriate.

- 3. *Within the following subjects as they relate to affordability, please identify and describe practices/concepts that are currently working well, areas that can be improved and ideas/plans for improvement:***

a. *Communications/Outreach*

In 2019, ComEd executed an integrated campaign to help customers learn about financial assistance programs and available payment arrangements (like DPAs). Outreach tactics and collateral materials also incorporated energy efficiency tips and program information to help customers reduce energy use and save money. Advertising channels targeted high-disconnect and low-income ZIP codes as well as broad reach throughout our service territory. The successful campaign assisted in the depletion of CARE financial assistance funds by October 2019.

2019 Communications and Outreach Tactics to Residential Customers Regarding Payment Arrangements and Financial Assistance Options

- **Targeted And Broad Reach English And Spanish Media Campaign**
 - Radio commercials, print ads, digital ads, transit signage and convenience store posters educating about CARE financial

assistance programs generated more than 48 million impressions, reaching 79.7% of customers exposed to an advertisement an average of 4.9 times.

- Social media posts generated 686,451 impressions.
- An advertising awareness survey showed that 34% of customers recalled at least one of the advertisements, with 19% of respondents participating in financial assistance programs.
- Radio ads attributed to a 14.23% increase in visits to ComEd.com/CARE.

- **Direct Communications**

- ComEd CARE English and Spanish brochures, as well as large font brochures for senior audiences were distributed at community events and provided to community organizations.
- Envelope messages on mailed customer bills informed recipients of ComEd CARE programs.
- A bill insert newsletter was mailed to 2.8 million customers and included an article on ComEd CARE financial assistance programs.
- Five bimonthly newsletters were emailed to more than 500 community organizations and included CARE financial assistance and energy efficiency program information, achieving an average open rate of 25% and click-through rate of 3.44%, outperforming industry averages of 21.43% and 1.78% respectively.
- Informational financial assistance inserts were included in 1,650,269 mailed customer disconnect notices.

- **Community Outreach**

- ComEd participation in 315 community events and eight energy fairs, educating 39,963 customers through face-to-face interactions.
- ComEd made 30 formal presentations, educating participants about ComEd CARE and energy efficiency program options.

2020 Communications and Outreach Tactics to Residential Customers Regarding Payment Arrangements and Financial Assistance Options

ComEd's 2020 educational outreach campaign has been focused on increasing customer awareness about financial assistance programs and payment arrangements. Due to the success of the 2019 education and outreach campaign, many of the same tactics were planned and have been replicated in 2020. However, the COVID-19 pandemic, Illinois' Stay-at-Home orders, and Commission-approved Stipulation Agreement in ICC Docket No. 20-03-09 have resulted in new and/or altered plans and tactics, which are described below.

- **Direct Mail**

- On April 24, a letter was mailed to 5,356 customers with existing service disconnections, informing them of options to have service safely reconnected.
- In mid-July, a letter was mailed to 333,693 residential customers with account balances 90 days past due to educate about new and existing financial assistance options.

- **Email**

- An email was sent to 367,715 residential customers with account balances 90 days past due to inform them about new and existing financial assistance options; it had an open rate of 46%.

- **Bill Inserts**

- Educational financial assistance information was included in 2.8 million mailed customer bill newsletter inserts in April, June and September.
- The financial assistance disconnect notice insert was updated to include new financial assistance information and payment arrangement options (as of August 31).

- **Educational Materials**

- Informational materials were created for legislative and community stakeholders to share with their constituents and members, including social media posts, web copy and newsletter copy.

- A financial assistance fact sheet was created and shared with public officials about ComEd, state and federal financial assistance programs.
 - A new Bill Payment Assistance program fact sheet was created and shared with community organizations.
 - An English/Spanish financial assistance brochure was created to educate customers about ComEd, state and financial assistance programs, and is being distributed to customers via community organizations and at virtual and in-person events.
- **Targeted and broad reach media campaign**
 - Starting in March, a variety of media channels (e.g. radio commercials, print ads, digital ads, transit signage and convenience store posters were again used to educate customers about CARE financial assistance programs) in English and Spanish have been utilized to educate customers about financial assistance programs. The program was expanded in early September to educate customers about the ComEd CARE programs and new financial assistance and flexible payment arrangement options. It was also expanded to include Polish radio and print ads, as well as Chinese print ads.
- **Community outreach**
 - Church bulletins have recently been added as a channel for educating customers about ComEd CARE financial assistance programs.
 - ComEd is participating in numerous virtual community events to educate to customers despite the cancellation of public events.
 - Newly created English/Spanish financial assistance brochures are being distributed to customers through municipalities, community and faith-based organizations, and in support of virtual events.
 - Videos about financial assistance options are being created to be shared with customers through virtual events and social media.

b. CSR tools to identify consumer budget needs/challenges

See ComEd Response to 20-NOI-01 B4.

c. Encouraging payment

See ComEd Response to 20-NOI-01 B5.

d. Referrals to Community Services

See ComEd Response to 20-NOI-01 B4.

e. Privacy and Consumer concerns about sharing data

See ComEd Response to 20-NOI-01 F2.

G. Energy Efficiency Measures

1. *What current utility energy efficiency programs aimed at increasing the affordability and/or the ability of customers to receive essential levels of electric services are available and how effective are they?*

Under the current four-year energy efficiency plan for 2018 – 2021 approved by the Commission in ICC Docket No. 17-0312, ComEd offers a wide variety of energy efficiency programs specifically tailored and targeted to low-income or “income eligible” (“IE”) customers, to help increase affordability and/or the ability of those customers to receive essential levels of electric services.

For purposes of this response, “income eligible” or “IE” refers to low-income households as defined in Section 8-103B of the Public Utilities Act as households at or below 80% of area median income. *See* 220 ILCS 5/8-103B(c).

ComEd’s Energy Efficiency Income Eligible program offerings include, but are not limited to:

- Lighting Discounts - IE – This program offers deeper instant discounts on lighting and appliances at participating retailers in targeted geographic areas (e.g., IE census tracts). The intent of this program element is to offer higher discounts in these areas than in other geographic areas of ComEd’s service territory, making energy saving products more affordable for IE customers.
- Single-Family Retrofits - IE – This program provides income eligible single-family homeowners a fully subsidized, whole building approach to EE, ranging from energy assessments through weatherization. Subsidies to remedy health and safety issues are also available. Eligible measures include LED lighting, programmable and smart thermostats, advanced power strips, faucet aerators, low-flow showerheads, pipe insulation, air sealing, attic and wall insulation, and in some cases furnaces, water heaters, boiler tune-ups and replacements, ductless heat pumps, and central air conditioning. ComEd jointly offers a portion of this program element with Nicor Gas, North Shore Gas, and Peoples Gas, and offers another portion with Peoples Gas.
- Multi-Family Retrofits - IE – This program provides multi-family building owners and managers whose buildings are designated as income eligible a subsidized, whole building approach to EE, ranging from energy

assessments through weatherization. Subsidies to remedy health and safety issues are also available. Eligible measures include LED lighting, programmable and smart thermostats, advanced power strips, faucet aerators, low-flow showerheads, pipe insulation, furnaces, water heaters, boiler tune-ups and replacements, ductless heat pumps, air sealing, and attic and wall insulation.

- Affordable Housing New Construction – This program offers technical assistance and incentive funding to affordable housing developers for new construction or major renovation of affordable housing. Participant buildings must implement an integrated bundle of energy conservation measures (“ECMs”) that can be applied to new construction and renovation projects across single-family, low-rise, mid-rise, and high-rise multifamily buildings. The bundled ECMs are designed to result in significant energy savings over the current Illinois Energy Conservation Code baseline. Compliance must be achieved for all living spaces within the participant building(s). Energy-efficient building practices emphasized under this program include high-performance windows; air sealing and reduced thermal bridging in the building construction; efficient, controlled ventilation, high efficiency HVAC systems with advanced controls; efficient interior and exterior lighting; efficient water heating equipment and water conservation measures; and efficient appliances. ComEd coordinates this program element with Nicor Gas, North Shore Gas, and Peoples Gas, when applicable.
- Public Housing Retrofits – This program offers energy assessments and incentives to upgrade inefficient equipment and systems in buildings owned and managed by public housing authorities in the ComEd service territory. Building types include residential units, common areas, maintenance, community, office, and other buildings. Participants also receive educational information about easy, energy saving actions that they can take to reduce their energy bills. ComEd jointly offers this program element with Nicor Gas, North Shore Gas, and Peoples Gas
- Food Bank-LED Distribution – This program provides ENERGY STAR certified LEDs and advanced power strips to food banks affiliated with Feeding America (and others), which in turn use their networks of local food pantries to distribute the bulbs and advanced power strips to IE ComEd customers. The food banks primarily serve as a distribution center by receiving the LEDs and advanced power strips, providing temporary

storage, and distributing the allocated LEDs and advanced power strip quantities to the targeted food pantries. The program also offers direct shipping to some pantries outside the food bank networks.

- Low-Income Kits – This program provides IE customers with a kit containing energy-saving devices and educational information regarding additional energy-saving actions they can take to reduce their energy bills.

Although ComEd has only offered the IE programs since 2018, in just the first two years (2018 and 2019) they have proven to be very effective by:

- Distributing over \$51 million in energy efficient products, upgrades, and incentives to IE customers;
- Achieving over 267,207 MWh in net energy savings (not including converted therms) for IE customers;
- Reaching more than 119,535 IE households (not including IE Lighting Discounts); and
- Delivering comprehensive retrofits to 4,125 single-family homes and 19,523 multifamily units.

Additionally, ComEd offers several EE programs that are available to all residential customers, including IE customers, which also assist IE customers with energy affordability and accessibility:

- Residential Behavior (also known as Home Energy Reports)
- Lighting Discounts
- Appliance Rebates
- Elementary Education Kits
- Single-Family Assessments
- Multi-Family Assessments

More detailed descriptions of all of these programs, including the energy savings achieved and the cost effectiveness of each program, are provided in various ComEd ICC filings, including the Quarterly and Annual Energy Efficiency Reports filed in ICC Docket No. 17-0312, and the annual Energy Efficiency formula rate update proceeding and supportive testimony (*see, e.g.,* Lunn Dir., ComEd Ex. 2.0 and Lunn Supp. Dir., ComEd Ex. 3.0, ICC Docket No. 20-0475 (ComEd's pending EE formula rate update proceeding)).

2. ***What energy efficiency information, surveys or other data are available that address the effect of utility energy efficiency program participation on affordability and/or the ability of customers to receive essential levels of electric services?***

Energy efficiency programs can help customers lower their monthly utility bills. For example, homes improved by the federal Weatherization Assistance Program, save their occupants on average \$300 per year on energy bills and provide significant health benefits³.

For customers struggling with affordability, and low-income customers in particular, EE can be particularly valuable. According to the American Council for an Energy Efficient-Economy's ("ACEEE") *Understanding Energy Affordability*,⁴

Energy efficiency can offer a long-term solution to high energy burdens. It helps households reduce their energy usage with measures such as heating and cooling system upgrades, insulation, efficient appliances, and behavior change. This lowers energy bills and can also improve home health, comfort, and safety. Efficiency programs targeting low-income households are well suited to addressing high energy burdens. These programs are tailored to the needs of low-income communities and typically provide weatherization and efficiency upgrades at no cost to participants.

ACEEE further notes in *Supporting Low-Income Energy Efficiency: A Guide for Utility Regulators*,⁵

Low-income utility customers face numerous disadvantages when it comes to energy affordability. They typically have older and less-efficient appliances and heating and cooling equipment and live in homes that are structurally less efficient. Energy efficiency can help address many of the underlying factors contributing to a high energy burden by helping homeowners, multifamily building owners, and tenants replace appliances, seal leaky doors and windows, and install insulation. However, low-income customers face numerous

³ Hogan, D. K. (2013, October 28). *Weatherization Saves Families Energy and Money*. Energy.gov. <https://www.energy.gov/articles/weatherization-saves-families-energy-and-money>.

⁴ ACEEE, *Understanding Energy Affordability*, at 5, available at <https://www.aceee.org/sites/default/files/energy-affordability.pdf> (last accessed Sept. 29, 2020).

⁵ ACEEE, *Supporting Low-Income Energy Efficiency: A Guide for Utility Regulators* (February 5, 2020), available at <https://www.aceee.org/toolkit/2020/02/supporting-low-income-energy-efficiency-guide-utility-regulators> (last accessed Sept. 29, 2020).

barriers to participation in efficiency programs. This makes well-designed, specifically targeted efficiency programs for low-income customers an important consideration for utility portfolios.

3. *With respect to energy efficiency technology penetration:*

a. *How many customers continue to use incandescent light bulbs?*

Just 19% of ComEd residential interior lighting continues to be incandescent.⁶ This demonstrates a rapid transformation from 2012, when an estimated 63% of ComEd residential interior lighting was incandescent lighting.⁷ Among ComEd’s Income Eligible energy efficiency customers surveyed in 2019, the percentage of interior lighting that was incandescent was even lower, at less than 18%.⁸ That massive change in the ComEd residential interior lighting segment is largely due to the penetration of LED lamps, which in 2019 were just over 50% of ComEd residential interior lighting⁹, up from less than 1% in 2012.¹⁰ Although penetration of LEDs is high among ComEd residential customers, there does continue to be an energy savings opportunity.

b. *How many customers have advanced thermostats?*

Sixty-three percent (63%) of all ComEd residential customers have “advanced” thermostats; of those 39% have programmable thermostats and 24% have communicating (or “smart”) thermostats.¹¹ Among residential customers living in multifamily properties, the number of customers with advanced thermostats is significantly lower – just 40%.¹²

⁶ See Itron, *ComEd Residential, Commercial and Industrial Saturation/End-Use Research, Market Penetration and Potential Study* at 59 (February 2020), available at https://ilsag.s3.amazonaws.com/Itron_ComEd_Baseline_Potential_Res_SAG_2-06-2020.pdf (“February 2020 ComEd Residential Study”).

⁷ See Opinion Dynamics, *ComEd Residential Saturation/End-Use, Market Penetration & Behavioral Study* at 33 (April 2013), available at https://ilsag.s3.amazonaws.com/ComEd_Baseline_Study_April-2013.pdf (“April 2013 ComEd Residential Study”).

⁸ See *February 2020 ComEd Residential Study* at 50.

⁹ See *February 2020 ComEd Residential Study* at 59.

¹⁰ See *April 2013 ComEd Residential Study* at 33.

¹¹ See *February 2020 ComEd Residential Study* at 35.

¹² See *February 2020 ComEd Residential Study* at 35.

- c. *What existing energy efficiency technologies, if more widely deployed, can increase affordability and/or the ability of customers to receive essential levels of electric services?*

A wide variety of energy efficiency technologies, if more widely deployed, could help customers manage their electric usage and subsequent electric bills. This includes but is not limited to insulation, more efficient HVAC and water heating technologies, LEDs, advanced thermostats, appliances (in particular laundry), and advanced power strips.

4. *What changes could be made to utility energy efficiency programs to make them more effective at increasing the affordability and/or the ability of customers to receive essential levels of electric services?*

ComEd is continuously analyzing its energy efficiency offerings and considering ways to make them better, which includes making them more effective.

ComEd is considering making the following updates to its current energy efficiency programs that focus on the residential IE customer segment:

- Using factors like electric share of wallet, bill payment history/arrearages, and bill assistance program participation as well as income eligibility to help prioritize and target customers for IE program enrollment;
- Refining IE EE program delivery so that it is better coordinated with ComEd bill assistance programs and more seamless from a customer perspective;
- Increasing customer education and targeted customer follow-up after EE measures are installed and improvements are made to help ensure that energy savings are achieved; and
- Trying to make IE programs with the greatest affordability impact, like weatherization programs, more cost effective, by adjusting the measures offered and reducing administrative costs.

5. ***How effective are weatherization programs currently available to customers at increasing affordability and/or the ability of customers to receive essential levels of electric and natural gas services?***

The weatherization programs currently available to ComEd customers through the ComEd Energy Efficiency Program – ComEd’s Single-Family Retrofits IE, Multifamily Retrofits IE and Public Housing Retrofits, as well as the State of Illinois’ broader Illinois Home Weatherization Assistance Program (“IHWAP”)¹³ – have demonstrated their effectiveness at increasing affordability because these programs lead to significant, long-lasting energy savings. Links to recent evaluations by an independent evaluator of the three ComEd programs’ effectiveness in 2019 are provided in the footnotes.

- **Single-Family Retrofits - IE** – This ComEd EE program element provides income eligible single-family homeowners a fully subsidized, whole building approach to EE, from energy assessments to weatherization. Subsidies to remedy health and safety issues are also available. Eligible measures include LED lighting, programmable and smart thermostats, advanced power strips, faucet aerators, low-flow showerheads, pipe insulation, furnaces, water heaters, boiler tune-ups and replacements, ductless heat pumps, air sealing, and attic and wall insulation. ComEd jointly offers part of this program with Nicor Gas, North Shore Gas, and Peoples Gas, and another part with North Shore Gas and Peoples Gas.¹⁴
- **Multi-Family Retrofits - IE** – This ComEd EE program element provides multi-family building owners and managers whose buildings are designated as income eligible a subsidized, whole building approach to EE, from energy assessments to weatherization. Subsidies to remedy health and safety issues are also available. Eligible measures include LED lighting, programmable and smart thermostats, advanced power strips, faucet aerators, low-flow showerheads, pipe insulation, furnaces, water heaters,

¹³ As referenced in the response to “20-NOI-01 G.1”, ComEd delivers its Single-Family and Multifamily Retrofit IE programs in-part through the local CAAs and in partnership with the Illinois Department of Commerce & Economic Opportunity. Most of these projects are done through IHWAP, which is largely funded at the State-level and supplemented by the utilities. However, customers may have a CAA project done that is solely funded by the State, as the State has much greater funds available for this work than the utilities. Customers may also have a CAA project done that is solely funded by the utilities, as customers that exceed the IHWAP income threshold may still qualify under the utility FEJA threshold.

¹⁴ See Guidehouse, Joint Utility Single-Family Retrofits - Income Eligible Impact Evaluation Report, (Apr. 24, 2020), available at <https://s3.amazonaws.com/ilsag/Joint-Utility-Single-Family-Retrofits-IE-CY2019-Impact-Evaluation-Report-2020-04-24-Final.pdf>; last accessed May 7, 2020; see also ComEd Ex. 2.04, ICC Docket No. 20-0475 (filed May 21, 2020).

boiler tune-ups and replacements, ductless heat pumps, air sealing, and attic and wall insulation. ComEd jointly offers part of this program with Nicor Gas, North Shore Gas, and Peoples Gas, and another part with North Shore Gas and Peoples Gas.¹⁵

- **Public Housing Retrofits** – This program element offers energy assessments and incentives to upgrade inefficient equipment and systems in buildings owned and managed by public housing authorities in the ComEd service territory. Building types include residential units; common areas; and maintenance, community, office, and other buildings. Participants also receive educational information about easy, energy saving actions that they can take to reduce their energy bills. ComEd jointly offers this program element with Nicor Gas, North Shore Gas, and Peoples Gas.¹⁶

See Lunn Dir., ComEd Ex. 2.0, ICC Docket No. 20-0475 (filed May 21, 2020).

6. *Identify obstacles faced by low-income consumers that prevent them from participating in weatherization programs?*

In ComEd’s opinion, there are at least two significant obstacles that can prevent its IE customers from participating in weatherization programs:

(1) **Multifamily Rentals.** Approximately 57% of ComEd IE consumers reside in multifamily buildings, and therefore, they cannot directly participate in a weatherization program since the property owner or landlord must enroll in the program. Many property owners/landlords are apprehensive about making capital investments to dwellings where tenants are the primary benefactors to energy efficiency improvements. ComEd’s existing programs seek to address this issue by providing education to property owners on indirect benefits of providing energy efficiency improvements to their tenants (e.g., tenant stability), free direct installation of low-cost measures in tenant units and common areas (such as lighting), and substantial incentives for more expensive measures (e.g., HVAC upgrades and weatherization).

¹⁵ See Guidehouse, ComEd Multi-Family Retrofits - IE Impact Evaluation Report, (Apr. 30, 2020), available at <https://s3.amazonaws.com/ilsag/ComEd-MF-Retrofits-IE-CY2019-Impact-Evaluation-Report-2020-04-30-Final.pdf>; (last accessed May 7, 2020); see also ComEd Ex. 2.04.

¹⁶ See Guidehouse, Joint Utility Public Housing Retrofits Impact Evaluation Report, (Apr. 21, 2020), available at <https://s3.amazonaws.com/ilsag/Joint-Utility-Public-Housing-Retrofits-CY2019-Impact-Evaluation-Report-2020-04-21-Final.pdf>; (last accessed May 7, 2020); see also ComEd Ex. 2.04.

(2) **Health and Safety Issues.** Before a property can be weatherized through one of ComEd's programs, it must be free of preexisting health and safety issues – such as worn roofing, structural issues, plumbing issues, hazardous conditions, pests and mold – that could preclude the installation of the measures. Many homes have such issues, and for cost reasons, the IE customers are unable to address them, so they are precluded from participating in weatherization programs. In the first two years of ComEd's IE weatherization programs, the home deferral rate has ranged from 3% to 12%. While ComEd's IE EE programs include funding to address these preexisting housing health and safety issues, the funding is limited and can only address a fraction of the identified health and safety issues. If additional funding could be secured for these health and safety improvements, more IE customers could come off the deferral list and be served by these weatherization programs.

7. *What changes could be made to weatherization programs to make them more effective at increasing the affordability and/or the ability of customers to receive essential levels of electric services?*

See ComEd's Responses to 20-NOI-01 G4 and 20-NOI-01 G6.

H. Distributed and Community Solar

- 1. What distributed and community solar programs are currently available to customers that increase affordability and/or the ability of customers to receive essential levels of electric services, how effective are the programs at achieving these objectives, and what changes could make the programs more effective?***

The Illinois Solar for All program, created pursuant to Section 1-56(b) of the Illinois Power Agency Act, provides “incentives for low-income distributed generation and community solar project, and other associated expenditures” in order “to bring photovoltaics to low-income communities in this State.” Renewable energy credit (“REC”) contracts under the Illinois Solar for All program include a premium to incent low income participation in photovoltaic projects. Under the program, solar projects must be offered at no upfront costs and the ongoing annualized payments by the customer, if any, must be less than 50% of the annual first year estimated production and/or utility default service net metering value to be received by the customer. All Illinois Solar for All vendors, and all photovoltaic project vendors receiving REC contracts under the Adjustable Block Program, are required to adhere to certain prescribed consumer marketing and disclosure guidelines. ComEd believes that the guidelines should be periodically refined as institutional knowledge and experience develop. Current guidelines are published on the Illinois Solar for All website (www.illinoissfa.com).

- 2. Are there programs not currently available in Illinois, including programs adopted in other states, that could increase affordability and/or the ability of customers to receive essential levels of electric services?***

ComEd recognizes the value of programs and services that enable customers to more easily avail themselves of, and optimize, the cost savings provided by distributed and community solar. This includes, but is not limited to, services that enable more informed customer decisions regarding community solar enrollment, a more seamless enrollment process, and a simplified single billing option. The single or consolidated billing option, which is being implemented in New York through a utility-provided service, is of particular interest to ComEd as an example of a program for low to moderate income customers for whom an increased number of bills is often viewed as a significant barrier.

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Respectfully submitted,

COMMONWEALTH EDISON COMPANY