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City of Chicago Annual Summer Preparedness Hearing - Q&A

May 2026

ComEd Summer Preparedness Hearing:
Key Questions & Data Requests (2026)

Purpose of this document

This document consolidates key questions and data requests previously raised by Council members during past ComEd hearings and formal requests through the Chair. While many of these questions have been addressed in the past, we are requesting updated data and responses reflecting the most current information available for 2026 This will help facilitate a productive and informed discussion during our upcoming May hearing.

Reliability

1. **ComEd stated during our 2025 hearing that the primary driver of outages are weather-related events, which account for 21% of the SAIDI index. Of those, extreme weather contributed to roughly 30% of weather-related events. As severe weather becomes more frequent, what specific steps is ComEd taking to prevent outages and maintain grid reliability?**

We understand the significant risks that hotter temperatures and increasingly severe weather pose to our system. ComEd undertakes a rigorous process to forecast load, pressure-test our system, and conduct drills so our teams are prepared for severe weather and other emergencies. To better understand how these risks may evolve over time, ComEd commissioned a climate risk assessment conducted by Argonne National Laboratory, which indicates that severe weather will continue in the years ahead. Mid-century forecasts expect our region to experience more intense and prolonged summer heat waves, amplified by higher humidity. These conditions will place additional stress on our system and increase the likelihood of outages if additional investments to reduce the impacts of climate change are not made.

Examples of being ready include:

- *Verifying all portable generators of every size are ready for the summer and then testing early and completing all repairs prior to the summer;*
- *Ensuring that our substation flooding mitigation plan is up to date and taking necessary actions to reduce risk. This step paid off recently with the torrential rain that caused flooding;*
- *Completing an in-depth supply readiness plan which includes confirming with key suppliers, stocking mobile storm trailers utilized for severe storms, and developing mitigation plans for any disruptions to the supply chain for critical inventory; and,*
- *Completing all City of Chicago summer readiness projects and planned maintenance inspections prior to the summer to mitigate the risk for long duration outages during the summer.*

ComEd also has flood mitigation strategies in place, for example flood proofing and flood forecasting to help protect against natural disasters. As previously mentioned, ComEd takes a series of steps to ensure preparedness for extreme weather events, such as heat waves and other severe conditions.

2. **<u>As power plants are taken offline and PJM still faces a backlog of connecting green energy generators, how is ComEd working to meet rising demand from data centers, AI, and Quantum computing?</u>**

To meet rising demand from data centers, AI, and Quantum computing ComEd and indeed all of Exelon have been actively engaged with PJM as well as all stakeholders in the PJM stakeholder process, including end-use customers, consumer advocates, electric distributor municipalities and cooperatives, generation owners, other transmission owners, and other suppliers. Exelon worked closely with PJM to initiate a new "Connect and Manage Senior Task Force" (CAMSTF) focused on exploring development of appropriate rules and procedures for how new data centers can be efficiently connected to the grid while maintaining reliability recognizing that these connections could occur before there is sufficient capacity and transmission capability. We are attempting to construct a coherent, legally durable framework that allows large load to connect and operate, serving legitimate economic development and electrification goals, while ensuring that the costs and risks of doing so fall on those loads rather than on the broader customer base that depends on the grid for essential service. Additionally, ComEd and other Exelon OpCos have begun requiring Transmission Security Agreements (TSAs) for projects over 50 MWs. TSAs are Exelon's innovation to protect customers by establishing a take-or-pay structure ensuring transmission revenue contributions by new large load customers. TSAs also improve load forecast by reducing speculative location shopping by customers. ComEd has 8 FERC-approved TSAs already. Lastly, Exelon has been advancing important analyses surrounding best ways to meet the resource adequacy and reliability challenges and opportunities posed by data center load growth. Most recently, we retained Concentric Energy Advisors to complete a study that showed that federal policies that rely solely on direct assignment of transmission upgrades costs to large load customers may ultimately shift significant costs onto other customers. Significantly, the Concentric study was recently endorsed by the National Association of Regulatory Utility Commissioners (NARUC) in comments filed at the Federal Energy Regulatory Commission (FERC) urging FERC to avoid disrupting state-level cost-allocation proceedings when responding to a Trump administration request to help speed the interconnection of large-load customers, such as data centers. (RM26-4).

3. **<u>With increased demand from high-energy users (such as data centers), what is ComEd doing to prevent higher bills and potential power shortages not just now but in the coming years?</u>**

Energy demand in northern Illinois is rising significantly due to extraordinary changes in the energy sector, driven by increased construction of fully electrified homes and businesses, EV adoption, and the growing use of Artificial Intelligence (AI). AI requires massive amounts of electricity to power computers, servers, and cool equipment, which in turn drives the rapid deployment of energy-intensive data centers. At the same time, distributed energy resources and renewables are expanding. In addition to connecting solar and battery storage, ComEd's Grid Plan includes investing in advanced technologies and digital controls to build a grid aligned with

clean energy goals. Other challenges include increasingly extreme weather, security threats and shifting public policies. To meet these challenges and maintain system reliability, ComEd must increase load capacity, interconnect new energy sources, and modernize existing infrastructure. To prepare for additional energy load, support economic development and meet customer needs, we're going to facilitate customer connections and increase energy capacity at more than 70 targeted substations experiencing high demand. Most importantly, our proposed Grid Plan places customer affordability at the forefront. Our investments are carefully evaluated and planned to build a system with demonstrable customer impact and value for years to come – and we're supporting our customers with their bills along the way. To ensure large customers pay their fair share, ComEd and Exelon introduced Transmission Security Agreements that require a firm financial commitment from developers of large load projects above 50MW as a condition of service. These agreements protect existing customers from financial risk if a project does not fully materialize by ensuring the large load customer covers the shortfall in rate payments so that other customer are not burdened with increased costs.

4. **<u>How does the passage of CRGA at the Illinois General Assembly impact rates and grid reliability?</u>**

CRGA made positive incremental steps toward ensuring Illinois is developing the resources needed to provide reliable energy supply aligned with the state's energy goals. The state established an Integrated Resource Planning process, which will lay out a road map for how it might procure resources that account for retirement of older generating units, acquire new and cleaner power, and accommodate growing load associated with electrification and economic development. It also established programs to encourage greater demand flexibility to support resource adequacy, such as a VPP program.

As for rate impacts, it is expected to have a very modest impact on customer bills in support of grid reliability -- less than 1% for residential and 2% for commercial and industrial customers on average over the next decade. Those impacts are primarily driven by two items. First, the battery procurement that the IPA is initiated this fall, though that will not be felt until 2030 and may be partially offset by reduced energy and capacity costs, depending on the market. [Note: this does not address the application of the DG rebate to standalone storage, for which analysis has not been conducted but incentives for storage are expected to be offset by lower capacity charges ComEd customers.] Second, there is increased funding for energy efficiency, but that will be offset by savings for participants in the program, with significant allocation required to low-income customers. Given the way the incremental program funding is allocated, that primarily impacts the C&I customers.

5. **How does the proposed POWER Act in front of the General Assembly impact rates and grid reliability?**

ComEd did not take a position on this specific legislation. As the electric utility, our role is to reliably connect customers to the grid and ensure safe, affordable service, regardless of customer type.

From our perspective, the broader conversation around the POWER Act touches on several issues we are actively focused on today — including large customer load growth, affordability for all customers, transmission planning, and long-term resource adequacy. As large new customers like data centers come online, it is important that growth is managed in a way that maintains system reliability and aligns with Illinois' clean energy goals under CEJA, now CRGA.
ComEd continues to work with policymakers, regulators, and stakeholders to support a reliable grid while advancing clean energy and protecting customers from unnecessary cost impacts.

6. **Can ComEd provide updated reliability data and trends for the City of Chicago using industry-standard metrics like SAIFI (System Average Interruption Frequency Index) and CAIDI (Customer Average Interruption Duration Index) for the most recent reporting period?**

In 2025, Chicago customers experienced a 99.995% reliability rate.

In 2025, overall reliability in the city of Chicago (measured by the System Average Interruption Duration Index, or SAIDI) was 28 minutes and 82% better than the 2007–2011 average of 155 minutes.
The City of Chicago 2025 System Average Interruption Frequency Index (SAIFI), which measures the frequency of outages customers experienced, was 0.32 and better than the historic average of 1.04 by 69%.
The 2025 Customer Average Interruption Duration Index (CAIDI), which measures the average length of outages that customers experienced, was 88 minutes and 41% better than the 2007–2011 historic average of 149 minutes.

7. **How has reliability in the city changed over time? Are there measurable improvements? And if so, what factors have contributed to these changes?**

Please see the response to Question 6 regarding how reliability in the city changed over time. The following are examples of investments that have contributed to these improvements:

- *Distribution Automation: Installs medium-voltage (4, 12, and 34kV) reclosers/sectionalizers with advanced sensing, protection, and switching intelligence to automatically isolate faults, reconfigure feeders, and restore power to unaffected sections—reducing the scope, customer affected, and duration of outages.*

• *Targeted Resiliency: Deploys the most cost-effective engineered solution by circuit (e.g., overhead-to-underground conversion, spacer cable, circuit re-routing, stronger/alternative poles, added switching points, and targeted vegetation management), prioritizing circuits with the greatest history of storm-related damage.*

• *Replacing Underground Cables: Proactively replaces aging underground cables and other at-risk equipment to prevent failures and reduce and shorten outages.*

• *Converting 4kV Circuits: Modernizes legacy circuits (many from the 1950s or earlier) to improve safety, reliability, and environmental performance and better support growing demand (EVs, heat pumps, rooftop solar), with prioritization in under-resourced communities under the Refiled Grid Plan.*

8. **Are reliability levels consistent across all areas of the city? If not, where are the most significant gaps or areas needing improvement this summer?**

On average, reliability across areas is improving. In a given year, we will see disproportionate impacts from weather events that impact some areas in the city and not others. As a result, reliability should be assessed over multiple years. Any census blocks that see adverse reliability over two consecutive years are prioritized for potential work to improve reliability.

9. **What is ComEd doing to improve those areas?**

ComEd has rigorous preventive and corrective maintenance programs designed to maintain this reliability performance. However, ComEd continues to monitor for underperforming wards (none in 2025), worst performing circuits, and components on the grid that require further actions. We prioritize this work every year since performance can significantly change from year-to-year due to storms, public damage, and other uncontrollable factors.

10. **Can ComEd identify the worst-performing census blocks within the 50 wards and outline steps being taken or planned to improve reliability in these areas?**

Yes, we analyzed the worst performing census blocks within the 50 wards and the major drivers were storm related outages. Many of these communities overlapped with underperforming wards and worst performing circuits. Please see the response to Questions 8 and 9.

Infrastructure Investments

11. **Can ComEd speak to the second grid plan submitted to the Illinois Commerce Commission in January, and what specific investments we see included?**

ComEd is a proud industry leader today — but leadership in the future depends on building a stronger, smarter, and more modern grid. Our focus is on our customers — the people and businesses who depend on ComEd every day. From city residents and rural farmers to small and large customers. ComEd's commitment is to provide safe, affordable, reliable, and sustainable service for all. To that end, we're continuing our goal of building the flexible, intelligent, and equitable grid of the future; an integrated system that powers people, powers progress, and advances Illinois' clean energy and economic development goals. This multi-year Grid Plan comprises a portfolio of investments that are necessary to meet the needs produced by key drivers of change in the energy sector.

Load growth: the electrification of homes and businesses and arrival of large load customers (including data centers and the manufacturing complexes) require a lot of power to operate, and ComEd has a duty to serve any type and size of customer requesting power. The New Substations program will build new substations to create capacity for added load growth and resolve configuration constraints. These new substations are planned for areas where existing and growing loads demand it.

Supporting State clean energy goals: our approach is grounded in our customers' needs as well as our legislative obligations, including CEJA and CRGA, to usher along the clean energy transition through investments in renewable energy integration, EV and smart energy infrastructure. Investments in this area includes our DERMS Expansion Program to increase dynamic hosting capacity and flexible interconnections for Distributed Energy Resources (DERs).

Sustained reliability: new technologies, systems and platforms like advanced metering infrastructure (AMI), distributed automation, and monitoring and control operations like SCADA will be required to sustain reliability performance under rapidly changing system conditions and customer needs. In addition, we're upgrading aged equipment with technological advancements and fortifying the system to withstand the increased frequency and severity of extreme weather events. Sustained reliability is important not only because it ensures delivery of power to our customers when they need and want it, but also because it supports economic health and development across the region and the state.

Customer affordability: ComEd's plan was designed with customer affordability at the forefront, and in addition to carefully evaluating its portfolio of proposed investments for customer impact, ComEd also offers programs, like the Low-Income Discount, that help customers manage their energy bills.

12. **How does this build off of the grid plan passed in 2025?How will the second grid plan impact utility rates?**

Customer affordability is at the center of everything we do – this was central to the development of our Plan. Approved by the ICC, ComEd evaluates affordability with a goal that total home energy costs to not exceed 3% (non-electric space heat) or 6% (space heat) of average household income. Based on our proposed Plan, the average residential customer will devote 1.41% of income in 2028 and 1.48% by 2031 to electricity, remaining within ICC energy burden standards. For context, the average ComEd bill is currently $106, which is below the average monthly bill for the top 10 metropolitan areas. However, we realize that customer support is critical. In 2025, ComEd connected 220,000+ customers to $108M in financial assistance and our energy efficiency programs have also helped customers save $12B since 2008. And beginning this year, ComEd's Low Income Discount, a percentage-based discount, is now available for qualifying income-eligible customers.

13. **How does the recently submitted grid plan address the issue of high-energy users while balancing the needs of everyday ratepayers and compliance with state, local, and federal regulations?**

Please refer to question 3

14. **What grid infrastructure projects is ComEd prioritizing to meet CEJA and CRGA requirements?**

Our Grid Plan aligns with CEJA, the 2024–2027 Refiled Grid Plan (RGP), ICC feedback, and begins to consider CRGA enacted January 2026. It includes strategies grounded in the objectives of CEJA's aim to achieve a 100% carbon-free electricity grid by 2045-2050 and increase renewable energy use to 40% by 2030 and 50% by 2040. Building on our current Plan, the pending Plan outlines our vision for the grid of the future: flexible, intelligent and equitable – one that supports the rapid growth of solar, electric vehicles and other electric technologies – powered by 100% clean energy. ComEd already has more than 1.4 Gigawatts of distributed solar on the ComEd system, up from 1 Gigawatt in 2024. And in investments in things like advanced grid management and communications, digital controls and new analytic systems will help speed interconnections to meet growing customer demand and Illinois' clean energy goals. Further, continued investment in beneficial electrification programs, as adjusted through CRGA, will maintain the growth

of residential and commercial transportation electrification. The grid of the future helps achieve Illinois' clean energy goals, all while enabling affordability, customer choice and community resiliency.

15. **Is ComEd looking at adding any other projects to meet the proposed POWER Act?**

ComEd is not proposing additional projects solely to meet the proposed POWER Act. Issues raised under the proposal, including large load growth and affordability, are being addressed through existing grid planning and coordination efforts, with the Transmission Security Agreement (TSA's) helping ensure costs associated with large new customers are borne by the cost causer rather than other customers.

16. **How will these investments be timed with the 2026 summer peak demand?**

ComEd plans distribution system capacity investments to meet load demand (for 2026 system peak and beyond) by using bottoms-up component peak demand forecasts that identify localized capacity needs at the substation and circuit levels. These forecasts identify where demand is expected to exceed existing infrastructure capabilities, driving targeted capacity investments to expand, reinforce, or reconfigure the grid to reliably serve customers. Investments are prioritized based on forecasted peak demand, operating conditions, equipment loading, and system resilience needs, ensuring that the investment is in service prior to the system need. The investments needed to meet 2026 peak demand were approved as part of the Refiled Grid Plan in 2024.

17. **How will ComEd balance grid reliability and affordability for Chicago residents while meeting the state's clean energy goals under CEJA?**

Our strategy in ComEd is to balance reliability, affordability, and CEJA's clean energy goals by treating them as connected outcomes that must be planned together. The core approach is to invest in the distribution grid so that it can host more DERs, EVs, storage, demand response, and flexible resources, while using cost-effectiveness analysis, equity targeting and reliability metrics to justify the investments.

For Chicago residents, this balance is especially important because Chicago has dense load, aging and complex urban infrastructure, and many customers who are sensitive to outages and bill increases. Our refilled grid plan shows Chicago has existing DER capacity across residential and commercial customers, but much less total installed DER capacity than some other regions, especially West and South. That means Chicago's clean-energy transition will depend not only on customer adoption but also on whether the local distribution grid can safely absorb more solar, EV charging, storage, and flexible load.

We address affordability by focusing on cost-effectiveness, avoiding unnecessary upgrades, automation, enabling flexible interconnection, and focused planning. Chapter 5 of the grid

plan states that the hosting capacity portfolio has approximately $2.05 billion in monetized benefits from DER and electrification versus $319 million in present value revenue requirements. This shows that our investments are not only clean energy enabling, but also economically justified. In addition, customers spend less than 3% of their household income on electricity (6% for those with electric heating). For low-income customers and vulnerable Chicago communities, the plan adds support through financial assistance, energy efficiency, demand response, and bill-management programs.

And importantly, in the long run, clean energy itself can support reliability. A more distributed and flexible system through DERs, storage, and demand responses can reduce strain on the grid, provide localized support during peak conditions, and enhance resilience. As a result, these concepts increasingly reinforce each other.

18. **What key projects in this plan are relevant to Chicago residents and will enhance grid resilience in the face of extreme weather events?**

Chicago's most prominent resilience projects include the West Side, Lakeview, and Van Buren substations. These facilities increase capacity and adaptability in densely populated and expanding areas of the city.

In addition to these new Chicago substations, the resilience value also comes from modernization of older downtown infrastructure, including the Jefferson-DeKoven 69kV conversion, which replaces obsolete 69kV buses and breakers at Jefferson with a new 138kV GIS and supports long-term resilience and customer load growth.

Other programs in Chicago include distribution automation to help isolate outages faster, targeted resiliency projects relevant for extreme weather, substation hardening, flood mitigation (ComEd has already completed flood mitigation at 12 substations and plans further flood mitigation at high-risk locations), as well as inspections of underground vaults and manholes. Underground inspections are especially important for Chicago because so much of the downtown system depends on vaults, manholes, and underground equipment.

Resilience enhancements also align with CEJA because the plan says these investments prioritize facilities serving EIEC communities and can also increase DER and EV hosting capacity.

19. **How is ComEd coordinating with PJM, state agencies, and federal authorities to ensure that CEJA, POWER Act, and CRGA requirements are implemented efficiently and do not create unintended rate or reliability issues for Chicagoans?**

ComEd and Exelon are actively engaging with PJM, state agencies, and federal authorities to collaboratively address reliability, increasing energy demand, and affordability. The State Resource Adequacy Study issued in December 2025 identified a potential resource adequacy shortfall as early as 2029. In response, the Climate and Resource Grid Authority (CRGA) has tasked ICC Staff, the Illinois Power Agency, the Illinois Finance Authority, and the Illinois Environmental Protection Agency with developing an Integrated Resource Plan (IRP) that serves Illinois customers in a manner that is adequate, safe, reliable, affordable, efficient, environmentally sustainable, and aligned with state energy policy goals at the lowest cost over time. As active participants in these discussions, we recognize the significance of this effort and remain committed to continued collaboration, emphasizing the importance of a data-driven process, practical, customer-focused solutions, and utilities' role as a constructive partner.

20. **CRGA introduced new rules and regulations. How is ComEd updating its PJM interconnections plan? Specifically, ComEd anticipated these new regulations can affect timelines, cost and reliability for Chicagoans?**

This answer may best be coupled with numbers 24 and 25: ComEd participates in the PJM Interconnection Queue process, a FERC-approved and recently (July, 2023) revised plan intended to streamline connecting generation projects within PJM's member company zones. ComEd has been performing and meeting the timelines established within this revised process through PJM's 2 Transition Cycles within this new process and is taking lessons learned within that defined process in order to provide generation developers with the information they need regarding scope, cost and schedule so they may make an informed business decision on where best to spend their capital.

The changes within CRGA will likely affect the volume of battery projects, or combination projects of battery technologies alongside wind or solar generation assets. ComEd is poised to ramp up and down staff through utilization of specific contractors to perform studies and construct facilities as volumes ramp up and down to allow more efficient utilization of resources to account for volume changes. In that sense, CRGA rules and regulations may change the type and volumes of types of generation assets, but ComEd does not discriminate based on generation type and will support connections as necessary to meet developer project timelines established through the PJM Study process. Timelines and costs to developers may increase due to land availability for developer generation assets requiring more land and, therefore, may require additional Transmission line build-out to connect those assets and upgrade existing facilities in order to allow for full generation output to ensure reliability for the generation assets and Chicagoans while also constructing as efficiently as possible.

Grid

21. **Has ComEd identified weak points in its grid?**

ComEd's grid is continuously strengthened because we routinely analyze system performance. ComEd identifies circuits and components that underperform on a variety of metrics through data analysis and identifies improvements that are most likely to improve performance. We prioritize this work every year since performance can significantly change from year-to-year due to storms, public damage, and other uncontrollable factors.

22. **Can you provide updated maps or data highlighting these areas?**

Please see the response to question 21

23. **What strategies are in place to address weak points, ensuring that all communities, particularly vulnerable and environmental justice areas, benefit from grid improvements?**

In addition to the analysis described in Question 21, ComEd meets with the City of Chicago on a quarterly basis to review reliability performance in detail across the system, including at the ward level, ensuring a shared understanding of performance trends and helping to inform how improvements are prioritized across circuits and components.

24. **How is PJM working to accelerate clean energy interconnections?**

PJM is accelerating clean energy interconnections by transitioning from a "first-come, first-served" to a "first-ready, first-served" queue, aiming to process ~200,000 MW of projects by late 2026. Key actions include streamlining Capacity Interconnection Rights (CIR) transfers for replacements, using Surplus Interconnection Service for faster co-location (e.g., adding batteries), and fast-tracking projects with less system impact

25. **What would ComEd like to see PJM do that would be effective in expediting interconnections?**

While PJM provides clearance authority, it could prove beneficial if PJM collaborates with Transmission operators to proactively identify areas on the grid with excess capacity, whether existing or resulting from in-flight projects, and/or leverage hosting capacity maps to signal areas of opportunity for more rapid interconnection

Environmental Justice and Renewable Energy

26. **Based on environmental justice census block tracking, are there disparities in service reliability between environmental justice communities and the rest of the city?**

The majority of EIEC areas or Equity Investment Eligible Communities performed better than the overall City performance. EIEC includes environmental justice communities and R3 communities (Restore, Reinvest, and Renew) per the state's Climate and Equitable Jobs Act (CEJA).
As discussed in Question 8, a single year of reliability performance may be driven by weather events rather than indicative of disparities in service reliability. Therefore, two years of consecutive reliability should be considered to identify chronic reliability issues.

Here are some important facts relating to ComEd 2025 performance in EIEC areas in Chicago:

- *82% of City of Chicago EIEC census blocks experienced better than the system average SAIDI (meaning 82% experienced fewer durations of interruptions on average) – 65% better than Chicago average.*
- *72% of City of Chicago EIEC census blocks experienced better than system average SAIFI (meaning 72% experienced fewer interruptions on average) – 57% better than Chicago average.*

27. **Can ComEd provide a granular breakdown of environmental justice data by census block within Chicago's 50 wards, including the latest data tracked as part of the ICC's performance metrics case? For clarity, we request this information in both table format and visual maps.**

Please refer to Excel attachment ComEd does not have a visual map of this data.*

28. **How does ComEd determine the costs associated with interconnection studies for Chicagoans looking to install rooftop or community solar?**

ComEd follows the Administrative Code 83 Part 466, also known as the Interconnection Rules, to perform required engineering reviews studies based on the type of system being installed and determine if distribution upgrades are required to ensure the safety and reliability of the grid once customers' solar is interconnected. Most residential customers can be approved to interconnect their rooftop solar array by paying the $50 Level 1 fee. Notably, residential interconnections are capped at $200.

29. **What factors contribute to the limited adoption of solar energy within Chicago city limits, and what role does ComEd play in expanding access?**

ComEd continues to pursue innovative regulatory models to increase benefits for Chicago residents while promoting awareness of solar and energy storage, as well as continuing to streamline the interconnection process. The company supports customer solar education through subject matter experts (the Green Power Connection Team), regularly updated physical and digital educational materials (including information on incentives and rebates) and a Digital Solar Toolkit with online self-help resources for residential and commercial customers—all kept current with regulatory eligibility requirements

30. **What strategies are in place to address weak points equitably, ensuring that all communities, particularly vulnerable and environmental justice areas, benefit from grid improvements?**

Please see response to question 21.

Affordability

31. **How much has the average residential monthly bill increased over the past 5 years in both dollar and percentage terms?**

The average residential customer's monthly bill currently stands at $106.73, 29% higher than the $82.99 average in 2020.

32. **How does Chicago compare to the statewide average?**

Of the three Investor-Owned Utilities (IOUs) in Illinois, ComEd's average residential rates are in the middle and approximately 13% higher than the statewide average, based on the most recent data from the Edison Electric Institute (EEI). However, when expanding the number of IOU's to cover the states that make up the Midwest, ComEd's average residential rates are 7% below the average; this is also based on the most current data from EEI.

33. **How does Chicago compare to the national average?**

ComEd's average residential rates currently sit 1% below the national average, according to the most recent data from EEI. However, when re-focusing the search criteria to cover just the top 10 largest metropolitan areas in the United States, ComEd's average residential rates are currently 22% below the average for these utilities, based on the most current data from EEI.

34. **Can you explain how the PJM auction affects ratepayers' electric bills? For example, how much of that increase is passed directly to Chicago customers, and when does it hit their bills?**

PJM is the regional transmission organization that operates the multi-state electrical grid to which ComEd is connected. The Base Residual Auction (BRA) is where PJM procures the supply resources needed to meet the projected electricity supply needs across the entire PJM territory. Customers on ComEd's basic rate (Rate BES) will see a line item in the supply section of their bill named "Electricity Supply Charge." This line item includes costs associated with procuring Capacity. Customers on ComEd's hourly rate (Rate BESH) will see a separate line item in the supply section of their bill named Capacity Charge. The next update to these charges will take effect with customer bills for the June monthly billing period. Current estimates are for a $3.50 increase in supply charges and an offsetting credit of just under $1 for the Carbon Free Resource Adjustment (CFRA), for a net impact of approximately $2.50 on an average residential bill. Actual impacts depend on final PJM allocations and customer usage.

35. **What is ComEd's projection for the upcoming July 2026 auction? Does ComEd think the upcoming PJM auction is likely to reach the federally established price cap?**

Based upon prior auctions and current market conditions, the next auction is expected to be at the cap. More on the last capacity auction can be found here: PJM Auction

36. **As new federal cuts to affordable programs continue and are projected for the coming years, what concrete steps is ComEd taking to help low- and moderate-income customers manage higher bills beyond LIHEAP?**

ComEd recognizes the challenges facing low- and moderate-income customers, especially as federal support for affordable energy programs is reduced. To address these needs, ComEd has implemented a Low-Income Discount (LID) program, which provides eligible customers—those at or below 300% of the Federal Poverty Level—with a percentage discount on their monthly bills. This targeted assistance ensures that more customers experiencing financial hardship receive meaningful relief.

In addition to LID, ComEd offers a robust portfolio of support programs, including the Supplemental Arrearage Reduction Program (SARP), Catch Up and Save, and Give-A-Ray. SARP helps customers manage and reduce their outstanding balances, while Catch Up and Save combines arrearage forgiveness with energy efficiency measures, empowering customers to lower their bills over time. Give-A-Ray provides access to community solar benefits, expanding renewable energy access to those who might otherwise be unable to participate.
To further extend our reach, ComEd continues to invest in outreach efforts, especially in underserved communities. We regularly host in-person resource fairs, where customers can

meet with trained employees to discuss their options and enroll in assistance programs. Recognizing that not all customers can attend in-person events, we are launching virtual resource fairs to ensure that everyone has access to information and support, regardless of their location or mobility.

Through these concrete steps—expanding financial assistance, broadening access to energy-saving programs, and enhancing outreach both in-person and virtually—ComEd is committed to helping low- and moderate-income customers manage higher bills and maintain reliable service, even as federal resources diminish.

37. Can ComEd break down what is driving the increase on customers' bills?

Using the current average bill of $106.73 as compared to the 2020 average bill of $82.99, increases included $17.36 in delivery and $16.77 in supply and transmission, and a decrease of $10.38 in Taxes and Other. Some of the notable changes in Taxes and Other include increases in energy efficiency programs, introduction of the Low-Income Discount (LID) program, Distribution Generation rebates, and Renewable Energy Credit (REC) purchases with an offset from the Carbon Free Resource Adjustment (CFRA). Note that roughly 48% of ComEd's LID participants are in Chicago.

Specifically, how much of the increase is attributable to:

- **ComEd's own distribution charges:** *ComEd's distribution charges, and all adjustments to our distribution charges, can be found on ComEd.com/Rates. Specific link is: https://www.comed.com/cdn/assets/v3/assets/blt3ebb3fed6084be2a/blt7904befea93c3525/69cd7a7d7482cf84056e3b2c/A_Guide_to_the_Retail_Customer_s_Billed_Delivery_Service_Charges.pdf?branch=prod_alias*

- **PJM capacity costs:** *Please see response in question 34, ComEd's transmission service charges can be found on ComEd.com/Rates. The specific link for Rate BES customers is: https://www.comed.com/cdn/assets/v3/assets/blt3ebb3fed6084be2a/bltd77be2a6f4e6909c/69ebcdd54c40d131946f83af/41_PJM_Services_Charges_-_Info_Sheet_2.pdf?branch=prod_alias*

  The specific link for Rate BESH customers is: https://www.comed.com/cdn/assets/v3/assets/blt3ebb3fed6084be2a/blte3de1d3252ac6246/69ebce71ee1352ba7816a981/44_PJM_Services_Charge_-_Info_Sheet_5.pdf?branch=prod_alias

- **Supply and generation costs:** *Purchased Electricity Charges are ¢/kWh charges applicable to monthly billing periods and are designated on retail customer bills as the Electricity Supply Charge. More information can be found here: 40_Purchased_Electricity_Charges_-_Info_Sheet_1_-_FINAL.pdf*

- **State and federal fees:** *State and municipal tax additions are applied to the kilowatt-hours delivered to retail customers based on ¢/kWh rates and are separately stated on the monthly bill. More information can be found here: 18_Rider_TAX.pdf*

38. **Does ComEd have separate rate classes for large and medium electricity users within the same category? With new large energy users coming online (e.g., data centers), will a new large load rate class be needed?**

Yes, ComEd has delivery classes that vary by the customer's kW demand level. Specifically, there are over 10 MW delivery classes for the High Voltage and non-High Voltage customers. The Commission just issued a Final Order in Dockets No. 25-0679/25-0677 (Consol.), which provides greater deposit protection for large-load customers and security for transmission investment under the FERC-approved Transmission Security Agreements (TSAs). The Commission also directed a follow-up proceeding. The follow-up proceeding will further investigate the potential impact of the application of Rider NS, ZSS and DE to large load customers and how they impact other customer rates. As well as a review of the potential application of interruptible loads related to transmission and/or generation concerns. That proceeding may address how costs are assigned to large-load customers.

39. **Has ComEd had any discussions with the State about adjusting the tax rates applied to residential users so that they are not higher than those applied to data centers?**

ComEd has not had any such discussions with state policymakers about such a proposal

40. **How does ComEd partner with the City to create a guidance plan to prepare for data centers (legislation, infrastructure, etc)?**

There are no formal ongoing structures in place to create such a plan. In 2025, ComEd participated in a working group meeting with members from various city departments and agencies (including the Departments of Planning and Development, Environment, and Law) to discuss issues related to data center development in the City. ComEd would be willing to continue such discussions formally or informally as desired by the City.

41. **How much financial assistance does ComEd provide directly to its customers, excluding any federal or state funding?**

In 2025, ComEd provided a total of approximately $9.8 million in direct financial

assistance to its customers, excluding any federal or state funding. This includes $826,000 from the Give A Ray program and $9 million from the Customer Relief Fund. Year-to-date in 2026, the Give A Ray program has provided an additional $49,000 in assistance to customers.

42. How much of that is coming from shareholder funds?

Of the total direct financial assistance provided to customers in 2025, all $9 million from the Customer Relief Fund came from ComEd shareholder dollars. Additionally, $267,000 of the assistance provided through the Give A Ray program was also funded by shareholders. This means that, in total, approximately $9.267 million in assistance was funded by ComEd shareholders in 2025.

43. What steps is ComEd taking to reduce the number of disconnections and support at-risk customers?

ComEd aims to reduce the number of disconnections and support at-risk customers by connecting customers with available financial assistance and energy efficiency programs, which reduce usage, and reduce customer arrearages. ComEd utilizes digital and USPS-mail customer outreach, along with public events to connect customers with available programs. In 2025, ComEd hosted or participated in 616 customer events to connect customers with the referenced programs. Those events and the digital and USPS-mail customer outreach led to ComEd disbursing $109M of financial assistance across all programs, including federal and state funding, which correlates to more affordability and less customer disconnections.

44. Are there any insights into customer needs as federal cuts affect more families?

The average number of customers past due in Q1 2026 is ~14% higher than last year (381k customers in 2026 vs 335k customers in 2025), though the average past due balance is 16% lower than last year ($341 in 2026 vs $407 in 2025).

Reduced assistance, rising inflation and other energy prices will continue to present a challenge and is an industry-wide concern. LID, energy efficiency programs and the other assistance programs have helped customers reduce their balances, but this will continue to be a watch area.

45. How does ComEd balance the need for investments to ensure reliability and resiliency against energy burden and affordability for vulnerable Chicagoans?

ComEd has historically been one of the most affordable service providers in the U.S. and we intend on maintaining that status. However, rising energy demand from EV adoption, electrification, AI data center growth and other factors are increasing costs, and we recognize the strain these historic shifts in the energy sector place on customers. ComEd works closely with the Illinois Commerce Commission (ICC) to carefully evaluate proposed Grid Plans and ensure electric delivery costs remain within reasonable limits—so they do not place additional

strain on customers who are already working hard to make ends meet. When we assess how Grid Plans affect affordability for low-income customers, we account for the benefits of the ComEd Low Income Discount program, which took effect in January 2026, to provide an accurate picture. It's also important to note that many customers may receive additional help through other programs not fully reflected in these calculations, including energy efficiency programs, bill assistance programs, and government or community supported resources such as LIHEAP, PIPP, and GiveARay. Together, these programs are designed to help customers manage energy costs today and over the long term. We also prioritize equity by directing at least 40% of grid modernization and clean energy benefits to Equity Investment Eligible Communities (EIEC)—areas with the highest energy burden and climate impacts. Through modernization and customer support programs, we aim to ease financial pressures so families can focus on essentials like food, healthcare, and transportation.

46. **What are ComEd's latest trends regarding customer disconnections for non-payment and costs associated with reconnections?**

Customer disconnections and the associated costs with reconnection are projected to remain consistent with 2025.

Coordination with the City & Electrification Efforts

47. **How is ComEd collaborating with the City and other stakeholders to implement beneficial electrification programs for transportation and buildings?**

ComEd collaborates with the City of Chicago's Green Homes Program to help deliver comprehensive energy efficiency and electrification upgrades to single family income eligible households. ComEd supports the program by cost-sharing on select projects. More information on the Green Homes Chicago program can be found here: https://www.chicago.gov/city/en/depts/doh/provdrs/homeowners/svcs/green-homes-chicago.html. ComEd is supporting efforts to electrify City owned fleets through providing comprehensive make-ready assessments.

Additionally, in 2025, the City of Chicago and its residents benefited significantly from ComEd's EV rebate subprograms and related initiatives supporting transportation electrification. Through the Residential EV Charging and Installation Rebate Sub-Program, Chicago residents received more than 620 rebates for Level 2 home chargers, with approximately more that 70% awarded to Low Income (LI) and Equity Investment Eligible Community (EIEC) customers. Under the Business and Public Sector EV Rebate Sub-Program, more than 650 vehicles were rebated for businesses located in Chicago, along with 36 vehicles for the City of Chicago itself; approximately 90% of these rebates supported LIC/EIEC businesses or those serving LI/EIEC communities. In parallel, ComEd

expanded its EV dealer network and Electric Vehicle Service Provider (EVSP) networks. The dealer network was expanded to 180 participating dealers and OEMs in 2025, including seven located within the City of Chicago, and the EVSP network grew to more than 180 local contractors. Finally, through the Business and Public Sector Make Ready Rebate Sub-Program, more than 800 Level 2 and DC fast charging C&I private and public ports were deployed within the City of Chicago with more than 70% of all rebates paid to those located in or primarily serving LIC/EIEC communities.

Finally, customers could also take advantage of the EV Toolkit which offers an EV charger installation checklist, rate options, a public charging station locator, and a summary of available EV and charger incentives (https://www.comed.com/ev). And the Fleet Electrification Toolkit, a set of tools designed for commercial customers interested in electrifying their fleet of vehicles. The toolkit features a high-level fleet electrification roadmap and allows customers to view light, medium, and heavy-duty electric vehicles that are available now and in development, as well as available level 2 and level 3 chargers in the market, a new fuel cost savings calculator for fleet vehicles was recently added to allow customers to explore cost and carbon savings from electrifying their fleet, and an interactive EV load capacity map, which enables commercial and business sector customers to view estimated EV load capacity at any location and support project siting (http://www.comed.com/evbiz).

ComEd continues to collaborate closely with a broad range of stakeholders including state and local agencies such as the Illinois Environmental Protection Agency (IEPA), the Metropolitan Mayors Caucus (MMC), the Illinois Department of Transportation (IDOT), and the Illinois Finance Authority (IFA), among others. Within the City of Chicago, this collaboration extends to organizations such as the Building Owners and Managers Association of Chicago (BOMA Chicago). ComEd remains an active partner in advancing the City of Chicago's Energy Partnership Framework, supporting initiatives that promote clean energy and sustainability.

ComEd also carried out 6 pilots under BE Plan 1 and the City of Chicago and several Chicago-based organizations were key participants in several of those pilots. More specifically, three Chicago communities on the West and Southeast sides participated in the Air Quality Monitoring pilot administered by a project team consisting of the University of Illinois at Chicago (UIC), the Little Village Environmental Justice Organization (LVEJO), the Southeast Environmental Task Force (SETF), the Alliance of the Southeast (ASE), and the Pilsen Environmental Rights and Reform Organization (PERRO). The Curbside Charging pilot included EIEC communities in both Chicago and Rockford, bringing both EVs and EV charging infrastructure to LI/EIEC communities. Six of the eight pilots concluded in 2025, and their Report Summaries were posted to Innovate.ComEd.com/BEpilots; the remaining two (Curbside and Backup Power Capabilities) received extensions into 2026.

Finally, through its Fleet Electrification Assessments initiative under the Customer Education and Awareness Program, ComEd delivered Fleet Electrification Assessment (FEA) reports to the

Chicago Department of Fleet Management for 8 different sites where the City of Chicago indicated there were plans to add EV charging infrastructure for future electric fleet vehicles. The City of Chicago previously achieved a Bronze Level EV Readiness designation in 2024 through the MMC EV Readiness Program. The eight FEA reports advanced the City to a Gold EV Readiness designation in 2025.

48. **If ComEd is not currently offering utility incentives and assistance for electrification, what are the reasons, and when is the company planning to implement such programs?**

ComEd offers a range of incentives and assistance to support residential electrification. Through ComEd's Home Heating and Cooling Program, residential customers can receive discounts of up to $2,000 on qualifying heat pump installations. ComEd also provides rebates for additional electrification technologies, including heat pump clothes dryers and induction cooktops. More information can be found at: https://www.comed.com/ways-to-save/for-your-home

Through ComEd's Whole Home Electric offering, income-eligible customers can receive air-source heat pumps, heat pump water heaters, induction stoves, heat pump clothes dryers, and weatherization upgrades at no cost to qualifying single-family households and multifamily tenants. In addition, ComEd offers educational resources for customers interested in electrification, including technology information, savings calculators, and available incentives, accessible at https://goelectric.comed.com/. Electric fork trucks are incentivized through the Instant Discounts offering and more information can be found at https://www.comed.com/ways-to-save/for-your-business/incentives/fork-truck-technology-instant-discounts

Additionally, ComEd does currently offer a range of incentives for Residential and C&I customers to support the proliferation of transportation electrification. See response to question number 47 for further details on impact of these initiatives in the 2025 program year. For additional information about these incentives, please visit https://www.comed.com/smart-energy/innovation-technology/electric-vehicles

Federal Funding

49. **How has the dismantling of the Inflation Reduction Act impacted grant opportunities or future investments in ComEd's grid and a transition to sustainable energy sources?**

Overall relative to the Biden Administration, federal grant opportunities have been more limited with a focus on energy infrastructure, energy supply, and grid reliability. The Trump administration has favored deregulation, executive action, and reduced reliance on new

grantmaking, favoring existing formula programs and agency discretion. Under the Biden Administration, federal grants were used to advance policy goals such as infrastructure, clean energy, climate resilience, broadband, and equity.

Current Exelon Position:

- *The federal funding landscape has shifted in recent months, with evolving requirements, timelines, and program reviews. We are taking a case-by-case approach to ensure any opportunity provides certainty and delivers clear value to our customers. This decision is about staying focused on what customers need most right now. Our priority is delivering safe, reliable, and affordable service and making the investments needed to strengthen the grid, improve resiliency, and support growing demand. We consider all grant opportunities on a case-by-case basis, with a focus on prioritizing investments that deliver the greatest impact on reliability, resiliency, and capacity for our customers, and remain open to future funding opportunities through collaborations with state and local partners.*
- *We know customers are frustrated with rising energy costs – we are too. That's why we are taking action to keep customer bills as low as possible through the Exelon Promise, our commitment to putting customers first. Our approach to federal grants and our own investments is designed to ensure that we are exploring opportunities and projects with the greatest potential to bring customer costs under control.*
- *This approach allows for greater flexibility, helps us move faster and invest where it matters most and allows us to manage resources more effectively and prioritize certainty for the projects that have the greatest impact on reliability, resiliency, and capacity across our system.*
- *We are continuing to invest. This approach does not change our commitment to grid modernization or cleaner energy. We are advancing that work through our long-term planning and investment processes, in coordination with regulators.*
- *We remain committed to transparency and partnership. We will continue working closely with regulators to ensure our investments are prudent, aligned with policy goals, and focused on delivering real value for customers.*
- *This is a strategic decision to ensure we can stay focused, flexible, and disciplined in how we invest — with reliability, cost control, and customer impact at the center of every decision.*

Specific to ComEd: Commonwealth Edison is focused on meeting the needs of the customers and communities we serve, guided by our values and long-term vision. With or without these grants, we will continue to lead efforts to improve America's electrical grid and infrastructure—enhancing strength, security, stability, reliability, flexibility, capacity, and demand management.

50. **What programs in federal funding does ComEd rely on?**

Historically through partnerships with federal agencies such as the Department of Energy (DOE), the Department of Commerce, and the National Science Foundation, ComEd has already demonstrated its ability to secure competitive funding and deliver high-impact projects. Between 2017 and 2025, ComEd received nearly $10.4 million in federal grant funding, matched by $9.6 million in cost share, to advance technologies that improve grid performance and serve economically underserved communities.

51. **How do cuts to those programs affect project timeline, interconnection, and customer bills? How will ComEd prioritize projects as funding shrinks and the economy shifts?**

Amid federal funding uncertainties, our purpose is to power a cleaner and brighter future for our customers and communities. Our commitment to delivering safe, reliable, and affordable energy remains steadfast. The Multi-Year Integrated Grid Plan for 2028-2031 is ComEd's plan to provide safe, reliable, affordable, and adequate electric service, while meeting the ambitious goals for an equitable, decarbonized future for our customers.