

Applying a Framework for Addressing Cost-Effectiveness and Distributional Equity in Distributed Energy Resource Investment Decisions

Illinois Work Group Third Meeting

July 24, 2024

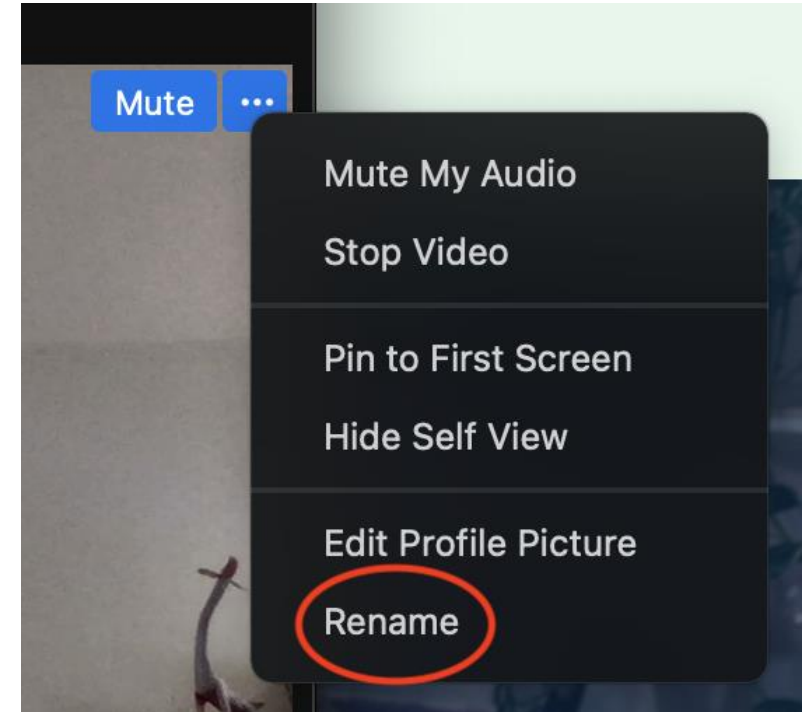
Julie Michals, E4TheFuture

Alice Napoleon and Tim Woolf, Synapse Energy Economics

Greg Ehrendreich and Natalie Newman, Midwest Energy Efficiency Alliance

Housekeeping

- Please add your affiliations and pronouns to your Zoom name.
- Please mute yourself when you are not speaking.
- If you have a comment or question, please raise your hand or use the chat.
- We will be recording the session to share with DEA Work Group members that could not attend this call.



Agenda

1. Introductions
2. Recap: project goals, the role of the DEA Work Group, and DEA
3. Stage 3 of DEA: Identify Priority Populations
 - Existing definitions
 - Options and considerations for priority population definitions
4. Stage 4 of DEA: Preliminary discussion on DEA metrics
 - Potential ComEd Energy Efficiency metrics
 - Potential Ameren Beneficial Electrification metrics
5. Project schedule and next steps

Project Team

Midwest Energy Efficiency Alliance

Liaison and facilitation



Gregory Ehrendreich
Sr. Analyst



Natalie Newman
Sr. Policy Associate

E4TheFuture

Project management



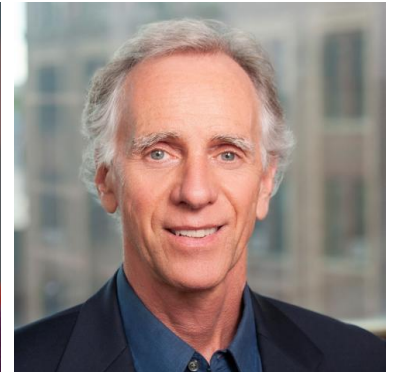
Julie Michals
Director

Synapse Energy Economics

Research and analysis



Alice Napoleon
Principal Associate



Tim Woolf
Senior VP



DEA Work Group – Going Into Meeting 3

First	Last	Organization
Kevin	Dick	389nm
Bev	Bowlby	Ameren Illinois
Peter	Millburg	Ameren Illinois
Agnes	Mrozowski	Ameren Illinois
Brice	Sheriff	Ameren Illinois
Celia	Johnson	Celia Johnson Consulting
Andrew	Weuve	Champaign County Regional Planning Commission
Mary Ellen	Guest	Chicago Historic Bungalow Association
Sarah	Moskowitz	Citizens Utility Board
Kyle	Danko	ComEd
Jim	Fay	ComEd
Molly	Lunn	ComEd
Cassidy	Kraimer	Community Investment Corp (CIC) Chicago
Kenyatta	Parker	Community Investment Corp (CIC) Chicago
MeLena	Hessel	Elevate
Pastor Booker	Vance	Elevate

First	Last	Organization
Quinn	Parker	Encolor Consulting
Chris	Neme	Energy Futures Group (for NRDC)
Fahad	Rashid	EPE Consulting
Cheryl	Watson	Equitable Resilience Sustainability
Selena	Worster Walde	Erthe Energy Solutions
Neil	Curtis	Guidehouse
Mark	Mandolini	Honeywell
Roger	Pavey	Illinois Association of Community Action Agencies
Elizabeth	Horne	Illinois Commerce Commission
Ronaldo	Jenkins	Illinois Commerce Commission
Latifat	Moradeyo	Illinois Commerce Commission
Jennifer	Morris	Illinois Commerce Commission
Jim	Zolnierek	Illinois Commerce Commission
Caty	Lamadrid	Inova Energy Group
Grey	Staples	Mendota Group
Karen	Lusson	National Consumer Law Center

First	Last	Organization
Kari	Ross	Natural Resources Defense Council
Scott	Metzger	Office of the Illinois Attorney General
Susan	Satter	Office of the Illinois Attorney General
Shelby	Smith	Office of the Illinois Attorney General
Hannah	Howard	Opinion Dynamics
Julia	Friedman	Oracle
Christina	Frank	Peoples Gas and North Shore Gas
Kristen	Kalaman	Resource Innovations
Deborah	Dynako	Slipstream
Nikia	Perry	Solutions for Energy Efficient Logistics (SEEL)
Keely	Hughes	The JPI Group
Stephen	Taylor	The Will Group
Boratha	Tan	Vote Solar
Erika	Dominick	Walker-Miller Energy Services
Carla	Walker-Miller	Walker-Miller Energy Services

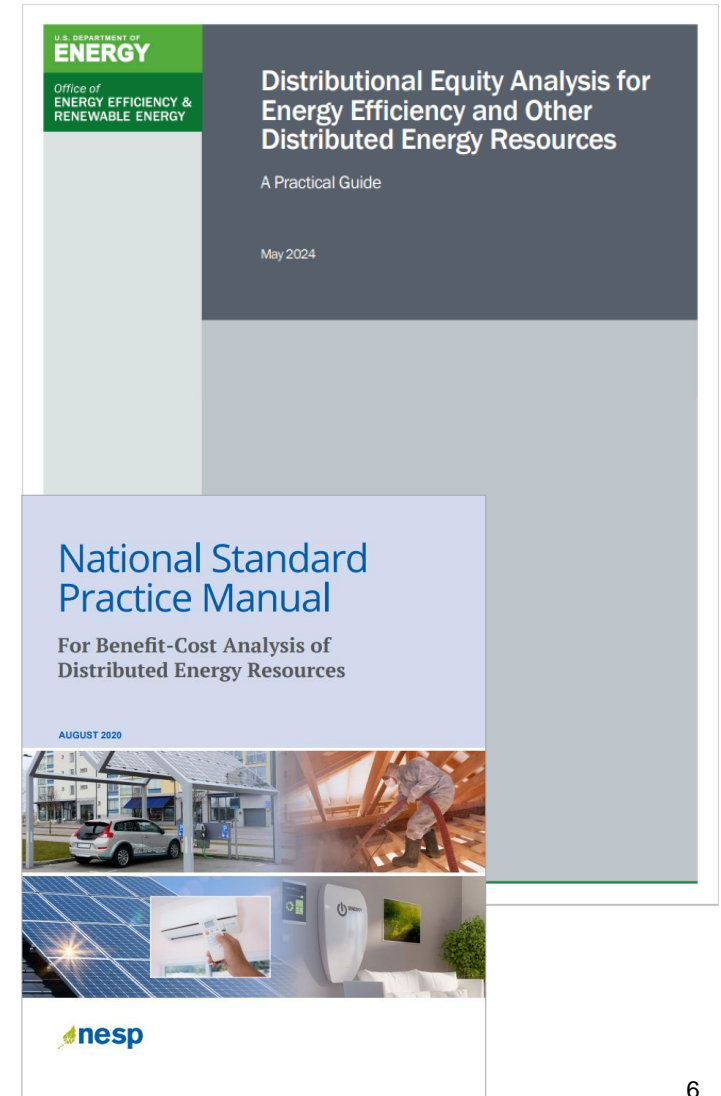
Guiding Resources for the DEA Case Studies

Distributional Equity Analysis for Energy Efficiency and Other Distributed Energy Resources (May 2024)

- Funded by US DOE, through Lawrence Berkeley National Lab (LBNL) and E4TheFuture
- Overseen by an Advisory Committee made up of experts in energy equity and in energy planning.
- Additional information and report available [here](#).

National Standard Practice Manual (NSPM) for DERs

- Benefit Cost Analysis (BCA) guidance being used by states across the country
- With state focus on equity, key questions raised about how BCA addresses equity (or not...)



Reminder: Work Group Role and Meeting Guidelines

- Work Group Role
 - Participate in Work Group meetings – input is critical to project and is encouraged (via chat box, verbal input, follow-up emails, and/or subgroup phone calls)
 - Provide comments on DEA key methodologies, inputs, and assumptions
 - Review and comment on DEA and BCA results and draft/final case studies report
- Agendas and meeting materials will be sent in advance of meetings
- Meeting notes will be shared with Work Group
- Chatham House rule will apply
 - i.e., input shared in our meetings will not be assigned to or associated with any Work Group member or representative outside of the Work Group meetings

All Materials Posted to DEA Case Study Project Website:

DEACaseStudy.org

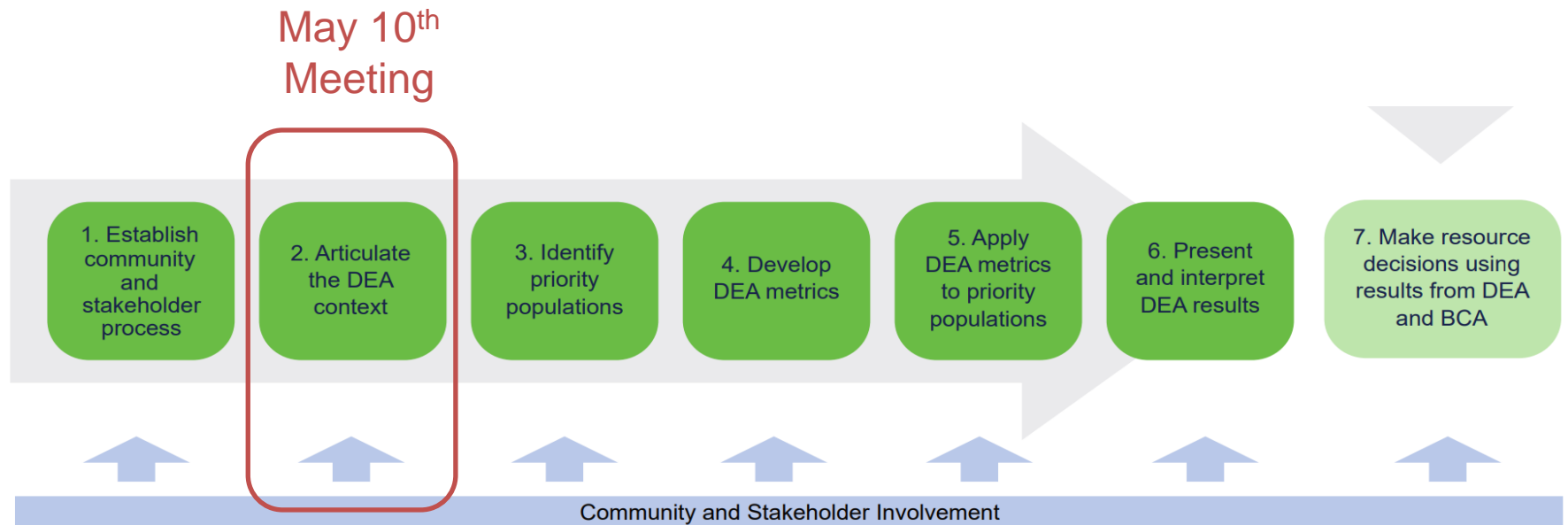
Case Study Objectives

1. Show ICC and stakeholders **how to conduct a DEA** using existing definitions for priority populations and metrics based on statute and utility plans.
2. **Identify gaps and limitations** and options to address gaps going forward.
3. Develop stakeholder understanding on **how to use map-based resources and spatial tools** to visualize DEA metrics for priority populations.
4. Using analysis results, **demonstrate the use of DEA, alongside BCA, to guide decision-making** on DER resource investments that accounts for impacts on priority populations.

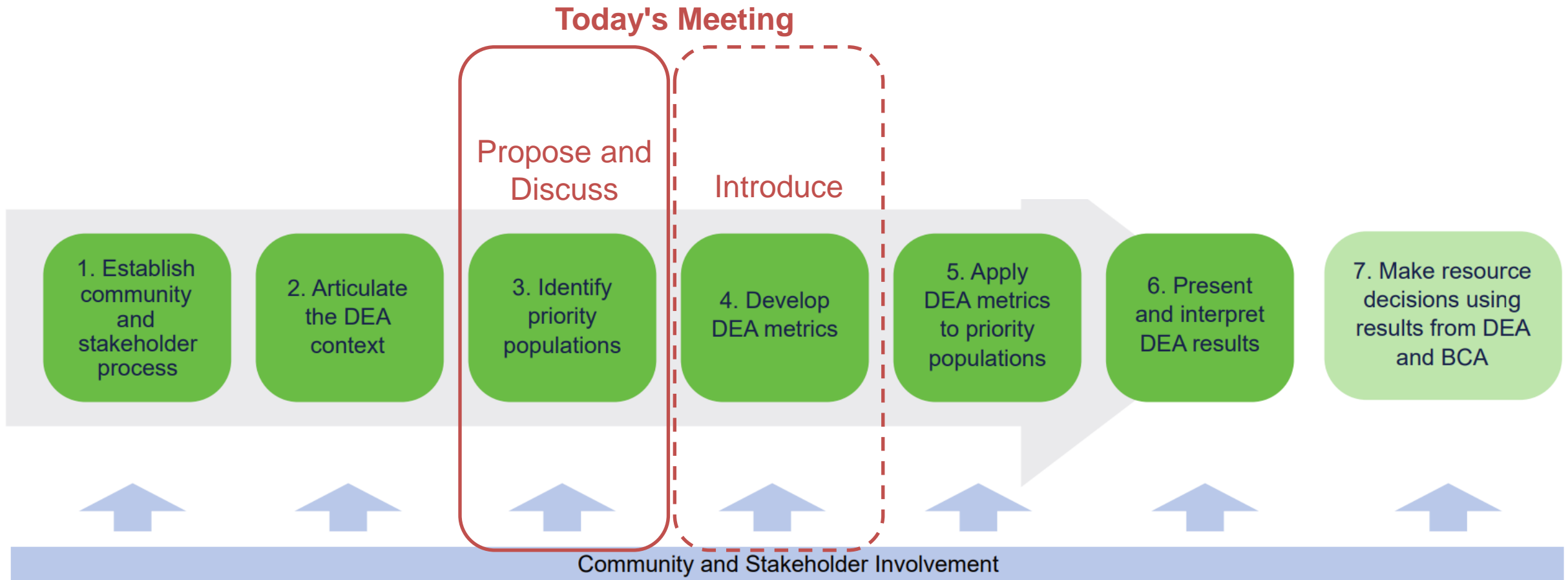
Recap from Work Group Meeting #2

We proposed the contexts for the two DEA case studies.

Proposal	Utility	DER	Detail	Application	Geographic	Timeframe
Case Study #1	ComEd	EE Plan	Full DEA	Portfolio and programs	Urban v. rural	Prospective (2022-2025)
Case Study #2	Ameren	BE Plan	Streamlined DEA	Portfolio	Entire system	Prospective (2026-2028)



DEA Stages – Where we are in the process



Stage 3. Identify Priority Populations

What are Priority Populations?

- **Priority populations** are the set of electric or gas utility customers who warrant additional attention to address equity concerns, consistent with the jurisdiction's energy equity policy and with stakeholder input. These include customers who have borne and continue to bear disproportionate, systemic costs and burdens from energy extraction, generation, transmission, distribution, and consumption (1)

Steps we are taking to identify priority populations

1. Review existing state energy equity goals
2. Review existing state and utility definitions already in use
3. Solicit input from stakeholder representatives
4. Choose priority populations based on the previous steps

(1) Distributional Equity Analysis for Energy Efficiency and Other Distributed Energy Resources, available at https://live-etabiblio.pantheonsite.io/sites/default/files/bto-distributed-equity-analysis-guide_may2024.pdf

Step 1. Review Existing State Energy Equity Goals

- Illinois' energy equity goals as stated in CEJA:
 - **Beneficial Electrification (BE)**
 - Support for EV adoption, especially increased access to EVs and charging in EIEC and LI populations
 - Cost-beneficial plans that are not detrimental to EV-owners, including EIECs and LI customers
 - Emissions reductions, especially in EIEC and LI communities
 - **Energy Efficiency**
 - Budget for energy efficiency measures that target LI households
 - \$40M for ComEd
 - \$13M for Ameren
 - Reporting processes that demonstrate progress towards EE goals and LI participation in EE programs

Step 2: Review Existing State and Utility Definitions Already in Use

- The project team reviewed many reports, plans, pieces of legislation, and testimony to understand the priority population definitions in use in Illinois. Key references are shown below.

Resource	Reference Type
Climate and Equitable Jobs Act (CEJA) (Public Act 102-0662, Sep 15, 2021)	Legislation
Electric Vehicle Act (20 ILCS 627, Nov 16, 2021)	Legislation
Restore, Renew, Reinvest (R3) website	Government grant program
Illinois Solar 4 All program	Government grant program
ILLUME Report on ComEd Disadvantaged Communities Research	3 rd party analysis

Low-income

- CEJA provides the definition of Low-Income.⁽¹⁾
 - Low-income means persons and families whose income does not exceed 80% of area median income, adjusted for family size and revised every 2 years.
 - Low-income community means a census tract where at least half of households are low-income.

(1) 102-0662 § 10-10 (Sep 15, 2021),
<https://epa.illinois.gov/content/dam/soi/en/web/epa/topics/ceja/documents/102-0662.pdf>

Equity Investment Eligible Communities (EIECs)

CEJA provides the definition of EIECs.⁽¹⁾

The Electric Vehicle Act requires utilities' BE plans to invest in EIECs.⁽²⁾

EIECs include Restore, Reinvest, Renew Areas (R3) + Environmental Justice communities (EJC).

a) R3 Areas

- Established by the 2019 IL Cannabis Regulation and Tax Act, communities that have been historically harmed by violence, excessive incarceration, and economic disinvestment ⁽¹⁾
- Identified by gun injury hospitalization rates, unemployment rates, child poverty rates, commitments to/returns from Illinois Department of Corrections, identified by the Illinois Dept. of Commerce and Economic Opportunity as a Disadvantaged Community ⁽³⁾

b) EJCs

- Defined by the Illinois Power Agency Act
- Block groups that have experienced “disproportionate burdens of pollution,” excluding racial and ethnic indicators ⁽⁴⁾

(1) 102-0662 § 10-10 (Sep 2021), <https://epa.illinois.gov/content/dam/soi/en/web/epa/topics/ceja/documents/102-0662.pdf>

(2) 20 ILCS 627/ (Nov 2021), <https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=3348&ChapterID=5>

(3) <https://r3.illinois.gov/>

(4) <https://www.ilga.gov/legislation/102/SB/PDF/10200SB2408lv.pdf>





Priority Populations – Geographic Data

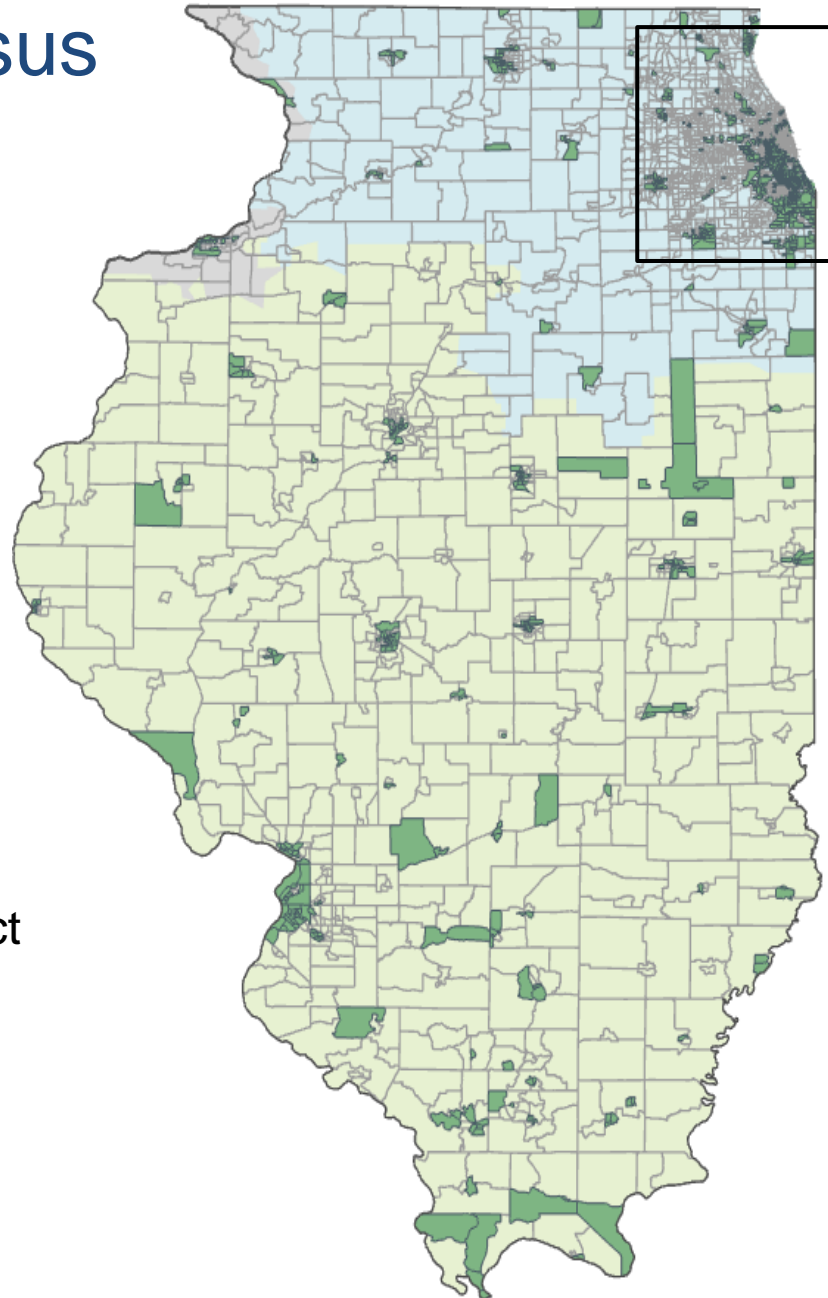
The following maps show how these definitions and available data are applied to each utility, how they overlap, and pros and cons of different approaches to identifying priority population for the case studies:

- ComEd's EE plan focuses on benefits to Low-Income customers (consistent with CEJA).
- Ameren's BE plan focuses on benefits to EIEC and Low-Income customers (consistent with Electric Vehicles Act).

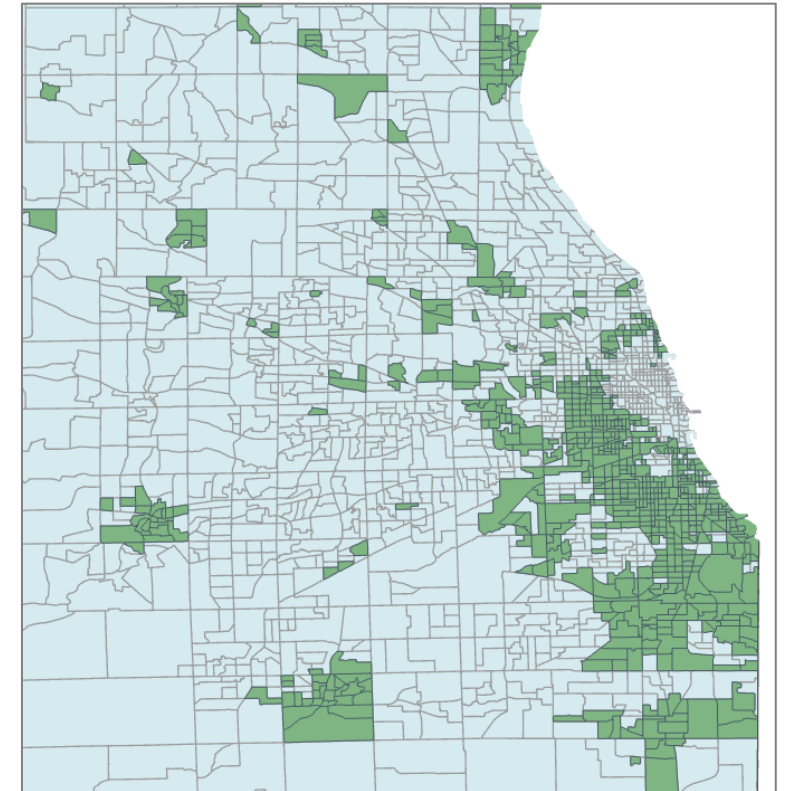
Low-income census tracts in IL

This map shows the distribution of census tracts that are designated as low-income across Illinois. Utilities are required to dedicate EE benefits to LI customers, including these communities.

-  Low-income census tract
-  ComEd territory
-  Ameren territory
-  Census tract boundary







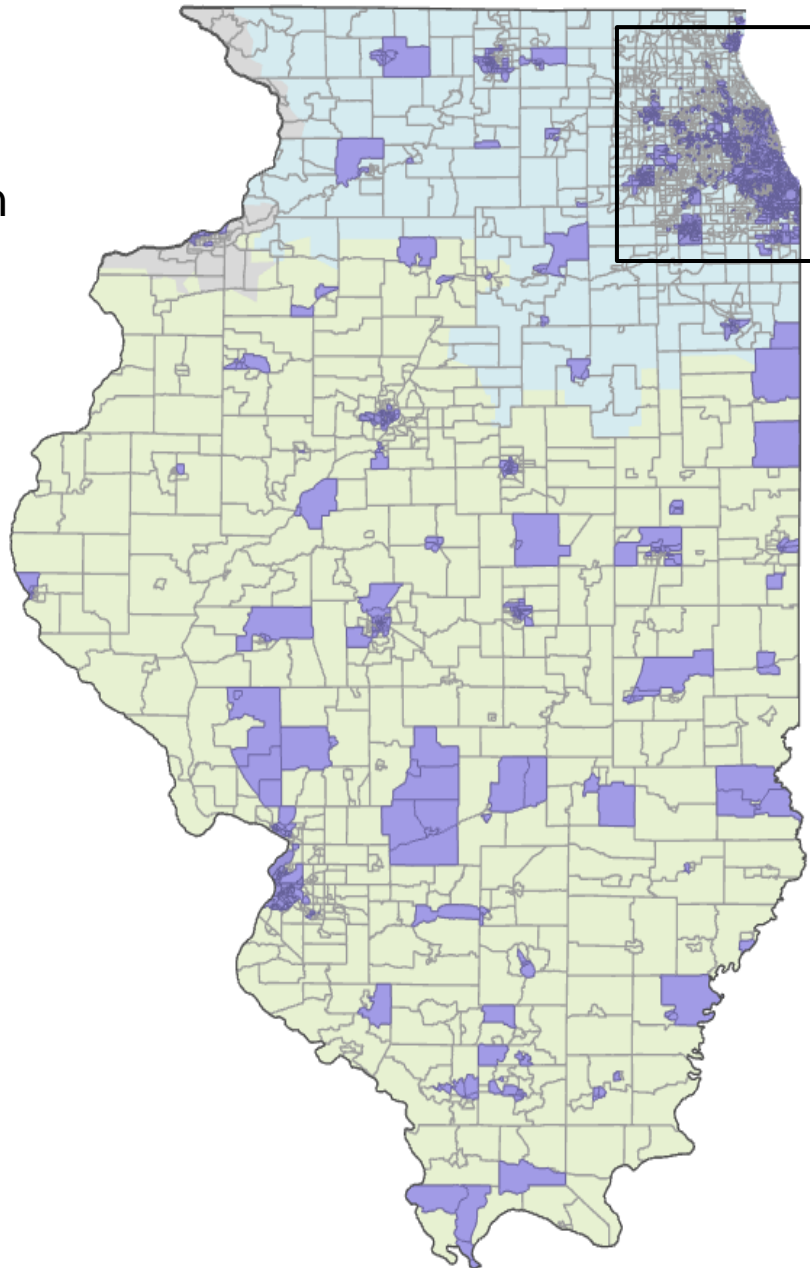
Chicago area



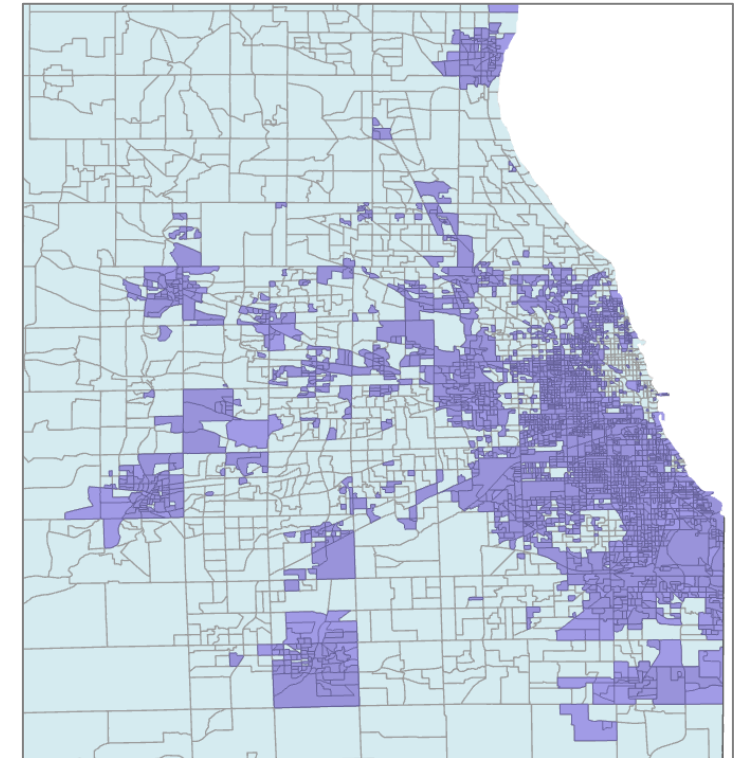
EIECs in IL

This map shows the distribution of communities that are designated as EIEC across Illinois. Utilities are required to dedicate BE benefits to EIEC customers. Tracts in the green area to the South are the populations of focus in Ameren’s BE plan.

-  EIEC (R3 + EJC)
-  ComEd territory
-  Ameren territory
-  Census tract boundary



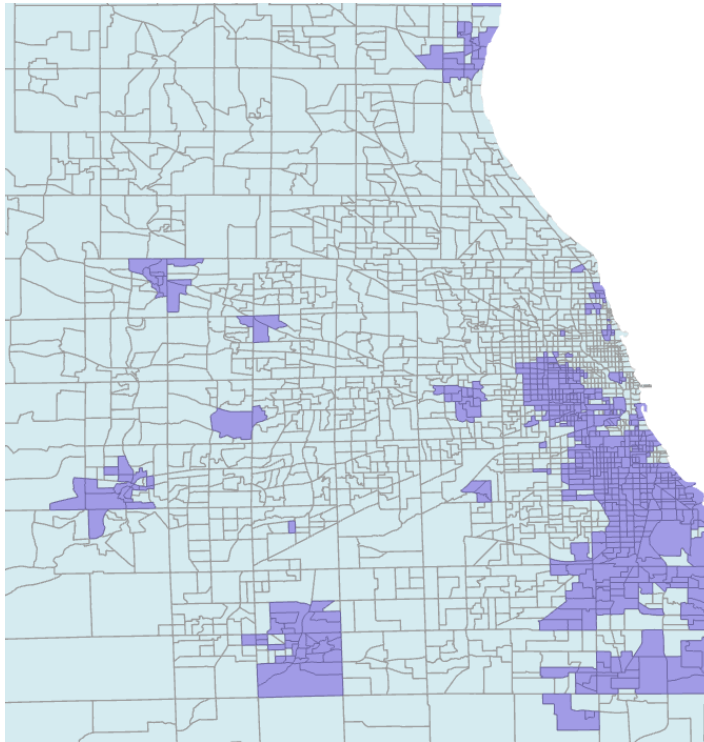
Chicago area



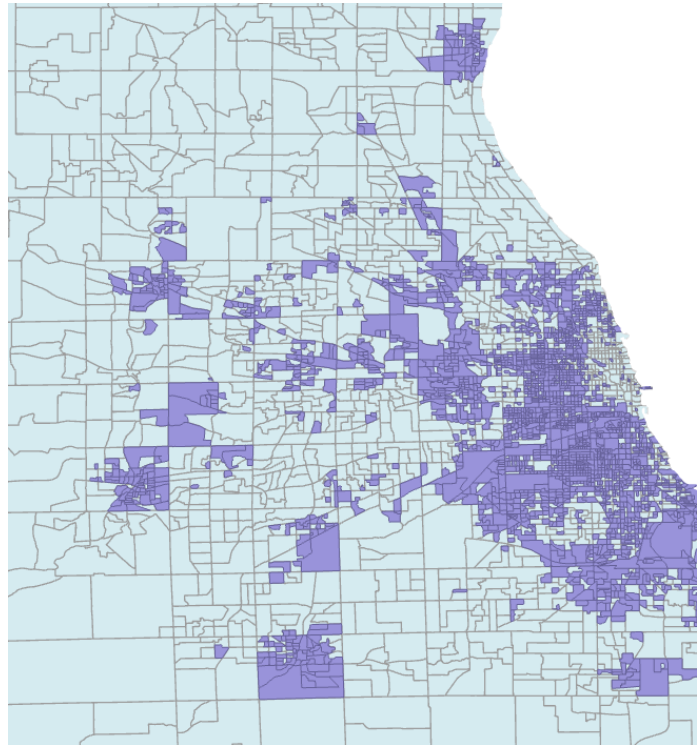
EIECs in Chicago area

- ComEd territory
- EIEC (R3, EJC)
- Census tract boundary

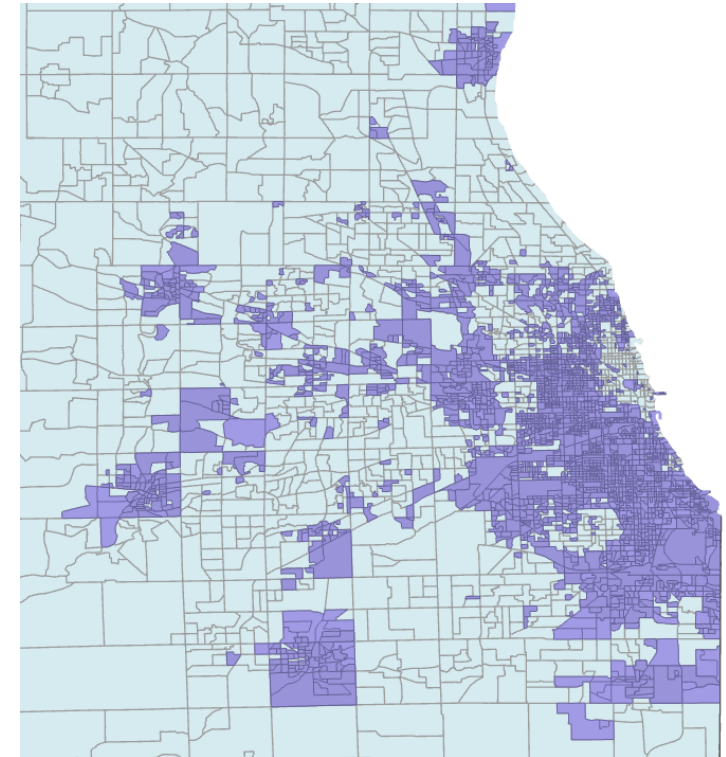
R3 Areas



EJ Areas



EIECs (EJC + R3)







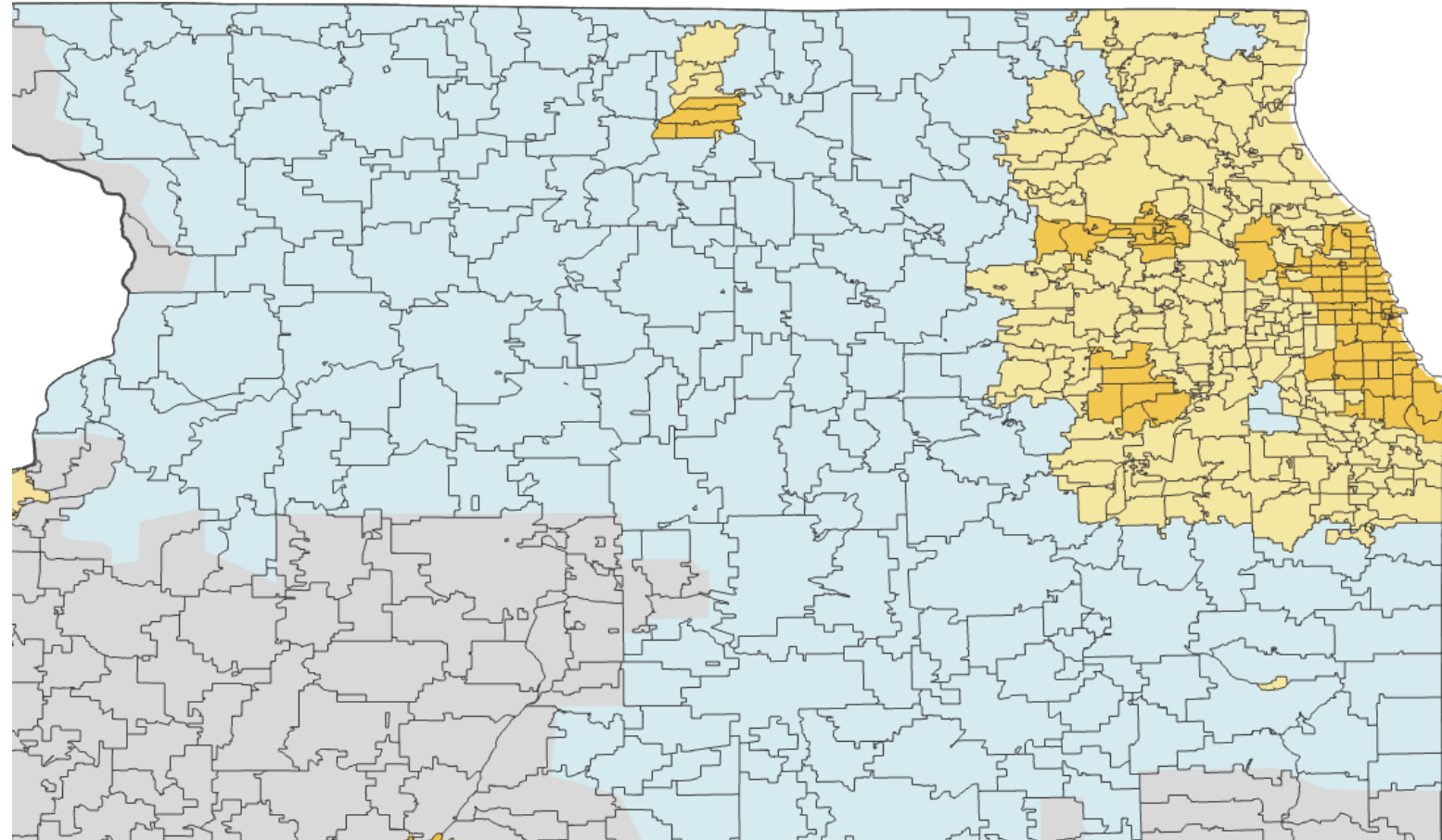
Chicago has a high density of EIEC communities. Many communities are designated as both EJC and R3, as seen in the maps above. These EIECs are the focus of the utilities' BE plans.

Urban Areas in ComEd territory, by zip code

The ComEd EE DEA will distinguish between benefits to urban and rural priority populations.

Greater Chicago is defined as “urban” and “suburban” while the rest of the ComEd’s territory is mostly rural.

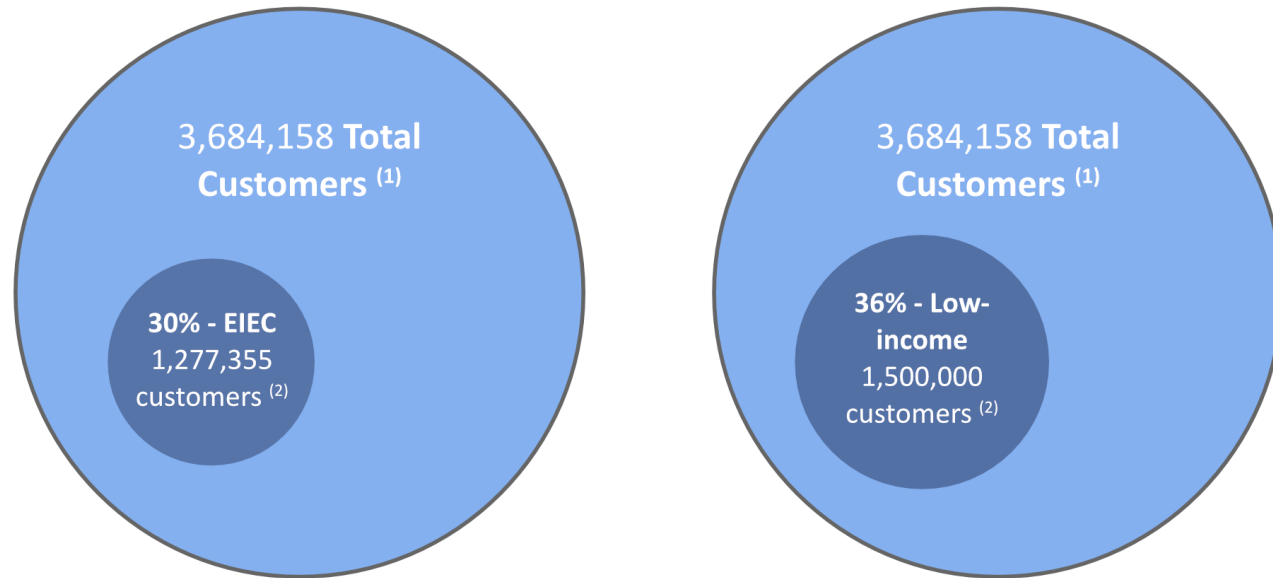
-  Urban areas
-  Suburban areas
-  ComEd territory
-  Zip code boundary



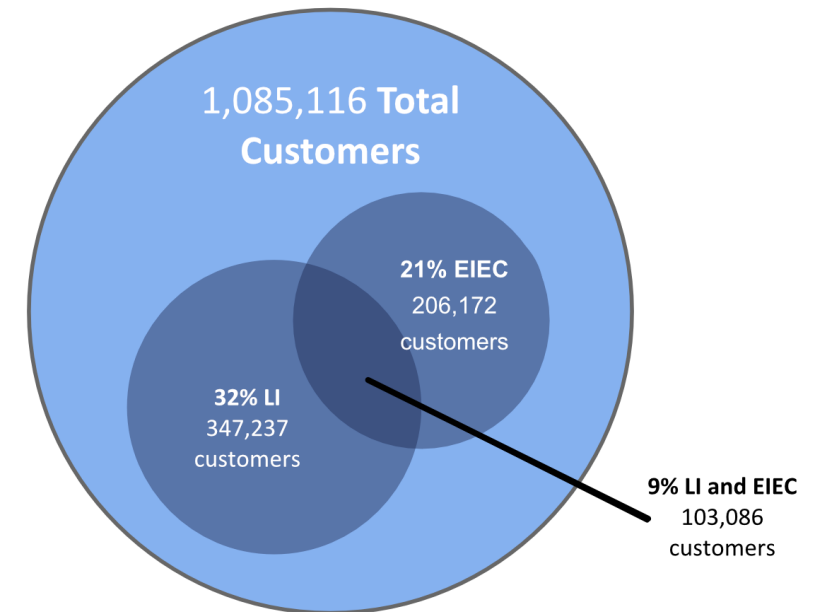
Source: National Center for Education Statistics. ZCTA Locale Classifications.
<https://nces.ed.gov/programs/edge/Geographic/ZCTAAssignments>

Ameren and ComEd Customer Breakdown

ComEd



Ameren



(1) Pg 7. Available at <https://icc.illinois.gov/api/web-management/documents/downloads/public/Low%20Income%20Discount%20Rates/ComEd%20Low%20Income%20Rate%20Study%20Reply%20Comments%20to%20Staff%20FINAL.pdf>

(2) 2023 Source: Illume ComEd Disadvantaged Communities Study Report <https://illumeadvising.com/files/ComEd-Disadvantaged-Communities-DAC-Study-Report.pdf>, pg 26

Source: Ameren's Multi-year Integrated Grid Plan (2023), <https://icc.illinois.gov/downloads/public/edocket/607904.PDF>

Priority Populations – How should we define?

Since BE and EE plans define priority populations differently (EIECs and LI for BE and LI only for EE), we must determine whether to use a combined definition or different definition for the two DEAs.

- **Approach 1:** Different definitions
 - Each DEA analysis would use a unique definition for priority population, as defined by CEJA and the Electric Vehicle Act.

Proposal	Utility	DER	Priority Population
Case Study #1	ComEd	EE Plan	LI
Case Study #2	Ameren	BE Plan	EIEC and LI

Priority Populations – How should we define? (cont.)

Approach 2: Combined definition

- Both DEAs would use a combined priority population of EIECs and LI customers.

Proposal	Utility	DER	Priority Population
Case Study #1	ComEd	EE Plan	EIEC and LI
Case Study #2	Ameren	BE Plan	EIEC and LI

Pros and cons and recommendation are addressed on the next slides.

Considerations for choosing priority population definition

Issue	Consideration
Policy directive	Which definition will best serve Illinois equity policy goals?
Resolution of available data	<p>How do utilities break out metric data in their plans? For example, is participation reported for specific programs by EIEC or LI community, by zip code, or both?</p> <p>If metrics data is only available at the zip code level, then the demographic data at the census tract level must be aggregated up to the zip codes. This significantly reduces the resolution of the results, leading to potential uncertainties and inaccuracies.</p>
Ease of comparison of DEA case studies	Will DEA results be comparable to one another?
Level of effort required of utilities and project team	What is the relative amount of effort for using the approach for the utilities and for the project team?


Considerations for Defining Priority Populations

Green indicates a “pro”, red indicates a “con” and gray indicates “neutral”

Issue	Approach 1: Different definitions	Approach 2: Combined definition
Description	<ul style="list-style-type: none"> EIEC and/or LI for Ameren’s BE LI for ComEd’s EE 	EIEC and/or LI for both DEAs
Policy Directive	ComEd’s EE results will not cover EIEC	Includes a more comprehensive set of customers
Resolution of available data	Data are available for these populations. May require some allocation of impacts, introducing a modest amount of uncertainty	Data not available by EIECs only for ComEd’s EE plan. Would require significant allocation of impacts and data, introducing potentially significant amount of uncertainty
Ease of comparison of DEA case studies	Not easy to compare	Easy to compare
Level of effort required of utility partners/study team	Would require a medium amount of effort	Would require a larger amount of effort by either the project team or utility to identify ComEd’s participants that are EIEC

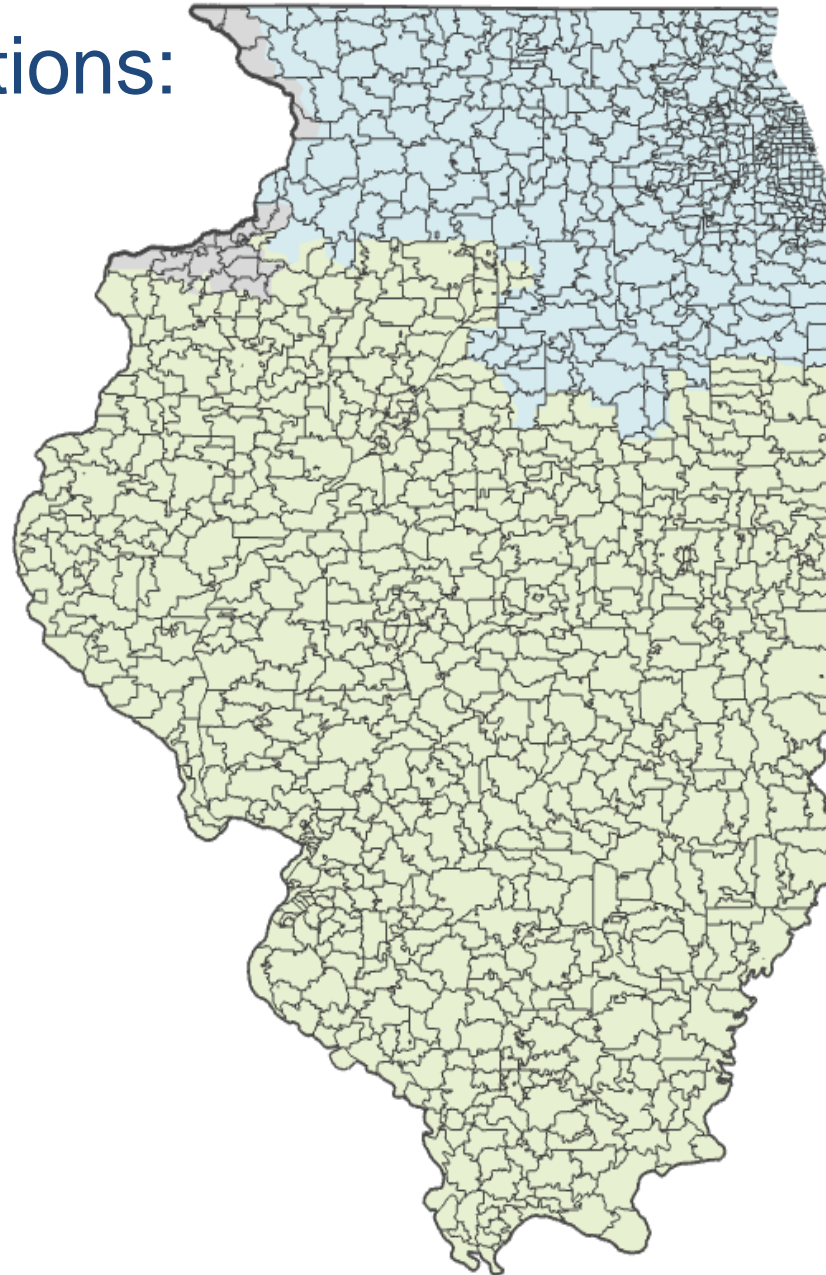
Data allocation considerations: zip code data

- Some utility and customer data is tracked by zip code.

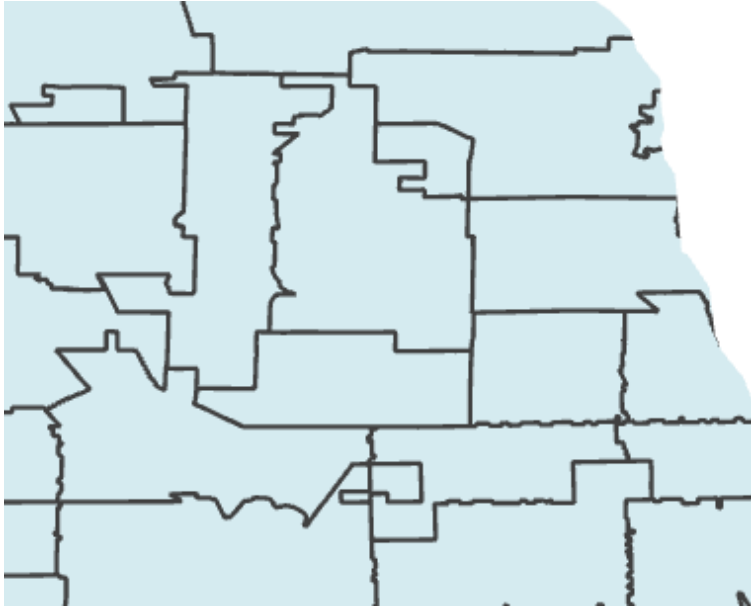
 ComEd territory

 Ameren territory

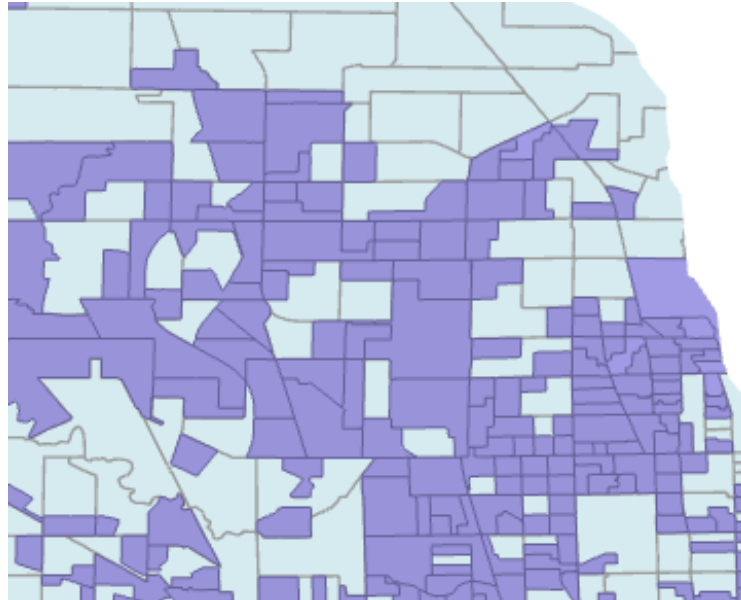
 Zip code boundary



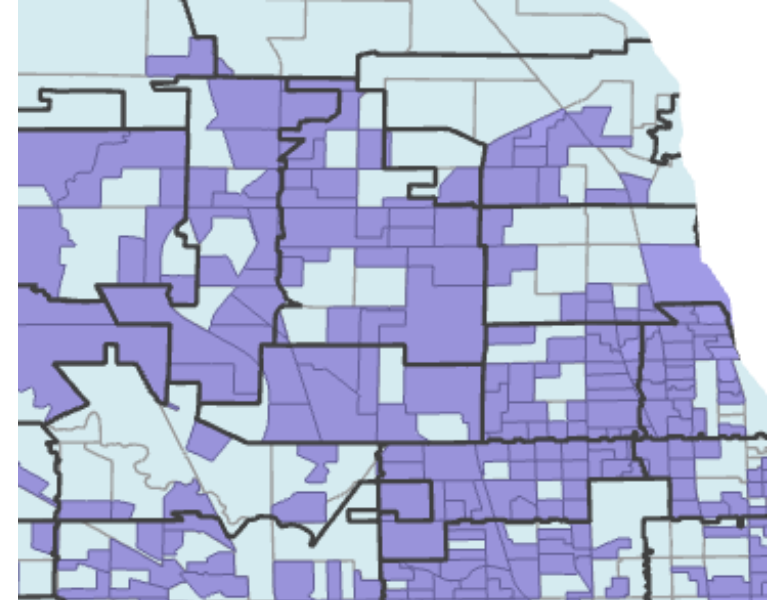
Data allocation considerations: zip code data



Utilities tend to track data by zip code



EIECs are identified by census tracts or block groups



Allocating utility data (at the zip code level) to EIECs (at the census tract level), or vice versa, creates uncertainty

-  EIEC (R3 + EJC)
-  ComEd territory
-  Census tract boundary
-  Zip code boundary

Recommended Approach for Priority Populations: Approach 1

Based on our research and discussions with stakeholders, we propose using the priority populations as defined in statute (Approach 1) as opposed to a combined definition.

Proposal	Utility	DER	Priority Population
Case Study #1	ComEd	EE Plan	LI
Case Study #2	Ameren	BE Plan	EIEC and LI

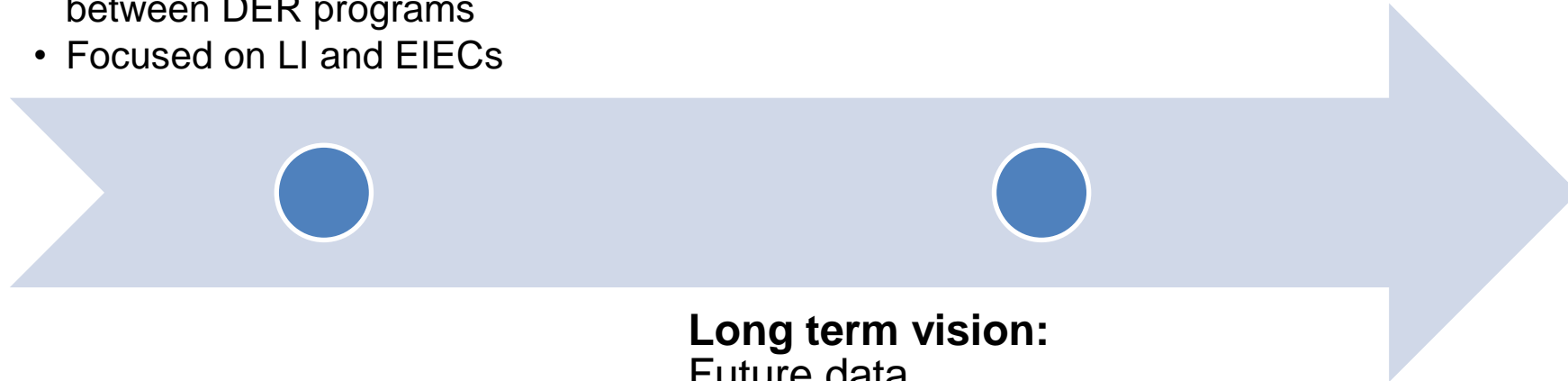
Ideally, going forward there would be a consistent definition for priority populations between EE and BE plans and consideration for other populations, e.g., moderate income (see next slide)

Defining Priority Populations

Current status:

Existing data

- Shaped by current requirements
- Inconsistent data collection between DER programs
- Focused on LI and EIECs



With Work Group input, our report will include recommendations for changes to data collection to support other priority population definitions.

Long term vision:

Future data

- Shaped by broad equity considerations
- Organized, consistent data collection between DER programs
- Could include other characteristics (e.g. moderate income, BIPOC)

Discussion

**Please share clarifying questions and comments in chat box.
For example:**

1. Does our recommended approach align with your priorities and interests?
2. Do you have any concerns with using our recommended approach?

POLL #1

Do you support our recommended approach for defining priority populations? (Yes, No, Unsure)

Stage 4. Develop Distribution Equity Analysis Metrics

Overview of DEA Metrics

- “**DEA metric**” is one of the metrics used to determine if costs and benefits of a utility program or investment are equitably distributed between priority populations and other customers.
- The choice of DEA metrics determines which aspects of equity will be assessed in the DEA.

DEA Categories	Subcategory	Example DEA Metrics
Access	Participation for the DER being evaluated	Participants as percent of eligible customers
Economy	Utility dollars invested	Utility funds invested in businesses and contractors located in priority populations
Affordability	Change in rates	Percent change in rates
	Change in bills	Percent change in bills
Public Health	Health impacts	Change in rates of emissions, avoided emissions
Shutoffs	Shutoffs	Change in number of shutoffs or frequency of shutoffs
Reliability and resilience	Outages	Change in number and duration of outages on the utility system
		Change in number and duration of outages at the customer level

Resources Reviewed for Metrics/Data Availability

The project team reviewed many plans and reports to assess available utility data that can be used to develop metrics. Key resources are listed below.

	Resource	Resource Type
Commonwealth Edison	<ul style="list-style-type: none"> • 2018-2021 Energy Efficiency and Demand Response Plan • 2022-2025 Energy Efficiency and Demand Response Plan • Quarterly Reports (2022-2024) • Cost effectiveness reports (2020-2024) • Total Resource Cost Test Reports (2020-2024) • Impact Evaluation Reports (2023-2024) • Multi-Year Integrated Grid Plan • Bill impacts reports (2018-2020) • 2020 Multi-Year Performance Metrics 	Utility plans and reports
Ameren Illinois Company	<ul style="list-style-type: none"> • 2023-2025 Beneficial Electrification Plan (Plan #1) • Beneficial Electrification 2024 Annual Report • 2026-2028 Beneficial Electrification Plan (Plan #2) • Multi-Year Integrated Grid Plan • 2022 Ameren performance metrics 	Utility plans and reports
Stakeholder Advisory Group	<ul style="list-style-type: none"> • Large Group SAG meeting presentation and minutes • Small group meetings on equity 	Stakeholder feedback
ILLUME	Report on ComEd Disadvantaged Communities Research	3 rd party analysis

Considerations for Choosing DEA Metrics

Issue	Considerations
Distributional	Does the metric focus on distributional equity impacts, i.e., whether some customers are receiving greater benefits than others for the required costs?
Discrete	Does the metric overlap with BCA metrics or other DEA metrics?
Tied to equity goals	Does the metric reflect or address one or more of the jurisdictional equity goals?
DER impact (causation)	Will the DER being considered have an impact on the metric?
Data availability	Is the relevant metric data available or can it be obtained within the study period?
Data resolution	Is the data at a level that is detailed enough to provide sufficient resolution?

Metrics Already in Use in Utility Plans

- EE Plans
 - Program participation (all customers)
 - Energy Savings (MWh) (all customers)
 - Utility dollars invested/spending (\$) (all customers)

- BE Plans
 - Participation (all customers and EIEC)
 - Utility dollars invested/spending (all customers and EIEC)
 - Emissions reduced(all customers and EIEC)

- Multi-Year Grid Plans (not a comprehensive list) ⁽¹⁾
 - Aggregate disconnections in top zip codes
 - Emission reductions
 - Job and workforce

⁽¹⁾ <https://icc.illinois.gov/downloads/public/edocket/576451.PDF>

Potential Metrics for ComEd EE DEA

Data availability, prioritizing, and future metrics to consider

Issue	Rate & Bill Impacts	Participation	Air Emissions	Shutoffs
Distributional	✓	✓	potentially	✓
Discrete	✓	✓	✓	✓
Tied to equity goals	✓	✓	✓	✓
DER impact (causation)	✓	✓	potentially	challenging
Data availability	✓	✓	challenging	✓
Data resolution – all customers	✓	✓	challenging	✓
Data resolution for priority population (LI)	✓	✓	challenging	✓

Other metrics lack available data and DER impact (causation) and thus are not displayed here.

Potential Metrics for Ameren BE DEA

Data availability, prioritizing and future metrics to consider

Issue	Rate & Bill Impacts	Participation	Air Emissions	Shutoffs
Distributional	✓	✓	✓	✓
Discrete	✓	✓	✓	✓
Tied to equity goals	✓	✓	✓	✓
DER impact (causation)	✓	✓	potentially	challenging
Data availability	✓	✓	challenging	✓
Data resolution – all customers	✓	✓	challenging	✓
Data resolution – priority population (EIEC and LI)	✓	✓	challenging	✓

Other metrics lack available data and DER impact (causation) and thus are not displayed here.

Discussion

**Please share clarifying questions and comments in chat box.
For example:**

1. What metrics are highest priority to you?
2. Do you have questions about the metrics discussed by the consulting team?
3. Do you have concerns about data gaps for these potential metrics? Where there might be data gaps, are there other sources of info we could use?
4. Are there any metrics you would like to add to the list? Are you aware of data sources that we can use to analyze those metrics?

Project Schedule and Next Steps

Estimated Project Schedule and Work Group Meetings

Work Group Meeting	Approximate Date
#1 - Introduction to process, relevant policies	March 6, 2024
#2 – Proposed Case Studies & DEA Context	May 10, 2024
#3 – Priority Populations and DEA Metrics	July 24, 2024
#4 – Metrics Revisited & Benchmarks	Sept 2024
#5 – Review Results	Dec 2024
#6 - Decision-making & Draft Report	Jan 2025

Next Steps

- Questions to address regarding DEA metrics:
 - Which metrics can we analyze using available data and data provided by our utility partners?
 - What metrics may be harder to develop but are of high interest to stakeholders that the Project Team should investigate further?
- Please reach out to team with any questions/comments following this meeting (see next slide)
 - Project Coordination: Julie Michals at jmichals@e4thefuture.org
 - Lead Work Group contact: Greg Ehrendreich at gehrendreich@mwalliance.org

Thank you!

Contact Information



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MEEA

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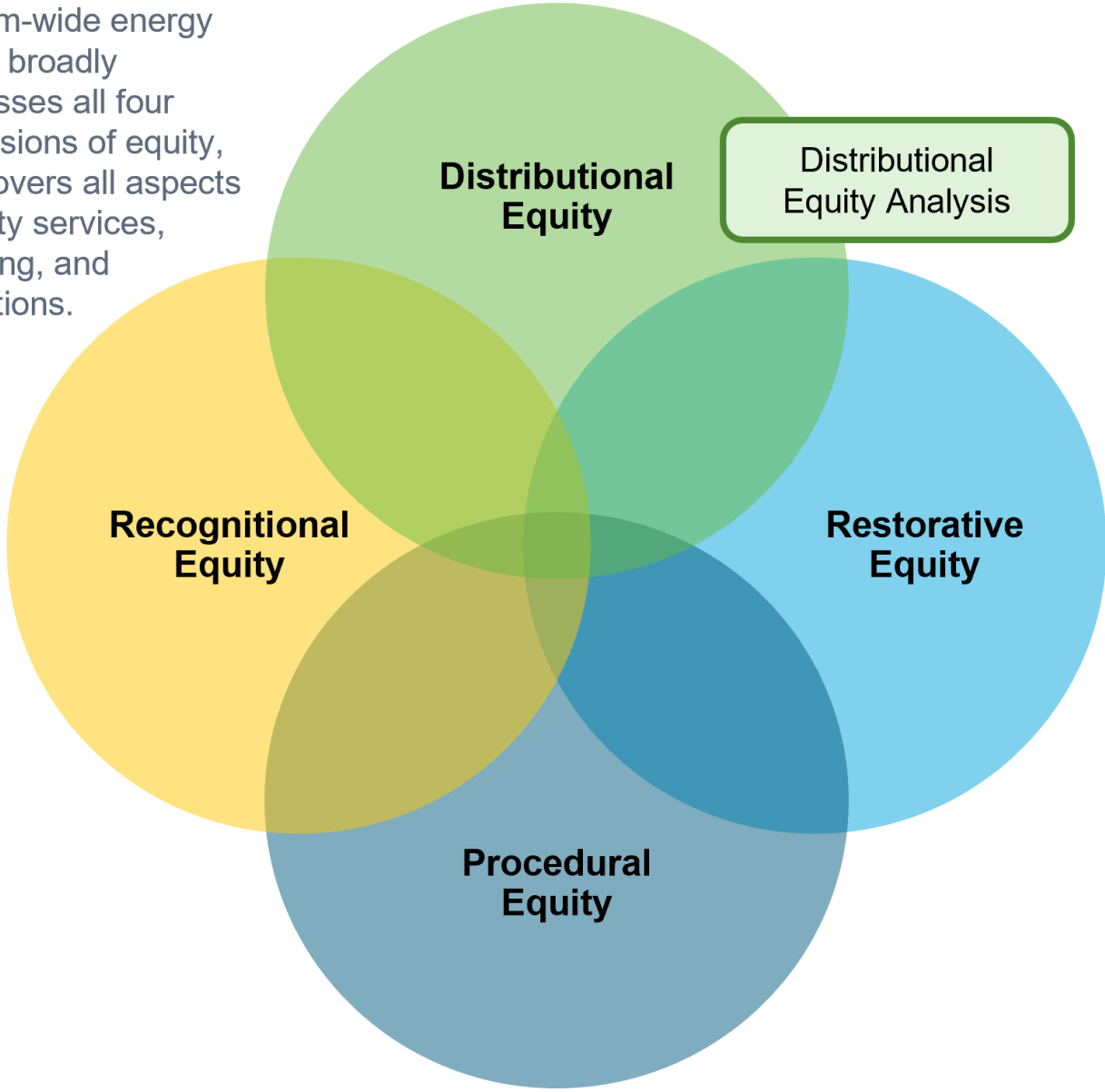
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Check out [NESP Events](#) for NSPM and BCA webinars

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Background Slides

System-wide energy equity broadly addresses all four dimensions of equity, and covers all aspects of utility services, planning, and operations.



Distributional Equity Analysis

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Benefit Cost Analysis

DEA and BCA address one aspect of distributional equity:

What are the distributional equity impacts of utility resource investments?

Eligibility Verification for ComEd's EE Programs

- Low-income customers (income-qualified)
 - Income-qualified multifamily customers – income below 80% of Area Median Income – can verify eligibility through:
 - Showing participation in an affordable housing program or weatherization assistance program
 - Submittal of a Rent Roll documentation or tenant information showing income
 - Located in a Low-Income Census tract
 - Demonstrate participation in disaster relief program or local/community-based assistance programs
 - Income-qualified single family customers - income below 80% of Area Median Income – can verify eligibility through
 - Showing participation in a weatherization assistance program, energy assistance program (such as Low Income Home Energy Assistance Program (LIHEAP) or the Percentage of Income Payment Plan (PIPP), other income eligible programs like the Supplemental Nutrition Program (SNAP),
 - Being located in a census tract identified as low-income (using the U.S. Department of Housing and Urban Development (HUD) annually published “qualified census tracts”)
 - Self-certification process





Eligibility Verification for Ameren's BE Programs

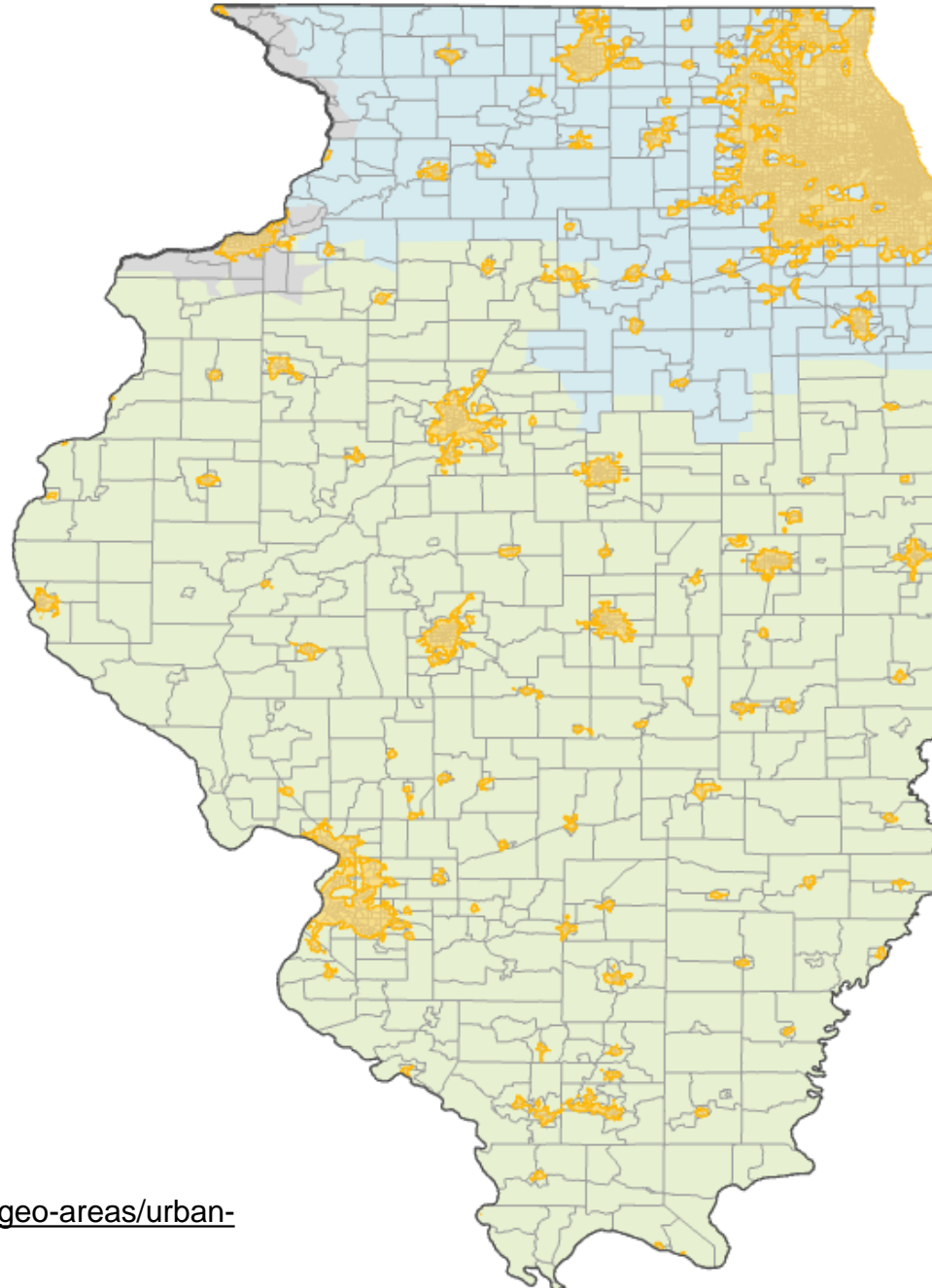
- Eligible BE program participants are those located in:
 - an Environmental Justice Community
 - Restore, Reinvest, Renew (R3) Community
 - Low-income community

- Eligible BE program participants are also individual customers who:
 - Lives in an EJC, R3, or LI community
 - Is low-income, meaning:
 - A member of a household at or below 80% of the latest median household income as reported by the United States Census Bureau for the most applicable community or county;
 - A member of a household at or below 150% of the federal poverty level;
 - A person who is eligible for the Illinois Low Income Home Energy Assistance Program (LIHEAP) as defined in the Energy Assistance Act;
 - A person who is eligible to participate in the Percentage of Income Payment Plan (PIPP or PIP Plan) as defined in the Energy Assistance Act; or
 - A person who is eligible to receive Lifeline service as defined in the Universal Service Telephone Service Protection Law of 1985.

Source: <https://www.icc.illinois.gov/docket/P2024-0494/documents/352385/files/616708.pdf>

Urban Areas in IL

-  Urban areas
-  ComEd territory
-  Ameren territory
-  Census tract boundary



Source: U.S. Census Bureau. 2020 Census Urban Areas.
<https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural.html>