

Industrial Decarbonization Research

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Executive Summary

This report outlines key findings and recommendations following a series of in-depth interviews conducted with large industrial customers, service providers, consulting engineers, and equipment manufacturers on the topic of industrial decarbonization and energy efficiency within ComEd territory.

Unlike regions with strict carbon-reporting regulations, such as California and New York, Northern Illinois has little organic plant-level demand for decarbonization. Momentum for corporate sustainability has noticeably cooled in the face of inflation and shifting federal priorities. Today, proactive decarbonization is driven almost exclusively by top-down mandates from foreign parent companies or intense "Scope 3" pressure from massive supply-chain partners. Rather than pursuing transformational capital projects, facilities are using a patchwork strategy to meet these mandates, implementing basic, tried-and-true efficiency measures (like LED lighting and VFDs) and purchasing carbon offsets or Renewable Energy Credits (RECs) to fill the gap.

Industrial facilities face competing internal priorities that can stall decarbonization projects. Corporate ESG teams push for greenhouse gas reductions, but these goals collide with facility maintenance teams that actively resist new technologies out of a fear of production downtime and corporate procurement and finance teams, who strictly enforce two- to three-year payback periods on all capital expenditures. This friction is compounded by a skilled-worker deficit; decades of corporate downsizing have left plants without the internal "energy champions" required to analyze data, oversee contractors, or execute deep retrofits. Furthermore, broader transformational efforts, such as full facility electrification, are actively resisted by plant managers due to perceived local grid capacity constraints and a fundamental fear of power outages disrupting their operations.

Service providers and engineers see massive, untapped opportunities in the market, particularly regarding heat recovery solutions. However, capturing waste heat often uses more electricity and less of another fuel, which some service providers view as potentially being in conflict with ComEd incentive programs that reward kWh savings.

Energy data tracking is largely unsophisticated. Facilities rely on retroactive monthly utility bills and often lack the staff or sensors required for real-time monitoring, which may cause newly installed, high-efficiency equipment to operate sub-optimally.

When it comes to ComEd's role in supporting the industrial sector, the market views ComEd's generous incentives as a catalyst that allows projects to clear strict corporate ROI thresholds. However, service providers are deeply frustrated by heavy administrative burdens and tedious, shifting measurement and verification (M&V) processes that delay projects.

To maximize the program's potential, the market desires a digitized, streamlined application portal similar to the one utilized by ComEd's Small Business Program. Furthermore, stakeholders believe ComEd can accelerate market transformation by offering joint-utility fuel-switching incentives for heat recovery, funding internal staffing grants to solve the skilled worker deficit and shifting marketing messaging to focus on operational resiliency rather than environmental benefits.

Key Findings

- **Decarbonization Demand is Down:** Without mandates, environmental goals are only driven by supply-chain pressure and foreign corporate directives.

Respondents observed that momentum behind corporate "decarbonization" has noticeably tapered off in the industrial sector compared to where it was a few years ago. Once a boardroom trend and stockholder concern, Environmental, Social, and Governance (ESG) mandates and calls for decarbonization have cooled off, especially in light of shifting federal priorities.

Because Illinois lacks the strict carbon reporting regulations seen in states like California or New York, organic demand for decarbonization at the plant level is virtually non-existent.

The only facilities actively pursuing carbon reductions are those required to do so by foreign-based parent companies or by massive customers in the supply chain. Pharmaceutical and beauty brands are more likely to have requirements related to decarbonization and sustainability given their focus on health and wellness. While some companies in the food and beverage category noted their customers ask about sustainability practices, those inquiries appear to be more curiosity than requirement for the time being.

Though the demand for decarbonization solutions in the large industrial space has declined recently, service providers noted demand is still strong in the institutional segment, particularly among education and healthcare clients.

In respondents' own words:

"In states that have the reporting requirements, [decarbonization] is more talked about. States that don't have the reporting requirements [like Illinois], it's not words they like using. During Biden's administration, it was a lot more people talking about the word decarbonization. Then since it changed, it's shifted away again." – **Service Provider**

"There are probably few boardrooms where 'sustainability' is even on the [agenda]. And then the stock market, of course, is not, like, asking for it anymore either. What was the term? ESG? Yeah. What is that, right?" – **Service Provider**

"Our corporate owners have objectives regarding sustainability. And our customers, particularly some of the Japanese [brands] and some U.S.[brands], have programs that incentivize us to work on those efforts as well." – **Customer, Chemicals**

"[Focus on sustainability] is driven from the European side. That's how we are. We're global. [Our global headquarters are] based here, but a lot of our management and our leadership is overseas. We have a specific [Environmental Health & Safety] branch of our company that is based out of Europe, and they come up with a lot of things like 'landfill-free.'" – **Customer, Chemicals**

"Our customers prioritize what they want to as working partners with them. You'll have the [major skincare brands] of the world that say, 'Hey, you know, these are for our green products.' So that's driving our internal goals and global KPIs [around sustainability]." – **Customer, Chemicals**

"In most cases, [customers ask about decarbonization and efficiency] because their clients require it. For instance, their clients are all the big pharma companies. And all the big pharma companies are knocking them on the head and saying, 'hey, what are you doing in terms of emissions reductions.' Walmart, of course, has done the same thing [in asking their suppliers about emissions reductions]." – **Service Provider**

"We have large multinationals, like [food brands] out of Europe, and those guys are definitely more concerned about it, so they ask about it, but they don't require it."

– **Customer, Food & Beverage**

- An Internal "Tug-of-War" of Competing Priorities: Decarbonization projects stall out due to perceived threats to productivity and strict financial payback guidelines.

Proposed energy projects must survive a gauntlet of conflicting departmental success metrics. While corporate sustainability teams at large industrial organizations aim for greenhouse gas reductions, facility and maintenance teams may view new, high-efficiency technologies as a threat to equipment reliability, production uptime, or operational costs. Procurement and finance teams operate in a different silo where their priority is achieving a two- to three-year project payback period. If a decarbonization or energy efficiency project cannot prove it will pay for itself in three years, or it appears it will disrupt the assembly line, it is not likely to move forward.

In respondents' own words:

"Usually the energy or sustainability lead from a corporate standpoint does [ask about decarbonization]. Most of the people that we work with are going to be plant managers, maintenance managers, and their goal is to keep the plant running, not necessarily save on energy. So there is a tug-of-war that happens between usually corporate and local plants." – **Service Provider**

"I am not dealing with the coat and tie crowd in the maintenance shop. No. Nobody's had that conversation [about decarbonization]. In the engineering boardroom? Maybe. If you're at GE, yes. If you're at, you know, Buck and Rita's slaughterhouse? No." –

Service Provider

"I don't put it [tons of carbon eliminated] in my reports. I don't put it in my reports because it's more likely to raise a red flag with the customer than a green flag. And the reason is they're looking at that as, like, 'Oh, you can't save me money.'" –

Service Provider

"A lot of manufacturing companies have procurement handle the energy procurement. Their objective is to look at dollars and cents. And they set up contracts, and they pay the bills. And the facility has no incentive or does not have functions which are responsible to look at how much energy is being used." –

"[Our challenges are] mainly trying to not impact production when we're working on some of this stuff that took a little bit of logistics to just make sure that they were able to access the machines and equipment. While, you know, not shutting the line down to stop production. That's kind of the main goal." –

"They're trying to be more sustainable and more predictable from the manufacturing line, which is our bottom line. That's how we make money, and that's what my team is here to support. We have good days, we have bad days. It's a never-ending struggle to get predictability." –

- **Frankenstein Strategies Toward Decarbonization:** Facilities meet mandates by patching together basic efficiency improvements and purchasing carbon offsets to fill the gap.

Because corporate finance teams strictly enforce three-year payback rules, facilities cannot afford deep, transformational decarbonization solutions, such as electrification or on-site renewable energy generation. Proposed renewable energy projects are further hampered by physical plant limitations and the expiration of federal tax incentives.

Service providers and customers both stated that large capital overhauls are no longer in favor. Instead, facilities are implementing minor upgrades to increase efficiency of old equipment.

They implement basic, tried-and-true energy efficiency solutions, like LEDs, variable frequency drives (VFDs), compressed air leak repairs, and reduction of temperature and pressure set points.

To bridge the gap between these upgrades and their massive corporate carbon mandates, facilities simply buy their way to compliance using Renewable Energy Credits (RECs) and carbon offsets.

In respondents' own words:

"In the grand scheme of things it was really easy stuff for us to do, and they were calling them quick wins. Just setting limits on tower fans instead of letting them run up to 60 hertz. Most of the wins that we've had are trying to either lower or raise set points against what is absolutely needed or required." – **Customer, Food & Beverage**

"We took care of the low-hanging fruit first. You know, the stuff that was easy, projects that could reap huge rewards like the reduction of pressure set points on the air compressors, automating the light controls. [Then] we purchase the credits to be a 100% renewable energy source." – **Customer, Chemicals**

"We get being asked to do projects, but if they don't have a payback period of, you know, less than 3 years, they don't get the green light. So then we do have to purchase credits, and that's one of the things that come from our customers, or we end up buying carbon offsets." – **Customer, Chemicals**

"[We're seeing] a lot of auxiliary equipment things. It's a lot more just improving part load efficiency of a majority of systems. and fewer major large capital fixes and changes. More just how do you tack on controls, or an improvement, or a minor upgrade? In the past five or six years, huge investments and capital upgrades have not been favorable." – **Service Provider**

"We had a company come in and do a solar presentation to us on using an empty lot here we have for a large solar system... Yeah, just the... the feasibility and the payback wasn't there on the solar." – **Customer, Chemicals**

"You used to be talking about solar panels, which, it's just no longer interesting unless you're in California with the demise of the federal tax credits for solar. It just does not pan out anymore." – **Service Provider**

- **Skilled Worker Deficit:** Without internal "energy champions," facilities lack the bandwidth to identify deeper savings opportunities, monitor data, or execute projects.

Decades of corporate downsizing have reduced industrial maintenance departments, forcing the remaining staff to operate in a purely reactive state just to keep the assembly lines running. Because everyone is tied to a daily production function, facilities lack personnel who can step back and see the "big picture."

Even when plants possess smart meters or advanced control systems, they often sit on mountains of data they never look at because they simply do not have the staff to process it. Without a dedicated "energy champion" to monitor the data, identify the opportunities, and oversee the contractors, energy efficiency is typically ignored until a machine physically breaks down.

In respondents' own words:

"Companies everywhere are just reducing headcount across the board. You have maintenance departments that used to be turnkey that could fabricate everything and keep this place running but they are now down to three guys. Even though I am driving 90% of the coordination and the effort, I still need 10% of boots-on-the-ground help to take contractors in." – **Service Provider**

"We've been also collecting a lot more data than we are able to process. We amass a lot of information, but we don't put it to our own use. Internally, we're a very small team of engineers that are on our payroll. I have a select small group of vendors, consultants to do my work audit or assessment [because we lack internal bandwidth.]" – **Customer, Plastics & Rubber Products**

"We call that person a champion, an energy champion, and it's a huge plus. The best thing is having one person who says, 'we're doing it,' and people are dragging their feet and pissed off, but they're gonna do it, it's their job. So an energy champion or someone just says, 'you're doing it,' is the best." – **Service Provider**

*"People have jobs to do, and they do their jobs, and they have fewer people who can take a broader view and say, 'you know, while we're doing this, we can improve because we're using so much energy.' So, there are fewer of those people around, which is almost always what gives utilities the ability to say, 'we've got a service provider who could help you.'" – **Service Provider***

"When I'm going to the customer, I'm requesting a system owner. And whenever I have a system owner, we have tremendous success. This is a key, key item you need an owner [of a system or process.] If they don't care, nothing happens." – **Service Provider**

- Managing in the Rearview: Customers rely on retroactive billing, and even when real-time data is available, they lack the bandwidth to act on it.

Industrial customers are largely unsophisticated when it comes to tracking energy, typically relying on 30-day-old utility bills rather than real-time management.

While some forward-thinking facility managers express a strong desire for cloud-based or AI-driven monitoring, translating that desire into action is a massive hurdle. First, some industrial customers resist ongoing software subscription fees to access equipment data. Second, and more importantly, facilities often suffer from "data fatigue." Because maintenance teams are so short-staffed, handing them a dashboard of real-time data without the personnel to interpret it is viewed as a burden, not a benefit.

As a result, system changes are made without completely understanding the effects on energy use. Energy savings quietly evaporate shortly after the ComEd rebate check is cashed.

In respondents' own words:

"Right now, we're only going by monthly billing. Getting that real-time data is what I really want to get into and do some cloud-based AI [because right now] we have no baseline to track." – **Customer, Chemicals**

"We've been also collecting a lot more data than we are able to process. We amass a lot of information, but we don't put it to our own use. Ideally, you want someone to be telling you real-time or near real-time because a month later, it's too late. You may have lost time, you may have lost money." – **Customer, Plastics & Rubber Products**

"I've had some customers who are like, 'Well, we're not gonna use it. Like, we collect data for a million things, and we don't use it, so I don't need to collect more data.'" – **Service Provider**

"And everything [with "smart" compressor systems] has a fee associated with it. When you get into smaller customers they just want to pay for it [once], and they just want it to work, and they don't want to have to pay a monthly fee or whatever in order to access the [energy] information." – **Service Provider**

"Once that check is cut, there's no incentive anymore to make that system work. All of a sudden, that system can deteriorate in terms of its efficiency. And as a result of that, ComEd has no idea [whether efficiencies remain.]" – **Service Provider**

- Heat Recovery Hurdles: High capital costs and kWh-centric incentives block a significant, largely untapped decarbonization opportunity.

Several service providers cite that one of the most valuable decarbonization opportunities for the industrial sector are heat recovery measures that capture waste heat from ovens, stacks, and chillers to heat make-up air or sanitation water .

While some advanced facilities are already successfully capturing and applying their waste heat, it remains a massively untapped opportunity across the broader market for two reasons. First, capturing and redirecting heat is highly investment-intensive, requiring custom piping and equipment. Second, moving that heat requires installing electric pumps and compressors. Because ComEd's incentives traditionally reward absolute kWh reduction, facilities that increase their electricity usage to eliminate their natural gas usage are effectively penalized, which could stall decarbonization projects.

In respondents' own words:

"Yep, we do heat recovery, because our units are all water-cooled. We'll use that heat from the towers to heat during the winter. We can do better, and there's always projects in my back pocket, if the CapEx is available to do that." – **Customer, Chemicals**

"A lot of heat recovery-related projects come up, and heat recovery is more often than not investment intensive. Because you've got to put in equipment to capture a waste stream and then redirect it back to where they could use it." – **Service Provider**

"The one thing that I've heard and seen that does make sense 100% of the time is heat recovery. In particular, high-temperature heat recovery. What I've seen is there are companies that have, like, an oven. It just goes straight out at whatever high temperature, straight out the stack. And yet they heat their facilities with fresh natural gas." – **Service Provider**

"Their [ComEd's] incentives focus on reducing electricity usage. So in the case of heat recovery, we are actually going to be increasing electricity usage. So the only incentives that I can think of that are available would be through the gas utility. I don't think ComEd provides any kind of incentive for reducing [gas]." – **Service Provider**

- The Technology Gap: The perception that electric alternatives cannot yet compete with natural gas on operational cost or process performance.

While corporate ESG teams may consider whether it is feasible to switch from fossil fuel-based processes to electrified ones, plant managers and engineers note that for heavy industrial processes like massive ovens, boilers, and thermal oxidizers, the electrical alternatives are either too expensive to operate or physically do not exist at the scale they need. Because natural gas is so cheap compared to electricity in the Midwest, fuel-switching is viewed as a financial nonstarter that actively hurts the facility's bottom line.

In respondents' own words:

"As an industrial, manufacturing [facility]... There are no technologies that are very applicable to the type of processes that we do, that would be cost-effective... I consulted at DOE, I consulted folks in the national labs that do research. There was no mature technology that could fit what we do." – **Customer, Plastics & Rubber Products**

"General impression for me is those systems [are] less expensive to run on natural gas than they would be on electricity... if somebody could show me that it's more efficient. Somehow, to switch that to electric. That'd be something definitely that we'd consider." – **Customer, Chemicals**

"[When asked if they would switch their natural gas steel-coating ovens to electric] You know, I don't think we've looked at that. It would have to be a pretty sizable oven." – **Customer, Plastics & Rubber Products**

"If changing fuel type, it could end up being a more expensive operational measure to go electric. [The customer] has to understand if the emissions are worth this much to us, even though it's not money in our pocket from reducing it. Some will still pass on that if it's not literally a cost saving." – **Service Provider**

- Infrastructure Roadblocks: Grid reliability concerns and perceived capacity constraints could make full facility electrification an operational risk.

While corporate reporting requirements occasionally prompt facilities to investigate electrification, plant managers face two massive roadblocks.

First, three of the six customers we spoke to mentioned challenges with frequent power outages or voltage drops affecting their operations and causing damage to equipment. Though they did not say so explicitly, there is an undercurrent of a perceived lack of trust in the grid's reliability and ability to handle a shift away from fossil fuel-based systems to electrified solutions.

Second, even when facilities do enter the investigation phase for electrification, they often discover their internal electrical panels and the local utility grid lack the capacity to handle the massive new load. The steep up-front cost of upgrading electrical service presents a financial hurdle to these transformational projects, which, again, could be put under the desired three-year payback microscope.

In respondents' own words:

"We're having too many power outages. We're having too many blips. We're having too many things that create a lot of downtime for us and damage our equipment. The sun can be shining, it's nice and bright outside, and we lose power." – Customer, Chemicals

"The process of extrusion is not easy. And you never want to stop dead in the water. When we get our power cut off, it's always a problem for us." – Customer, Food & Beverage

"Well, this is a huge ask, but we do have a lot of power outages out here, and I think they know it. Weather is one thing, and then when it gets hot. I know that's not a realistic expectation, [but] can you have us have fewer power outages?" – Customer, Food & Beverage

"[Are customers interested in electrification?] Definitely. At least in the investigation phase, to find or quantify what's available. One of the hurdles is they don't have the service and the electric equipment. So, the sunk cost is upgrading that part of it. That's probably some place where some more tools or education to help people find out: What do they have, and what will they need? Where if we have a customer, and they're in an area where [the grid is] constrained, we can tell them, 'Here's some projects, but these aren't feasible [because the grid is constrained].'" – Service Provider

"We could use some easy access tool from ComEd to help find out if there is additional electricity supply available in a local grid where, you know, some of the customers are considering, pretty transformative projects, and they need to be able to find out, 'Well, can I actually get that?' Having easier access to areas that are favorable for that would help. probably like a just a GIS map or something like that, would help to show at least zones or regions where it's ample and other areas where it's not." – Service Provider

- Double-Edged Sword: ComEd's incentives drive the market, but heavy administrative burdens create project bottlenecks for service providers.

ComEd's Industrial Systems Program is very positively regarded by service providers and customers. The incentives serve as the critical mechanism that enables projects to clear strict corporate ROI thresholds, and they actively motivate contractors to pitch energy efficiency in Illinois over neighboring states.

However, the trade-off for these payouts is a heavy administrative burden. Service providers express frustration over a tedious application process, shifting calculation requirements, and lengthy M&V audits. While the financial rewards keep providers deeply engaged in the program, the volume of paperwork delays project timelines and, in some cases, causes overwhelmed contractors to put new efficiency projects on the back burner.

In respondents' own words:

"I think their program is very good, it's just arduous. Other utility programs don't have 17 steps to get paid. It's like, fill out an application, submit it, they look at the after-data, and they pay you. Here [with ComEd] we have 17 things. It's just super confusing." –

Service Provider

"An audit that I might sell in Wisconsin for \$10,000, I'm getting \$30,000 for it in Illinois. The payday is what makes it worth it. [But] to be honest, it's a pain in the tuchus. Yeah. It slows everything down." – **Service Provider**

"It is a very nice-looking cents per kilowatt hour offering. Even my president was impressed by the size of it. [But] out of all of the incentive programs that I've looked into, ComEd's is the most confusing. They have different programs for different things. I think not only does that confuse us, it confuses the customer." – **Service Provider**

"I could get 13 things to bid and get done for these other customers, or I could fill out all this [ComEd] paperwork. And so that one's just sitting there. That's a year delay, because I don't want to do the paperwork." – **Service Provider**

"I completed my final measurement and verification before Christmas, and we're still going back and forth about how much did it actually save, you know? Back and forth, back and forth, back and forth. So there's 60 days that were delayed on that one." –

Service Provider

"I finish my report in four to six weeks, my usual timeline. I send it in, it bounces back, we talk about it a few times, they want me to make updates. We send it in, and four months later, the customer got their report. My frustration I have is rework. They bounce back stuff, 'You guys are using VIN analysis, we want linear regression,' all this other stuff. It's like, if that's what you really want. Give us the spreadsheet. I'll fill out the spreadsheet." – **Service Provider**

- The Silver Lining: When projects successfully clear the hurdles, the financial and operational rewards are significant.

While the industrial market is bogged down by strict CapEx limits, skilled worker deficits, and administrative hurdles, the data proves that when energy efficiency projects cross the finish line, the results are worthwhile.

Customers who successfully leverage ComEd's programs are not just saving a few kilowatt-hours; they are offsetting entire months' worth of utility bills and uncovering opportunities that yield cross-fuel savings.

Furthermore, the operational side benefits often eclipse the energy savings. Customers report that upgrading to high-efficiency equipment actively improves product quality and reduces maintenance downtime that previously plagued their facilities.

In respondents' own words:

"They estimate that we've saved about \$180,000 this year on energy [bills]. We're halfway through the year. If we extrapolate that and say that's \$360,000, that's probably two months' worth of ComEd bills for the entire year [we've saved]." –

Customer, Food & Beverage

"When we improved the air compressor systems, our downtime went drastically down from what we used to have. We used to have a lot of downtime because of air compressor problems. With most of the new compressors that seems to have gone away. There are benefits to all these improvements other than the cost savings. They reduce downtime [which sends] more products out the door." –

Customer, Plastics & Rubber Products

"Well, there's a lot of benefits, too. switching over to LEDs other than the cost savings. We have more lighting over the quality control stations now, where they can do a better job inspecting parts." –

Customer, Plastics & Rubber Products

"For a [Food & Beverage customer] it actually was supposed to be just focused on electricity reduction, but we found also incredible amounts of gas usage reduction too. I encouraged ComEd to team up with the corresponding gas utility to provide incentives for both. It was just a golden opportunity, and they got an incredible amount of incentives from both companies." –

Service Provider

"25% [average savings on compressed air] is probably a fair number. [For one of our clients] we came in with that number. But at the end of the day, we got them 70% savings, but there was really, obviously, a lot of things wrong." –

Service Provider

Recommendations

Finding: Decarbonization Demand is Down: Without mandates, environmental goals are only driven by supply-chain pressure and foreign corporate directives.

Recommendation: Target the “Scope 3” Supply Chain. ComEd should proactively identify industrial customers in its territory who act as suppliers to massive global brands. Because these customers are facing intense “Scope 3” pressure from their buyers, they are highly motivated to act. ComEd can position its incentive programs as a financial tool to help these suppliers keep their lucrative vendor contracts by reducing the cost of improvements that cut emissions and electricity use.

Finding: An Internal “Tug-of-War” of Competing Priorities: Decarbonization projects stall out due to perceived threats to productivity and strict financial payback guidelines.

Recommendation: Equip trade allies with tailored key messages segmented by decision-maker group. Because different industrial departments evaluate success using unique metrics, ComEd must help service providers tailor their pitches. Provide proposal templates that simultaneously speak to the needs of three factions by highlighting GHG reduction to appease the ESG team, estimating figures related to reduced downtime to appease facility and maintenance teams, and applying ComEd incentive dollars to ROI calculations so it achieves (or comes close to achieving) three-year payback to appease procurement and finance. Another option may be for ComEd to offer on-bill financing for industrial projects.

Finding: A Frankenstein Strategy Toward Decarbonization: Facilities meet mandates by patching together basic efficiency improvements and purchasing carbon offsets to fill the gap.

Recommendation: Consider “deep retrofit” incentive multipliers.

To encourage facilities to keep from cherry-picking low-hanging fruit and abandoning deeper energy savings opportunities, ComEd should consider offering tiered bundling bonuses. For example, if a customer commits to combining a basic efficiency measure like VFDs with a deeper, more complex decarbonization measure like heat recovery or partial electrification, ComEd could increase the total incentive payout, mathematically bridging the gap between quick wins and transformational decarbonization projects. Another option may be to offer assistance in building a five-year efficiency and decarbonization roadmap for a site to optimize their savings and incentive opportunities.

Finding: Skilled Worker Deficit: Without internal “energy champions,” facilities lack the bandwidth to identify deeper savings opportunities, monitor data, or execute projects.

Recommendation: Resurrect “staffing grants” to fund energy champions who act as internal project managers. To solve the skilled worker deficit, ComEd could directly subsidize the human capital required to get projects over the finish line. Staffing grants could pay a facility to hire a dedicated project manager for 12 to 18 months. If ComEd funds the person to navigate the paperwork and contractors, the facility will execute the projects. Another option could be to provide energy management training and resources for staff making decisions and controlling equipment at industrial facilities.

Finding: Managing in the Rearview: Customers rely on retroactive billing, and even when real-time data is available, they lack the bandwidth to act on it.

Recommendation: Generate meaningful energy usage insights for customers and train them on how to interpret them. Using already-available meter data, automatically generate energy insights that are readily available to plant personnel. These reports could highlight changes to energy use based on weather and production and help to identify when increases in energy use may be due to factors within the control of the site.

Finding: Heat Recovery Hurdles: High capital costs and kWh-centric incentives block a significant, largely untapped decarbonization opportunity.

Recommendation: Create a joint-utility “fuel-switching” incentive. Partner with local gas utilities (NICOR, People's Gas) to create a formal, joint “Heat Recovery / Fuel Switching” program. This ensures facilities are rewarded for cross-fuel decarbonization and are not penalized on the electric side for ditching natural gas, while simultaneously helping ComEd secure new, long-term electrical load.

Finding: The Technology Gap: The perception that electric alternatives cannot yet compete with natural gas on operational cost or process performance.

Recommendation: Fund electrification feasibility. ComEd should acknowledge that for certain heavy industrial processes, in particular high temperature processes, full electrification is currently a financial impossibility. Rather than pushing an “all-electric” narrative, ComEd can fund highly targeted, risk-free electrification feasibility studies. If a customer is willing to test an electric boiler for lower temperature heating or heat pumps, ComEd can provide an incentive that helps buy down the capital cost of the equipment, while also subsidizing the increased operational kWh cost so the customer is not financially penalized for fuel-switching.

Finding: Infrastructure Roadblocks: Grid reliability concerns and perceived capacity constraints could make full facility electrification an operational risk.

Recommendation: Provide transparent grid capacity mapping and resiliency bundles.

ComEd should create an accessible GIS map that clearly shows engineering firms which geographic zones have ample electrical supply available for heavy electrification, preventing customers from wasting time investigating impossible projects. Furthermore, ComEd should create "resiliency bundles" that offer incentives for pairing electrified equipment and on-site energy generation with battery energy storage systems (BESS), transforming electrification from a "grid risk" into a more resilient operational upgrade. Another option would be to offer funding to complete engineering design work for infrastructure upgrades to encourage electrification.

Finding: Double-Edged Sword: ComEd's incentives drive the market, but heavy administrative burdens create project bottlenecks for service providers.**Recommendation: Digitize and streamline to maximize the program's potential.**

ComEd has already captured market attention with attractive incentives. The next step is reducing contractor friction through a centralized tracking portal (similar to the one used in its Small Business Program, as referenced by service providers), clearer submittal requirements, and automated status updates (e.g., "Your project is in the queue"). This would alleviate frustration, reduce the M&V back-and-forth, and accelerate the rate at which contractors can funnel new projects into the program.

Finding: The Silver Lining: When projects successfully clear the hurdles, the financial and operational rewards are significant.**Recommendation: Promote the "beyond energy" business case.**

ComEd should collect and promote these specific, localized success stories. Because maintenance managers are inherently skeptical of "green" claims, and corporate finance teams demand strict ROI thresholds, ComEd's marketing can lead with these hard, operational numbers. Highlighting the fact that an energy project can eliminate compressor downtime and wipe out two entire months of utility bills gives internal energy champions the exact ammunition they need to win the CapEx battle with corporate finance.