

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

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Commonwealth Edison Company	)	
	)	Docket No. 26-0047
Petition for Approval of a Multi-Year	)	
Integrated Grid Plan Under Section	)	
16-105.17 of the Public Utilities Act.	)	

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**DIRECT TESTIMONY OF**

**MELANIE MINUCHE**

**ON BEHALF OF**

**THE JOINT NON-GOVERNMENTAL ORGANIZATIONS**  
**ENVIRONMENTAL DEFENSE FUND, ENVIRONMENTAL LAW & POLICY CENTER,**  
**NATURAL RESOURCES DEFENSE COUNCIL, UNION OF CONCERNED**  
**SCIENTISTS AND VOTE SOLAR**

**MAY 14, 2026**

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1 **I. INTRODUCTION AND WITNESS QUALIFICATIONS**

2 **Q: Please state your name and where you live.**

3 A: My name is Melanie Minuche, and I am a resident of the Pilsen neighborhood on  
4 Chicago's Southwest Side.

5 **Q: By whom are you employed and in what capacity?**

6 A: I am employed by the Little Village Environmental Justice Organization, commonly  
7 known as LVEJO, where I serve as a senior policy analyst. I work in both building and  
8 transportation decarbonization initiatives to ensure environmental justice communities  
9 across Illinois can breathe cleaner air and are not overburdened with the rising cost of  
10 utilities. LVEJO is a community-based environmental justice organization rooted in the  
11 Little Village neighborhood in Chicago, Illinois. For more than 30 years, we have worked  
12 alongside residents to address the environmental and public health impacts of pollution,  
13 and to advocate for the clean energy solutions and investments that our community  
14 deserves.

15 **Q: On whose behalf are you submitting this direct testimony?**

16 A: I am submitting this testimony in my capacity as a senior policy analyst for the Little  
17 Village Environmental Justice Organization, and I am testifying as a witness for the Joint  
18 Non-Governmental Organizations (JNGO), which consist of Environmental Defense  
19 Fund (EDF), Environmental Law & Policy Center (ELPC), Natural Resources Defense  
20 Council (NRDC), Union of Concerned Scientists (UCS), and Vote Solar .

21 **II. PURPOSE OF TESTIMONY**

22 **Q: Why is it important for LVEJO's voice to be heard in this proceeding regarding**  
23 **ComEd's 2026 Grid Plan?**

24 A: Commonwealth Edison, or ComEd, provides electric service to customers in Little  
25 Village. Decisions made in this proceeding will shape infrastructure investments for years  
26 to come, including how and where ComEd prepares the grid for electrification.  
27 Electrification planning and upgrades must be prioritized in environmental justice  
28 communities like Little Village and other neighborhoods on Chicago's South and West  
29 sides. For environmental justice communities like Little Village, those decisions affect  
30 not only reliability and affordability, but also public health, climate resilience, and  
31 whether the benefits of the clean energy transition reach communities that have borne  
32 disproportionate pollution burdens for generations.

33 **III. LITTLE VILLAGE AND TRANSPORTATION POLLUTION**

34 **Q: Please describe the Little Village community.**

35 A: Little Village is a neighborhood on Chicago's Southwest Side that has been a main port  
36 of entry to the Midwest for many Latino immigrants over the years. It is a predominantly  
37 Mexican-American neighborhood, home to about 100,000 residents and is one the  
38 densest communities in Chicago. It is estimated that 47% of the population in Little  
39 Village are foreign born residents. Little Village is a demographically young  
40 neighborhood with 18% of residents being between the ages of 5 and 19.

41 Little Village is a predominantly immigrant, working-class community that has  
42 long been subjected to concentrated industrial activity, freight infrastructure, and high  
43 levels of transportation pollution. The neighborhood sits at the intersection of major truck

44 routes, rail yards, warehouses, and within industrial corridors that serve the regional and  
45 national economy but impose daily pollution impacts on local residents.

46 **Q: How does transportation pollution affect residents in Little Village?**

47 A: Transportation is one of the most harmful sources of pollution in the community.  
48 Medium- and heavy-duty vehicles—including diesel trucks serving warehouses,  
49 industrial facilities, rail yards, and major arterials—routinely travel and idle through  
50 residential streets where community members live and go to school. LVEJO partnered  
51 with the Center for Neighborhood Technology to lead truck count studies in 2023 and  
52 again in 2025, documenting 2,206 trucks and buses over a 24-hour period at intersections  
53 near La Villita Park where LVEJO grows food with community members, youth play  
54 soccer, and families gather and connect.<sup>1</sup> A few blocks south and west of the park—near  
55 a school, homes, and local restaurants—3,878 trucks and buses were counted over a 24-  
56 hour period. These vehicles emit diesel exhaust which contains nitrogen oxides, fine  
57 particulate matter, and other pollutants that contribute to asthma, heart disease, and other  
58 serious health conditions.

59 According to the Climate Vulnerability Index,<sup>2</sup> Little Village is nationally in the:

- 60 ● 99th percentile for toxic air pollutants and diesel particle pollution that harm  
61 the body's immune system, liver, kidney, and other systems;
- 62 ● 93rd percentile for NO<sub>2</sub> (nitrogen dioxide) concentration air pollutants per  
63 year;

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<sup>1</sup> Chicago Truck Count Data Portal (Last visited May 4, 2026), <https://chicagotruckcounts.cnt.org/>.

<sup>2</sup> Available at <https://map.climatevulnerabilityindex.org/report/baseline/tract-17031301802-little-village-chicago-il?mapBoundaries=Tract&mapFilter=0&reportBoundaries=Tract&geoContext=State>.

- 64                   ● 90th percentile for PM2.5 concentrations, based on the 3-year average from  
65                   2017 to 2019 for levels of fine particulate matter air pollutants per year; and  
66                   ● 74th percentile for black carbon, which is created when diesel or fossil fuels  
67                   are not completely burned.

68                   These pollution risks are not isolated to transportation pollution. Little Village is  
69                   also nationally in the:

- 70                   ● 98th percentile for proximity to chemical facilities;  
71                   ● 98th percentile for proximity to facilities that make or process chemicals that  
72                   are regulated by TSCA (Toxic Substances Chemical Act);  
73                   ● 97th percentile for sources of toxic chemicals within 500 meters of a stream  
74                   segment;  
75                   ● 96th percentile for facilities that pose a serious threat to the public in the event  
76                   of a chemical accident and required to file a Risk Management Plan with the  
77                   EPA;  
78                   ● 95th percentile for waste management facilities that treat, store or dispose of  
79                   hazardous waste located within approximately 3 miles;  
80                   ● 94th percentile for proximity to superfund sites, which are areas designated  
81                   by the EPA to be heavily contaminated by hazardous substances and require  
82                   government oversight in cleanup; and  
83                   ● 92nd percentile for proximity to brownfield sites, which are former industrial  
84                   sites that are likely contaminated and currently abandoned or unused.

85 Residents in Little Village experience much higher rates of asthma-related  
86 emergency room visits compared to many other parts of the city<sup>3</sup>. Children, seniors, and  
87 people with underlying health conditions are especially vulnerable. Based on most recent  
88 available data from Illinois Department of Public Health, the Little Village neighborhood  
89 (zip 60623) ranked second among Chicago’s 60 residential zip codes for the number of  
90 youth (age 0-17) emergency department visits with 250 in 2024.<sup>4</sup> The neighborhood also  
91 ranked eight for asthma hospital admissions for youth for the period 2021-24.<sup>5</sup>

92 For many families, exposure to poor air quality from industrial and transportation  
93 pollution is not occasional—it is chronic.

94 **Q: How do these impacts intersect with environmental justice concerns?**

95 A: The pollution experienced is not accidental. Land use policies, transportation planning,  
96 and underinvestment have concentrated freight and industrial activity in communities like  
97 Little Village while shielding wealthier and white neighborhoods from similar levels of  
98 pollution exposure. Black, brown, low-wage and migrant communities across Chicago  
99 have been exposed to air pollution in our neighborhoods as a result of decades of  
100 unregulated industrial activity. Fast track industrial permitting processes in and around  
101 Little Village have made it easy for manufacturing and warehouse industries to develop  
102 on land adjacent to residential areas and schools.

103 LVEJO organized with community members in Little Village for decades to shut  
104 down a nearby, polluting coal plant. This coal plant was demolished during a botched

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<sup>3</sup> Asthma ED visits. Chicago Health Atlas, <https://chicagohealthatlas.org> (based on data from Illinois Department of Public Health - Hospital Discharge Data; accessed 13 May 2026).

<sup>4</sup> IDPH, Hospital Discharge Data - 2021-2024.

<sup>5</sup> *Id.*

105           implosion and blanketed the entire neighborhood with a cloud of debris in 2020. A few  
106           years later, the area was developed into a large Target warehouse generating thousands of  
107           truck trips in a given day. Little Village is a prime example of how industrial polluters use  
108           zoning and land use policies to their benefit and develop without considering the impact  
109           of its pollution on nearby residents. As a result, our community bears cumulative  
110           environmental and health burdens while receiving little to none of the economic benefits  
111           associated with the movement of goods through our neighborhoods.

112 **IV. CLIMATE CHANGE AND FREIGHT ELECTRIFICATION**

113 **Q: How is climate change connected to transportation pollution in Little Village?**

114 A: Medium- and heavy-duty vehicles are a significant source of greenhouse gas emissions as  
115 well as local air pollution.<sup>6</sup> As climate change intensifies heat waves, flooding, and  
116 extreme weather, communities like Little Village face heightened risks while also  
117 contributing least to the problem. Flooding is a severe issue in Little Village. High-traffic  
118 streets, crosswalks, and entrances to parks are frequently flooded after heavy rainfall,  
119 making it more difficult to move around the neighborhood. Truck trips to and from  
120 warehouses continue even when some streets are flooded. This contributes to the  
121 increasing number of trucks moving through residential streets and attempting to avoid  
122 traffic congestion from busy roads or flooding. Increased traffic also leads to more idling,  
123 an issue that Little Village has been struggling with for decades. Truck idling is common  
124 on 26th street, a street with hundreds of small businesses that power the local economy of  
125 the neighborhood.

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<sup>6</sup> Clean Air Task Force, “Deaths by Dirty Diesel: Mapping the health impacts of diesel nationwide,” (last visited April 29, 2026), <https://www.catf.us/deathsbydiesel/>.

126                    This is why reducing emissions from freight transportation is essential both to  
127                    addressing the localized health harms that environmental justice communities experience  
128                    every day and to meeting Illinois' climate goals.

129    **Q:    What role does electrification play in addressing these challenges?**

130    A:    Electrification of medium- and heavy-duty vehicles is one of the most effective ways to  
131                    reduce both climate pollution and harmful local air pollutants. Unlike diesel vehicles,  
132                    electric trucks and buses do not produce tailpipe emissions. Battery-electric trucks will help  
133                    to reduce air pollution in Little Village and protect residents, truck drivers, and warehouse  
134                    workers from breathing in diesel pollution. Chicago's Southwest Side has a  
135                    disproportionate number of warehouses in our neighborhoods. Close to 86% of residents  
136                    in Little Village live within ½ a mile of a warehouse that is 30,000 square feet or larger.  
137                    Families are both close in proximity to these warehouses and often have relatives or loved  
138                    ones in the trucking industry that are exposed to diesel pollution at work and at home.  
139                    Having access to affordable electric medium- and heavy-duty vehicles can help reduce  
140                    exposure to air pollution drastically. This means cleaner air on the streets where people  
141                    live, go to school, and work. For Little Village, electrification is not an abstract climate  
142                    strategy—it is a public health intervention that can lead to reduced hospitalization expenses  
143                    and less days of missed work.

144    **V.    BENEFICIAL ELECTRIFICATION AND THE GRID**

145    **Q:    Why is the concept of “beneficial electrification” important for this proceeding?**

146    A:    Beneficial electrification means electrifying uses that reduce overall emissions, lower  
147                    health impacts, and deliver benefits to customers and communities. Electrifying freight

148 and transit vehicles in Little Village and other environmental justice communities clearly  
149 meets that definition.

150 However, in many cases these benefits will be realized only if the electric grid is  
151 proactively planned and upgraded to support new loads in the right places—particularly  
152 near freight corridors, warehouses, and industrial zones that are transitioning from diesel  
153 to electric vehicles. Proactively planning and upgrading for EV load will help reduce long  
154 term costs and help ease the transition to EV trucks and buses.

155 **Q: What concerns does LVEJO have about current grid planning practices?**

156 A: Historically, grid investments have not always reflected the needs or priorities of  
157 environmental justice communities. Without intentional planning and public participation  
158 avenues, electrification investments risk bypassing places like Little Village or placing  
159 new costs on residents without delivering corresponding benefits.

160 LVEJO has played a pivotal role in advocating for spaces of public participation  
161 in planning processes. We believe that community members should be informed and  
162 active participants in processes that involve changes and investments that could impact  
163 their monthly expenses.

164 If ComEd's grid planning does not explicitly account for freight electrification in  
165 environmental justice communities nor involve the direct participation of impacted  
166 community members, the result could be delayed adoption, higher costs, or missed  
167 opportunities to reduce diesel pollution where it is most harmful.

168 **VI. EQUITY, ENGAGEMENT, AND COMMUNITY BENEFITS**

169 **Q: What does LVEJO believe ComEd and the Commission should prioritize in the 2026**  
170 **Grid Plan?**

171 A: First, ComEd's grid plan should explicitly plan for medium- and heavy-duty vehicle  
172 electrification, including distribution upgrades in and around industrial corridors that  
173 disproportionately impact environmental justice communities. Partnering with local,  
174 small-fleet owners to understand charging challenges and gaps will ensure grid planning  
175 is accurately meeting local needs.

176 Second, ComEd's grid plan should include direct and meaningful engagement  
177 processes with impacted communities and community-based organizations early in the  
178 planning process. Community members have deep knowledge of where freight activity  
179 occurs and where electrification would deliver the greatest health benefits. ComEd can  
180 strengthen public participation and engagement processes by transparently informing  
181 community members of what grid update entails. Informing communities of timelines,  
182 project challenges, and benefits should be industry best practice and can help ensure  
183 meaningful community participation. Community engagement is not only about hosting  
184 public forums, but about hearing the concerns of residents, following up with questions,  
185 closing information gaps, and creating multiple avenues and opportunities for accessible  
186 in-person and virtual feedback.

187 Third, grid investments that support electrification should be paired with  
188 affordability protections and programs that ensure residential customers are not burdened  
189 with costs while others capture the benefits.

190                   Finally, electrification investments should support local workforce development  
191                   and bring economic benefits to the community, so that residents of communities like  
192                   Little Village can participate in and benefit from the clean energy transition.

193 **VII. CONCLUSION**

194 **Q: What message would you like the Commission to take from your testimony?**

195 A: Communities like Little Village have been systemically forced to bear the health and  
196                   environmental consequences of energy and transportation systems built without regard  
197                   for our health or well-being. The transition to electric transportation offers a rare  
198                   opportunity to reduce those harms—but only if grid planning is intentional, equitable, and  
199                   grounded in real community needs.

200                   We urge the Commission to ensure that ComEd’s 2026 Grid Plan treats beneficial  
201                   electrification of freight and medium- and heavy-duty vehicles in environmental justice  
202                   communities as a priority, not an afterthought. We also urge the Commission to ensure  
203                   that ComEd’s 2026 Grid Plan incorporates meaningful avenues of public participation to  
204                   understand community concerns and adjust planning processes according to feedback  
205                   from impacted community members. Cleaner air, healthier residents, and a more  
206                   equitable energy system depend on it.

207 **Q: Does this conclude your testimony?**

208 A: Yes.