

**From:** Sameer H. Doshi

**Sent:** Thursday, September 14, 2023 10:59 PM

**To:** IPA.ContactUs <[IPA.ContactUs@Illinois.gov](mailto:IPA.ContactUs@Illinois.gov)>

**Subject:** [External] Re: IPA Releases Draft 2024 Long-Term Renewable Resources Procurement Plan and Draft 2024 Electricity Procurement Plan

Hello,

I have the following largely non-substantive comments on the IPA's Draft 2024 Electricity Procurement Plan published on August 15, 2023. I am writing solely on my own behalf, on behalf of no other entity.

On page 92, where the Draft Plan discusses ComEd's ongoing residential Peak Time Savings program, I suggest changing "This program is required by Section 16-108.6(g) of the PUA" to "This program was created through Section 16-108.6(g) of the PUA" or something similar. The reason is that Public Utilities Act Section 16-108.5(h) (amended several times, most recently by Public Act 102-1031 in May 2022) states that PUA §§ 16-108.5, 16-108.6, 16-108.7, and 16-108.8 [but expressly excluding subsections 16-108.5(h) and (i)] are all inoperative after December 31, 2022. PUA Section 16-108.6(g), which is thus now inoperative, is the provision that required (when first enacted back in 2011 in Public Act 97-0616) Ameren Illinois and ComEd to create residential peak time rebates programs, as noted on page 11 of the Draft Plan.

Page 11 of the Draft Plan mentions "Section 6.13, where demand response resource choices are mentioned." A similar reference to Section 6.13 is made on page 38. But the Draft Plan doesn't have a Section 6.13. Instead, these references on page 11 and page 38 should probably refer to Section 6.8 and/or Section 7.4. (The 2023 Electricity Procurement Plan mentioned Section 7.4 in the cognate spots.)

In each of footnote 98 on page 16 and footnote 103 on page 23, the end of the final sentence should probably say "update of the Final Modified 2022 Long-Term Plan" rather than "update of the Final Revised Long-Term Plan". Alternatively, these two footnotes could be phrased as footnote 105 on page 29 describes it ("IPA Data Request for the 2024 Long-Term Plan").

On page 41, it says that FERC issued an approval order in Docket No. ER22-495 (MISO seasonal resource adequacy construct) on August 31, **2021**. Actually it was **2022**.

In Section 5.2.2.3 on page 56, it says: "The capacity offered in the North/Central region exceeded requirements by 4,760 MW." This sentence could clarify that this figure given by MISO is for the **Summer** 2023 season, as shown in page 5 of the MISO document linked within footnote 172.

Speaking of the document linked within footnote 172, the URL in the footnote is missing a **.pdf** at the end.

Thank you for your consideration,  
Sameer