Ameren Illinois Company's Comments in Response to 2026 Long-Term Plan Requests for Stakeholder Feedback
July 9, 2025

Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois or the Company) respectfully submits these comments in response to the request from the Illinois Power Agency (IPA) for comments on the 2026 Long-Term Plan. Ameren Illinois appreciates the opportunity to submit its comments.

1. Currently, the RPS Budget Forecast Model utilizes the same forecast prices when forecasting Indexed REC projects (i.e., the same forecast "strike price" is maintained during forecasted years for all utility-scale projects regardless of project type), which are also held constant for each forecast year as well. These prices are successively replaced with the actual strike prices realized following an IPA Indexed REC procurement. This choice was implemented for simplicity given the unclear nature of future project prices – especially given both market volatility and project-specific nuances that are difficult to predict – and to maintain consistency and reduce unintended errors between model updates.
    a. Should the IPA consider varying Indexed REC strike prices by resource type (solar or wind/hydro) and by year (forecast year)?

Yes, the IPA should consider varying Indexed REC strike prices by resource type and by year. Ameren Illinois believes that the projects are different enough in their generation profiles that a more accurate approach would be to separate the different resource types into separate analyses.

    b. If yes, what are the most important factors to consider if the Agency were to consider varying the forecast strike prices by resource?

As discussed above, Ameren Illinois considers the generation profile as the most important factor the IPA should consider in determine whether or not to vary the forecast strike prices by resources.

    c. If yes, what are the most important factors to consider if the Agency were to consider varying the forecast prices by year?

Ameren Illinois has no comment on this matter.

    d. The RPS Budget Model currently uses a forward price curve for calculating imputed REC prices that are based on around the clock prices. Should the IPA consider using different forward price curves that match the generation profile of each resource? Forward prices are generally available as monthly on-peak and off-peak quotes. What would be good adjustment factors to use to simulate average generation-weighted prices for wind, hydro, and solar?

Yes, the IPA should consider using different forward price curves that match the generation profile of each resource. Ameren Illinois believes that solar budget forecasting is significantly different than wind in consideration of their generation profiles. Solar energy facilities produce their generation almost exclusively during on-peak hours while wind has a more variable generation profile. Because of this, the Index REC solar budget forecast should be priced against a monthly forward on-peak hours price curve rather than an around the clock (ATC) price.

Ameren Illinois performed a back of the envelope analysis where we took Ameren Illinois' internal Indy-Hub forward on-peak curve and compared it to the ATC price curve provided by E3 in the most recent data request served to the utilities for the preparation of the LTRRPP. The Company's analysis looked at all the executed Solar Index REC contracts and what the difference in forecasted notional contract value compared to the E3 ATC curve. The analysis showed an aggregate difference of ~$350M between the two price curves through 2042, which is the last year on our daily published internal curve. This number would be even higher if the analysis had performed through the full expected 20-year terms. Considering the concern over a possible budget shortfall due to the energization of the Index REC contracts, Ameren Illinois believes a more accurate assessment of budgetary constraints should be made utilizing a forward price curve that more closely aligns with the actual production profile of each resource type. A lower forecasted notional value of over $350M for solar index rec contracts would have a dramatic impact on the forecasted budget and future procurement planning.

e. Are there any additional factors or considerations that the Agency should take into account when forecasting future, uncontracted Index REC project strike prices.

Ameren Illinois would like to point out that the Company performed a similar analysis of the E3 ATC pricing curve against its own internal ATC curve through 2042 for all resource types for both MISO and PJM pricing nodes. The analysis showed that if all of Ameren Illinois' Index REC contracts were priced at the Ameren forward ATC curve, rather than the E3 curve, there would be a decrease of $300M in forecasted notional contract values, as noted before, this could have a dramatic impact on the forecasted budget.

Ameren Illinois is willing to participate in further meetings or workshops with the IPA which may explore the different pricing scenarios and what price curves to use. The dollars at stake have the potential to be exceptionally large and quite impactful to the planning process. Considering these issues, Ameren Illinois believes the use of the proper forward curves is the most important part of the Index REC budget forecast process and should be treated with concern and diligence.

Ameren Illinois appreciates the opportunity to provide these comments and is looking forward to working with the IPA and other stakeholders in a manner that moves Illinois closer to a cleaner energy grid, while also maintaining customer affordability. The Company's comments represent its preliminary positions and thoughts on these topics, and these may be subject to

change as more information becomes available during further development of the policies. By not responding to or addressing a specific issue or topic at this time, the Company does not waive its right to comment at a later date.