Ameren Illinois responses to Resource Adequacy Study Post-Workshop Stakeholder Questions.

TOPIC 1: Resource Adequacy Study goals and scenario analysis considerations.

Question 1: The Agencies recognize this study process is purposefully targeted in its nature, with Section 9.15(o) providing clear goals and expectations of the resource adequacy study and resulting report. What additional goals, objectives, or evaluation metrics should be considered, either as part of this study process or future resource adequacy study efforts?

In no particular order, Ameren Illinois suggests the Agencies may also want to focus on the following factors:

- Customer Affordability , including total energy cost estimates compared to other neighboring states
- Consideration of emerging technologies, including the costs and benefits of thereof
- The level of reliance on out-of-state imports for reliability
- The impacts of recent federal legislation
- Evolving accreditation factors from the RTO's
- Transmission constraints that may affect the reliable or economic deployment of in-state resources, including but not limited to the availability of transmission capacity in and around REAP Zones.
- RTO reserve margin requirements

In examining resource adequacy, Ameren Illinois also recommends the Agencies apply a very broad definition of reliability - one that looks not only at matching supply and demand, but that also helps increase system resiliency and recognizes the value of different types of diversity in a generation portfolio.

Question 2: Which variables are the highest priority to explore? Further, are there important policies or drivers missing in addition to those outlined in the preceding stakeholder workshop that could help shape scenario development?

AIC believes that Reliability and Customer Affordability should remain at the top of the list. As a subset of reliability, we believe we need to pay particular attention to the effects of losing thermal generation sources and replacing that with generation having different attributes. We feel that Transmission is also an important piece of the Reliability and RA discussion and that the Agencies may want to consider the work being performed in the parallel effort related to the revising the REAP. Finally, we suggest parties stay informed of the accreditation discussion taking place at the RTO, as that may affect certain variables relevant to this analysis.

Question 3: Which of the following drivers are most critical to explore in the resource adequacy modeling scenarios and why?

a. Extreme weather
b. Demand growth
c. Thermal retirements
d. Transmission build and future needs
e. Generation resource diversity
f. Out-of-state reliance on generation resources
g. Some other driver not described above

As a preface, Ameren Illinois believes that resource adequacy is important because it has significant implications for consumers with respect to the ability of the electrical system to meet their demands and to do so in an affordable way. The most critical consideration is reliability, defined here as the ability of the system to safely deliver energy when, where and how a customer wants it. In our modern society, access to a reliable supply of electricity is vital to the health, safety and welfare of our customers and communities. Nonetheless, energy affordability is also critical. While ensuring access to electricity for essential societal functions may transcend immediate concerns about prices and costs, a lack of resources or scarcity has a direct impact on the commodity prices and affordability. If shortages and scarcity drive prices up in a prolonged manner, electricity may become less affordable and access to essential electric service may be impaired.

Among the drivers listed above, the two most critical are the recognition of thermal generation retirements and the modeling of anticipated demand growth (or more generally demand as forecasted, whether flat or growing). Extreme weather and out-of-state consumption of electricity are certainly variables that impact both supply and demand, along with other contributing factors, but are two among other inputs into the larger supply/demand equation.

Transmission too has a critically important role to play with respect to resource adequacy, and we would view this as an essential consideration in addressing how to facilitate and most efficiently match demand needs with various generation sources.

Generation diversity is also an important consideration with respect to resource adequacy because overreliance upon one type of generation source (in terms of type or even location) increases the risk of a disruption or the effects of adverse event. That said, Ameren Illinois believes this is more of a strategic consideration in meeting resource adequacy that a fundamental driver of any RA analysis.

All of the items listed are very important considerations in assessing Illinois' path to resource adequacy certainty. That said, we believe at least three additional factors warrant consideration: the broader economic landscape, environmental goals, and resiliency.

One issue not noted above is the need to look at the broader economic landscape and the needs of business and industry with respect to electric energy. As noted above, energy affordability is critical. While it might not be immediately intuitive, business and economic continuity in the state has a direct impact on customer affordability. A customer's ability to afford needed commodities is a function of the price of that community and the economic means of that customer, and, accordingly, job retention and creation are important considerations in assessing strategies to ensure resource adequacy in the state.

Climate change and environmental externalities have been identified as areas of critical focus in state energy policy. Ameren Illinois believes that reliability and affordability are foundational to a sound energy policy strategy, but given the clear direction of Illinois law and policy, continued advancement of clean energy goals should be given due consideration in assessing resource adequacy needs and strategies to ensure reliable and affordable energy for the future.

Bulk electric power systems also should be assessed and planned for resiliency in mind, particularly given the extreme weather, physical security and terrorism threats, and cyber security concerns. Among other items, this may include an analysis of import and export capabilities, as well as perhaps the ability to provide throughput to help out others in need.

Question 4: Are there known or expected developments in federal or state policy that should be integrated into scenario development? Please explain in detail and provide references where possible.

On the federal level, the Agencies may consider several issues. H.R. 1, "One Big Beautiful Bill", was signed into law on July 4, 2025 (Enrolled bill text here). The law makes many changes to energy tax credits from the Inflation Reduction Act, including ramp downs of investment and production tax credits for wind and solar, as well as implementing new supply chain standards ("foreign entities of concern" or FEOC) that would apply to wind and solar, as well as battery storage, geothermal, hydropower and nuclear. Additionally, shortly after enactment, the White House issued an executive order (text here) calling on the Treasury department to issue new guidance on wind and solar energy credits, including possible changes to "beginning of construction" standards and FEOC restrictions. All of these could impact renewable energy deployment and cost.

Question 5: How should cost implications or other findings beyond potential reliability shortfalls be presented or considered to support constructive policy decisions?

Ameren Illinois believes cost implications associated with the policy decisions of resource adequacy should be considered among a variety of factors, including those discussed in the Company's affordability framework in its recently approved Grid Plan. AIC continues to advocate for reasonable total electric bill cost impacts, which, given state policy, likely require at least higher short-term costs associated with the decarbonization of the grid - including cost increases associated with delivery, supply, and other utility bill costs. Affordable customer bills cannot be achieved with discipline of delivery service cost management alone; Illinois state policy actions affecting electric supply must also be managed with foresight and discipline in order for Illinois consumers to receive affordable total electric bills. Ensuring either affordable delivery or supply costs alone will not result in overall affordable total electric bills, and thus careful consideration and balance should be taken with Illinois resource adequacy and supply options.

Question 6: What blind spots or gaps in the RA Study process do you worry might be overlooked or otherwise not addressed?

Ameren Illinois believes customer affordability needs to be a significant factor when we look at our future energy landscape. With the potential of both large load growth and baseload generation retirements not only in Ameren Illinois footprint, but across the state and nation, the significance of ensuring customer affordability is critical.

It is imperative that the RA study provides a clear path for the state as it relates to our CEJA goal and reliability, but we must also ensure that it is done in a way that is affordable to our customers. Not only our residential customers but also non-residential customers that are critical for economic growth in downstate Illinois.

a. Are the identified blind spots or gaps unique to customer segments, modeling scenarios, market conditions or other targeted parameter?
   No

b. How could the identified blind spots or gaps be addressed? (e.g. through additional scenarios, targeted data inputs, utilizing specific modeling, etc.)
   Any modeling or scenarios should include customer impacts.

Question 7: Have any peer jurisdictions developed scenario(s) through the completion of their own resource adequacy assessments or studies that should also be considered by the Agencies through this Resource Adequacy Study?

a. Provide details concerning the scenario(s), which jurisdiction developed the scenario, and provide link to the supporting detail(s).

Given the unprecedented increase in anticipated load across the United States, and elevated capacity prices in many areas, resource adequacy and integrated resource planning is very active across the country. Ameren Illinois will continue to monitor those developments and report back with any best practices or useful models as we identify them throughout the process.

Given our role as a distribution utility, and the growing role of distributed generation integration as a tool to help manage load, we took note of the following Minnesota docket:

Minnesota Public Utilities Commission – Xcel Energy – Docket No. E002/RP-24-67 - Xcel Energy – Initial Comments 8-9-24.pdf – Proposed DCP Program

We believe that the potential for utility DER integration and optimization in meeting load needs is something that Illinois should consider. By bringing together a package of aggregated and planned DERs, we can bring them into our core planning efforts—specifying and capitalizing distributed energy resources in our territories and including customer-sited battery storage as a grid asset—we can accelerate the pace of deployment, support additional economic development and load growth, and lower the net cost to the grid. With significant new load growth opportunities between data centers, electrification, and electric vehicle adoption, we face many challenges including maintaining affordability, building resources fast enough to support economic growth, and continuing our carbon emission reduction efforts--this program allows us to meet all of those goals. The contemplated approach allows us to plan for and optimize DER deployment to where the grid needs it the most and leverages our understanding of grid needs, delivering the maximum benefit to our customers.

This DCP program could be considered a version of a utility-lead and funded Virtual Power Plant (VPP), but improved through utility planning to deliver increased value to the grid and to ratepayers, with an innovative deployment model allowing for a faster deployment of assets at a higher scale than previous VPP program models. We believe this program is scalable and flexible -- we could add anywhere from 400 MW to over 1,000 MW to the system with options that allow for the DCP to be scaled to achieve almost any speed of deployment. And while we are open to the size and timing of this program, we note that the record in this proceeding shows an existing need that is only compounded by new load growth opportunities so the faster we move and the more scale we can deliver, the better.

b. Is the assessment part of a broader resource adequacy assessment, or any more detailed integrated resource planning effort?

The proceeding noted, is a more focused examination and evaluation of a distribution utility program designed to maximize the distributed resources to meet load obligations.

More broadly, Ameren Illinois strongly believes customers could benefit from integrated resource planning in Illinois, a process already utilized in several states, which could help identify a deliberate and longer-term plan to match in-state supply and demand.

c. Are there any market conditions or policy considerations that are unique to the jurisdiction and/or scenarios referenced.

Yes, Ameren Illinois is a deregulated state with retail customer choice. Accordingly, it is important that difference be considered as the state relies upon markets to provide sufficient generation to meet customer needs.

TOPIC 2: Analytical approach to analysis and data assumptions.

Question 8: Are there recommendations for specific data sources that could be utilized in this study?
Generators in the interconnection queues for the RTOs and utilities and any information regarding retirement that may be available from the RTOs.

a. Are there preferences for certain input assumptions that should be made?

See above.

b. What prior or concurrent studies could be referenced that might add value or ensure alignment with similar or adjacent work (e.g., queue assumptions, RTO projections)?

Alignment with the REAP study process revisions and any RTO-related studies, including the MISO Futures Analysis related to their ongoing resource adequacy efforts.

Question 9: Are there specific transmission constraints, expansions, or projects that should be considered and reflected in a model scenario? Further, Are these transmission considerations intended to target and/or solve specific challenges? Please explain, provide supporting documentation justifying inclusion, and provide pertinent reference materials including reports or studies.

Ameren Illinois believes any model should include active projects that have been approved in current and prior MISO MTEP cycles. These projects include, but are certainly not limited to, the MISO LRTP Tranche 1 and Tranche 2.1 portfolios.

Ameren Illinois assesses its zonal transmission system needs and coordinates with MISO and other utilities on transmission planning and generation market dynamics. We also stive to review needs and opportunities between TOs and across seams, including the Illinois seam between MISO and PJM. We believe this type of collaboration is important, recognizing the unique characteristics of Illinois energy policy and the grid that serves our customers and communities.

Question 10: Are there specific assumptions that should be considered concerning generation resources, including buildout (queue, pace, technology availability) or retirements, both in-state and regionally in the RTO markets?

OMS recently completed a study that had two different levels of assumptions. One based on how much historical generation was put online, and the second had optimistic expectations on how quickly generation would come online assuming the MISO ERAS process.

In this resource adequacy study, they should consider multiple scenarios regarding construction and queue times along with different assumptions about contracted projects coming to completion considering that many contract terminations that have already occurred in the utility scale arena. In addition, the study should recognize the current timelines and schedules regarding retirements of fossil fuel generators.

a. Which proposed assumptions should be considered as part of the base case and which are best considered as part of a prospective scenario? Provide any available references to RA studies, IRPs, or comparable assessments and reports to support your recommendations.

   The base case should include up-to-date load forecast information based upon data provided by utilities and RTO's, and should be as much as possible inclusive of the entire state, including municipal and cooperative load areas. If there is missing or unavailable load data, reasonable statistical estimates should be used. Additionally, based upon publicly available information, and information furnished by generators thermal generation unit lifespan and retirements should be considered. Any available capacity estimates, including planned upgrades to nuclear units, including new units, should be considered. Based upon current growth, with reasonable forecast assumptions concerning distributed generation and utility scale renewables should also be considered in the base case.

b. Which assumptions are contingent upon specific policy and/or legislative conditions being met or otherwise enacted? Please plain in detail.

Implications of changes in federal tax policy and "foreign entity of concern" regulations should be considered with respect to all types of generation. Policies designed to encourage data center and onshoring of manufacturing load should also be considered. With respect to state policy, it is recommended that changes in state policy not be considered in the base case as the study is intended to inform policy changes.

Question 11: As a component of the RA Study, the Agencies will be seeking to obtain utility and RTO load forecast projections and the underlying assumptions behind the load forecasts. In addition to these utility forecast assumptions, what additional assumptions should also be considered, either embedded in a base case or considered in scenarios? Further, what data sources should be drawn upon, supporting any load forecast modifications? (i.e. large load / electrification growth).

Solar, Electrification Growth, Data Center Load, Supply Price projections, and Energy Efficiency programs as these have the greatest impact on total energy and demand.

a. Provide details on why these additional assumptions should be considered during the modeling process?

The topics listed above have the greatest impact on total energy and demand forecast uncertainty.

b. Are any proposed load forecast assumptions directly impacted and/or predicated upon specific to policy, legislative, or other conditions being met and/or otherwise enacted? Please explain in detail.

Yes, to a great extent. Ameren Illinois takes into consideration solar RECs from – Illinois Shines Program block capacity for their solar forecast. They also take into consideration the state's Electrification goals as forecasted by CEJA. Although perhaps difficult to model, AIC also believes it is important to track the effects of federal tax, jobs and economic development policies and proposals, to the extent practicable.

Question 12: Are there any additional considerations – data inputs, policy, drivers, or assumptions – that Stakeholders believe the Agencies should consider, not already explain in response to the preceding questions? Please explain in detail.

Not at this time.