

1. Additional goals to consider are:
 - Scarcity in the RTO
 - Availability of resources
 - Exposure to extremely high market prices and results
 - Ability to construct resources and develop new technologies, in light of supply chain challenges
 - Feasibility of renewable resources, given changes at the federal level that could result in fewer and more costly wind and solar developments in RTO footprints
2. Variables that should be explored throughout the Resource Adequacy (RA) study process should include, but are not limited to:
 - Wide range of load forecasts
 - Distributed Energy Resources (DER) impacts
 - Environmental regulations
 - Economic Drivers such as market price forecasts
 - RTO Changes such as capacity accreditation methodology
3. We believe thermal retirements, transmission build and future needs, generation resource diversity, and out-of-state generation reliance are outcomes of modeled scenarios rather than drivers. The drivers most critical to explore in RA modeling scenarios are:
 - Demand growth
 - Economic drivers
 - DER forecasts
 - Regulatory changes at the RTO level and across governmental bodies dealing with environmental regulation
4. At the federal level, the pace at which renewable resources are adopted is now in question given the enactment of the One Big Beautiful Bill Act (OBBA). The elimination of various tax credits will likely result in fewer and more costly wind and solar developments in RTO footprints. At the state level, a “big picture” view must be taken. States must look beyond their borders because RTO jurisdictions cross state lines and what occurs in one state could have a ripple effect in others. For example, Indiana’s aggressive stance on nuclear and coal development could yield imports to Illinois.



5. As a Generation & Transmission (G&T) Cooperative, recent large load developments have required us to work with prospective organizations in a new way. As part of our process, to protect our member-consumers, we require financial guarantees for transmission buildouts and power supply procurement to avoid stranded costs and capacity shortfalls.
6. The RA study should use a wide range of active participants in developing future-focused outcomes against which to measure potential risk. Establishing a broad range of scenarios is essential. The results serve as 'goal posts' within which innovative and effective solutions can be developed and aligned.
7. As a G&T in two states, Wabash Valley Power Alliance files an Integrated Resource Plan (IRP) with the Indiana Utility Regulatory Commission (IURC) on a three-year cycle to guide future resource decisions. In addition, Purdue University's State Utility Forecasting Group (SUFG) has employed a reputable statewide forecasting process for more than 40 years. The SUFG regularly interfaces with utility planners, RTO staff and industry experts to develop biannual reports
8. See Purdue University's SUFG [website](#) for publications which describe their methodologies and results. In addition, MISO is in the midst of developing four futures to guide planning modeling. Multiple workshops have been conducted with public materials posted for review on their website [here](#).
9. Both MISO and PJM websites have detailed transmission information. MISO's Long Range Transmission Planning (LTRP) has completed two tranches and will be significant in management of the grid in the future. This information ([website here](#)) should be considered in state analyses. The RTOs also are studying interregional transfer capability. This analysis could lead to future collaboration to support reliability.
10. Generation resources will need to be developed. The lengthy interconnection queues, permitting, supply chain constraints, workforce availability, and regulatory approval processes, in addition to local and/or state government regulations lead to challenges in developing resources.
11. PJM has a load forecast that includes a component for organic and data center load growth. See this [PJM website page](#) for related materials.
12. Developing policy without fully leveraging the expertise of an array of voices, threatens the future of a reliable, affordable and sustainable power system. We have expertise from the cooperative and IOU business models and welcome the chance to be a roll-up-your-sleeves resource.