

## **IPA Integrated Resource Planning Workshop #3: Customer Cost Impacts Methodology**

May 26, 2026

**Respondent Name:** Mick McGuckin

**Respondent Organization:** SOO Green HVDC Link

**Respondent Email Address:** mmcguickin@soogreen.com

**Respondent Zip Code:** 10011

### **Question 1**

*How should “commercial” versus “industrial” customer classes be defined for purposes of reporting customer cost impacts?*

SOO Green initial thoughts on customer classes for the purposes of reporting are as follows:

- Commercial should be limited to customers with distribution level voltage requirements and with varying summer/winter and day/night loads.
- Industrial should apply to transmission level voltage requirements and 24/7/365 loads.

Also, consistency and clarity is essential for determining how data center load class is allocated going forward.

### **Question 2**

*If “commercial” and “industrial” are defined using load thresholds, what threshold(s) do you recommend and why?*

SOO Green has suggested some high-level notional thresholds above. It may be prudent to consider voltage class and load variability as well as load size. In any case, these would need further discussion and agreement with all stakeholders and alignment with RTO's / energy utilities.

### **Question 3**

*For the stakeholder group(s) that you are representing in the IRP process, what are you hoping to learn from the cost impact analysis specific to the customer group you are interested in?*

SOO Green hopes to learn the relative impacts of the scenarios to residential/small commercial customers versus large load customers. This would be based on the understanding that existing residential and C&I customers should benefit and not face negative impacts from new installation required to meet new large loads.

#### **Question 4**

*E3 proposes to estimate the future delivery revenue requirement by starting with the current delivery revenue requirement and applying a growth rate based on historical authorized revenue requirement increases over the past 10 years, along with modeled additions for new transmission and distribution investments. Do you believe this is a reasonable approach for projections?*

Yes, but should be adjusted

#### **Question 5**

*If “Yes, but should be adjusted” or “No” was selected in the previous question, what adjustment is most appropriate?*

Align growth rate with recent multi-year rate plans (e.g., using recent approved increases as a forward-looking proxy) In addition, for this modelling, the accuracy of the forecast T&D investment costs (and associated assumptions) necessary to integrate a interconnected resources and DERs as part of the supply plan is absolutely critical.

#### **Question 6**

*If “Use a different historical window” was selected in the previous question, what lookback period should be used to estimate the growth rate and why?*

Not applicable

#### **Question 7**

*Energy burden is defined as the percentage of a household's annual income spent on household energy bills. What baseline would be most useful for examining energy burden in the IRP (e.g., historical, business-as-usual, etc.)?*

Under Gov. Pritzker’s leadership of the Midwest Governor’s Association between 2023 and 2026, the America’s Smartland Series of webinars focused significantly on affordability and equity. To support the approach to energy burden, SOO Green would like to draw Agencies’ and E3’s attention to the following series of webinars and the innovative approaches and metrics discussed:

<https://midwesterngovernors.org/electricity-affordability/>

#### **Question 8**

*Are there data sources available at the community or census-tract level in Illinois that should inform how EJ and equity investment eligible communities are identified and characterized?*

No comment.

**Question 9**

*What are the most significant barriers to participation in existing programs for EJ and/or equity investment eligible communities, e.g. upfront costs, eligibility restrictions, lack of information, or structural factors like renter status?*

No comment.