

New Procurement Mechanism Public Workshop 2

SOO Green HVDC Link Responses to the third set of stakeholder questions

11th June 2026

- 1) What components of the new procurement mechanism framework should be detailed in the 2027 EPP, and why? What components should be deferred to being detailed in the 2028 EPP or 2029 EPP, after the first IRP will have been released and litigated, and why?

It's important from the outset (2027 EPP) that the procurement mechanism framework clearly defines the new baseline of eligible products as well as the product parameters. Developers would benefit from transparency to understand what assets qualify and specifically how the IPA will consider energy, capacity, environmental attributes, and resource adequacy attributes. In particular, since the CRGA states that "Facilities eligible for long-term contracts under this subsection must be new clean energy resources", it would be useful to detail the development/ implementation timeline of "new" resources procured in the 2027 EPP, so as to inform the anticipated timelines and the need for "shovel ready" projects for future EPPs, by projecting from the most recent data.

Details of the EPP like term-lengths of the contracts, nature of new and additive supply resources, faction of an LSE's portfolio, capacity to energy considerations, details of contracting structures (like physical versus virtual CFD PPAs) etc. can be deferred to future EPPs, as their relevance is mostly in the context of the pending IRP and MP). Conscious the 2027 EPP drafting in August will occur prior to the IRP (Nov), the finalised IRP will hopefully further build on and better inform future EPPs (2018 and beyond) e.g. procurement frequency and MW targets.

- 2) Are there any adjustments or refinements to the statutory framework that would better align the mechanism with its intended policy objectives?

Any adjustments or refinements to the statutory framework should be outside the scope of the 2027 EPP, as it should take into consideration short- and long-term resource requirements stated in the pending MP and IRP.

SOO Green would like to ensure non-discriminatory consideration of inter-regional power flows.

Refining the statutory framework to clarify that interregional transmission can participate and are treating the same as in-state generation. This could also lower overall procurement costs by broadening the number of competitive bidders resulting in a potential overall cost reductions.

- 3) Aside from need determination, in what other ways should this procurement mechanism link to the IRP or Resource Adequacy Study / Mitigation Plan processes?

The procurement mechanism should be informed by real time data during each procurement process, rather than historical or outdated studies.

In addition, when considering the procurement evaluation matrix thought should be given to:

- The geographical location of assets and whether these are grid constrained areas identified in the RA plan or the IRP*
- The 'shovel readiness' of these assets and how far along the project development process there are.*

- 4) How should costs be allocated to Illinois customers and via what type of mechanism(s)? Should different procurement products warrant different cost allocation approaches? Should existing contracts and position be considered, and if so, how?

Both Capacity and Energy needs of customers should be considered in cost allocation, along with load profiles (constant 24/7/35 versus diurnal and seasonal variability). Voltage class of consumers (transmission or distribution level) should be considered in allocating new and additive T&D costs. Physical versus contract for difference (virtual) PPA contracts should consider different cost allocation approaches, as the latter decouples energy needs from the need for environmental attributes.

- 5) Given the IRP and mitigation plan studies will not be completed ahead of the 2027 EPP, should there be any procurement conducted under this mechanism in advance of the final studies? If so, why? How should the need be determined? What considerations (if any) should be part of this procurement decision and process that may differ from future procurements performed after subsequent planning processes such as IRP and Mitigation Plan?

New procurement for 2027 EPP should only be conducted if immediate additional energy needs and supply gaps are quantified.