

September 15, 2026

Illinois Power Agency

Via Email: ipacontactus@illinois.gov

**Ameren Illinois Company d/b/a Ameren Illinois' Comments on
Draft 2027 Electricity Procurement Plan**

Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois or the Company) respectfully submits these comments on the Draft 2027 Electricity Procurement Plan (the Plan), which the Illinois Power Agency (IPA or Agency) released for public review and comment on August 17, 2026. Once a docket proceeding has been initiated following the filing of the Plan with the Illinois Commerce Commission (Commission), Ameren Illinois may provide additional comments and recommendations.

Ameren Illinois appreciates the IPA's thoughtful development of the Draft 2027 Electricity Procurement Plan. The Company is generally supportive of the Plan's proposals concerning energy and capacity hedging and other procurement matters and offers no comments on those proposals at this time. These comments are therefore limited to the Long-Term Clean Energy Procurement mechanism addressed in Section 9, consistent with the IPA's request for stakeholder feedback.

Internal Comments Regarding the Plan

I. Section 9.4.2: Stakeholder Feedback Regarding Long-Term Clean Energy Procurement (LTCEP)

LTCEP Should Be Deferred Until Completion of the Integrated Resource Plan (IRP) Process

Throughout the stakeholder process, Ameren Illinois has consistently emphasized that procurement decisions, procurement targets, triggering mechanisms, and program design should be informed by the results of the IRP rather than developed in advance of it. The IRP and associated mitigation planning processes will provide stakeholders with information needed to evaluate resource needs, potential alternatives, and the appropriate path for Illinois customers.

Developing a detailed procurement framework before completion of those planning processes could require key design decisions to be made before stakeholders have sufficient information regarding the nature, magnitude, and timing of any procurement need. Proceeding before completion of the IRP would limit the ability of stakeholders to incorporate the results of the planning process into procurement design and implementation decisions.

The LTCEP mechanism will result in substantial and long-term financial commitments for Illinois customers. Before such commitments are considered, stakeholders should have the benefit of analyses addressing resource adequacy needs, technology alternatives, regional market considerations, procurement costs, customer bill impacts, and overall affordability. Those analyses should inform any future LTCEP framework.

Accordingly, Ameren Illinois recommends that the Agency defer development of a detailed LTCEP procurement framework until the 2028 Electricity Procurement Plan, and after

the completion, review, and litigation of the initial IRP and associated mitigation planning processes.

II. The Nature and Magnitude of Future Procurement Needs Should Be Determined Through the IRP Process

Procurement targets and triggering mechanisms should be derived from the needs identified through the IRP and any associated mitigation plan. This sequencing would allow the Agency and stakeholders to evaluate whether a procurement is appropriate and, if so, to design the procurement around the identified need.

The IRP and related mitigation planning processes are intended to evaluate resource needs, assess alternative solutions, and identify cost-effective pathways for addressing those needs. Until those analyses are completed, stakeholders do not have sufficient information to fully evaluate the nature, magnitude, timing, or scope of any future procurement need. Accordingly, Ameren Illinois recommends procurement design decisions should follow completion of the IRP and mitigation planning processes rather than precede them.

III. Customer Affordability Must Remain a Primary Consideration

Regardless of the structure ultimately considered for an LTCEP mechanism, customer affordability must remain a primary consideration. The contracts contemplated under an LTCEP framework may extend for decades and could expose customers to substantial costs over an extended period. Given the long-term nature of the contracts under consideration, customers could be exposed to significant and lasting costs if procurement decisions are made before the planning studies are completed and fully evaluated. These commitments therefore warrant careful review and meaningful customer protection. Ameren Illinois supports the use of explicit cost caps, rate-impact protections, and affordability testing before a procurement begins. Given the potential duration of LTCEP contracts, affordability should also be evaluated periodically, along with mitigation plans, over the life of the contracts so that customer impacts remain a central consideration.

The Agency should therefore treat customer affordability and cost-effectiveness as key selection criteria in any future LTCEP framework.

IV. Any Initial Procurement Should Be Limited in Scope

If the Agency ultimately determines, following completion of the IRP and mitigation planning processes, that an LTCEP mechanism should move forward, Ameren Illinois recommends a deliberate, incremental approach.

Any initial procurement should be narrowly scoped and capped in both quantity and budget. A limited pilot procurement would allow the Agency and stakeholders to evaluate pricing, bill impacts, participation levels, execution ability and whether the product is a financially viable solution before larger commitments are considered. The results of any pilot should inform whether and how the mechanism is expanded. This crawl-walk-run approach would provide practical information while limiting customer exposure before the procurement structure has been tested.

V. Competitive Procurement Structures Should Be Prioritized

If an LTCEP procurement is pursued after completion of the applicable planning processes, its design should promote meaningful competition among suppliers and resources capable of addressing the identified need. Ameren Illinois has previously expressed concern regarding procurement structures focused on technologies or products for which only a limited number of suppliers may be able to submit bids. The Agency should instead focus on technologies and products capable of attracting multiple bidders and creating meaningful competitive depth. Resource evaluation should emphasize competitive depth, customer affordability, cost-effectiveness, and alignment with applicable PJM or MISO capacity constructs and requirements. The IPA and its consultants could also seek feedback from developers and stakeholders to identify technologies with sufficient market interest to support a competitive procurement.

Competitive procurement structures that promote meaningful bidder participation should remain a guiding principle in any future LTCEP design.

VI. Procurement Products and Contract Terms Should Follow the Identified Need

The appropriate procurement products, resource eligibility requirements, and contract terms should be evaluated after the IRP and mitigation planning processes identify the need that the procurement is intended to address.

Contract duration should be evaluated in conjunction with customer affordability, procurement objectives, IRP cadence, and overall customer risk. Given the potentially long duration and significant financial implications of the contracts under consideration, these design decisions should be informed by the completed planning studies and a careful evaluation of customer impacts.

VII. Cost Allocation Must Follow Cost-Causation Principles

Ameren Illinois encourages the Agency to provide additional consideration to cost-allocation and cost-recovery mechanisms before implementing any LTCEP framework. Cost recovery for wholesale product procurements should use methods that align with industry standards, reflect cost causation, and ensure that resulting rates remain fair and reasonable. The applicable allocation methodology should be clearly defined before a procurement is authorized so stakeholders can evaluate the customer impacts of the proposed procurement. Utilities and Alternative Retail Electric Suppliers (ARES) should be afforded a reasonable opportunity to adapt their portfolios to any new obligations. Existing contractual positions may warrant limited transitional consideration over the near term. Thereafter, utilities and ARES should have the opportunity to adjust their portfolios, and ARES should participate fully in order to maintain a robust and competitive supply market in Illinois.

Providing greater clarity regarding cost allocation before procurement will reduce uncertainty and allow stakeholders to evaluate the financial implications of the proposed mechanism.

VIII. Technical Errors Discovered in Review

During the Company's review of the Draft 2027 Electricity Procurement Plan, Ameren Illinois identified the following technical, clerical, and typographical errors. Ameren Illinois respectfully requests that the Illinois Power Agency correct the following items before filing the Plan with the Illinois Commerce Commission to promote clarity, consistency, and accuracy:

- **Sections 1.1 and 7.1.1, Tables 1-1, 1-2, 7-1, and 7-2, pages 3, 88, and 89:** In the “Upcoming Delivery Year +2” column within the “Fall 2027 Procurement” portion of each table, remove the second occurrence of “all months.”
- **Section 1.3, Table 1-6, page 6:** In the Ameren Illinois row for the 2028-2029 Delivery Year, insert a space between “175” and “MW” in the “Energy” column.
- **Section 1.4, page 7:** Insert “the” before “Resource Adequacy Study process.” The relevant clause should read: “including the Resource Adequacy Study process as defined by Section 9.15(o).”
- **Section 2.5, page 12:** Insert a space between footnote marker 62 and “Public Act 104-0458 made additional.”
- **Section 2.7, page 16:** Revise “deactivation dates notices” to “deactivation date notices”; add “MW” after “6,381” in the sentence beginning “The RBP will seek to secure up to 6,381”; and remove the extraneous quotation mark within the parenthetical defining “Reliability Must Run (RMR).”
- **Section 2.7, page 17:** Replace “devolvment” with “development” in the phrase “interconnection process of 90 days to accelerate development of critical generation.”
- **Section 2.7, page 19:** Replace “reformed” with “reforms” and hyphenate “stakeholder-supported”. The phrase should read: “developing and submitting to FERC stakeholder-supported reforms by September 2026.”
- **Section 3.2, page 21:** Update the references to “2025” so that they refer to the “2026 Plan” and the “September 2026 solicitation,” as applicable.
- **Section 3.2, page 22:** Replace “2017” with “217” so that the phrase reads “159 of 217 communities.”
- **Section 3.2, page 23:** Replace “updated” with “update” so that the phrase reads “which resulted in an update to the Ameren default service load forecast.”

- **Sections 3.2.3 and 4.1, pages 24 and 48:** Revise the ARES-supplied small commercial load percentage from 65% to 66% to reflect correct rounding and revise the stated decrease from 2% to 1%.
 - **Section 3.2.3, page 24:** Revise the sentence concerning municipal aggregation agreements to read: “The majority of municipal aggregation contracts are set to expire in Summer 2026.”
 - **Section 3.2.3, page 25:** For the “low switching/high load” forecast, if the text is intended to state the switching rate at the end of the submitted forecast horizon, revise the ARES-supplied small commercial switching rate from 18% to the May 2032 rate of 22%.
 - **Section 3.2.3, page 25:** For the “high switching/low load” forecast, if the text is intended to state the switching rates at the end of the submitted forecast horizon, revise the ARES-supplied residential and small commercial switching rates to the May 2032 rates of 72% and 95%, respectively.
 - **Section 3.4, Figure 3-16, page 34:** Revise the delivery year in the figure title to “Delivery Year 2027-2028.”
 - **Section 3.4, footnote 119, page 34:** Correct the unit for Eligible Retained Load. The value appears to be stated in kWh but labeled as MWh. Or change it to MWh to match rest of figure and page.
 - **Section 3.4.1, page 36:** Remove the duplicated percent sign following MidAmerican’s annual growth rate of -1.2%.
- Section 3.5.4, page 43:** Revise "Capacity prices for the Summer 2025 MISO PRA cleared at \$424.30/MW-day" to "Capacity prices for the Summer 2026
- **Section 5.1.1, footnote 151, page 54:** Replace “compacity” with “capacity.”
 - **Section 5.1.1, page 55:** Replace “provided” with “provide” so that the sentence reads: “The uprates are estimated to provide 2.11 GW.”
 - **Section 5.2.2.1, page 61:** Revise the delivery year in the sentence referring to Figure 5-7 to “2026-2027.”
 - **Section 5.2.2.1, Figure 5-7, page 62:** Revise the delivery year in the figure title to “2026-2027.”
 - **Section 6.1.1, page 71:** In the phrase “from June 2025 through June, 20265,” remove the comma after “June” and replace “20265” with “2026.”
 - **Section 6.7, page 82:** Replace “the” with “that” in the phrase “generation resources that clear the market,” and did you mean “implement” or “implementing” in the phrase “first implementing measurement and verification criteria for demand response resources.”

- **Section 6.8, page 83:** Replace “day-head” with “day-ahead.”
- **Section 6.8.1, Table 6-3, page 84:** In the table title, insert a space between “June” and “2026” and remove the extraneous word “July” preceding “June 2026.”
- **Section 8.1, page 106:** Replace “filling” with “filing” in the phrase “FERC approval of MISO’s Seasonal Capacity and Accreditation Requirements filing,” and replace “alterative” with “alternative.”
- **Section 8.4, page 108:** Insert the missing space between “Docket Nos. 254-0727” and “and 25-0893.”
- **Section 8.4, page 108:** Revise the end year for the seven procurement events on which Bates White submitted comments and add the missing period so that the phrase reads: “Summer 2025 through Spring 2026.”
- **Section 8.4, page 108:** In the second sentence of the final paragraph, replace “It” with “In” and replace “materials benefits” with “material benefits.”
- **Sections 9.1.1 and 9.1.2, page 109:** Replace “outline” with “outlined” in the opening sentence of the second paragraph of Section 9.1.1; replace “occurring” with “occurring” in the opening sentence of the fourth paragraph of Section 9.1.1; and replace “response” with “responsive” in the final sentence of the second paragraph of Section 9.1.2.
- **Section 9.1.3, page 111:** Replace “force” with “forced” in the phrase “if only eligible retail customers were forced to pay a premium to facilitate.”
- **Section 9.1.4, Table 9-1, page 112:** In the “Traditional EPP Procurements” column for the “Contract Term” characteristic, replace “employees” with “employs.”
- **Section 9.2.2, page 113:** Insert “the” before “first stakeholder workshop” so that the opening phrase reads: “In advance of the first stakeholder workshop.”

IX. Conclusion

Ameren Illinois supports continued stakeholder discussion regarding long-term resource planning and potential procurement mechanisms. However, implementation of an LTCEP framework should follow, rather than precede, completion of the IRP and associated mitigation planning processes. Consistent with its prior comments in Feedback Requests 2 and 3, Ameren Illinois advocates applying the results of the IRP and mitigation planning process to inform the procurement targets, triggering mechanisms, and framework design. The Company continues to recommend that customer affordability remains a primary consideration, that competitive procurement structures promoting meaningful bidder participation be utilized, and that cost allocation follow established cost-causation principles. If an LTCEP mechanism is ultimately

pursued, Ameren Illinois suggests a limited pilot approach should be considered before larger procurement commitments are undertaken. Accordingly, the Company recommends that development of a detailed LTCEP framework be deferred until the 2028 Electricity Procurement Plan, following completion, review, and litigation of the initial IRP.

Ameren Illinois appreciates the opportunity to provide comments and looks forward to continued engagement with the Agency and interested stakeholders.