

September 16, 2026

VIA EMAIL

Mr. James Rouland
Planning & Procurement Bureau Chief
Illinois Power Agency
180 N. Wabash Ave
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Chicago, Illinois 60601

RE: Commonwealth Edison Company's Comments on the Illinois Power Agency's Draft
2027 Electricity Procurement Plan Issued on August 17, 2026

I. Introduction

Pursuant to Section 16-111.5(d)(2) of the Public Utilities Act ("PUA"), Commonwealth Edison Company ("ComEd") submits these Comments on the Illinois Power Agency's ("IPA" or "Agency") 2027 Draft Electricity Procurement Plan ("2027 Draft Plan") that was issued for public comment on August 17, 2026.¹

ComEd submits these Comments to address two subjects: (1) a technical correction to Energy Procurement Targets for ComEd and (2) to respond to the Agency's request for feedback from stakeholders as to whether there may be an alternative way to obtain more granular fuel mix data on page 106 of the 2027 Draft Plan.

II. Comments on the 2027 Draft Plan

A. Technical correction to Energy Procurement Targets for ComEd

As the Agency correctly states in the 2027 Draft Plan:

This Plan proposes to maintain the block energy or capacity products offered through the 2026 Plan, with one notable change. Since the 2024 Plan, the Agency has hedged only 50% of ComEd's forecasted eligible retail customer load during the summer delivery months and 30% during the non-summer months in order to account for offsetting price impacts as a result of Carbon Mitigation Credits ("CMC"s) purchased by ComEd, with the price

¹ ComEd's silence at this time regarding any particular issue should not be interpreted as agreement with all statements, approaches, calculations, or recommendations made in the 2027 Draft Plan pertaining to that issue.

volatility of the unhedged load offset by month-to-month changes in the CMC Price. With the CMC contracts ending after the 2026-2027 Delivery Year and this 2027 Plan addressing the procurement of electricity through the 2029-2030 Delivery Year, the Plan is summarily projected to include the conclusion of the CMC contracts and the loss of the cost offsetting feature of these contracts. For this reason, this Plan includes a ramping up of procurement volumes in anticipation of returning to hedging 100% of ComEd’s forecasted eligible retail customer load starting in the 2027-2028 Delivery Year.

2027 Draft Plan, p.1.

ComEd suggests that, in order to return to “pre-CMC” hedge percentages, beginning with the 2027-2028 Delivery Year, Table 1-2 on page 3, Table 7-2 on page 89, and the subsequent narratives should be updated to reflect the hedge percentages below:

Spring 2027 Procurement			Fall 2027 Procurement		
June 2027 - May 2028 (Upcoming Delivery Year)	Upcoming Delivery Year + 1	Upcoming Delivery Year + 2	October 2027 - May 2028 (Upcoming Delivery Year)	Upcoming Delivery Year + 1	Upcoming Delivery Year + 2
June 100% peak and off Peak July and Aug. 106% peak, 100% off peak Sep. 100% peak and off peak Oct. - May 75% peak and off peak	37.5 % all months except June, July and August on-peak and off-peak, which should be 52.5%	12.5 % all months except June, July and August on-peak and off-peak, which should be 15%	100 % all months	50 % all months except June, July and August on-peak and off-peak, which should be 75%	25 % all months except June, July and August on-peak and off-peak, which should be 30%

B. ComEd’s response to the Agency’s request for feedback from stakeholders as to whether there may be an alternative way to obtain more granular fuel mix data on page 106 of the 2027 Draft Plan

In the 2027 Draft Plan, the Agency seeks feedback from stakeholders as to whether there may be an alternative way to obtain more granular fuel mix data while ensuring any such alternative means does not impact the bid event or results (*i.e.*, creating barriers to entry, increasing bid premiums). The Agency correctly points out that the Illinois Commerce Commission has previously found that the law prohibits the consideration of fuel mix in bid evaluation, and confidentiality provisions found in Section 16 111.5(h) of the PUA prohibit the publication of the fuel mix of winning bids. And as aggregated expected fuel mix data were reported for the winning bidders starting in the Spring 2023 energy procurement and continuing through the Spring 2026 energy procurement, the Agency proposes to continue to collect fuel mix data from winning bidders through the 2027 Plan.

ComEd supports the Agency's proposal to continue to collect fuel mix data from winning bidders through the 2027 Plan. ComEd also recognizes that, since the Spring 2023 energy procurement, a majority of fuel mix data reported by winning bidders has increasingly been reported as the RTO (Regional Transmission Organization) Fuel Mix, and, in the case of ComEd, the PJM Interconnection, L.L.C. ("PJM") average fuel mix data (the "PJM Fuel Mix"), without additional granularity. Bidders likely report the RTO Fuel Mix rather than a more granular supply-specific fuel mix because in Illinois' competitive energy market electricity supply generally comes from RTO-wide financial and portfolio-based transactions, not transactions tied to the output of specific generating units.

Many suppliers manage energy obligations through a continuously changing portfolio of generation resources, market purchases, and hedging arrangements rather than designated generating units. Accordingly, requiring more granular fuel mix disclosures could present challenges including: (1) limited ability to accurately attribute energy to specific generating resources in the PJM and Midcontinent Independent System Operation ("MISO") organized wholesale markets, (2) potential disclosure of commercially sensitive procurement and hedging strategies, (3) the risk of creating barriers to participation or reducing customer affordability, and (4) increased administrative and reporting burdens. As a result, the RTO Fuel Mix provides a standardized and readily available disclosure that can be reported consistently by all bidders without requiring them to reveal proprietary portfolio information or establish complex resource-tracking processes, and the current use of RTO Fuel Mix data may therefore represent the most practical, uniform approach that provides customers with fuel mix information while still supporting a competitive procurement process.

In accordance with Illinois Administrative Code Title 83, Section 421.30(c), ComEd

publicly files a quarterly Environmental Disclosure report reflecting the break-down, on a percentage basis, of the known sources of electricity supplied in Illinois and related emissions and renewable energy attribute data.² Considering the challenges stated above, suppliers may, and often do, simply respond to the query in support of that Environmental Disclosure with the PJM Fuel Mix. In comments on the 2023 Draft Plan, ComEd suggested that electricity procurements could require bidders to include more granular fuel mix data to identify electricity procured from carbon-emitting resources, so that the associated cost of carbon value could be calculated and included to ensure that the actual full cost of procuring carbon-emitting resources is transparently identified, as well as to suggest options to mitigate or avoid procurement of electricity from carbon-emitting resources.³ If accomplished in a manner consistent with ComEd's required Environmental Disclosure process and format, that remains a specific, targeted option for the Agency to consider.

Alternately, if the IPA seeks more granular information, ComEd recommends consideration of other alternatives that can be implemented outside of the bidding process and without requiring suppliers to attribute energy serving ComEd load to specific generating resources. For example, the Agency could consider developing an Illinois-specific or procurement-specific residual fuel mix using publicly available generation and market data from sources such as the U.S. Department of Energy's Energy Information Agency ("EIA") or PJM and MISO RTO data. That approach could provide a more representative estimate of the generation characteristics associated with energy serving Illinois customers and could be used to estimate the carbon emissions profile and associated carbon costs of procured energy.

² Ill. Admin. Code tit. 83, § 421.30(c) (2026).

³ Commonwealth Edison Company, *Comments on the Illinois Power Agency's Draft 2023 Electricity Procurement Plan* at 13-15 (Sept. 14, 2022).

Because the methodology would be developed independently of supplier bids, it would avoid requiring suppliers to disclose commercially sensitive information or incur additional compliance costs that could affect bid pricing.

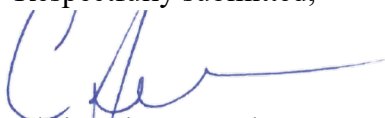
As another example, the IPA could consider standardized annual supplier portfolio fuel mix reporting based on suppliers' overall generation and procurement portfolios rather than the specific utility load obligation. In fact, this data may already exist for suppliers' sustainability and Environmental, Social, and Governance ("ESG") reporting. That approach could provide insight into the resource characteristics and emissions profile of winning suppliers while recognizing that wholesale supply obligations are generally served through dynamic portfolios rather than designated generating resources. A standardized reporting framework could also improve transparency regarding carbon-emitting and carbon-free resources without requiring resource-level attribution that may be difficult to verify and inconsistent with organized wholesale market structures.

Those approaches may provide customers and policymakers with more meaningful information regarding fuel mix, emissions, and potential carbon costs while minimizing the risk of increased administrative burden, barriers to participation, disclosure of proprietary procurement strategies, or higher bid costs. Regardless of the approach ultimately adopted, any modifications to the current disclosure framework should remain informational in nature and avoid introducing requirements that could limit bidder competition or procurement results that adversely affect ComEd customer affordability.

III. Conclusion

ComEd respectfully requests that the 2027 Draft Plan be revised to reflect the Comments articulated herein.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'C. Foley', with a long horizontal flourish extending to the right.

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