

Hello,

Below I offer comments on the Illinois Power Agency's Draft 2027 Electricity Procurement Plan, published August 17, 2026.

I'm writing only in my personal capacity, on behalf of no entity; and I have not shared or discussed my comments here with anyone. Generally, I am attempting to offer non-substantive points, suggesting clarification of the descriptions of existing or proposed policies.

All my page number references are for the clean version of the Draft 2027 Plan, <https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/20260817-draft-2027-electricity-procurement-plan-ipa.pdf>.

Page 43: it says "Capacity prices for the Summer **2025** MISO PRA cleared at \$424.30/MW-day". This should say "Summer **2026**".

Page 55: It says "In the following Delivery Years the potential PRMR continues to increase..."

As background, please note the following:

- * PRMR or "Planning Reserve Margin Requirement" in MISO tariff language is a **megawatt** amount, measuring the capacity auction procurement target. But all the bars in Figure 5-3 (from the recent NERC 2026 Long-Term Reliability Assessment) are showing **percentages**.

- * The light blue bars in the graph (that is, the quantities increasing with time) show what NERC calls the Prospective Reserve Margin, which basically means (as NERC uses it) the surplus of "Prospective" resources over expected demand, as a percentage of demand. ("Prospective" resources is a more expansive category than "Anticipated" resources, in NERC's reckoning: see pages 168-170 of the NERC 2026 LTRA, https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf.)

- * What MISO calls the Planning Reserve Margin -- a minimum **percentage** of surplus resources required, within loss-of-load modeling, to meet resource adequacy standards -- is roughly what NERC in this graph calls the Reference Margin Level (the dark horizontal lines).

- * It is not necessarily true that having more physical supply resources in the ground, holding all else equal, causes the Planning Reserve Margin percentage (as determined by MISO's loss-of-load modeling) to increase (this is a very complex topic).

-->All that background is to say that in the quoted page 55 text, I think a fair rewrite might be "In the following Delivery Years the potential PRMR **surplus** continues to increase..."

Pages 57-58: The final paragraph on page 57, and Figure 5-5 on page 58, should take account of the 2028-2029 PJM capacity auction result, which was announced in July 2026

(<https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2028-2029/2028-2029-bra-results-report.pdf>).

Page 59: the third full paragraph says that the PJM capacity auction price cap has been extended through Delivery Year 2030-2031. Actually, the price cap is (as of today) extended only through the auction for Delivery Year 2029-2030 (see FERC Docket No. ER26-1556 and also <https://insidelines.pjm.com/ferc-approves-capacity-auction-price-collar-to-next-two-capacity-auctions/>).

Page 61: Near the top, it says: “Figure 5-6 below, compares the 2024/2025 results to the 2025/2026 results.” This sentence should note that the graph also shows the 2026/2027 results. Similarly, the immediate next sentence about wind/solar ELCC ratings should say “previous **three** PRAs.”

Page 61: toward the bottom, it says “third seasonal PRA” -- this should say “**fourth** seasonal PRA”.

Page 61: The end of footnote 186 should probably include the URL for MISO's 2026-2027 Schedule 53 resource class accreditation results, <https://cdn.misoenergy.org/PY26-27%20Final%20Schedule%2053%20Class%20Average743297.pdf>.

Page 64: at the bottom, it says “As shown in Figure 5-5...” This should refer to Figure 5-8.

Page 66: Figure 5-10 or the text just before it (on the prior page) should clarify that this is about the Summer season.

Page 68: There are two lines (one beginning “For this reason...” and one beginning “Two-year physical...”) here stating that for this 2027 Electricity Procurement Plan, the Agency will seek to procure (for Ameren Illinois default supply load) a **two**-year Zonal Resource Credit product covering Delivery Years 2028-2029 and 2029-2030. **But** later on page 96 (where it says “As discussed in Section 5.2.3...”) and again at the top of page 99, it suggests the Agency is contemplating trying to procure a **three**-year ZRC product for Ameren default load, going through Delivery Year 2030-2031. These should be reconciled.

Page 78: first paragraph, fifth line: in the phrase “with the exception of December and January of 2025” -- I think you need to insert “2024” immediately after “December”.

Page 78: first paragraph, eighth line: the parenthetical “(i.e. operating as charge to customers)” should probably go immediately after the phrase “positive values”.

Page 82: The text of Section 6.7 here doesn't mention a slew of recent FERC decisions modifying MISO's market participation protocols for demand-side resources, which are all summarized on page 4 of this recent MISO

document: https://cdn.misoenergy.org/20260824%20Demand%20Resources%20DR%20LMR%20Workshop_UPDATED777023.pdf.

At minimum, I would suggest:

- * Editing the sentence in your footnote 223 stating “EDR resources may qualify as LMR but are not required to do so.” -- considering that in Docket No. ER25-2050, FERC accepted MISO’s proposal to end the allowance of dual registration of one resource as both EDR and LMR, effective with Delivery Year 2026-2027.

- * Acknowledging that (while MISO brought energy efficiency resources into the capacity auction over a decade ago, as your text already notes here), FERC decided late last year in Docket No. ER26-148 to approve the disqualification of Energy Efficiency Resources from the MISO capacity auction beginning with Delivery Year 2026-2027.

Some others of the recent FERC dockets could be mentioned if you deem them significant enough.

Page 97: it says that, for Ameren Illinois default supply load, “it is not recommended that any capacity hedges be procured for years beyond the 2029-2030 Delivery Year in this Procurement Plan.” **But** that seems inconsistent with the two bullet points above on this same page 97 saying this 2027 Electricity Procurement Plan envisions attempting to procure some Zonal Resource Credits for Delivery Year 2030-2031 during calendar year 2027. [Relatedly, see also my comment above about page 68.]

Thank you for your consideration of my comments.

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