

MEMORANDUM

TO:	Illinois Power Agency (IPA)
FROM:	Mick McGuckin (SOO Green HVDC Link)
DATE:	16 th September 2026
RE:	Draft 2027 Electricity Procurement Plan

1. Introduction

SOO Green HVDC Link (“SOO Green”) appreciates the current opportunity to review and comment on the Draft 2027 Electricity Procurement Plan for the period of June 2027 through May 2032 which is covering the jurisdictions served by Ameren Illinois, Commonwealth Edison and MidAmerican.

Following publication of the draft on 17th August, SOO Green can now provide comments to the IPA ahead of the 30-day deadline.

2. SOO Green HVDC Link Comments

SOO Green hereby identifies the following sections of the Draft 2027 Electricity Procurement Plan with provision of comments as follows:

- **Section 2.3 (7th Bullet)**

SOO Green would appreciate clarification regarding the following statement:

“Procurements of standard wholesale products may include energy from high voltage direct current (HVDC) transmission lines with converter stations located in Illinois”

SOO Green would like to confirm that this does not preclude Inter-Regional Transmission Converter Stations e.g. an HVDC Link with one converter station located in Illinois and one converter station located in Iowa.

- **Section 6.3.1 Suitability of Supply Hedges (Paragraph 7)**

In this section, the Draft Electricity Procurement Plan states:

“The commercial operation date for this project has been delayed several times. The last updates provided by SOO Green HVDC link through their website were in 2023 which communicated approval by the Iowa Utilities Board for a franchise to construct, maintain, and operate the Iowa portion of the project. The uncertainty regarding the project’s commercial operation date raises the issue of timing as to when the IPA would be able to consider products from the HVDC project for inclusion in the procurement process”

During the various consultation processes with the State of Illinois during 2026, SOO Green has submitted formal responses/information on following items:

- Long Term Clean Energy Procurement Framework (LTCEP) RFI Responses
- Integrated Resource Plan (IRP) Workshop Responses



Based on this information now being on record with the Agency, we propose the following revision to Paragraph 7 of Section 6.3.1:

"The SOO Green HVDC Link is a 2,100 MW, $\pm$ 525 kV underground merchant HVDC transmission project of approximately 350 miles connecting MISO (Northern Iowa) to the ComEd zone of PJM at Plano, Illinois. In 2026 the project's developer provided updated information to the Agency through the Long-Term Clean Energy Procurement RFI and the IRP/Mitigation Plan research-question processes. Based on those submissions, the developer reports a target in-service window of Q4 2032–Q3 2033 (driven by equipment lead times and supply-chain conditions, finalization of interconnection agreements, and offtake commitments). Otherwise, the project is 'shovel-ready and has agreements in place with Prysmian (HVDC cable) and Siemens Energy/Mortenson (converter stations and it can demonstrate site control at the Plano terminus and a purchase option at the Iowa terminus. In addition, railroad rights-of-way have been acquired through voluntary agreements for the entire route without exercise of eminent domain authority. Finally, the project has required state and local franchises in Iowa, is currently under expedited NEPA review with federal and state agencies for environmental permits and does not need to pursue a CPCN in Illinois (again, as a merchant project that does not need eminent domain authority."

- **Section 6.3.1 Suitability of Supply Hedges (Paragraph 8)**

SOO Green believes that the statement that the IPA "would only be procuring energy...not capacity" considers the traditional 3-year mechanism but read alone it implies the line has no Capacity/RA value to Illinois. This seems to contradict Page 75, where the Plan itself notes b-10(1) makes accredited-capacity HVDC facilities eligible.

SOO Green therefore requests the following addition (*highlighted in red*) and redaction (*highlighted in strikethrough*) in Section 6.3.1 (Paragraph 8), below:

"If the SOO Green HVDC transmission link is constructed, it would offer a path for the transmission of wholesale energy, but the project will seek to also be compensated for the value of its capacity. Since the proposed terminus of the line would be in PJM, the IPA would only be procuring energy for ComEd's eligible customers that would be delivered through the HVDC line not capacity. This limitation reflects the structure of the traditional three-year procurement and does not address the capacity or resource-adequacy value of interregional HVDC. As discussed in Chapter 9, the resource-adequacy and capacity attributes of a qualifying HVDC facility are eligible for evaluation and procurement under Section 16-111.5(b-10) and are appropriately assessed through the IRP and Mitigation Plan. This raises additional uncertainties regarding how this product could be incorporated in the IPA procurement process and still provide sufficient revenues to help make the project economically viable. In its recent Policy Study, the IPA's analysis of a policy to establish a procurement for RECs from a high voltage direct current transmission line included a review of the potential costs to ratepayers, the impact on grid reliability and impact on resource adequacy in Illinois of the proposed SOO Green HVDC line."

- **Chapter 9 - Long-Term Clean Energy Procurement**

SOO Green support and endorse Subsection (b-10) of Section 16.111.5 of the Public Utilities Act (PUA). SOO Green request that any future identification of need also be tied to the IRP resource adequacy gaps.

This is consistent with SOO Green's previous comments, and we there request the following new addition at an appropriate point relating to b-10 in Chapter 9 of the plan:

"A future identification of need under Section 16-111.5(b-10) would draw on the resource-adequacy gaps quantified through the IRP and Mitigation Plan, and eligible resources — including qualifying clean-generation-associated HVDC transmission facilities — would be evaluated on the basis of their delivered energy, capacity, and resource-adequacy value to Illinois."

3. Summary

SOO Green appreciates the forthcoming IPA review and consideration of the comments and clarifications listed above and look forward to the ongoing co-operation with the Agencies and stakeholders to help develop the 2027 Electricity Procurement Plan.