

COMMENTS OF COMMONWEALTH EDISON COMPANY

Commonwealth Edison Company (“ComEd”) respectfully submits comments and recommendations regarding the questions posed during the Illinois Power Agency (“IPA”) Feedback Request on November 12, 2021 and subsequent workshops conducted by the IPA on November 18, 2021. ComEd appreciates the IPA’s commitment to solicit stakeholder feedback as part of the development of the 2022 Revised Long-Term Renewable Resources Procurement Plan.

Utility-Scale Procurement Questions

1) Are annual procurements sufficient, or should procurements be more frequent? If procurements are conducted annually, is there a time of year that would be best to hold them?

ComEd Response: ComEd’s preference would be that annual procurements that do not coincide with other IPA procurements, i.e. Spring and Fall Block Energy RFPs.

4) How should the Agency balance seeking to receive RECs as quickly as possible to meet aggressive RPS targets, and adjusting procurement volumes to account for project attrition, with allowing developers needed time for project development? Should midstream milestones or increases in collateral requirements be considered as a means to ensure that selected projects are indeed on track for development? What lessons can be taken away from development delays extending from the COVID-19 pandemic?

ComEd Response: ComEd recommends that any midstream milestones implemented be tracked and monitored for completion by the IPA.

7) With both MISO and PJM using 5-minute real-time settlements, is a five-minute settlement period practical for the IPA to use, considering that the IPA would also have to request that bidders submit their strike prices in 5-minute periods? If a 5-minute period is not practical, what period would you consider a reasonable settlement period?

ComEd Response: ComEd prefers using 60-minute real-time settlements.