

Clean Grid Alliance Comments on
Illinois Power Agency's
Draft Revised Long Term Renewable Resources Procurement Plan
for 2020

Clean Grid Alliance (“CGA”) appreciates the opportunity to provide feedback and substantive comments on the Revised Long Term Renewable Resources Procurement Plan for 2020 (“LTRRPP” or “Draft Revised LTRRPP”) (posted August 15, 2019).

1. Forecasted Retail Customer Load for 2020-2021 to 2025-2026 is inconsistent with Recent PJM and MISO Forecasts

The load forecast presented in table 3-11 (page 65) is inconsistent with data in recently published PJM and MISO reports. The table indicates a decrease in “Statewide” energy from Ameren Illinois, ComEd, and MidAmerican between 2020-2021 and 2025-2026. This should be re-evaluated because PJM and MISO are forecasting increases over that time period. See [PJM Load Forecast Report](#), Table E-1 at 81 of 90 (Jan. 2019) and [MISO Energy and Peak Demand Forecasting for System Planning](#) at 11 of 94. Figure 6 of the MISO Energy and Demand Forecast includes both MISO and PJM and it has an increasing slope from 2020 til 2026. In addition, Table 7 of the same report shows an average annual increase of net annual energy for all of Illinois that is in the MISO footprint.¹

¹ CGA notes that MidAmerican’s retail customer load is increasing in a manner consistent with [MISO Energy and Peak Demand Forecasting for System Planning report](#).

2. CGA Supports IPAs Proposed Correction to MidAmerica’s Load forecast

The LTRRPP describes a methodology, proposed by MidAmerican in 2018, for forecasting its portion of the load applicable for RPS requirements. The change results in load from 2025-2026 to 2030-2031 being 45% lower than the 2019-2010 load, and varying dramatically from year to year.² This change would cause curtailment of REC contracts.³ The IPA proposes a new methodology – using a fixed percentage of 26.025% of MidAmerican’s total Illinois retail load.⁴ CGA supports the change proposed by the IPA.

3. CGA Supports the use of ACPs for Forward Procurements

Due to budget uncertainty the IPA has expressed a need for additional flexibility, and that utility-held Alternative Compliance Payments (“ACPs”) be held in reserve to help provide some flexibility in managing the RPS budget. CGA supports the IPAs proposal regarding ACPs. In addition, CGA would also encourage legislators to extend the rollover period allowed under 20 ILCS 3855/1-75(c)(6).⁵

4. CGA Recommended Edit

The LTRRPP includes a statement regarding renewable resources being baseload. This statement is not instructive, moreover, baseload is a descriptor that is rapidly changing. As Illinois, PJM and MISO integrate higher amounts of renewable resources their operations will change, and RTOs/ISOs will take steps to increase their flexibility and robustness. Baseload as a concept will change because RTOs/ISOs will run first run renewable resources and then manage

² See *Draft Revised LTRRPP* at 55-57.

³ See *Draft Revised LTRRPP* at 57.

⁴ See *Draft Revised LTRRPP* at 57.

⁵ Discussed at *Draft Revised LTRRPP* at 28-29 and 77.

intermediate/fast ramping resources as complements to meeting electricity demand. Thus, CGA proposes the following edit on page 83:

“Among the differences from the ZES Plan scoring approach are that renewable generating facilities ~~are likely to be intermittent rather than baseload (a defining characteristic of zero emission facilities),~~ typically impact generation on the margin of the dispatch order and are generally smaller in size relative to the ZES replacement generation.”

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