

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission :
On Its Own Motion : Docket No. 22-0749

Initiation of an Investigation to develop and :
adopt a Renewable Energy Access Plan :
pursuant to Section 8-512 of the Public :
Utilities Act :

:

**VERIFIED INITIAL COMMENTS
OF ENVIRONMENTAL LAW AND POLICY CENTER, NATURAL
RESOURCES DEFENSE COUNCIL, AND VOTE SOLAR
ON THE RENEWABLE ENERGY ACCESS PLAN**

I. Introduction

Pursuant to Section 8-512 of the Public Utilities Act (220 ILCS 5/8-512), the Environmental Law and Policy Center, Natural Resources Defense Council, and Vote Solar, collectively (“Joint NGOs”) respectfully submit these comments to the second draft of the Illinois Renewable Energy Access Plan (“the Draft REAP”) in the above-captioned Docket.

Joint NGOs thank the Illinois Commerce Commission’s (ICC) staff for the second draft of the Draft REAP. Joint NGOs support the Draft REAP’s goals and agree with the significance of the issues it raises. Joint NGOs recognize the novelty of this process and that the ICC staff has dedicated considerable time and resources to develop the Draft REAP. Joint NGOs submit the comments below to help improve the final REAP and aid the ICC in addressing wholesale grid and transmission issues to achieve the goals laid out in Public Act 102-0062, colloquially called the Climate and Equitable Jobs Act (CEJA).

II. REAP Requirements

CEJA is the foundation to move Illinois into a clean energy future. It sets out requirements and goals that lay out how to achieve a clean, equitable future for Illinois and benefit all Illinoisians, including improving the air we breathe, electrifying the cars we drive, increasing the clean energy jobs we work, and replacing dirty electricity with clean energy. In short, CEJA sets out to transform Illinois – especially the electric sector. It sets a requirement that Illinois procure 50% of its energy from renewable energy resources built in Illinois or located in neighboring states by 2040,¹ representing at least 64 terawatt-hours per year of clean generation, phases out all fossil fuels by 2045, and establishes a goal of 100% clean electricity goal by 2050. Draft REAP at 2, 6.

Notably, CEJA standards require that Illinois increase its use of renewable energy by almost 20 times current levels by 2040. There is simply no way to achieve this level without more transmission capacity to deliver clean energy. For that reason, CEJA created the REAP process to establish a road map to help achieve its goals. 200 ILCS 5/8-512

These are transformative goals, and their success will depend on strong, ongoing Commission leadership. The language establishing the REAP clarified and expanded the ICC’s role in ensuring the wholesale grid would not limit the objectives of CEJA. 200 ILCS 5/8-512 The requirements of the REAP go beyond mere reporting and listing potential issues or opportunities. The plan is meant to lead to ICC action.

¹ Noting that the Renewable Portfolio Standard (RPS) amounts are based on the amount of electricity demand served by distribution utilities Commonwealth Edison (ComEd), Ameren Illinois (Ameren), and the portion of MidAmerican Energy Company (MidAmerican).

Of note, it made clear the ICC should advocate at the regional transmission operators (RTOs) for the State's interest, including the goals of CEJA. 200 ILCS 5/8-512(a)(11) CEJA also lists "at a minimum" what the REAP must do. 200 ILCS 5/8-512(b) This includes creating zones where renewables can be built and "develop[ing] a plan to achieve transmission capacity necessary to deliver the electric output from renewable energy technologies..." 200 ILCS 5/8-512(b)(1)-(2) Further, the REAP is not just a survey of possibilities. The Commission should use the REAP "to determine actions that the Commission should take." 200 ILCS 5/8-512(b)(7) The requirement that the ICC act, not merely report or consult, is further underscored in the language that requires the REAP be revised every two years in which the ICC:

"at a minimum, evaluates the implementation and effectiveness of the renewable energy access plan, recommends improvements to the renewable energy access plan, and provides changes to transmission capacity necessary to deliver electric output from the renewable energy access plan zones." 200 ILCS 5/8-512(c)

In short, CEJA requires a transformation of our electric sector to clean energy resources. As part of this transformation, the ICC is required to address barriers to building renewables, especially transmission constraints.

III. The final REAP should be an actionable plan that includes timelines, next steps, gaps, and prioritization of actions.

The Draft REAP considers many issues that are (or may in the future be) barriers to achieving the goals of CEJA at local, state, and regional levels. The range of issues addressed include measuring emission reductions over time, local siting laws, potential for various generation sources to retire and those retirements' impact on clean energy goals or emissions reductions, evaluation of renewable

energy production throughout the state, and RTOS policies, including transmission planning, interconnection issues, and resource adequacy requirements. Draft REAP at v-xvi.

Despite the Draft REAP's accounting of many issues, it fails to provide enough detail to determine which issues are the most significant and which would have the greatest impact if addressed. It also fails to clearly lay out the actions the ICC should undertake. This lack of detail means it is challenging to prioritize the issues now and later, and it will be hard to evaluate the plan during its revision. Greater details and information will help the ICC prioritize by illuminating how much these issues are holding back needed transmission and renewables development. Thus, the Draft REAP does not meet the statutory requirements to designate renewable energy zones, achieve the necessary transmission capacity, determine actions the ICC should take to implement CEJA, and give enough detail to evaluate the plan at the next iteration.

As discussed above, the REAP is not supposed to merely list barriers to achieving CEJA. It is meant to be a plan that sets out clear actions. Unfortunately, the Draft REAP lacks enough details to achieve this. The ICC should revise the plan to establish clear next steps, prioritize actions, establish timelines, list staff needs (including funding), identify whether statutory or regulatory changes are necessary to accomplish the REAP's goals, and add more analysis where necessary to complete its required objectives. Joint NGOs also recommend that to facilitate an understanding of the final REAP, the ICC should create a summary table identifying each major issue, its current status, planned actions to address the issue, and a timeline for achieving it.

The urgency of the need to expand and transform the transmission system in Illinois could not be clearer. More than 70,000 megawatts (MWs) of generation currently are in the Midcontinent

Independent System Operator Inc. (MISO) and PJM Interconnection LLC (PJM) queues, most of which is storage, wind, and solar.² Connecting a sizeable fraction of these resources to the grid will require major upgrades to local and regional transmission systems. The REAP can provide the roadmap to ensure that Illinois can build the additional capacity as quickly as possible to integrate these and future resources into the system and meet the state’s clean energy requirements. The following table summarizes areas where the Draft REAP requires more detail to fulfill the requirements of CEJA and create an actionable plan.

Table 1: Examination of Policies and Details Needed

Policies/Goals	Summary of Needed Detail
1.A Reports to Capture Progress Against Goals	Description does not explain how the ICC will collect information or which agency is in charge of what information. It gives no information about when a first draft will be released. It also says the report may identify strategies and policy instruments without stating who would develop them. Description gives no timeline for action or identifies resource needs to complete.
1.B Developing Greenhouse Gases (GHG) Accounting Methodology	Description does not give a timeline or next steps on how to develop methodology, including outreach to the RTOs.
2.A Identify Resource and Strategies to Meet CEJA’s Economy-wide Decarbonization Goals	Description does not detail clear next steps on developing a study and gives no timeline for any actions or needed resources to complete the study.
2.B Identify Mechanisms to Limit Leakage	Description does not detail next steps, timelines, or staffing needs. It does not detail the methodology or a plan to set methodology. For example, it lists some potential interventions for limiting leakage but does not state how it plans to decide which to evaluate or how to develop a complete list.
2.C Encourage Regional Market Reforms	ICC addresses this in Strategic Element 5. See below.
3.A Adopt REAP Zone Concepts	Description does not give a timeline or process for adoption. It is unclear if adopting concepts (Level 1 and 2) also means adopting Zones 1-3. Description says headroom analysis will help refine but gives no detail on when that will be complete. It is unclear how advanced transmission technologies will be incorporated into

² MISO identifies 36,506 MW of summer capacity in its queue, and PJM identifies 36,743 MW (energy basis) in its queue. (Queue data accessed March 31, 2023.)

	analysis or how ICC plans to address barriers to implementing them. It does not give details of how it will address potential barriers to utilizing existing transmission. Discussed in more detail below.
3.B Quantify Renewable Interconnection Capability Through a Comprehensive Transmission Headroom Analysis	Description does not give clear next steps, date for completion, or staffing needs. Discussed in more detail below.
3.C Adopt Expansion Zones for Transmission Planning Purposes	Description does give clear next steps, timeline for adoption, or staffing needs.
3.D Develop a Model Ordinance	Joint NGOs recommend removing this policy action, See Section IX.
3.E Review and Refine Enforcement Authorities	Joint NGOs recommend removing this policy action, See Section IX.
4.A Provide Input on Policy Requirements and REAP Zones on MISO Transmission Planning Studies	Description does not say when ICC will approve zones and when these zones will be incorporated into MISO planning.
4.B Advocate for Reform in PJM Transmission Planning Processes to Ensure Illinois and All States Can Cost-Effectively Achieve Decarbonization Goals	Description does not give clear next steps or timelines. It does recognize that these efforts are likely to occur further out. It does not address what steps the ICC could take to help PJM understand the urgency of action for Illinois to reach its goals.
4.C Advocate for Interconnection Reforms	Description does give clear next steps, timeline for adoption, or staffing needs. It does discuss potential interconnection reforms but does not set out how the ICC will determine which reforms are necessary.
4.D Pursue Joint Interconnection Study	Description does not detail next steps, timelines, or staffing needs. It is unclear how the ICC plans to initiate the study between MISO and PJM.
4.E Consider Pursuing Transmission Development Through PJM's State Agreement Approach	Description does give clear next steps, timeline for adoption, or staffing needs.
5.A Evaluate Options for Maintaining Resource Adequacy in MISO	Description does not detail next steps, timelines, or staffing needs to initiate an assessment.
5.B Seek GHG Emissions Data from RTOs	Description does not detail next steps, timelines, or staffing needs to get data from RTOs.

5.C Contribute to Regional Market Development of Clean Energy Attributes	Description does not say when the ICC will have enough information to move forward, timelines, or staffing needs.
5.D Study Reliability and Operational Implications of Fossil Units' Emission Limits under CEJA	Description does not detail next steps, timelines, or staffing needs to conduct study. It is unclear how the ICC will determine what market reforms to potentially pursue.
5.E Authorize Use of Identified Regional Solutions	Description does not detail next steps, timelines, or staffing needs.

The final REAP should rank each policy action to understand what the ICC should address first. For each policy action that the final REAP lists, there should be a list of detailed steps to complete the task, including needed approvals from other agencies or RTOs, required staffing resources, and an estimated timeline. Only with this level of detail will the ICC have met the statutory requirements of developing an actionable plan that creates the grid needed to meet the goals of CEJA.

Two examples highlight how more details, timelines, and clear next steps will improve the REAP. First, the REAP requires the designation of renewable energy access plan zones, which are locations where renewable energy can be developed. The Draft REAP correctly evaluates potential production differences, local siting restrictions³, and natural resource protections. The Draft REAP also lists seven zones which could be candidates and lists some issues that may need to be addressed in the identification process. Draft REAP at 38. However, the Draft REAP does not establish clear next steps or timelines to address these issues. Although the Draft REAP says the zones are “indicative in nature, subject to refinement and approval through subsequent ICC review and investigation,” id., it does not provide a road map to working through these issues and actually finalizing the zones. Without more information on next steps in the next two years, the Draft REAP

³ Noting that 55 ILCS 5/5-12020 passed earlier this year and changed the ability of counties to limit renewable siting. The comments address this further below.

does not provide enough information to understand if and when potential issues may be resolved.

For Zones 1-3, the Draft REAP proposes that the PJM and MISO coordinate to expedite interconnection and potential need for joint study, but the Draft REAP does not detail the process or timeline for this and implies this process is for the RTOs alone to decide, obviating the ICC's role. Id. From the Draft REAP, Joint NGOs do not know when the REAP Zone Concepts will become actual zones, and there are scant details on the steps to get there.

Another example is the transmission headroom analysis, which is an important step towards the identification of REAP zones. The Draft REAP describes the headroom analysis as a study that identifies where existing transmission may be available for renewables, either currently available, may be available when fossil fuels plants retire, or available through the use of grid enhancing technologies (GETs), such as dynamic line ratings, power control devices, and topology optimization. Id. at ix-x.

From reading the discussion of the headroom analysis, Joint NGOs believe that the Draft REAP envisions three analyses – two to be completed by PJM and MISO and another by the ICC. Id. at 30, 39.⁴ Unfortunately, the Draft REAP lacks any details on the schedule for completing draft and final transmission headroom analyses and who will perform them. Nor does the Draft REAP explain the various inputs and assumptions for the different analyses, such as demand and load growth, generation retirements and availability of transmission rights, and use of GETs. More details, clear next steps,

⁴ The headroom analysis is referenced many times in the Draft REAP. In different places, the Draft REAP says the analysis is being completed by RTOs and the ICC. Draft REAP at ix and 30. It also implies in one section that it has begun and in another that it has not. Id. The final REAP should clarify this and list the next steps, timelines, etc.

timelines, priorities, and staffing resources needed are necessary to meet the requirements of the statute, clearly lay out actions for the ICC to take, and evaluate the REAP's success in 2025.

IV. The final REAP should determine estimates of needed transmission capacity to help the ICC prioritize actions and measure success.

The Draft REAP enumerates many issues that may help meet the goals of CEJA and the related transmission buildout, but it does not give a way to prioritize actions or measure success. The law requires the REAP to be a plan to achieve transmission capacity in the REAP zones that is the most beneficial and cost effective. 200 ILCS 5/8-512(b)(2) However, the Draft REAP does not give any estimate of how much transmission capacity is needed or any other metrics to determine the value of each item on the long list of issues. This makes it difficult to prioritize actions when resources are constrained. Joint NGOs recommend the final REAP should estimate the needed transmission capacity expansion to achieve the renewable requirements set in CEJA, and it should develop metrics focused on expanding transmission capacity to help prioritize actions. The estimate of needed transmission capacity and other metrics can then be revised with every iteration of the REAP, helping the ICC measure its success.

As indicated above, more than 70,000 MWs of generation currently are in the PJM and MISO queues in Illinois. More will be developed through the identification of REAP zones and other attractive development areas (e.g., transfers of interconnection rights from retiring fossil generation). This data alone suggests the basis for beginning to quantify the amount of transmission needed to keep Illinois on pace to meeting CEJA's requirements.

V. The final REAP should emphasize the need for strong advocacy at the RTOs, set clear actions and timelines, measure success of the RTOs' progress, and consider alternatives to relying on RTO processes.

It is perhaps impossible to overstate how much of what the Draft REAP lays out overlaps with ongoing policies or changes at PJM or MISO. Thus, the final REAP must require critical advocacy at the RTOs. The Draft REAP says:

The RTOs play a central role in planning for transmission expansion, renewable interconnection, dispatching generation, and ensuring the reliability of the electricity grid. Illinois' participation within these two RTOs and access to extensive transmission infrastructure will be a substantial asset as Illinois proceeds with large- scale renewable deployment and fossil phase out. Id. at 8.

Almost every aspect of the Draft REAP includes some work at the corresponding RTO, including measuring potential greenhouse gas emissions, interconnection of renewables, identifying zones for building renewables in Illinois, and improving the linkage between the two RTOs (including improvements in process, such as improvements to affected system studies, and other issues at the MISO and PJM seam). The overlap also includes redeployment of available transmission, transmission planning, resource adequacy, and other markets issues. Thus, advocacy at the RTOs is critical to the success of CEJA and the REAP.

However, the language of the Draft REAP does not convey how important or difficult advocacy at the RTOs will be, nor does the Draft REAP emphasize the significant role of the ICC commissioners representing Illinois in the RTO stakeholder processes, prioritize the list of potential Commission's actions at the RTOs, clearly delineate steps the ICC will take, or give timelines for actions. Further,

it does not identify other stakeholders or members, like utilities and transmission owners, and how their activities can either help or hurt Illinois achieve its goals and how the ICC should work with these stakeholders.⁵

The final REAP should look at the specific goals laid out and answer how the ICC is planning to achieve acceptable, timely solutions in RTO processes that are known to be contentious and slow. Each issue that the Draft REAP lists that relates to the RTOs should have a clear list of actions and timelines that correspond with each step. When naming actions, the ICC should look for ways to be proactive and not merely wait for the RTO process to come to a conclusion. One example of where ICC could lead is in discussions surrounding transfers of energy between MISO and PJM in Illinois. The ICC could establish a working group with the RTOs and other stakeholders to discuss ideas to improve issues around the seam. The ICC does not need to wait for the RTOs to initiate and lead the discussion.

In addition, the final REAP should summarize the actions the RTOs should be doing and if they have completed these actions or not. Brattle Group has done something similar in a different report, and Joint NGOs urge the ICC to include a similar summary in the final REAP.⁶ The ICC should include the list of activities or actions it wants the RTOs to undertake, including studies to understand opportunities to reduce greenhouse gas emission leakage, headroom transmission analysis, opportunities for and policies to implement GETs, scenario-based long-term planning, regional

⁵ The final REAP could require (or request) the utilities, transmission owners, and other relevant RTO stakeholders in Illinois to submit their votes or state their positions on relevant issues at the RTOs to the ICC and explain how it will help Illinois achieve the goals of CEJA.

⁶ See Brattle Group, *Transmission Planning for the 21st Century: Proven Practices that Increase Value and Reduce Costs*, https://www.brattle.com/wp-content/uploads/2021/10/2021-10-12-Brattle-GridStrategies-Transmission-Planning-Report_v2.pdf, at 15, Table 2.

transmission planning that allows for transmission built for regional reliability and state policies, portfolio planning, interconnection queue reforms, improvements to affected systems studies, PJM-MISO joint interconnection study, and an assessment of market incentives at RTOs to ensure they align with Illinois policy, such as those around resource adequacy construct.

Finally, the ICC should consider what options it has if the RTO processes do not result in needed action recognizing that interregional and regional transmission has significant benefits and should be chosen whenever possible. PJM's State Agreement Approach and Supplemental projects or MISO's Other projects are options that do not have to rely on collective agreement from RTO stakeholders.⁷

VI. The final REAP should examine ICC and other state and local processes to determine what improvements should be made to build transmission.

The Draft REAP fails to examine state and local laws, regulations, and processes that impact transmission development that may further delay necessary transmission build. As mentioned in the Draft REAP, MISO has already approved the largest package of transmission lines to date, called MISO Long-Range Transmission Plan's (LRTP) Tranche 1. Draft REAP at 40, 48-9, 59. Some of the lines will be built in part in Illinois. Yet, the Draft REAP does not prepare for these lines to come online. It does not assess current laws or other regulations or processes that may delay the building of these lines. Further, Tranche 1 is not the last of the MISO regional lines; MISO is currently working towards approval of another package of lines, Tranche 2, that will highly likely include lines in Illinois. These MISO tranches are merely the beginning of a significant amount of transmission

⁷ The Draft REAP raises the question if the ICC has the authority to pursue PJM's State Agreement Approach. Draft REAP at 63. The statutory language establishing the REAP requires the ICC create a plan to achieve transmission. 200 ILCS 5/8-512(c) Through the statute, it is clear ICC has authority to develop the transmission necessary to meet the needs of the REAP zones, including moving forward with PJM's State Agreement Approach.

expansion needed to meet CEJA’s clean energy goals. On the conservative side, Illinois must build almost 20 times the amount of clean energy currently to meet the 2040 goals of a 50% RPS. The ICC should review laws, regulations, and other policies and processes, especially ones that it implements, to see if they hinder or help build transmission, like MISO Tranche 1, at the potential scale and pace needed to accomplish the goals set forth in CEJA. Joint NGOs recommend the final REAP include a section to examine laws, regulations, and other processes at the state and local level that may delay transmission lines from getting built in state and identify whether additional statutory authority is necessary to accelerate development of additional transmission capacity.

VII. The final REAP should also consider the benefits of High Voltage Direct Current lines and barriers to getting them built.

As the Draft REAP recognizes, Illinois is uniquely situated between two RTOs and is a nexus between abundant renewable energy resources, like wind energy from the Plains, and large load pockets, like Chicago and the East Coast. High Voltage Direct Current lines (HVDC lines), like Grain Belt Express and SOO Green, seek to benefit from Illinois’ optimal location, yet these lines have experienced many delays. The final REAP should, at the very least, investigate whether pursuing more HVDC lines would be beneficial, how they would compare to upgrading alternating current lines in the region, and what action the ICC, RTOs, and other agencies should take to improve the process for planning, financing, and paying for HVDC lines.⁸ Joint NGOs recommend the final REAP include a section on evaluating the benefits of and barriers to building HVDC lines.

⁸ Last year, Invenergy asked Federal Energy Regulatory Commission to hold a technical conference to remove barriers to the development of interregional merchant HVDC lines, like Grain Belt Express, pointing out in its request that HVDC has benefits such as reliability and resilience and alleviating backlogged interconnection queues. Invenergy Transmission LLC, Request for Technical Conference on Interregional High Voltage Direct Current Merchant Transmission, (Accession Number: 20221110-5252), Nov. 8, 2022, at 13.

Included in the actions the ICC can take would be requiring ICC and its commissioners to advocate for their incorporation in RTO planning processes.

VIII. The final REAP should consider the potential of distribution-connected resources and benefits to transmission.

In assessing the State's renewable energy needs, consideration should be given to the potential for and benefits of distributed-energy resources (DERs). Effectively utilizing distributed solar generation and storage reduces system transmission and generation operating and upgrade costs.

A 2021 study by Vibrant Clean Energy (VCE) shows that a policy that allows for co-optimization of the distribution grid with utility-scale generation reduces the total system costs compared to a lower distributed generation (DG) scenario. The study, commissioned by the Coalition for Community Solar Access and Local Solar for All (which includes Vote Solar), investigated scenarios for the state of Illinois to achieve economy-wide electrification and complete decarbonization by 2050.⁹ The study shows that co-optimization of DG saves customers \$3.44 billion from 2018 to 2050.

The final REAP should devote more attention to understanding the potential contribution that distributed energy resources (DERs) can make to meeting state energy and capacity needs, as this could significantly impact future transmission requirements. As demonstrated by the VCE study, co-optimizing the distribution system with utility-scale generation can lead to lower system costs and emissions while ensuring grid reliability. By effectively utilizing DERs, such as rooftop solar

⁹ Clack, Christopher T M, Aditya Choukulkar, Brianna Coté, and Sarah A McKee, *A Vision for Clean Energy in Illinois by 2050*, Vibrant Clean Energy, April 30, 2021. <https://www.vibrantcleanenergy.com/media/reports/>

and community solar, the grid can manage peak loads, shift load, and increase load factors more efficiently. This, in turn, reduces the amount of utility-scale generation and transmission infrastructure investments needed.

By incorporating a more comprehensive analysis of DERs and their potential role in meeting the state's energy and capacity needs, the final REAP can help inform more cost-effective and environmentally friendly transmission policy decisions, benefiting both the energy system and consumers in Illinois. Headroom analysis plays a crucial role in understanding the available capacity on the transmission and distribution system to interconnect new renewables. Although the Draft REAP is clear about the necessity of determining the existing headroom on the transmission system, it is essential to consider both utility-scale resources and DERs in the analysis.

For utility-scale resources, headroom depends on the capacity to connect to the bulk power system, whereas for DERs, the focus is on the distribution system and lower-voltage parts of the transmission system. By assessing headroom thoroughly on both levels, the REAP can provide a comprehensive understanding of the existing capacity and potential constraints in integrating new renewable resources.

Joint NGOs recommend incorporating a thorough headroom analysis in the final REAP, considering both utility-scale and DERs levels, will help policymakers and stakeholders identify potential bottlenecks and areas that may require additional investments in transmission or distribution infrastructure.

IX. The final REAP should be revised to reflect recently enacted legislation on renewables siting.

On January 27, 2023, Governor Pritzker signed a law that revises siting regulations in Illinois, 55 ILCS 5/5-12020. It standardized siting for wind, solar, and hybrid facilities at the county level by establishing what generally the most restrictive standards can be. For example, in the legislation, wind turbine setbacks cannot exceed 2.1 times the maximum blade tip height of the wind tower. 55 ILCS 5/5-12020(e). Considering this legislation, the final REAP should be revised. In particular, the REAP may no longer need to develop a model ordinance to enable renewable development. Draft REAP at x, 44.

If the ICC decides a model ordinance or coordination with stakeholders and other agencies, such as the Illinois Environmental Protection Agency, Department of Natural Resources, and Department of Agriculture, is still needed, the REAP needs to lay out in detail why and what actions it plans to take. Joint NGOs hope that this new legislation means ICC can finalize REAP zones faster than originally anticipated, spurring needed renewables and related transmission development. Without further justification, Joint NGOs recommend removing Policies 3.D and 3.E and references to considering siting restrictions across the state. Id. at 44.

X. The Draft REAP correctly looks to maximize efficiencies of the existing transmission system and assess advanced conductor technologies.

The Draft REAP correctly looks to maximize the efficiencies of the existing system by looking for technologies and other improvements to the existing transmission lines. Draft REAP at 40, 44, 49. The final REAP should consider all ways to efficiently add capacity to the bulk electric power

system, such as through advanced conductors, dynamic line ratings and GETs and consideration of capacity interconnection rights. GETs such as dynamic line ratings and power flow control, together with topology optimization, can significantly increase circuit capacity and lower costs. As the MISO Independent Market Monitor explains, integration of GETs into the grid is “synergistic with integration and utilization of new resource types, including energy storage and DERs.”¹⁰ In addition to GETs, the final REAP should consider advanced conductor technologies, which can add significant capacity to the existing system. Aging lines, which need replacement, present a particular opportunity to add advanced conductor technologies. Joint NGOs recommend that the final REAP also consider advanced conductor technologies when considering expanding existing transmission system.

XI. The Draft REAP correctly considers integrating siting considerations into the transmission planning process.

The Draft REAP rightly considers siting considerations when evaluating REAP zones. Draft REAP at 26-36. Integrating siting considerations into the planning process means that the grid planners, working with the input of resource planning agencies and other stakeholders, can reduce siting challenges whenever possible. These approaches are collectively known as “smart from the start” system planning.

In the Draft REAP, it does not appear that actual transmission pathways or lines are being considered yet. When building new lines, the easiest approach to expanding transmission is to double circuit existing corridors or construct larger transmission circuits on existing rights of way. For example, more than 90% of MISO’s LRTP Tranche 1 projects utilize existing or adjacent rights of way to increase circuit capacity.

¹⁰ Potomac Economics, *2021 State of the Market Report for the MISO Electricity Markets*, at 30.

When use on or adjacent to existing rights of way is not possible and greenfields development is necessary, planners should minimize siting issues to the maximum degree practicable during the planning process. Planners can consult with state and federal resource agencies, community groups, and others in choosing which circuits to prioritize for expansion. The Draft REAP has already begun to consider consulting with some of these groups, laying out what an inclusive process would look like. *Id.* at 42. The importance of planning and minimizing conflicts before siting lines is important. Siting decisions made early in the planning process set a baseline risk of delay or non-approval that after-the-fact mitigation measures can only reduce incrementally.

The ICC can play a leadership role in realizing efficient, integrated and ultimately faster transmission expansion in Illinois and the region. Whether alone or through the RTO state advisory groups in MISO and PJM, the ICC can ask the grid operators to accelerate their adoption of grid enhancing technologies and other efficient transmission expansion solutions, and to adopt “smart from the start” in planning processes. Since the RTOs do not have jurisdiction over siting and permitting requirements, they will need to cooperate closely with Illinois and other states. The ICC can facilitate such engagement directly and with the assistance of the Illinois Department of Natural Resources, Environmental Protection Agency, and other relevant state agencies. The Commission also can use the ongoing Federal Energy Regulation Commission (FERC)/National Association of Regulatory Utility Commissioners transmission collaborative as a forum for pressing FERC to support these approaches.

XII. Conclusion

Joint NGOs appreciate the ICC staff's significant work to initiate the first draft of the REAP and wants to ensure that the REAP fulfills its purpose, to create a plan to develop Illinois' transmission capacity to meet the clean energy growth demanded in CEJA. The Draft REAP has begun the effort. Joint NGOs' suggestions will help the ICC meet that goal, and Joint NGOs recommend the ICC revise the plan to reflect the suggestions above. Joint NGOs look forward to working with ICC in the future on this critical issue and many others.

Respectfully Submitted on this 31st day of March 2023



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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in the above Verified Comments of the Environmental Law and Policy Center, Natural Resources Defense Council, and Vote Solar are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.



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NOTICE OF FILING

Please take notice that on March 31, 2023, the undersigned, an attorney, caused the attached Verified Comments to be filed via e-Docket with the Chief Clerk of the Illinois Commerce Commission in Docket No. 22-0749.

Respectfully submitted,



Elizabeth Toba Pearlman

CERTIFICATE OF SERVICE

I, Elizabeth Toba Pearlman, an attorney, certify that a copy of the foregoing document was served upon the parties on the Illinois Commerce Commission's service list as reflected on e-Docket via electronic delivery on March 31, 2023.



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**ICC Docket 22-0749
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