

[Commenter 4]
Comments on
Draft ISC Contract

From: [Commenter 4]
Sent: Wed 5/13/2026 2:36 PM
To: Illinois-RFP <Illinois-RFP@nera.com>
Subject: [Commenter 4] Comments

To Whom It May Concern,

Attached are [Commenter 4]'s comments in response to the IPA's Invitation to Comment on Energy Storage, issued April 22, 2026. Thank you for the opportunity to provide our feedback. If you have any questions or concerns, please feel free to reach out.

Thanks,

[Commenter 4]

Battery Storage Comments – due 5/13

https://nera-content-media.s3.us-east-1.amazonaws.com/ipa/Energy_Storage_RFP_Invitation_to_Comment_Round_1_of_2_April_22_2026_to_post_ab296daf25.pdf

Topic 7: ELCC Floor

The Draft ISC Contract defines the ISC Reference Capacity Price as the product of: (a) the ELCC and (b) [MISO’s Planning Resource Auction clearing price (or successor) applicable to the ISC Delivery Point and applicable to the Vintage Month divided by 4 hours / PJM’s base residual auction resource clearing price (or successor) applicable to the ISC Delivery Point and applicable to the Vintage Month divided by 4 hours].

*ISC Reference Capacity Price = ELCC * [MISO’s planning resource auction clearing price applicable to the ISC Delivery Point and applicable to the Vintage Month divided by 4 hours / PJM’s base residual auction resource clearing price applicable to the ISC Delivery Point and applicable to the Vintage Month divided by 4 hours]*

The ELCC is the project-specific effective load carrying capability rating in percentage recognized by RTO for the Project for a Delivery Year as provided by Seller (see Section 1.28 of the Draft ISC Contract).

Question:

1. Is it appropriate to establish an ELCC floor (for example, setting ELCC to X% if it falls below that threshold)? Please explain the rationale for or against such a floor. If establishing an ELCC floor is appropriate, please propose a value.

Yes, it is appropriate to establish an ELCC floor value for the Indexed Storage Credit Agreement (“ISC Contract”). The Energy Storage RFP initiative was created to remedy two concerns: first, to bring additional capacity to the MISO footprint to alleviate resource adequacy issues, and second, to look to alleviate high price concerns for customers. High electric supply costs continue to be a pressing issue facing Illinois customers in the current market. This needs to be recognized, and customers need to be protected wherever possible. With customer bills remaining near historical highs, bill impacts cannot now be ignored for selective initiatives.

If the battery accreditations drop below fifty percent (50%), these projects are no longer delivering the expected capacity product. In such an event, Customers should not be footing

the bill for any such underperformance of these units, particularly as these units are already being backstopped by customers. Multiple state-sponsored studies have promoted the multibillion-dollar benefits of battery storage, but if customers are not receiving these capacity benefits, then those customers have no reason to subsidize the construction of these facilities. These developers must bear some of this risk—it should not be held by the customers alone. Customers pay for performance, not developer risk.

In sum, [Commenter 4] supports the customers receiving value for their rates and is against customers paying more and getting less than they were promised in the case of declining accreditation.