

**[Commenter 8]**

**Comments on Draft  
ISC Contract**

**From:** [Commenter 8]

**Sent:** Mon 6/15/2026 5:28 PM

**To:** Illinois-RFP <Illinois-RFP@nera.com>

**Subject:** [Commenter 8] Response to IPA's Invitation to Comment (June 1, 2026)

To the Agency,

Attached please find our comments on the 2026 Energy Storage RFP. Please let me know if you have any questions.

Regards,

[Commenter 8]

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**[Commenter 8] Response to IPA’s Invitation to Comment on the  
2026 Energy Storage RFP**

[Commenter 8] appreciates the opportunity to respond to the Illinois Power Agency’s (“IPA” or “Agency”) invitation to comment on the Summer 2026 Energy Storage RFP to procure Indexed Storage Credits (“ISC”) for Ameren Illinois Company (“AIC”) and Commonwealth Edison Company (“ComEd”). As a [Commenter 8 Information], [Commenter 8] is committed to supporting the state's goals and accelerating cleaner, more reliable, affordable energy.

Our comment is focused on the issue of transmission service charges in MISO and supports the proposal to amend the ISC contract to contain language that compels the Buyer in MISO, in this case AIC, to secure Network Integration Transmission Service (NITS) for Sellers. As indicated in the comments, MISO is unique in requiring energy storage systems (ESS) to obtain and pay for transmission service when charging. This requirement increases the cost for an ESS project, and, in this case, it will lead to more expensive project bids being submitted for the MISO portion of the Agency’s RFP. In lieu of MISO revising its policy on transmission services, which MISO is considering this year<sup>1</sup>, a near-term solution to provide a more cost-effective energy storage solution for Illinois is to require AIC to secure NITS for the successful bidders. If Sellers cannot access NITS, then it will increase projects and bids costs by requiring Sellers to purchase point-to-point transmission services.

[Commenter 8] has advocated at MISO for the removal of transmission service requirements for charging storage when charging is economically dispatched and consistent with study assumptions. Requiring storage resources to obtain transmission service solely to charge introduces unnecessary cost and complexity, particularly where charging behavior is already captured in interconnection study models. Storage resources should not be required to procure transmission service to enable charging within modeled scenarios. [Commenter 8] will continue to advocate for this revision to MISO’s policy. However, in the interim, we encourage the Agency to address this issue in its 2026 energy storage procurement by revising the language of the ISC contract to contain provisions that ensure ESS projects will be able to secure NITS through assistance and support by AIC.

Submitted by:

[Commenter 8]

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<sup>1</sup> “MISO noted during the PSC, its' intent to reactivate this Issue to revisit current transmission service requirements for charging storage resources,” 4/29/2026 Update, *available at*: <https://www.misoenergy.org/engage/MISO-Dashboard/transmission-service-requirements-for-charging-electric-storage-resources-from-the-grid/>