

[Commenter 8]

**Comments on Draft
ISC Contract and
Preliminary
Proposal
Requirements**

From: [Commenter 8]

Sent: Wed 5/13/2026 5:06 PM

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

Subject: [Commenter 8] Comments on Draft ISC Contract and Preliminary Proposal Requirements

Dear IPA Administrator and NERA Team,

Please find attached [Commenter 8]'s comments on the draft Indexed Storage Contract and Preliminary Proposal Requirements. *[NTD: There is no attachment to the email]*

[Commenter 8] generally supports the comments submitted by [Entity affiliated with Commenter 8], particularly with respect to:

- reduction or elimination of bid assurance collateral;
- reduction or release of post-COD performance assurance;
- rejection of an ELCC floor;
- balanced treatment of augmentation and degradation;
- clarification of labor peace agreement scope; and
- increased flexibility for project financing and SPE structures.

Additionally, [Commenter 8] would like to emphasize the importance of the following:

- Allowing participation by distribution-interconnected storage projects of any size in the ComEd LDA and MISO LRZ 4 where projects are cost competitive and capable of satisfying operational requirements.
- Ensuring the procurement and contract framework supports both transmission-scale and distributed storage deployment models.

In particular, [Commenter 8] encourages the IPA to consider the “missing middle” between the existing treatment of projects 5 MW and below and the proposed 20 MW minimum threshold for participation in this procurement. Projects in the 6-19 MW range can provide significant reliability, congestion relief, and local system benefits while often offering meaningful advantages in development timeline, siting flexibility, interconnection timing, and overall deployment cost.

Preserving eligibility pathways for these projects would broaden participation, increase geographic diversity, and allow Illinois to capture a wider range of storage solutions capable of delivering value to ratepayers and the grid.

We appreciate the opportunity to participate in the stakeholder process and welcome continued engagement as the procurement structure evolves.

Thank you,

[Commenter 8]