



ILLINOIS CHAMBER OF COMMERCE

Thank you for the opportunity to submit comments for the NextGrid Working Group 4 (WG4) P3 exercise. The Illinois Chamber of Commerce would like to suggest the following points be considered when engaging in the drafting of the WG4 report and rather than offer programs or policy ideas that advance the interests of DER proliferation, electrification, and the availability of smart grid data, we instead encourage the report focus on how it maintains the below policies/principles for customers. Any programs or policies that come from this report should focus on ways that customers can adapt to the implementation of new technologies, rather than prescribing their onboarding.

1. Competition in energy rates and programs

We appreciate the ICC's efforts to ensure Illinois remains competitive in the 21st Century. With that, we need to also ensure that while Illinois strives to provide electricity efficiently and responsibly, it maintains its leadership of competitive energy costs. Competitive electricity rates in Illinois help retain businesses and leads to economic growth.

The Illinois Chamber is committed to the development of long term policies that encourage sustainable economic growth. We encourage the Commission to be continually mindful that energy costs are vital to the competitiveness of energy-intensive industries, such as manufacturers, hospitals, and data centers, and are critical to economic development statewide. Programs should not adversely impact businesses' ability to manage costs and make investment decisions. With that, any new programs must be pilot tested, subject to competitive RFP's, open to the private sector to provide, and economic impacts studies should be conducted to determine the impact on all customer classes. It is also important that any activity by the state not interfere with technologies, services, or programs that can be competitively provided by the market.

2. Market-based Solutions that Promote Competition

We encourage this process to prioritize market-based programs and policies to drive competition, and ensure a level playing field for all market participants. If the market is solving a need or a void, or has the ability to solve it, let it.

The report should encourage promoting competition among energy and technology resources and not facilitate the success of any one type over another. The more access we have to affordable energy, the more opportunities we as a society have to advance ourselves, grow our economy and care for our planet. Legislative or regulatory mandates impede the functioning of competitive markets and can raise energy costs needlessly.

We encourage this process to continue ensuring that Illinois' energy market design promotes competition to safeguard efficient market outcomes that deliver reliable, affordable electricity to customers.

3. Customer Perspective vs. Resource Perspective

Maintaining the strength of the grid is critical to providing customers with affordable, reliable, and safe access to electricity. This report should not prescribe that the state look at how customers can adapt to the use of DER proliferation, electrification and access to smart grid data, but instead how customers can adapt to any new technology and what framework should exist to maximize the benefit to the customer. That framework should include, but not limited to, examining how a technology could impact each customer class; what the cost implications could be to the customer; ROI and service improvements; and security and reliability implications. The priority should be maintaining the reliability of our grid infrastructure to the benefit of the customer.

4. Adaptable

The ICC's grid resolution stated that the State needed to have a regulatory process that can evolve and adapt to new innovations. That should be a key tenant to any policy or program that State implements. The recommendations set forth should be adaptable so unseen technological changes, new energy resources, and environmental considerations are not unfairly prevented from participating because the resulting recommendations were too prescriptive.