STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)	
On Its Own Motion)	
)	23-NOI-01
Notice of Inquiry Regarding)	20 1101 01
Ameren Illinois RTO Cost-Benefit)	
Study)	

INITIAL COMMENTS OF THE MIDCONTINENT INDEPENDENT SYSTEM OPERATOR

The Midcontinent Independent System Operator, Inc. (MISO) by and through its undersigned attorneys, appreciates the opportunity to participate in the Illinois Commerce Commission's (the Commission) Notice of Inquiry (NOI) regarding the Ameren Illinois RTO Cost-Benefit Study. MISO is committed to sharing with the Commission the information the Commission deems necessary to address the Notice of Inquiry.

MISO has reviewed the Ameren Illinois Cost-Benefit study submitted in Docket 22-0485 and believe that the study utilizes MISO's models appropriately and that the scenarios and impacts are reasonable.

There are many challenges facing the energy industry as it continues to progress in its transition to a more decarbonized future. MISO, in collaboration with our stakeholders and regulators, has been actively engaged in identifying those challenges through the Reliability Imperative MISO Reliability Imperative (misoenergy.org) and taking concrete actions to address them. For example, the Long Range Transmission Plan is an industry leading effort to identify and build necessary transmission at a

regional level that will enable the reliable integration of new resources onto the grid. This transmission expansion is a critical component of meeting member and state decarbonization goals. In addition, MISO continues to refine our market products to address changing system conditions. The MISO resource adequacy construct has transitioned from an annual process to a seasonal process that better captures risk throughout the year. MISO is also in the process of developing a Reliability Based Demand Curve for the Planning Resource Auction. This new Reliability Based Demand Curve will provide more appropriate and consistent pricing signals to the market than the current vertical demand curve construct.

Because of these, and other, efforts MISO believes we are well positioned to meet these emerging challenges and the policy goals of the state of Illinois.

Respectfully submitted,

Midcontinent Independent System Operator

BY: /s/ Phillip A. Casey

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On behalf of Midcontinent Independent System Operator

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