

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission
On Its Own Motion

23-NOI-1

Notice of Inquiry Regarding Ameren Illinois
RTO Cost-Benefit Study.

**REPLY COMMENTS OF
THE ASSOCIATION OF ILLINOIS ELECTRIC COOPERATIVES**

The Association of Illinois Electric Cooperatives (“AIEC”) respectfully submits the following reply comments to the Illinois Commerce Commission’s (“ICC”) Notice of Inquiry (“NOI”) regarding the Ameren Illinois RTO Cost-Benefit Study (“RTO Study”).

The AIEC is the statewide service organization for 30 electric cooperatives which operate in Illinois (25 distribution cooperatives and five generation and transmission cooperatives). Electric cooperatives are not-for-profit organizations owned and democratically controlled by their member-consumers. The 25 distribution electric cooperatives provide service to approximately 600,000 primarily rural Illinoisans located in 90 of the state’s 102 counties.

The AIEC strongly urges consideration of the possible impacts that Ameren Illinois Company (“AIC”) leaving the Midcontinent Independent System Operator, Inc. (“MISO”) would have on other load-serving entities, such as electric cooperatives operating in Illinois, both financially and practically. If AIC were to leave MISO and electric cooperatives were able to receive an exception to stay in MISO, electric cooperatives could be faced with the need for new, duplicative transmission to connect to MISO. If AIC were to leave MISO and electric cooperatives

also left MISO, as noted on Page 24 of the Study, other load-serving entities such as electric cooperatives, would incur an exit fee. Changing RTOs is a very significant decision, could have significant impacts to electric cooperative members, and therefore requires a thorough, detailed analysis before any decision could be made.

The AIEC respectfully submits these comments to the Commission for consideration.

Respectfully submitted,



Craig J. Sondgeroth
President/CEO
Association of Illinois Electric Cooperatives
6460 S. 6th St Frontage Rd E
Springfield, IL 62712
217-529-5561

Dated: November 1, 2023