

p. 37. The discussion covers distribution and environmental aspects of a microgrid but not the economic benefits to a customer sited microgrid. We recommend this be added after the environmental benefits.

“ Customer sited microgrids offer economic and safety benefits to businesses. A customer sited microgrid offers resiliency to avoid outages which can result in loss of product during manufacturing, equipment damage and worker safety concerns.”

The final paragraph on microgrids should recognize that regardless of utility build a modern grid should be designed to allow for customer built and owned microgrids.

“While the ICC has approved utility built microgrids a modern grid should be designed for a customer to build and interconnect their own microgrids if they find it necessary in order to also capture the economic benefits.”

p.118 The first full paragraph references a flat rate price for utility default supply. That is not an accurate description of default service. In fact, recent price to compare disclosures approved by the ICC also point out to a customer that their total default service price in fact changes monthly.

It is recommended the report remove the words “flat rate” given they are factually inaccurate.

P. 118 Second to last paragraph. This implies that no ARES is currently offering products using AMI data. At our working group I pointed out several times that Direct Energy has offered TOU products using AMI for nearly two years. I realize this was a different WG than where this section is located. For factual accuracy I recommend the below change

It is recommended that the sentence saying some ARES may eventually offer products be adjusted to while some ARES offer products using AMI more plan to offer upon full AMI deployment to ensure the report is factually accurate that there are currently AMI based products available from ARES.

p. 119 the summary appears to be missing a broader point which is as DER is expanded non-traditional service providers will be in the market.

Recommend this sentence added “ As DER is introduced non-traditional companies not currently under ARES consumer protection laws or rules will be introduced to the market and new regulations will be needed to cover those new entrants into the energy supply and services industry. While recent

expansion of consumer protections focused on ARES there are other non-ARES companies which are not covered by these rules and laws.”

p. 122 Final bullet. This is not accurate. AMI data is currently shared with ARES and there are robust rules and requirements around it. In fact, it is the access by third-party non-ARES that is the current issue before the ICC in a docket. Please correct this. Both Ameren and Comed have tariffs and handbooks which lay out the ARES data access process. While onerous it is not as described in this report prohibited nor unavailable. Rather is a manual and expensive procedure.

Recommend this bullet be removed or correct to the current ICC docket which is 3<sup>rd</sup> party non-ARES data consent for access to data. It is factually inaccurate to state ARES do not have access or are not required to receive consent to access data.

p. 124 There is a lack of discussion around cap tag calculations.

Recommend the following bullet be added: The use of individual customer AMI data should be used to calculate a customer peak load contribution or PLC for purposes of capacity. This will allow a customer to not only impact their energy but also capacity costs through reduction of usage during peak periods.

p. 136 Third bullet point should not be only a utility recommend the following change in underline below:

- Smart-charging pilots under which a utility or third party provider will modulate charging among participating vehicles to optimize loads based

p. 161 One issue with current interconnection is that the requirements are separated in various tariffs and manuals. And utility interconnection studies for microgrids (large DER) tend to have no timeline for completion leading to leadtimes so long a project’s financing and approval is rejected. You capture this on p. 163 but it should be reinforced on p. 161 for a person reading only the microgrid section of the study.

Add a bullet point that says - “Clear interconnection standards with specific requirements and timelines to ensure projects can be clearly evaluated and financed without unknown utility delays.”