



ILLINOIS CHAMBER OF COMMERCE

Thank you for the opportunity to submit comments for the NextGrid Draft Final Report. The Illinois Chamber of Commerce has been engaged in the NextGrid process as a member of the Stakeholder Advisor Working Group, and Working Groups 4, 5, and 6. The Illinois Chamber would like to reaffirm previous comments submitted during the NextGrid process that were either not included or could receive greater emphasis, and offer new comments that should be considered when drafting the Final Report.

1. *Disclaimer*

The Illinois Chamber appreciates the NextGrid Facilitators efforts to clarify the NextGrid report is not a consensus document. That was stated to a degree, but greater emphasis needs to be given to clarify the text was not derived out of working group consensus. Rather it is a collection of individual opinions offered by a variety of parties invited to participate by the Commission. A clarifying statement is necessary to make it immediately clear to the reader that the subsequent document is a thought gathering exercise, and the document in no way is meant to offer concrete policy recommendations, suggestions, or legislative text.

Further, there was no policy analysis nor cost-benefit analysis conducted on any of the points raised in the document. The costs associated with any policies suggested in this report are unknown and deserve further analysis to appropriately understand the costs, benefits, risks, etc. associated. Any new programs must be pilot tested and economic impacts studies conducted to determine the impact on all customer classes.

The Lead Facilitator should consider adding a statement at the start of the document clarifying the report is not a consensus document, no cost-benefit analysis was conducted, and the document is not meant to support impending legislation or offer policy recommendations. The draft Final report attempts this, but greater emphasis should be given to reinforce these points.

2. *Working Group Reports*

Some topics were not discussed in Working Group meetings proportionally to the attention they are given in the Working Group reports. For the Working Group's the Chamber participated in, particularly in the case of electric vehicles, the Working Group sessions may have discussed them, but the reports reflect much greater emphasis than was actually given. This would suggest to the reader that group participants deemed this an important focus and therefore demands action, which in fact it was not.

To that end, certain reports focus on specific technologies and how the grid should adopt to those technologies, rather than how the grid should be technology neutral. 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, for example, 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, not prescribing the use of any one technology.

We raised these points to the Working Group Leaders during the drafting process. Overall, we are not arguing what was said. We understand this effort attempted to gather opinions and suggestions from a broad group of stakeholders and that should be reflected in the report. However, but we do raise concern with the attention given to some issues over others. That is why the Chamber continues to stress the need for a clarifying statement to provide balance and make clear NextGrid was an idea grabbing exercise to provide a snapshot to the public what the stakeholder community discussed during this process.

3. Strike the Entire Concluding Remarks Chapter

The Concluding Remarks Chapter is new and has not been reviewed by any NextGrid participants until now. The Chapter deviates from the tone of the rest of the NextGrid document and stated intent of the NextGrid process by making specific recommendations on EV-charging infrastructure, deployment of ESRs, and privacy in digitalization in the grid. The section should be stricken from the document entirely. The section is not necessary, but particularly when it is a violation of the stated NextGrid process by offering specific recommendations based off the drafter's assumptions of stakeholder discussions. The stakeholders involved in the NextGrid process did not agree, nor review, the recommendations offered in this Chapter. Further, the report weaves through language that there is no consensus yet disregards its own text by offering recommendations suggesting NextGrid stakeholders signed off on those points. That is simply not true, contradicts any effort to clarify non-consensus, and is concerning. If these recommendations move forward, they are done so without the consent or consensus of the NextGrid stakeholders.

Conclusion

Thank you to the University of Illinois and ICC staff for the time and energy put into organizing stakeholders to participate in the NextGrid process.