STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Commonwealth Edison Company Filing proposing changes to new service requests for large demand project applicants or customers. (tariffs filed June 23, 2025) Filing proposing revisions to Rider Distributed System Extensions. (tariffs filed June 23, 2025)	)	Docket No. 25-0677 (consolidated) Docket No. 25-0679

DIRECT TESTIMONY OF

SAAD SIDDIQUE

ON BEHALF OF

THE ENVIRONMENTAL LAW & POLICY CENTER, NATURAL RESOURCE DEFENSE COUNCIL, UNION OF CONCERNED SCIENTISTS, AND VOTE SOLAR

("Joint NGOs")

September 26, 2025

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I. INTRODUCTION AND WITNESS QUALIFICATIONS

Q: Please state your name and business address.

A: My name is Saad Siddique (he/him/his). My business address is 35 E. Wacker Dr., Ste. 1600, Chicago, Illinois 60601

Q: By whom are you employed and in what capacity?

A: I am employed by the Environmental Law & Policy Center ("ELPC") as an Economist & Energy Analyst.

Q: On whose behalf are you submitting this direct testimony?

A: I am submitting testimony on behalf of ELPC, Natural Resources Defense Council ("NRDC"), Union of Concerned Scientists ("UCS"), and Vote Solar, collectively referred to as the Joint NGOs ("JNGOs").

Q: Please summarize your educational background and professional qualifications.

A: I have been employed at ELPC since November 2023. As an Economist & Energy Analyst, I provide research, engineering and economic analyses, and data analysis in utility rate cases, grid and resource planning proceedings, and energy policy issues. Previously, I was a Senior Energy Systems Analyst at GTI Energy from 2022-2023, where I led a long-term strategy planning and modeling project for hydrogen and carbon capture, utilization and sequestration infrastructures in the lower 48 states of the U.S. to reach economy-wide net-zero CO2 goals by 2050. I also led a project that conducted a meta-analysis of multiple decarbonization studies that modeled and analyzed technological, economic, and policy pathways to economy-wide net-zero emissions by 2050 for the U.S. Prior to joining GTI Energy, I worked as a Sustainability Analyst at Stanford University from 2021-2022. I hold a Master of Science in Energy and Earth Resources from The University of Texas at Austin

(2020), where I wrote a thesis on investment and strategic decision-making for energy infrastructure projects under uncertainty and under risks of cost-and-time overruns. In 2018, I received a certification in Economics, Financial Accounting and Business Analytics from Harvard Business School Online. I graduated with a Bachelor of Engineering in Mechanical Engineering (2015) from Visvesvaraya Technological University in India. My resume is attached as JNGO Exhibit 1.01.

Q: Have you previously testified before the Illinois Commerce Commission or other state utility regulatory commissions?

A: Yes, I have. I recently testified before the Commission in Nicor's ongoing gas rate case, Docket No. 25-0055, and Ameren Illinois Company's gas rate case, Docket No. 25-0084. I have also testified before the Michigan Public Service Commission in DTE Gas Company's gas rate case, Case No. U-21291 and Consumers Energy's large loads tariff case, Case No. U-21859.

Q: Are you sponsoring any exhibits with your testimony?

A: Yes, I am sponsoring the following exhibits:

- JNGO Ex. 1.01: Resume of Saad Siddique
- JNGO Ex. 1.02: ComEd responses to data requests JNGO-ComEd 1.05, 1.21, 1.22, 1.23, 3.02, 4.13
- JNGO Ex. 1.03: Exelon Large Load Adjustment Proposal (Sept. 16, 2025)
- JNGO Ex. 1.04: Midcontinent Independent System Operator (MISO), *Long-Term Load Forecast* (Dec. 2024)
- JNGO Ex. 1.05: Monitoring Analytics, *Analysis of the 2025/26 RPM Base Residual Auction, Part G* (June 3, 2025)
- JNGO Ex. 1.06: Letter from PJM Board of Managers (Aug. 8, 2025)

- JNGO Ex. 1.07: Monitoring Analytics, *PJM State of the Market – 2025*, Introduction (2025)
- JNGO Ex. 1.08: SPP High Impact Large Loads Recommendation Report (July 18, 2025)
- JNGO Ex. 1.09: PJM Stakeholder Presentation, *PJM CIFP initial proposal and alternatives considered* (Sept. 15, 2025)
- JNGO Ex. 1.10: Exelon Comments to PJM in Response to CIFP Large Load Proposal
- JNGO Ex. 1.11: Montana-Dakota Utilities *High Density Contracted Demand Response* Tariff
- JNGO Ex. 1.12: Xcel Energy (MN), *Petition for Large Peak Controlled Time of Service Tariffs,* MPUC Docket 25-289 (July 16, 2025)
- JNGO Ex. 1.13: Alexandra B. Klass & Dave Owen, *Allocating Electricity*, 94 Geo. Wash. L. Rev. at 39 (Aug. 20, 2025 Draft)

Q: What is the purpose of your testimony in this proceeding?

A: The purpose of my testimony is to (1) describe and support ComEd's proposed tariff changes in this docket; (2) highlight some gaps and risks that aren't covered by ComEd's proposals; and (3) suggest next steps for the Company and the Illinois Commerce Commission ("ICC") to fill those gaps.

Q: What are your recommendations?

A: I recommend that the ICC approve the tariff modifications proposed by ComEd in this docket as an important first step towards protecting ComEd's retail customers from the costs and risks associated with ComEd's service to customers with large demands. In addition, I recommend that the ICC order ComEd to develop and file additional tariff changes to fill gaps identified in my testimony and by JNGO witnesses Kyle Thomas and

Mike Jacobs. These additional tariff changes can be reviewed by the Commission in a new docket.

As described further below, my testimony recommends that the Commission direct ComEd to require large-load applicants to file clean energy supply plans that document the customer's intended energy and capacity supply plan to meet their intended load ramp. I further recommend that the Commission consider directing ComEd to establish interruptible service options for large-load customers to expedite the interconnection process while mitigating cost and reliability impacts. JNGO Witness Thomas recommends that the Commission require ComEd to develop new large-load interconnection standards that are tailored to the unique risks posed by connecting extremely large loads to the grid. JNGO Witness Jacobs explains why further tariff changes are needed to prevent ComEd's customers from paying for high-voltage infrastructure built specifically to serve new large load customers.

JNGOs' testimony makes clear that ComEd's proposals in this docket represent a step in the right direction, but there is more work to be done to create fair rates and services that assign costs and risks to the large-load customers that are causing them.

II. OVERVIEW OF COMED'S PROPOSALS AND THE SCALE OF THE CHALLENGE

Q: What is ComEd requesting in ICC Dockets 25-0677 and 25-0679?

A: ComEd is requesting approval of proposed tariff amendments to its General Terms and Conditions (GTC) and Rider DE (Distribution System Extensions) to address the unprecedented volume of large demand project applications it is currently experiencing.[1]

[1] ComEd Ex. 1.0, Leichtman Direct Testimony at 2-3.

These filings are specifically designed to "clarify and improve aspects of the process through which customers with large demands (i.e., 50 MW or above) … apply for and receive retail electric delivery services."[2] The proposed tariff modifications are grouped into four main categories: defining Large Demand Project Applicants, implementing a Cluster Study approach, establishing enhanced engineering analysis deposits, and providing transmission revenue security.[3]

Q: According to ComEd's direct testimony, what is the total magnitude of large load applications currently in ComEd's interconnection pipeline?

A: ComEd's current pipeline includes "over 75 unique projects that total over 28,000 MW of maximum demand."[4] This historic demand is verified through data request responses showing that Cluster Study 1 covered 13 projects with about 9,300 MW (requested loads ranging from 112 MW to 1,870 MW), and Cluster Study 2 included 17 projects with roughly 11,800 MW (requested loads from 170 MW to 2,340 MW).[5] The size of individual project applicants has also grown significantly, with an average size over the last twelve months of "approximately 700 MWs," which ComEd explains is "roughly equivalent to the demand of 1,400 big box retail stores."[6]

[2] ComEd Ex. 1.0, Leichtman Direct Testimony at 2.
[3] ComEd Ex. 1.0, Leichtman Direct Testimony at 9.
[4] ComEd Ex. 1.0, Leichtman Direct Testimony at 6.
[5] JNGO Ex. 1.02 at 1 (ComEd response to JNGO-ComEd 1.05).
[6] ComEd Ex. 1.0, Leichtman Direct Testimony at 6.

Q: How does this 28,000 MW of pipeline demand compare to ComEd's historical peak system demand?

A: The 28,000 MW of large demand projects currently in ComEd's pipeline represents an unprecedented scale that more than doubles ComEd's historical system capacity. According to ComEd's testimony, "ComEd's all-time system peak demand in its 118-year history, set in 2011, is just shy of 24,000 MW."[7] This means that "the large-demand projects known to ComEd today have a cumulative maximum demand that is larger than the all-time ComEd system peak."[8] Witness Leichtman testifies that this represents growth that is "without precedent in the last three decades."[9]

Q: What does ComEd identify as the primary driver of this unprecedented load growth?

A: While ComEd does not explicitly state a single primary driver in its direct testimony, the evidence points to data centers as the predominant factor. ComEd witness Leichtman identifies his role as "the initial point of contact for large load projects including, but not limited to, data centers, advanced manufacturers, and clean technology companies such as solar and battery manufacturers."[10] The exponential nature of the growth is documented in ComEd's testimony, which describes load growth that "began in 2019 and has accelerated at an exponential pace" following "the proverbial hockey stick trajectory, remaining flat for a long time and suddenly curving sharply upward over the last three years."[11] The scale

[7] ComEd Ex. 1.0, Leichtman Direct Testimony at 6.
[8] ComEd Ex. 1.0, Leichtman Direct Testimony at 6.
[9] ComEd Ex. 1.0, Leichtman Direct Testimony at 5.
[10] ComEd Ex. 1.0, Leichtman Direct Testimony at 1.
[11] ComEd Ex. 1.0, Leichtman Direct Testimony at 5-6.

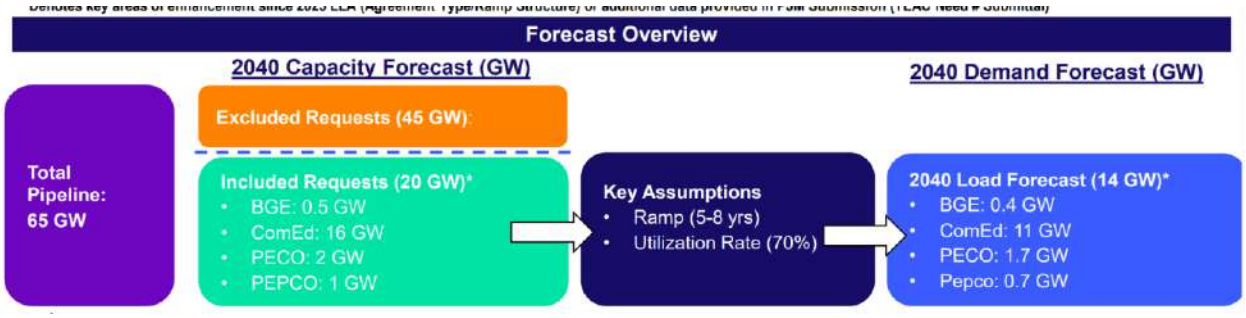
and characteristics of these applications—including projects seeking to interconnect at 138 kV and 345 kV with individual projects ranging up to 2,340 MW—are consistent with large-scale data center developments.[12]

Q: Does ComEd believe that all 28,000 MW of this pipeline demand will materialize?

A: ComEd does not directly answer this question in its testimony or discovery responses. When asked specifically about its confidence level regarding the 28,000 MW pipeline, ComEd states that "all of these projects have paid ComEd's required $1 million deposit, and many have committed additional funds to reserve long lead materials, which also contributes to the level of confidence," but acknowledges that "actual dates of initial service and load ramps could change based on a variety of factors that may not be known until detailed engineering is conducted and connection occurs."[13] Importantly, ComEd's parent company Exelon has provided a more conservative—but still quite large—forecast to PJM, projecting 11 GW of large load capacity for ComEd by 2040.[14] Exelon's forecast methodology explicitly excludes "45 GW of less certain capacity" from its 65 GW Exelon-wide "total pipeline" for its four distribution utilities (BGE, ComEd, PECO, and PEPCO).

[12] JNGO Ex. 1.02 at 1 (ComEd response to JNGO-ComEd 1.05).
[13] JNGO Ex. 1.02 at 2 (ComEd response to JNGO-ComEd 1.21).
[14] JNGO Ex. 1.03, Exelon Large Load Adjustment Proposal (Sept. 16, 2025) at slide 4 (available at 20250916-item-04d---exelon-large-load-request.pdf).

Figure 1 : Exelon Large Load Adjustment Proposal, September 16, 2025, PJM filing[15]



Other utilities and RTOs similarly discount the likely data center build from the total applications received. For example, MISO assumes that up to 41% of announced projects won't be built.[16]

Whether the ultimate outcome is 11 GW, 28 GW, or somewhere in between, this represents unprecedented load growth over a relatively short time period. For context, ComEd's all-time system peak demand was just under 24 GW.[17] Even Exelon's more conservative 11.1 GW projection would represent nearly a 50% increase in ComEd's peak demand by 2040, creating substantial challenges for system planning, cost allocation, and renewable energy compliance that require immediate regulatory attention regardless of which scenario ultimately materializes.

Q: How does ComEd define a "Large Demand Project Applicant or Customer" in its proposed tariff revisions?

A: ComEd's proposed definition creates a detailed framework for identifying customers subject to the enhanced tariff provisions. According to the proposed GTC revisions: "A

[15] JNGO Ex. 1.03 at slide 4.
[16] JNGO Ex. 1.04, Midcontinent Independent System Operator (MISO), *Long-Term Load Forecast*, at 19 (Dec. 2024) (available at https://cdn.misoenergy.org/MISO%20Long-Term%20Load%20Forecast%20Whitepaper_December%202024667166.pdf).
[17] ComEd Ex. 1.0, Leichtman Direct Testimony at 6:109-111.

Large Demand Project Applicant or Customer is (1) an applicant for electric service or (2) a retail customer that requests the Company to change or expand the facilities and/or services used to provide electric service when (3) the Applicant or Customer's projected load ramp for the project includes a Maximum Kilowatts Delivered (MKD) equal to or greater than 50 MW at any time before December of the tenth (10th) calendar year after the requested service date."[18] This definition includes both new service applicants and existing customers requesting service changes, with the key threshold being 50 MW of demand reached within ten years of service start.

Q: What specific problems does ComEd state that its proposed tariff modifications are intended to address?

A: ComEd identifies several related issues that its proposed tariff changes aim to resolve. First, ComEd seeks to address "speculative or inflated applications for large demand projects," which "directly impact ComEd and its customers, creating both operational and financial risks," including "costly system upgrades or new facility construction to serve anticipated demand that never materializes."[19] Second, the tariff changes intend to prevent "stranded costs and cost shifting" by ensuring "that new service requests of Large Demand Project Applicants or Customers neither harm, nor unjustly shift costs to, other customers."[20] Third, ComEd addresses the administrative complexity involved in processing large volumes of applications under current procedures, noting that "the work necessary for ComEd to provide service to these large demand projects is complex from a planning and

[18] ComEd Ex. 2.0, Perkins Direct Testimony at 4-5; ComEd Ex. 1.01 at 10.
[19] ComEd Ex. 1.0, Leichtman Direct Testimony at 14.
[20] ComEd Ex. 1.0, Leichtman Direct Testimony at 7; ComEd Ex. 1.01, Supplemental Statement at 3-5.

engineering standpoint" and that "one customer's application can often influence how and when ComEd can serve other such customers, adding a further layer of complexity."[21] For transmission-connected projects, the proposed modifications also tackle revenue security concerns by requiring Transmission Security Agreements to ensure transmission revenue contributions align with projected loads, even if actual usage falls short.[22] However, as detailed by JNGO Witness Jacobs, there are shortcomings with ComEd's approach to allocating transmission costs under certain circumstances.[23]

III. COMED'S PROPOSED SOLUTIONS

Q: What is ComEd's proposed "Cluster Study" approach for evaluating large-load interconnections?

A: ComEd's proposed Cluster Study approach represents a fundamental shift from sequential to batch processing of large load interconnection applications. Under this methodology, ComEd collects applications from Large Demand Project Applicants during open time windows rather than studying requests individually in first-in, first-out order.[24] The Cluster Study analyzes the combined impact of multiple applications simultaneously on both transmission and distribution systems, evaluating aggregated demand schedules to identify necessary system reinforcements and expansions to ensure safety, adequacy, reliability, and efficiency.[25] Cost recovery follows an equal-share allocation among cluster participants, with each applicant responsible for a non-refundable portion of the total actual Cluster

[21] ComEd Ex. 1.0, Leichtman Direct Testimony at 7.
[22] ComEd Ex. 2.0, Perkins Direct Testimony at 11-14.
[23] JNGO Ex. 3.0, Direct Testimony of Mike Jacobs.
[24] ComEd Ex. 1.0, Leichtman Direct Testimony at 10:191-196.
[25] ComEd Ex. 1.0, Leichtman Direct Testimony at 12, Sheet No. 149.3.

Study cost regardless of project size.[26] Importantly, the Cluster Study serves only as an initial assessment and does not replace subsequent individual detailed engineering analyses required before service commencement.[27]

Q: What cost protection measures has ComEd proposed in its General Terms and Conditions modifications?

A: ComEd has implemented a multi-layered cost protection framework comprising three primary components. First, the Company established a sliding-scale deposit structure requiring $1 million for projects up to 200 MW, increasing by $500,000 for each additional 100 MW increment, with amounts exceeding $2 million requiring Acceptable Letters of Credit for the incremental portion.[28] Second, ComEd requires deposits for long-lead materials procurement to prevent cost socialization if projects fail to materialize.[29] Third, ComEd mandates Transmission Security Agreements (TSAs) that would support revenue contributions based on load projections and customer credit ratings. Additionally, modifications to Rider DE expand deposit coverage to include standard on-premises facilities for customers exceeding 50 MW, addressing previously unprotected infrastructure investments.[30]

Q: What is your opinion of the cost protection measures that ComEd has proposed?

A: I believe ComEd's proposed cost protection measures are important and necessary reforms that the Commission should approve as a first step, while considering additional changes to further protect ComEd's customers from other risks identified in my testimony. ComEd's

[26] ComEd Ex. 2.0, Perkins Direct Testimony at 8:167-170.
[27] ComEd Ex. 1.0, Leichtman Direct Testimony at 12, Sheet No. 149.3.
[28] *Id.* at 16, Sheet No. 151.3.
[29] ComEd Ex. 2.0, Perkins Direct Testimony at 10:197-200.
[30] ComEd Ex. 1.03, Leichtman Direct Testimony at 6, Sheet No. 270.

willingness to revise its longstanding practices demonstrates the utility recognizes the unprecedented nature of current large load growth and the need for enhanced protections.

IV. GAPS IN COMED'S APPROACH

Q: In your opinion, do ComEd's proposed measures adequately address all the challenges created by this unprecedented load growth?

A: While ComEd's proposals are a good first step, they do not address all of the challenges associated with ComEd's service to large-load customers. Perhaps most importantly, ComEd has no visibility into whether sufficient generation will be available to power the massive new loads that ComEd will be connecting to the grid. There is no evidence that ComEd's grid can handle 28 GW of new load without causing reliability risks and an affordability crisis for the rest of ComEd's customers. Further, as JNGO Witness Jacobs explains, the cost protection measures are inadequate for certain transmission-connected large loads.

Q: How much electricity will be required to serve ComEd's pipeline of large load customers?

A: Based on ComEd's actual load deployment schedule disclosed in ComEd's discovery responses, the 28 GW large load pipeline would more than double Illinois's current electric consumption, raising total statewide demand by 123%.[31] The deployment starts with 500 MW in 2026, expanding to 5,000 MW by 2030, then accelerating to 18,000 MW by 2035, and reaching the full 28,000 MW by 2040. At a 70% load factor (which is conservative), this schedule would produce 30.7 TWh of additional electricity demand by 2030,

[31] JNGO Ex. 1.02 at 2 (ComEd response to JNGO-ComEd 1.21).

increasing to 110.4 TWh by 2035, and ultimately reaching 171.7 TWh annually by 2040-2045. To put this in perspective, the total amount of electricity sold in Illinois in 2023 was approximately 130.6 TWh.[32]

Q: Does ComEd currently consider whether sufficient generation is available to power new large load customers before connecting them to the grid?

A: No. ComEd states that the utility "does not have visibility into the generation supply procurement decisions of its customers" and therefore relies entirely on customer-provided load projections without verification.[33] ComEd states that it does not consider whether sufficient electricity supply exists because such issues fall outside the scope of its Illinois delivery service responsibilities.[34] Nor does ComEd factor in the possible impacts of increased demand on Illinois' Renewable Portfolio Standard obligations—again, because it believes the state's RPS requirements are not relevant to the Company's regulated delivery service mandate.[35]

Q: What are the risks to other customers if the Commission does not require ComEd to coordinate its large-load interconnection process with its customers' energy supply choices?

A: There are several related risks. First, as explained in the testimony of JNGO Witness Kyle Thomas, connecting large loads to the grid without coordinated supply planning may create system-wide reliability risks that extend beyond delivery service into wholesale market

[32] U.S. Energy Information Administration, Electric Power Annual, Table 2.8 (Sales of Electricity to Ultimate Customers by End-Use Sector (available at https://www.eia.gov/electricity/annual/table.php?t=epa_02_08.html).
[33] JNGO Ex. 1.02 at 5 (ComEd response to JNGO-ComEd 3.02).
[34] JNGO Ex. 1.02 at 3-4 (ComEd responses to JNGO-ComEd 1.22-1.23).
[35] JNGO Ex. 1.02 at 3 (ComEd Response to JNGO-ComEd 1.22).

stability.[36] Second, customer bills will likely increase and remain high due to an imbalance of supply and demand in the market, as energy suppliers will be forced to procure increasingly expensive resources. Third, increasing load without corresponding increases in new renewable energy generation in Illinois will challenge the state's ability to meet its clean energy goals under the Climate and Equitable Jobs Act (CEJA).

These broader supply-demand coordination challenges require additional regulatory measures that complement—rather than replace—ComEd's initial proposals here. This is not a shortcoming of ComEd's proposal, but rather recognition that unprecedented load growth requires coordinated regulatory response across both delivery service and electric supply domains to ensure comprehensive system reliability and customer protection. While ComEd operates solely as a delivery service provider, the utility and the Commission maintain fundamental responsibilities for ensuring grid integrity, system reliability, and basic fairness and affordability.

I expand further on these risks and propose policy solutions in my testimony below.

V. CAPACITY MARKET IMPACTS

Q: How is load growth from data centers affecting capacity prices in PJM?

A: According to PJM's Independent Market Monitor (IMM), "data center load growth is the primary reason" that PJM's capacity prices have increased so much in recent years."[37] Data

[36] JNGO Ex. 2.0, Direct Testimony of Kyle Thomas at 7-8.
[37] JNGO Ex. 1.05, Monitoring Analytics, *Analysis of the 2025/26 RPM Base Residual Auction, Part G*, at 2 (June 3, 2025) (available at https://www.monitoringanalytics.com/reports/reports/2025/IMM_Analysis_of_the_20252026_RPM_Base_Residual_Auction_Part_G_20250603_Revised.pdf).

centers overwhelmingly dominate PJM's long-term load forecast—representing 30 GW of PJM's expected 32 GW of peak load growth by 2030.[38] PJM's Board of Managers warns that "[t]his onrush of demand has created significant upward pricing pressure and has raised future resource adequacy concerns."[39] Indeed, the IMM concluded that "data center load by itself" increased prices in PJM's most recent capacity auction ***by more than $9 billion dollars.***[40]

Q: How do capacity market price increases affect electricity prices for the rest of ComEd's customers?

A: Despite the IMM's conclusion that these costs are "almost entirely the result" of data center load growth,[41] they are not paid for entirely by data centers—instead, all electricity consumers in PJM's footprint are paying for these costs through rate increases on their power bills. ComEd residential customers are already experiencing higher bills: capacity charges increased from approximately $0.91 per month for a typical 3 kW residential customer in July 2024 to approximately $8.00 per month in July 2025, an increase of over 775% in just one year driven in part by data center-induced capacity price escalation. As the IMM PJM Monitor explained, "the failure to recognize and address the role of large

[38] JNGO Ex. 1.06, Letter from PJM Board of Managers, at 1 (Aug. 8, 2025) (available at https://www.pjm.com/-/media/DotCom/about-pjm/who we-are/public-disclosures/2025/20250808-pjm-board-letter-re-implementation-of-critical-issue-fast-path-process for-large-load-additions.pdf).
[39] *Id.*
[40] JNGO Ex. 1.05 at 2 ("But for data center growth, both actual and forecast, the PJM Capacity Market would not have seen the tight supply demand conditions, the high prices observed in the BRA for 2025/2026 or the high prices expected for the 2026/2027 and subsequent capacity auctions. Holding aside all the other issues raised by the MMU in parts A through F of this report, data center load by itself resulted in an increase in the 2025/2026 BRA revenues of $9,332,103,858 or 174.3 percent.").
[41] *Id.* at 1.

data center loads is a direct cause of higher prices and will continue to result in even higher prices unless the related issues are addressed."[42]

Q: Beyond market price impacts, how can supply-demand imbalances created by large load additions threaten distribution system reliability?

A: As further explained by JNGO Witness Kyle Thomas, supply-demand imbalances from large load additions may create distribution system reliability risks that extend beyond wholesale market pricing impacts. When utilities connect large loads without any regard for available supply, the entire second to second balance of the system is at risk, leading to voltage and frequency stability concerns, transmission congestion, dependency on expensive real-time imports that can fail during peak demand periods or generation outages, and even load shedding as a last resort solution if the generation resource supply cannot meet the demand.[43]

Q: Does ComEd's current load interconnection process require any demonstration of adequate supply before ComEd energizes a new large load customer?

A: Not to my knowledge. ComEd acknowledges it "does not have visibility into the generation supply procurement decisions of its customers" and disclaims any obligation to ensure adequate supply exists to serve interconnecting loads.[44] In my opinion, this creates a fundamental gap where massive loads may interconnect to ComEd's grid without verification that sufficient generation capacity exists to serve them reliably. Given the scale and speed of large load demand expected in the near term and the risk it poses to

[42] JNGO Ex. 1.07, Monitoring Analytics, *PJM State of the Market – 2025*, Introduction at 10 (2025) (available at https://www.monitoringanalytics.com/reports/PJM_State_of_the_Market/2025.shtml).
[43] *See* JNGO Ex. 2.0, Direct Testimony of Kyle Thomas at 7-8.
[44] JNGO Ex. 1.02 at 6 (ComEd response to JNGO-ComEd 4.13).

affordability and reliability, the Commission and ComEd must re-evaluate this "business as usual" approach. I recommend several potential policy solutions in Section VIII of my testimony, below.

VI. ILLINOIS CLEAN ENERGY OBLIGATIONS

Q: What impact could this new data center load have on Illinois Clean Energy goals?

A: The new data center load could have a significant impact on Illinois' ability to achieve its clean energy goals. In this section of my testimony, I will explain the state's current clean energy goals, discuss the IPA's progress toward achieving those goals, and illustrate how the procurement of clean energy would be impacted by the new data center load projected by ComEd in this case.

Q: What are Illinois' renewable energy requirements under the Climate and Equitable Jobs Act (CEJA)?

A: Under the Climate and Equitable Jobs Act (CEJA), enacted as Public Act 102-0662, Illinois established comprehensive renewable energy requirements that greatly increased the state's renewable portfolio standard goals. CEJA increases the RPS percentage goals to 40% by 2030 and 50% by 2040 (up from 25% by 2025) and sets a policy goal for the state to transition to 100% clean energy by 2050.[45] The Act outlines specific procurement targets, including a goal of 45 million renewable energy certificates (RECs) annually by 2030, broken down into several categories. CEJA also increases annual RPS funding from $235

[45] The Act distinguishes "clean" from "renewable" energy, primarily by including nuclear power in the definition of "clean" energy.

334 million to over $580 million and provides additional flexibility around how funds are spent,
335 allowing funds collected in one year to be used for expenditures in a later year.[46]

336 **Q: When large electricity demand is added in Illinois, how does this affect the state's**
337 **total RPS obligations?**

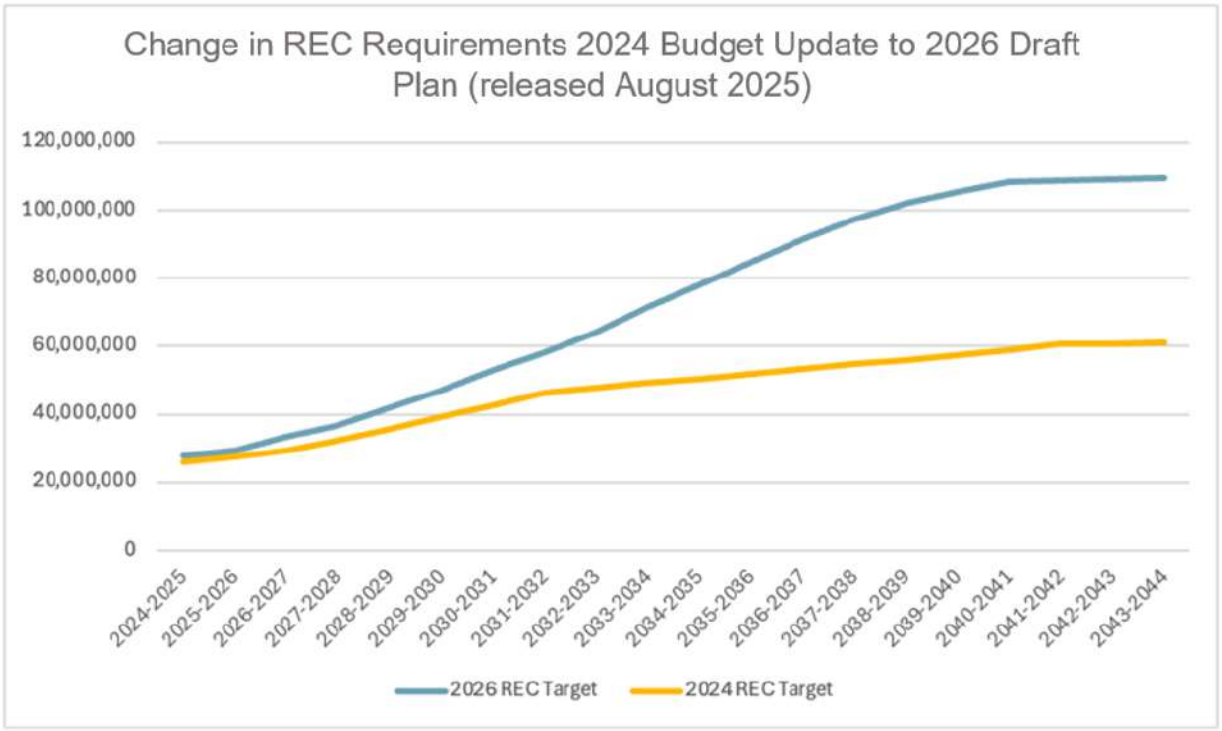
338 A: The addition of large electricity demand in Illinois directly increases the state's total RPS
339 obligations because REC requirements are calculated as a percentage of total utility load,
340 creating a mathematical relationship where load growth translates proportionally to
341 increased renewable energy procurement needs. The IPA explains that "[l]oad forecasts are
342 used to directly calculate the quantity of RECs required to be acquired through
343 procurements and programs by multiplying the RPS target for each renewable resource
344 (solar and wind) by the utility load forecast, per year."[47]

345 **Q: How is data center load growth affecting the IPA's Long-Term Renewable**
346 **Resources Procurement Plan?**

347 A: Load growth from data centers is significantly increasing the IPA's REC procurement
348 targets. For example, ComEd's forecasted load in the 2040–41 delivery year is now more
349 than double what was projected in the 2024 Plan. Figure 2 below compares the number of
350 RECs required to meet Illinois' RPS targets under two different planning scenarios: the
351 October 2024 update to the IPA's Long-Term Renewable Resources Procurement Plan
352 (shown in yellow) and the Draft 2026 Plan released in August 2025 (shown in blue).
353

[46] *See* Illinois Power Agency, CEJA Factsheet, available at https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/IPA-FactSheet_PA102-0662_Final.pdf.
[47] Illinois Power Agency Updated Renewable Portfolio Standard Budget Forecast (May 12, 2025) at 8 (available at https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/rpsbudgetupdate51225.pdf.)

Figure 2



The IPA notes that these increases "largely reflect the effects of data center growth, and continuing electrification – primarily heating and electric vehicles."[48] While the Illinois Power Agency continues to plan procurements to achieve the statutory REC targets, the growth of data center load increases both the scale of procurement needed and the strain on the RPS budget.

Q: How do these increased REC procurement targets translate into new MW of wind and solar projects required to meet the Illinois RPS?

Based on my calculations, if large load customers come online per ComEd's (28 GW) load forecast, the IPA would need to procure RECs from an equivalent of more than 4 GW of

[48] IPA Draft Long-Term Plan at 51 (Aug. 2025) (available at https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/20250815-draft-2026-long-term-renewable-resources-procurement-plan-august-15-2025.pdf).

new wind and solar projects by 2030, 19 GW by 2035, and 37 GW by 2040. Using Exelon's more conservative load growth forecast (11 GW), the IPA would need to procure RECs from an equivalent of 4 GW of new wind and solar projects by 2030, nearly 12 GW by 2035, and close to 15 GW by 2040.[49] These are very large numbers that illustrate the scale of the challenge facing the state in meeting CEJA's goals.

Q: Why are you raising the issue of RPS compliance in this proceeding, and how should the Commission view it?

A: While the Commission's approval of this tariff does not directly determine whether Illinois meets its RPS targets, I raise the issue here to illustrate the broader costs and complexities of load growth in Illinois. Achieving CEJA's 50% RPS targets by 2040 would require massive new wind and solar procurement, potentially tens of thousands of megawatts statewide, which could result in developer bottlenecks, lengthy permitting delays, and severe competition for project siting and transmission upgrades. These challenges directly affect the availability and thus, the price of RECs in the market, increasing the likelihood that REC prices will be higher in the future than recent procurement averages and projections. Given these constraints, I recommend that the Commission take into account

49 Step 1: Convert Megawatts to Annual Energy

Formula: Annual Energy = (MW × Load Factor × 8,760 hours) ÷ 1,000,000

- 2030: (5,000 MW × 70% × 8,760) ÷ 1,000,000 = 30.7 TWh
- 2035: (18,000 MW × 70% × 8,760) ÷ 1,000,000 = 110.4 TWh
- 2040: (28,000 MW × 70% × 8,760) ÷ 1,000,000 = 171.7 TWh

Step 2: CEJA RPS Requirements by Year: 2030: 30% renewable requirement, 2035: 40% renewable, 2040: 50% renewable

Step 3: RECs Needed = Annual Energy × RPS Target

- 2030: 30.7 TWh × 30% = 9.2 TWh of RECs
- 2035: 110.4 TWh × 40% = 44.2 TWh of RECs
- 2040: 171.7 TWh × 50% = 85.8 TWh of RECs

Calculations assume EPA capacity factors of 33.5% (wind) and 19% (solar), yielding 26.25% blended average. Formula: Required MW = (TWh RECs needed ÷ 0.2625 ÷ 8,760 hours) × 1,000,000. ComEd's 28 GW scenario creates 85.8 TWh annual REC obligations by 2040 (171.7 TWh load × 50% RPS), while Exelon's 11.1 GW forecast creates 34.0 TWh (68.1 TWh load × 50% RPS).

the implications for RPS compliance when considering the terms of service for large load interconnection in Illinois. I expand on potential policy solutions, such as a requirement for clean energy supply plans and "Bring Your Own Generation" (BYOG) requirements, in Section VIII of my testimony below.

VII. EMERGING BEST PRACTICES AND REGULATORY APPROACHES

Q: How are states and RTOs structuring their large load interconnection processes to better manage system-wide reliability and cost impacts?

A: Several states and RTOs have begun to propose changes to their load interconnection processes to address issues related to the unprecedented volume of potential new large loads. For example, PJM Interconnection has started a stakeholder process focused on "finding solutions to the potential resource adequacy challenges posed by rapidly interconnecting large loads."[50] Similarly, Southwest Power Pool ("SPP") has approved new interconnection processes to address the "challenge of connecting customers with significant demand, such as AI-driven data centers or manufacturing, while balancing essential goals of reliability and affordability."[51] Lastly, the Electric Reliability Council of Texas ("ERCOT") has been granted authority to require curtailment of new or expanded large loads under certain conditions.[52]

These examples, which I discuss in more detail below, demonstrate that grid operators across the country are aware that the interconnection of large loads at the speed and scale currently projected poses significant reliability and resource adequacy impacts,

[50] JNGO Ex. 1.06.
[51] *Southwest Power Pool board approves accelerated pathway for large load connection* (Sept. 16, 2025), https://www.spp.org/news-list/southwest-power-pool-board-approves-accelerated-pathway-for-large-load-connection/.
[52] PURA § 37.0561.

as well as potential cost-shifting to other customers. And in response to these challenges, some states and grid operators are considering and implementing approaches that involve 1) non-firm or interruptible service options or requirements for certain large load customers, and 2) incentives to coordinate energy supply with new load during the interconnection process.

Q: What are SPP's new interconnection procedures for large loads?

A: SPP's Board of Directors recently approved establishing an accelerated, 90-day study-and-approval process for interconnecting large loads "that will be paired with new generation (either on-site or nearby) or for interconnecting large loads with current or planned generation."[53] SPP materials describe the new framework as a way to "maintain grid reliability and operational efficiency while balancing cost-effectiveness with expedited market deployment timelines" associated with high-impact large loads.[54] By studying new load and its supporting generation together, SPP's proposal is an example of coordinating energy supply with newly interconnecting load, which can reduce the risks of system-reliability impacts and unfair cost-shifting to other customers. Further, an accelerated study timeline can provide an incentive for large loads to develop supporting generation in connection with its interconnection request.

SPP is also considering a proposal to create an interruptible service option, called Conditional High Impact Large Loads ("CHILLS"), under which new load could come online quickly but would be subject to curtailment for reliability reasons under certain

[53] *See* JNGO Ex. 1.08, SPP High Impact Large Loads Recommendation Report (July 18, 2025) (available at https://www.spp.org/documents/74680/2025-09-04%20special%20board%20meeting%20materials%203.pdf)
[54] *Id.*

conditions.[55] Under the proposal, which has not yet been approved by SPP's Board of Directors, CHILLS load would expect to transition to firm service within 5 years. This is another example of the potential for non-firm service to be a solution for balancing the desire of large loads to come online quickly while maintaining reliability of the system.

Q: Can you describe Texas's approach to interconnecting new large loads?

A: In response to exponential load growth expected in the ERCOT region, the Texas legislature has tasked ERCOT and the Public Utility Commission of Texas ("PUCT") with balancing the interconnection of these new large loads with protections against cost-shifting and potential reliability issues. Texas's approach includes three mechanisms that are relevant here: 1) mandatory curtailment of certain large loads during emergencies; 2) the creation of a voluntary demand response program for large loads; and 3) new standards for large load interconnection.[56]

Specifically, under the mandatory demand response mechanism, all non-critical large loads of 75 MW or greater that interconnect to ERCOT after December 31, 2025, can be subject to curtailment by their utility during firm load shed events. The new standards for large load interconnection aim to minimize system reliability impacts and the potential for stranded infrastructure costs. As explained in trade press coverage, the intent of the demand response mechanisms in S.B. 6 is "to make sure [large loads] pose as little

[55] *See* SPP Press Release, *SPP's High Impact Large Load Interconnection Solutions: Powering Growth, Accelerating Opportunity* (available at https://www.spp.org/markets-operations/high-impact-large-load-hill-integration/).
[56] *See* Texas S.B. No. 6, available at https://capitol.texas.gov/tlodocs/89R/billtext/pdf/SB00006F.pdf.

reliability risk to the system as possible and [are] not drinking the milkshake of all other Texas power customers."[57]

Q: What is PJM proposing in its Large Load Additions stakeholder process?

A: The key element of PJM's "Critical Issue Fast Path" proposal is the creation of a new type of non-firm service for transmission-connected loads, called Non-Capacity-Backed Load or NCBL, that could be curtailed in system emergencies. In exchange, NCBL would not be subject to capacity charges and would not be included in PJM's capacity auctions.[58] In order to ensure grid reliability, PJM also recommends developing "incentives for Large Loads to bring new generation (BYOG) or participate in existing load flexibility (Demand Response) products in order to avoid potential curtailment during capacity emergencies."[59]

Stakeholders had the opportunity to comment on PJM's proposal, and a number of commenters took the position that creating mandatory non-firm service requirements is a matter of state jurisdiction. For example, Exelon argued:

> The proposal establishes a new category of retail service for certain large loads whereby those customers would receive service on an interruptible basis subject to curtailment in emergencies and would be exempted from paying capacity charges. ... Deciding whether and on what terms a retail customer should receive firm service or interruptible service has always been a state function. Indeed, state utility commissions often oversee or approve special retail tariffs for large commercial and industrial customers, including interruptible rate programs ... ***Whether a particular data center customer receives firm, capacity-backed supply or a non-firm, curtailed***

[57] Utility Dive, *Texas law gives grid operator power to disconnect data centers during crisis* (June 25, 2025) (available at https://www.utilitydive.com/news/texas-law-gives-grid-operator-power-to-disconnect-data-centers-during-crisi/751587/).
[58] *See* JNGO Ex. 1.09, PJM Stakeholder Presentation, *PJM CIFP initial proposal and alternatives considered* (Sept 15, 2025) (available at https://www.pjm.com/-/media/DotCom/committees-groups/cifp-lla/2025/20250915/20250915-item-07---pjm-initial-proposal-and-alternatives-considered---pjm-presentation.pdf).
[59] *Id*. at slide 4.

supply in emergencies is a condition of that end-use customer's retail service.[60]

PJM and its stakeholders have yet to approve a proposed approach, which ultimately would need to be filed at FERC for approval. However, I believe that PJM's initial proposal in the stakeholder process is instructive here for two reasons in particular: 1) it demonstrates widespread concern in the PJM region about the potential for large loads to cause resource adequacy and/or system reliability impacts and a consensus that solutions to these challenges should be found; and 2) that there is significant disagreement as to PJM's authority, as an RTO, to *require* non-firm service, while it appears there is widespread consensus that states have such authority.

Q: Are you aware of any other examples of utilities implementing non-firm service as a solution to the potential reliability or resource adequacy impacts of large load additions?

A: Yes, this is becoming more common as utilities across the country look for solutions to large load challenges. For example, the North Dakota Public Service Commission recently approved the Montana-Dakota Utilities Company's interruptible service tariff for "data center-type facilities," under which the utility can interrupt the customer's service for up to 200 hours per year.[61]

The Minnesota Public Utilities Commission ("MPUC") is similarly considering Xcel Energy's proposal to create an interruptible service option for a "super-large

[60] *See* JNGO Ex. 1.10, Exelon Comments to PJM in Response to CIFP Large Load Proposal at 1 (available at https://www.pjm.com/-/media/DotCom/committees-groups/cifp-lla/postings/20250828-stakeholder-comments-cifp-lla.pdf).
[61] *See* JNGO Ex. 1.11, Montana-Dakota Utilities *High Density Contracted Demand Response* Tariff (available at https://www.montana-dakota.com/wp-content/uploads/PDFs/Rates-Tariffs/NorthDakota/Electric/NDElectric45.pdf).

customer" tariff subclass.[62] Xcel filed this proposal in response to an order from the Minnesota PUC, which required Xcel to "describe how it will ensure continued achievement of affordability, reliability, and clean energy goals and standards" while assigning "all incremental costs attributable to super-large customers" to that customer class.[63]

Relatedly, the Ohio Public Utilities Commission recently approved AEP Ohio's Data Center Tariff, which allows AEP to suspend a data center customer's service if the customer exceeds its contract capacity by more than 1,000 kW.[64] AEP's approved tariff explains that nothing in the data center-specific provisions affects the utility's right to "disconnect or curtail load in accordance" with its Commission-approved tariff and state law.[65]

Q: What lessons can Illinois draw from these other jurisdictions' experiences with balancing economic development goals against ratepayer protection and clean energy compliance?

A: These examples illustrate that states have a key role to play and a broad range of choices to ensure adequate, reliable, and affordable service in a world with increasing load growth. These trends are occurring both in deregulated states (like Ohio) and in states with vertically-integrated utilities (like Minnesota).

[62] *See* JNGO Ex. 1.12, Xcel Energy (MN), *Petition for Large Peak Controlled Time of Service Tariffs,* MPUC Docket 25-289 (July 16, 2025)
[63] Minnesota PUC Order, Docket No. 19-368 (2025) at 17-18.
[64] *See* Public Utilities Commission of Ohio, *Opinion and Order*, Case No. 24-508-EL-ATA (July 9, 2025) (available at https://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A25G09B43531I00509).
[65] *Id.*

VIII. POTENTIAL POLICY SOLUTIONS

Q: How can ComEd and the Commission address the resource adequacy and clean energy supply risks that you've identified through ComEd's state jurisdictional distribution tariffs?

A: ComEd and the Commission have a range of options to creatively address these risks through future modifications to ComEd's distribution tariffs and large load interconnection process. For example, ComEd could amend its load interconnection tariff to require prospective large load customers to file clean energy supply plans as part of their applications for interconnection service. Like the state examples mentioned above, ComEd could also consider developing a non-firm service tariff that would allow ComEd to curtail customers during system stress events. As described further below, this approach could help ComEd flexibly accelerate its load interconnection process while avoiding events that threaten distribution system stability and drive up costs for the rest of ComEd's customers.

Q: Can you please expand on your proposal for clean energy supply plans?

A: Yes. For the reasons explained by JNGO Witness Kyle Thomas, I recommend that the Commission direct ComEd to work with stakeholders to develop a new, transparent large-load interconnection process tailored to the unique characteristics of large load customers.[66] Conceptually, this could resemble the *generator* interconnection procedures in Part 466 of the Commission's rules.[67]

As part of this new process, ComEd should require large load customers to develop and file a clean energy supply plan that broadly describes the customer's strategy to meet

[66] *See* JNGO Ex. 2.0, Direct Testimony of Kyle Thomas.
[67] *See* 83 Ill. Adm. Code Part 466.

its projected load ramp with energy supply resources over time. At a high level, these plans could include: (1) the customer's plans to meet its projected load ramp with new and/or existing energy supply resources; (2) specification of the customer's clean energy and/or demand flexibility opportunities, including distributed energy resources, load flexibility commitments, and participation in the Illinois Power Agency's RPS Self-Direct Program; (3) timelines and milestones to synchronize the customer's supply strategy with its planned load ramp to prevent supply-demand imbalances; and (4) financial commitments or security instruments ensuring continued compliance if market conditions change.

Q: How could clean energy supply plans help mitigate risks for other ComEd customers and help expedite the development of innovative data center projects?

A: Clean energy supply plans could help mitigate risks to other ComEd customers by providing ComEd and the Commission with more visibility into whether the customer has procured sufficient electricity supply to offset the reliability and resource adequacy risks described earlier in my testimony. It could serve as the foundation for other innovative rate approaches, such as a non-firm service tariff, to allow large load customers to interconnect even before they have secured firm supply to meet their desired load ramp. It could also be used to accelerate the interconnection process for large load projects that bring their own clean generation (BYOG), thereby offering a powerful incentive for data center companies to innovate and incorporate clean energy and load flexibility into their project design.

Q: Have others recommended a "Bring Your Own Generation" (BYOG) approach?

A: Yes. PJM's Market Monitor has observed that a BYOG approach is a "pragmatic market solution" that could help avoid a "massive wealth transfer" from ratepayers to independent power producers and hyperscale data center companies:

> The market solution is to require new large data center loads to bring their own new generation with locational and temporal characteristics reasonably matched to their load profile. This solution needs to include an expedited interconnection process for large data center loads that bring their own generation.[68]

As the IMM further explains, "[t]he addition of large data center loads without associated generation imposes very significant capacity market costs and transmission costs on everyone else."[69] A BYOG approach would help internalize these costs to the data centers and protect ComEd's captive ratepayers from further electricity price increases that they did not cause. It would also benefit data centers and the state's economic development goals by offering an expedited development pathway for innovative projects that align with the state's clean energy goals. I invite ComEd to react to this opportunity and ways it could be implemented in Illinois in its rebuttal testimony.

Q: Please expand on your proposal for the Commission to consider requiring ComEd to offer a non-firm service tariff for large load customers.

A: Certainly. As explained in Section VII of my testimony above, several RTOs and states are considering new rates and tariffs that would allow utilities to connect data centers on a conditional or "non-firm" basis until such time as the customer secures sufficient capacity to serve its planned load.

In a recent paper, law professors Alexandra Klass and Dave Owen describe a "connect-and-manage" approach with the following "core elements": "(1) an option for new large loads to connect to the grid, even if supplies and transmission systems cannot meet demand at all times; (2) authority for state-regulated utilities to curtail those new

[68] JNGO Ex. 1.07, PJM State of the Market Report at 2.
[69] JNGO Ex. 1.07, PJM State of the Market Report at 3.

users; and (3) secondary markets where large loads can use trading to hedge against the risk of curtailments."[70] The paper explains that this approach would have several benefits for large-load customers and for the public at large:

> Major new [electricity] users could be allowed to connect to the grid and receive service, with the understanding that they would be curtailed in the rare circumstances when demand exceeds supplies. Those users also could use secondary markets to hedge against the risk of curtailment. New generation still would likely be needed, but not as quickly and not as much. And the risks associated with supply-demand mismatches would be borne primarily by data centers, which are run by (or for) large, sophisticated companies able to manage those risks, rather than by ordinary consumers. The system also would create powerful incentives for innovation, which might lead to new technologies, new business models for energy production and distribution, or both.[71]

Q: Does the Commission have jurisdiction to require ComEd to develop a non-firm service tariff for large load customers?

A: While I am not qualified to offer a legal opinion, I believe so. Many of the parties that responded to PJM's proposal to require non-firm service—including Exelon—have expressed the opinion that this decision is a retail rate matter that is squarely within the authority of states. For example, Exelon's response comments to PJM state that "[d]eciding whether and on what terms a retail customer should receive firm service or interruptible service has always been a state function."[72] Thus, Exelon concludes, "state commissions could require a data center to take service on an interruptible tariff."[73] If Exelon's analysis is correct, then it is clearly within the Commission's power to require ComEd to develop a new non-firm service tariff for large loads.

[70] JNGO Ex. 1.13, Alexandra B. Klass & Dave Owen, *Allocating Electricity*, 94 Geo. Wash. L. Rev. (Aug. 20, 2025 Draft) at 39.
[71] JNGO Ex. 1.13 at 47.
[72] JNGO Ex. 1.10 at 2.
[73] *Id.* at 3.

Q: How could a non-firm service tariff work in conjunction with clean energy supply plan requirements?

A: A non-firm service tariff could help accelerate and de-risk the interconnection process for both the utility and for large-load customers. For example, ComEd's tariffs could specify that large-load customers that demonstrate adequate supply resources through a clean energy supply plan would be eligible to receive firm, non-interruptible service at standard tariff rates. Conversely, large loads that cannot yet demonstrate sufficient clean energy at the time of interconnection could be served temporarily under interruptible tariffs with curtailment rights during peak demand periods or supply shortfalls. The combination creates powerful economic incentives for proper supply planning while maintaining grid reliability and preventing cost shifts to other ratepayers. It also has the advantage of speeding up the development cycle by providing flexibility to allow large-load customers to connect to the grid even when they have not yet secured sufficient supply to meet their desired load ramp. It thus represents a flexible solution that balances the state's interests in economic development and consumer fairness.

IX. CONCLUSIONS AND SUMMARY OF RECOMMENDATIONS

Q: In summary, what are your principal conclusions regarding ComEd's proposed tariff modifications?

A: My analysis shows that ComEd's proposed tariff changes are an important but incomplete step toward protecting ratepayers from high load cost impacts. ComEd's increased deposit requirements under Rider DE begin to address distribution infrastructure cost recovery to

reduce risks borne by other ComEd customers.[74] However, ComEd's plan has a major gap: it does not cover the reliability and energy supply risks caused by the addition of inflexible large loads that outpace the development of sufficient new, clean supply in the market. My testimony offers potential policy solutions for the Commission to consider, based in part on developments in other states and RTOs.

Q: What are your recommendations for Commission action in this case?

A: The Commission should approve ComEd's proposed tariff modifications in Dockets 25-0677 and 25-0679 as they represent important first steps toward protecting ratepayers from stranded distribution infrastructure costs.[75] However, the Commission should simultaneously direct ComEd to develop and file additional tariff modifications by a date certain (e.g. 90-180 days) to fill the policy gaps identified in my testimony and in the testimony of other JNGO witnesses.

As recommended by JNGO Witness Kyle Thomas, the Commission should direct ComEd to work with stakeholders to develop new large-load interconnection standards appropriately tailored to the specific characteristics of new large-load customers. The Commission should also direct ComEd to develop and file a proposal to require load customers to develop clean energy supply plans and establish interruptible service options for large-load customers. This would help accelerate and de-risk the large load interconnection process and serve the state's mutual interests in economic development, clean energy, and consumer protection. I invite ComEd to reflect on the regulatory

[74] ComEd Ex. 2.0, Perkins Direct Testimony at 3:44-46.
[75] ComEd Ex. 2.0, Perkins Direct Testimony at 3:44-46.

framework that governs electric service in Illinois and propose specific next steps that it considers viable in its rebuttal testimony in this case.

Q: Does this conclude your direct testimony?

A: Yes.