



Oppose SB1104: CEJA Integrates Existing Grid Reliability Protocols & Provides Additional Protections

CEJA's Integration with Existing Reliability Requirements

CEJA's Decarbonization Policies intentionally integrate existing reliability protocols and oversight from Regional Transmission Organizations (RTOs), which are non-profit entities regulated by the Federal Energy Regulatory Commission (FERC). RTOs such as PJM covering the ComEd service territory of Illinois and MISO covering the Ameren service territory of Illinois are responsible for ensuring grid reliability and regional planning for energy resources and transmission.

- CEJA specifies that if an RTO determines that a power plant is necessary to maintain grid power supply and reliability, operators of those plants *are able to emit greenhouse gases beyond CEJA's pollution limits and timeline without penalties.*
- Existing reliability requirements ensure that power plant operators are unable to take power plants offline without its RTO's permission. If an RTO determines that a unit is indeed needed to maintain grid reliability it will provide the operator of that power plant unit with a "must-run order" for a period of time until the RTO determines the grid issue has been resolved. CEJA affirms this responsibility of the RTOs and does not penalize operators who receive "must-run orders".

CEJA's Additional Oversight: ICC Reporting Process

CEJA also supplements and integrates the grid reliability and planning responsibilities of RTOs into a reporting process beginning in 2025 whereby the Illinois Commerce Commission, the Illinois Environmental Protection Agency, and Illinois Power Agency are required to issue a report to the General Assembly every 5 years that examines the current and projected status of electric resource adequacy and reliability throughout the state and any proposed solutions for the findings (415 ILCS 5/9.15) Sec. 9.15. (o)

- **Supplemental Protection to Address Potential Grid or Resource Challenges:** As part of this reporting process, if the Agencies and Commission conclude with RTO data and analysis that there will be an in-state resource shortfall or reliability problem, CEJA requires the Agencies to develop and submit a plan for ICC approval to reduce or delay greenhouse gas and co-pollutant emission requirements for the period of timeline necessary to resolve the reliability problem. This plan will be made public and the Agencies are required to provide an opportunity for public comment from stakeholders.