



June 27, 2018

City Water Light and Power
Amber Sabin, Public Information Officer
Municipal Center East
800 E. Monroe Street
Springfield, IL 62701

To Whom It May Concern:

On behalf of the members and the Board of Directors of The Greater Springfield Chamber of Commerce (GSCC), we appreciate the opportunity to participate in the public comment period regarding the Integrated Resource Plan (IRP) and the future of City Water Light and Power (CWLP). We believe it is a critical time to take a close look at past, present, and future operations of the utility in order to chart the best course forward for CWLP, the City of Springfield, our business community, and our residents.

During 2017, the GSCC worked with the City of Springfield, Sangamon County, and the Emberclear Corporation during the due diligence process of considering the possible development of Emberclear's Lincoln Land Energy Center in Pawnee, Illinois. As a part of that process GSCC commissioned The Power Bureau, a recognized leader in the power industry led by Mark Pruitt, the first Director of the Illinois Power Agency, to evaluate the impact on regional wholesale power prices resulting from the introduction of a proposed natural gas power plant in Pawnee. The focus of the study was to establish whether the addition of new power supply from the proposed power plant would depress regional wholesale prices, and thereby negatively impact the financial position of existing power generation resources that are owned and operated by the local municipal utility CWLP.

To answer these questions, The Power Bureau conducted a series of detailed simulations of the wholesale electricity market in the Springfield region for the benchmark year of 2022 (the anticipated first full year of operation for the Lincoln Land Energy Center). The Power Bureau also conducted a detailed review of how CWLP generation resources are operated by reviewing plant operations data reported by CWLP to the US Department of Energy, Energy Information Administration (EIA), and published in form EIA-923.

While The Power Bureau characterized the impact on regional wholesale power prices and the financial impact on CWLP as minor, we find significant portions of the evaluation concerning as we consider the price our businesses (and residents) are paying for electricity. A summary of the

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findings can be found in the Executive Summary on pages 1 and 2, the bold and underlined section on page 27, and the Conclusions on pages 30 and 31 of the attached full report.

The Power Bureau's analysis concluded that CWLP has been operating its generation resources in an uneconomical manner and passing above-market generation costs on to its business and residential customers for years. This conclusion was based on data reported by CWLP to the US Department of Energy, Energy Information Administration (EIA), and published in form EIA-923. If this data has been misinterpreted, misunderstood, or is in some way incorrect, we believe it is important it is clarified during the development of the IRP.

If we are going to provide reliable and reasonably priced electrical power to meet the community's future needs, we believe the information, questions, and concerns raised in The Power Bureau's final report must be considered as a part of completing the Integrated Resource Plan by CWLP, the Utility Committee, City Administration, and The Energy Authority (TEA), the company the City has contracted with to develop the IRP.

The development of the IRP is an opportunity for real leadership. It is an opportunity to address all questions and concerns regarding the operation of CWLP. Most of all, it is an opportunity to chart a course forward that will not only provide reliable and reasonably priced electrical power, but a competitive advantage as we all seek to grow our community and economy.

On behalf of the members and the Board of Directors of the Greater Springfield Chamber of Commerce, thank you for your attention to this matter.

Sincerely,



Chris Hembrough
President & CEO
The Greater Springfield Chamber of Commerce