

## WORKING GROUP 6: REGULATORY AND ENVIRONMENTAL POLICY ISSUES

**DRAFT REPORT APPENDIX B – AS OF SEPTEMBER 14, 2018**

### **APPENDIX B: WORKING GROUP 6 COMMENTS ON DRAFT REPORT**

The following are the collected comments received by the Working Group Facilitator on draft versions of the Working Group Draft Report.

Comments that were general clarifications, qualifications, or corrections are reflected in the August 31 version of the draft chapter, and are not listed below.

Substantive comments that made changes to what was presented at the Working Group discussion sessions, or that were beyond the contents of what was discussed during the Working Group discussion sessions are reproduced below.

Comments have been lightly edited for clarity and to preserve anonymity under Chatham Rules, as stipulated by the NextGrid process.

The arrangement of the comments follows the layout of the draft chapter.

#### **1. GENERAL COMMENTS**

*Commenter A:*

“Effective climate mitigation and adaptation presents a set of urgent, difficult, and complex challenges. Given limited time and public resources, environmental and energy policy makers need to address these challenges in the most efficient way possible. My general views are aligned with the overarching recommendations of a National Academy of Sciences panel that: 1) Federal and state governments should significantly increase support for innovation in clean energy technologies; and 2) Policy makers should place a price on carbon and other pollutants that is sufficient to meet environmental objectives and create consistent market pull for clean energy technologies. See: The Power of Change: Innovation for Development and Deployment of Increasingly Clean Electric Power Technologies, available at: <https://nas-sites.org/americasclimatechoices/other-reports-on-climate-change/the-power-of-change-innovation-for-development-and-deployment-of-increasingly-clean-electric-power-technologies-2016/>.

Making a global transition over a few decades to low carbon economies, while meeting growing energy demands, and despite recent improvements in technology remains very challenging. The steps we have taken in the U.S. and some other developed economies over the last 40 years to improve energy efficiency, develop renewable and electric vehicle technology, invest in modernizing the power grid, and set very modest prices on carbon in a few places have had positive impacts and are insufficient to the scale of the challenges.

I am concerned that readers might infer, from the RMI (and other) reported comments on the “potential” benefits of DER, that DER generally will provide such benefits. There will be examples in which specific deployments of a distributed technology provide enumerated benefits. However, it is very difficult to make accurate generalizable statements about a range of different DER technologies and applications. For example, in many cases rooftop PV may cost 3X utility scale solar, increase distribution losses, contribute to a need to improve distribution infrastructure, increase voltage volatility which can negatively impact power quality, have little or no impact on forecast circuit or system capacity requirements, and / or, given its variability, may not avoid the need for backup generation. Moreover, environmental benefits will depend upon the resources DER backs down.

Determining whether DER provides a net benefit requires technology, time, and location specific analyses. Moreover, to the extent policies – however well intended – incent DER that are not yet cost-effective, this may tend to divert resources from investments that could have a greater impact on climate change. While there are caveats included in the discussion summary, a statement that potential DER benefits are technology, time, and location dependent should appear early in the DER section and be used to help frame the discussion of DER issues.”

*Commenter B:*

“Based on the discussions that took place during the WG6 meetings, [Commenter B’s] understanding is that the Report is intended to capture the diverse opinions of various stakeholders on the topics that were discussed during the meetings. Accordingly, [Commenter B] is proposing a number of edits that are needed to qualify statements in the Report that, if left unaltered, would not adequately reflect differing views on a topic and may leave the reader with a false impression that the statements have universal support from WG6 participants.

It is important to [Commenter B] that the Report emphasize the vital role that industrial and large institutional customers play in supporting environmental policy goals in the electricity sector through the provision of efficient on-site industrial cogeneration, as well as through industrial interruptible and curtailable load options, along with extensive energy efficiency investments. Accordingly, [Commenter B] has proposed edits to the Report to further elaborate on these concepts.

The Report should highlight the fact that the economic impacts of implementing environmental initiatives in the power sector merit careful consideration. Such an evaluation should include consideration of the economic impacts of such initiatives on end-use retail customers and on the competitiveness of Illinois industry. This approach ensures that environmental policy proposals in the electricity sector are appropriately vetted for their cost-effectiveness and for their economic implications, as well as for their environmental benefits. [Commenter B] is proposing that language be added to the Report to expand on these concepts.”

“As we explained more fully in our Initial Comments on the Report that we submitted on August 13, 2018 (“Initial Comments”), [Commenter B] understands that the Report is intended to

capture the diverse opinions of various stakeholders on the topics that were discussed during the meetings. Accordingly, [Commenter B] is proposing a number of edits that are needed to qualify statements in the Report that, if left unaltered, would not adequately reflect differing views on a topic and may leave the reader with a false impression that the statements have universal support from WG6 participants.

As we also noted in our Initial Comments, [Commenter B] believes that the Report should highlight the economic impacts of implementing carbon pricing or other environmental initiatives on the Illinois power sector. The Report should clarify that such economic impacts merit careful consideration in the development of state policies on this issue. [Commenter B] is proposing that language be added to appropriate sections of the Report to expand on these concepts.”

*Commenter B (second comments):*

[Commenter B] take this opportunity to submit this second set of supplemental comments regarding the complete and revised NextGrid Working Group 6 (“WG6”) report (“Report”) that was posted by the NextGrid administrators on the NextGrid website on August 31, 2018. The complete and revised Report is intended to incorporate comments that were submitted in August 2018 by [Commenter B] and other stakeholders on various aspects of the initial draft of the Report.

In [Commenter B]’s initial comments on the Report dated August 13, 2018 and in our supplemental comments dated August 23, 2018, [Commenter B] attached documents that provided our specific proposed edits to the Report chapter in redlined format. While we appreciate that a number of our proposed edits are reflected in the August 31, 2018 draft, we are concerned that certain of our edits to the initial draft of the Report were not included. While the meeting administrators included some of our proposed policy language changes in an appendix to the Report, many of our edits were otherwise omitted from the complete and revised Report. This was done without adequate explanation or rationale for the omissions.

In particular, several of our comments were omitted which sought to qualify statements in the Report to ensure that the reader is not left with the impression that certain of the statements have unanimous support from Working Group participants or from the stakeholder community at large. In addition, the Report fails to incorporate language that [Commenter B] proposed in its comments to highlight the need to analyze the economic impacts of carbon pricing policies and other environmental initiatives and to focus attention on the cost of grid investments to support electrification initiatives. Instead, without adequate comment or explanation, [Commenter B]’s proposed language was relegated to an appendix to the Report. These omissions are very problematic because readers are much more likely to focus their attention on the language of the Report itself and to pay less attention to a summary of comments in an appendix.

[Commenter B]’s concern in this regard is heightened by the fact that the complete and revised Report contains new language which highlights the alleged benefits of new grid modernization investments and carbon pricing policies. For example, language was added to page 16 of the

complete and revised Report which alleges that a carbon price would show “the true price of electricity” and that a carbon price would encourage “additional deployment of renewable energy, energy efficiency, and demand response.” There was no consensus that a carbon price would show “the true price of electricity.” Nor, to the best of [Commenter B]’s knowledge, was consensus sought on this issue. Furthermore, if consensus had been sought, [Commenter B] and potentially other parties likely would have disagreed with this premise. As another example, new language was added to page 14 of the complete and revised Report which alleges that electrification “supports other important goals, including decarbonization, improving productivity and efficiency, which are also key parts of grid modernization goals.” Again, there was no agreement or consensus that these were “key parts of grid modernization goals.” Furthermore, new language was added to tout the benefits of programs such as electric vehicle charging infrastructure. Also, on page 14 of the complete and revised Report, the assertion is made that such charging infrastructure “provides well-paying jobs and economic benefits.” Such statements are put forth without any qualification or support and suggest consensus or agreement where they may not have existed.

The addition of such new language, combined with the relegation of much of [Commenter B]’s comments to an appendix, inappropriately leaves the reader with the mistaken impression that major policy actions such as grid enhancements to support electrification and the introduction of carbon pricing in Illinois are largely positive in their effects and that such policies enjoy unanimous or general support from WG6 participants.

The overall result of these changes is that the complete and revised Report places undue emphasis on the alleged benefits of grid modernization investments and new environmental initiatives such as carbon pricing in Illinois, while devoting little attention to the potential negative ramifications of such policies such as higher end-use customer electricity costs, potential cost shifting among customer classes and harm to the competitive position of Illinois industry.

Not all Working Group members were able to send representatives to attend each of the WG6 meetings in person. Nevertheless, the Report should give equal consideration and weight to all perspectives that were expressed on an issue by Working Group members, whether such perspectives were expressed in person during the various breakout sessions or whether they were expressed through written comments on the Report. To do otherwise results in an unbalanced presentation of the subject matters discussed in WG6.

[Commenter B] reiterates the concerns we expressed in our earlier comments on the Report regarding the need to carefully evaluate the economic implications of grid modernization investments and carbon pricing. [Commenter B] opposes any commitment by Illinois to additional grid modernization investments or to the implementation of new environmental initiatives such as carbon pricing without carefully vetting the economic ramifications of these policies. [Commenter B] is very concerned that such policies could impose substantial additional cost burdens on end-use electricity customers in Illinois, and that a disproportionate share of these burdens could be unfairly shifted to large industrial customers. [Commenter B] does not

necessarily oppose any new initiatives to modernize or otherwise improve the electricity grid. However, there needs to be a fair and balanced review of the impact of any proposed grid modernization investments.

Therefore, we wish to emphasize that the economic impacts of grid modernization investments, carbon pricing or other environmental initiatives on the Illinois power sector must be carefully evaluated prior to implementing such policies. Such an evaluation should include a detailed cost-benefit analysis to ensure that these policies in fact produce benefits for Illinois end-use customers in excess of their costs. Any policies or investments that cannot be shown to be cost-effective from an end-use customer standpoint should not be pursued. Furthermore, the economic analysis should address the need for cost caps to limit the economic impacts of such policies and the analysis should be based upon a recognized methodology that does not predetermine the outcome.

In addition, the economic evaluation should assess the impact that any proposed grid modernization or environmental policies would have on the competitive position of Illinois industry, particularly relative to industry in neighboring states. Finally, Illinois should carefully evaluate how the cost burden of such policies would be distributed among Illinois customers to ensure that the cost of such investments is fairly allocated among customer classes in a manner that avoids cross-subsidization and that honors established principles of setting rates based on cost causation. The latter evaluation is needed to ensure that large industrial customers are not saddled with an inappropriately large share of the cost burden associated with such policies.

Thank you for giving [Commenter B] an opportunity to submit these second supplemental comments.

*Commenter D:*

“A disclaimer should be added at the beginning to be very clear a consensus was not reached nor attempted to be reached in this report and further delineate the limitations of the report. Without a disclaimer, the reader could assume the comments below are agreed upon, which I know is not intended in the context of this effort. Intended to be a quick snapshot and not a deep dive into policy nor a recommendation to policymakers on future action.

Citations are critical. It is important for the reader to understand, generally, where things were said in these discussions. This document reads that all the points raised had equal discussion and agreement, which we know was not the case nor the intent of the working group. The value to the reader is for them to understand proportionally the attention given to topics and suggestions and where they came from. The document reads as fact and it is necessary for it to read as ‘perspectives offered and raised, not consensus.’

It is also worth noting that while individual perspectives were shared, there was no deep dive nor cost-benefit analysis done on any one policy. Policies should not move forward without a cost-benefit analysis and thorough dive. This exercise was only a thought exercise.”

## **2. SESSION 1: ENVIRONMENTAL IMPACTS OF DISTRIBUTED ENERGY RESOURCES**

*Commenter B:*

“available demand response strategies include industrial interruptible and curtailable load programs (both utility- specific and RTO-administered programs) that have been proven to be a cost-effective means of reducing system power costs through peak demand reduction.”

*Commenter C:*

“The benefits from a significant buildout of renewables and DER, however, is not without risks to Illinois’ existing carbon-free generation fleet. Specifically, portions of the fleet experience negative pricing hours with some regularity because of the overabundance of renewable resources. Indeed, wind facilities operate at negative prices. Wind located across the state and the region has the ability to offer power at negative prices because of the revenue stream that results from a combination of the federal production tax credit and payments from sales attributable to supporting and complying with state renewable portfolio standards.”

*Commenter E:*

“In addition to benefits, DER can also pose challenges to distribution systems that was not originally designed to host distributed resources. These systems must transform from one-way centralized delivery of electricity to a system with more bi-directional flows accommodating a mix of distributed dispatchable and non-dispatchable resources. Determining not just the benefits that DER provides, but the net benefits, which considers the costs of mitigating the challenges it can pose, is therefore part of the evaluation task.”

### **2.1 Survey Results**

*Commenter E:*

“Any benefits that DER can provide to the distribution grid are dependent on *what, when and where* they provide output to the distribution system: what product (real power, reactive power, or reserves) is being delivered to or consumed from the network; where the product is being delivered or consumed; and when the product is being delivered or consumed. Accurate estimation of the benefits of DER to the distribution system starts with a rigorous engineering analysis of the grid.”

### **2.2 Discussion Questions**

*Commenter E:*

“It should be noted that in Illinois, “value of DER”, as defined by the Future Energy Jobs Act, refers to *the value of DER to the distribution system*. While a variety of DER (i.e. solar, storage, EE, DR,

etc.) deliver numerous value streams to DER owners (i.e., energy, capacity, ancillary services, environmental, societal, tax incentives, etc.), *DER value to the distribution system* is a subset of total value provided by DER, and the statute requires Illinois utilities to only compensate for *DER value to the distribution system*. Other value streams are compensated (or potentially compensated) through other mechanisms (i.e. SRECs, PJM markets, state government, etc.). And just as DER may provide value to the grid, there is value the grid provides to DER, as the resilient, reliable, and secure system that enables benefits from DER integration, allows customers to extract value from their DER, facilitates decarbonization, and provides other benefits.

If policy makers advocate for changes to the statute, and utilities are deemed responsible for the administration of other non-grid DER value streams, utilities need to be adequately compensated for the administration of those value streams. Otherwise, to the extent non-grid DER value streams are conflated with grid value streams, distribution customers may *not* be the beneficiaries of all values they are compensating for (through their utility bill) or may pay twice for value they are recognizing through other mechanisms. Further, DER value may be different, or require a different methodology, depending on the type of DER (i.e. solar vs. storage, EVs, EE, DR, etc.), and any DER value must be grounded on sound distribution engineering and economic foundations, as well as principles of equity. Accordingly, any changes to the valuation of DER should be gradual and introduced over a reasonable timetable.”

“Illinois utilities plan and operate their own assets at scale throughout their service territory and are thus most well positioned to coordinate planning and dispatch of customer/3<sup>rd</sup> party-owned DER assets at scale. They have situational awareness of the system at a macro level and can understand the interrelation of distributed assets and their impact on the system more effectively than any other entity. Further, the utilities are in the best position to ensure equity among customers, and unlike other parties are ultimately the entities accountable to regulators and policymakers. The utility is therefore the preferred entity to plan, build and operate the electric grid given the grid’s complexity and the utility’s statutory mandate to ensure its safety, reliability, and security, and as the single integrator, the utility best situated to monitor, assess, and mitigate systemic risks to the platform model (e.g., cybersecurity).”

“Given their regulatory oversight, Illinois utilities can be more easily monitored to ensure optimal DER integration and realization of resultant societal benefits. The utility has, and has had, an obligation to serve, and is best positioned to protect the equity of value distribution (between customers) within its system.”

“Transitioning to a future of expanding low carbon DER requires investments in innovation. For example, utilities are already executing innovation initiatives, including ComEd’s Smart Grid Test Bed, Energy Foundry, and Community of the Future. [Utilities] also developing and implementing a series of demonstration projects meant to test various use cases such as storage for grid support, integration of renewable energy resources, and microgrid operation. As innovation is and will remain a core function of the utility, regulatory enablers should sufficiently incentivize appropriate spending on innovation initiatives and preserve the stable, fair recovery of those utility investments.”

### **3. SESSION 2: CLIMATE AND GRID RESILIENCY**

#### **3.1 Survey Results**

#### **3.2 Discussion Questions**

*Commenter B:*

“any future grid investments to address resilience or to respond to environmental concerns should be carefully evaluated for their economic impacts. Such an evaluation should include consideration of the cost-effectiveness of such investments from an end-use customer perspective and an assessment of the impact of such investments on the competitiveness of Illinois industry relative to other states and globally. Such an economic analysis should also encompass an evaluation of the need for cost caps on the recovery of such grid investments from retail customers, to the extent that cost caps are needed to mitigate the impact of such investments on the electricity costs of end-use retail customers in Illinois.”

*Commenter D:*

“To avoid placing the burden on ratepayers, investments can be made by private industry as a response to consumer and market demands. This can avoid equity issues and disproportionate cost distributions and promote customer choice. Public private partnerships, private industry investment and/or involvement can drive deployment where technologies are demanded most.”

“The state could choose to work with private industry to capture appropriate customer demands and promote market approaches to electrification deployment. If government chooses to intervene, it is imperative they do not interfere in determining where, when, and how electrification is deployed. Those decisions should be responsive to consumer demand and technological advancements. Markets can appropriately distinguish where the rollout of these technologies is most appropriate, delivering a true “bang for the buck”. Be mindful that state subsidies can distort actual consumer demands, misrepresenting consumer choices and hurting programs in the long run.

It is unclear as to whether the costs associated with the suggested strategies outweigh the benefits of beneficial electrification.”

*Commenter E:*

“Accounting for climate change and the need for resiliency will be a key factor in future planning decisions, but for the foreseeable future, utilities will continue to play a key role in both (a) protecting the value of existing assets and systems and (b) creating value through innovation, such as enabling and integrating DER, and meeting new needs that stem from climate change effects. New vulnerabilities need to be mitigated as the traditionally centralized and one-way

flow of data and kilowatts becomes more decentralized and bi-directional. These vulnerabilities pertain to information technology (IT), operations technology (OT), and the information networks that enable the interaction of advanced meters and behind-the-meter devices with the grid. Utilities therefore remain responsible for building the physical capacity of the electric grid and its critical infrastructure, including securing utility systems and any other systems that interact with it, adequately training employees, and implementing measures to prioritize and mitigate risks to preserve the resilience of the grid.”

“Smart Grid investments have already demonstrably enhanced the reliability, resiliency, and security of the grid, but it is imperative that potential vulnerabilities are continually assessed and prioritized as they evolve and that the appropriate safeguards are taken to protect the grid and the confidentiality of information transmitted over its networks.”

#### **4. SESSION 3: BENEFICIAL ELECTRIFICATION**

*Commenter D:*

“[The introductory presentation] did not address deployment of high efficiency low emission (HELE) fossil fuel generation technologies or other technologies considered critical by experts including the United Nations Intergovernmental Panel on Climate Change, such as carbon capture, use and storage and nuclear energy.”

“[The presentation] did not note that there are claims and analysis that portray RGGI as missing its goals, increasing electricity prices and driving jobs and businesses out of the Northeast.”

##### **4.1 Survey Results**

##### **4.2 Discussion Questions**

*Commenter A:*

“The start of challenges section recognizes an important issue with RAP’s definition of beneficial electrification, when it states, “In some cases, it may be difficult for a change to fit RAP’s definition of beneficial electrification, i.e. that a change must provide a benefit to customers, the environment, or the grid without also adversely impacting any of the other categories.” This is not just a challenge to achieving greater electrification, it is also (at least implicitly) an alternative opinion on the definition of what is beneficial. From an economics perspective, electrification is beneficial when it reduces total societal cost, even if costs to a particular interest may be increased. I would extend the statement in the report by saying that there may be alternative definitions of “beneficial” electrification that are consistent with maximizing societal benefits.”

“Under the benefits of electrification, I would not limit the benefits of EVs to cases where they are charged by renewables. Given the relative inefficiency of internal combustion engines, gas

and nuclear are also less air pollution-intensive generation sources. See for example: <https://www.ucsusa.org/clean-vehicles/electric-vehicles/life-cycle-ev-emissions#.W37M-C3Myjg>. In fact, PHEVs may, in some cases, reduce carbon emissions when consuming power from a largely coal fired generation fleet. See: R. Sioshansi, R. Fagiani, and V. Marano. 2010. "Cost and Emissions Impacts of Plug-in Hybrid Vehicles on the Ohio Power System," Energy Policy.

I was surprised by the lack of mention of deep decarbonization. It is hard to imagine how society could achieve 80% reductions in GHG emissions without widespread electrification of current uses of fossil fuels."

*Commenter B:*

"Other Working Group members did not fully agree that electrification would necessarily benefit the entire grid. They suggested that electrification could lead to higher costs associated with new grid investments and due to the need for new generation additions to support higher electricity consumption, particularly if electrification is not properly managed in a manner that would focus increased electricity consumption during off-peak periods."

"It was also noted that electrification could be harmful if it is not properly managed. For example, increased electricity consumption during on-peak hours due to electrification could drive the need for new generation additions, resulting in higher power costs to consumers and potentially leading to higher emissions levels relative to the status quo."

"it must be recognized that imposing a price on carbon can have far-reaching economic ramifications for Illinois end-use customers and for Illinois industry. These economic impacts must be carefully considered in any debate surrounding the introduction of a price on carbon in Illinois. Due to such economic and policy considerations, there is no consensus at this time regarding the merits of introducing a price for carbon."

*Commenter E:*

"Informed customers will be able to better engage in the grid of the future and the value it creates, and as customer education is a core function of the utility it will continue to play a key role in driving customer awareness, interest, and involvement in adopting new and/or enhanced offerings that create customer value and meet their expectations. Customer adoption of new technologies will facilitate other commercial and societal (e.g., decarbonization) value, thereby aligning decarbonization with a variety of customer interests, such as Smart Cities and adoption of DER."

"Utilities should not be precluded from ownership of charging infrastructure or other network assets that support the expansion of beneficial electrification. For example, the utility can play a role to address certain consumer/commercial segments that might be overlooked by the

private sector, or in instances where an inadequate rate of adoption is inhibiting expansion of beneficial electrification.”

## **5. SESSION 4: PATHWAYS TO DECARBONIZATION**

*Commenter A:*

“In Part 4 on Pathways to Decarbonization, my principal concern is what is not being said. Decarbonization, particularly when viewed on the global scale required to mitigate climate change, is a very difficult challenge. I made this point during the meeting. Transitioning to low carbon economies while meeting growing global energy demands will require better, less expensive low carbon technologies and a significantly greater investment in innovation. Additionally, a meaningful price on carbon will be needed to pull innovative technologies toward commercialization and efficiently reduce GHG emissions. This does not come across in the draft.

U.S. EPA recently changed its policy, moving from the Obama era use of global benefits in calculating the social cost of carbon to considering only U.S. impacts. This will prompt extensive comment and litigation. I would suggest noting that the question posed to the Working Group - what “benefits Illinois might expect” from pricing carbon - may not be the only relevant basis for action on climate mitigation.

I agree with David Littell that RGGI has been largely beneficial. However, RGGI is also insufficient. Carbon prices in RGGI have been a fraction of the Obama Administration’s estimates of the social cost of carbon (which are also the basis for IL ZEC prices in FEJA). A modest carbon cap and trade program is an innovative way to fund energy efficiency and other programs. However, it is not a fundamental policy change. The power sector has been funding energy efficiency programs since the 1980s.

David’s slides (at 24) correctly note that carbon markets, which price GHG emissions, are a much more efficient way to achieve emission reductions than direct support to renewable energy. This is consistent with a consensus among economists. See for example: National Research Council. 2010. *Limiting the Magnitude of Future Climate Change*. Washington, D.C.: The National Academies Press; National Academies of Sciences, Engineering, and Medicine. 2016. *The Power of Change: Innovation for Development and Deployment of Increasingly Clean Electric Power Technologies*. Washington, D.C.: The National Academies Press; and W. Nordhaus. 2013. *The Climate Casino: Risk, Uncertainty, and Economics for a Warning World*. New Haven, CT: Yale University Press. It deserves to be mentioned in the report.

I was concerned by David’s comment in the meeting about the British Columbia carbon tax and would have been happy to discuss it further. The counterfactual studies all suggest that the BC carbon tax worked much as anticipated. See:

[https://nicholasinstitute.duke.edu/sites/default/files/publications/ni\\_wp\\_15-04\\_full.pdf](https://nicholasinstitute.duke.edu/sites/default/files/publications/ni_wp_15-04_full.pdf).

BC will need to increase the tax rate, extend its coverage, and/or do more to meet its carbon reduction objectives. However, this does not mean the carbon tax was ineffective. What David failed to point out was that BC started with a power system in which hydro power was and is its primary source of generation. Much of the relatively inexpensive carbon reduction that can be achieved with a carbon tax at rates comparable to that in British Columbia was unavailable given the province's existing reliance on low carbon electric generation. If you were to bring David's comment on the BC carbon tax back into the report, it would be important to provide this context."

## **5.1 Survey Results**

## **5.2 Discussion Questions**

*Commenter B:*

"some participants did not necessarily agree with the positions described above and believed that imposing a carbon price would have negative economic impacts associated with higher electricity costs that would be harmful to end-use customers and detrimental to the competitive position of Illinois industry. Such adverse impacts should be carefully considered in any evaluation of carbon pricing in Illinois before such a policy is ever implemented."