

Public Utilities Advisory Board Meeting – Document Appendix

The following documents were referenced or submitted during the April 8, 2025, PUAB meeting. These materials are included as submitted, solely for the purpose of maintaining a complete record of the meeting. Their inclusion does not reflect an endorsement, opinion, or position by the City of Naperville or the Public Utilities Advisory Board regarding the relevance, accuracy, or content of the documents.

Public statement 4/8/2025 at the PUAB meeting

My name is Rev. Jacob Tipantasing-Wolverton. I am the Senior Pastor at Community United Methodist Church here in Naperville, a clergy person of the Northern Illinois Conference of The United Methodist Church, and a citizen of Naperville.

I come before you today to offer my support of energy initiatives that enable us to be better stewards of this world in which we live, in hopes that we offer a more sustainable future for the generations to come.

As a United Methodist clergy person, I promote the theologies, faith practices, and world views of the United Methodist Church. As part of our denomination, we have adopted various social principals that help us live out our walk with God in this world.

A remarkable amount of energy that comes from the sun has the potential to provide us with all of the energy that we might need to consume. In addition to the sun, we know that from science we can harness the energy generated from water and wind to provide us with additional energy resources. I offer this quote from the United Methodist Church's website: "When we think of the term "energy," however, our minds likely turn first to the oil, gas and nuclear fuels producing power. Whether through combustion engines, electrical transmission or batteries, that human-produced power runs our homes, factories, schools, hospitals and transportation systems worldwide. In the United States, electricity produced through solar power remains only a small fraction of the source of the energy on which we depend for our current way of life. Still, we must admit how little of the energy humans produce through fossil fuels is necessary for ourselves or the other creatures of our living world to survive and thrive. Indeed, we know now that the greenhouse emissions that our primarily fossil-fuel driven energy systems produce threaten the continued viability of many life-forms, including human life. We are coming to realize that the energy God supplies us from the sun, along with wind and water, provides or can provide nearly all we actually need to survive and thrive in our living world."

In Genesis 1, we read that God declares creation good (Gen. 1:4, 10, 12, 18, 25, 31), and we read in Genesis 2 that God "took the human and settled them in the garden of Eden to farm it and to take care of it" (Gen. 2:15). The goodness of God's creation, and the value given to every part of it, call people to respect, protect, and care for the creation and all interrelated aspects of it.

I believe that we can all agree that it is our goal to leave a community in the hands of the next generation which is better off than how we received it. That bears us asking the question, what practices are we considering today that will have a direct impact on the next generation? What might the world look like if we continue to rely on burning coal in order to produce our electricity? What might it look like if we decide to be front runners in our state, nation, and world by committing to utilizing energy efficient resources that are sustainable well into the future, leaving behind a much more environmentally friendly community and world to those who are following behind us.



To the City of Naperville, the Village of Winnetka, and the City of St. Charles:

At the request of local citizens in your communities, I am writing to provide insights based on my experience in energy supply contracts to inform your ongoing deliberations.

As a Principal at RMI, a non-partisan, non-profit “think and do” tank, I have spent the last 11 years advising communities, companies, and universities on their energy procurement strategies. In line with RMI’s mission, I currently oversee a team of 10 energy experts helping communities pursue a clean, prosperous, zero-carbon future for all.

I have been impressed by the collective attention and effort your communities have put into evaluating your energy supply options. I also want to recognize that you are being asked to make a meaningful, long-term decision in the face of significant uncertainty, conflicting priorities, and national political turmoil.

My intention in this memo is to supplement the information supplied by others, including Mark Pruitt and Customized Energy Solutions, and provide insights on four points:

- Power Marketers Offer Alternative Supply Options
- Flexibility Is an Important Consideration in Energy Supply Contracts
- Current Renewable Energy Prices Are Unusually High
- Electricity Demand Should Be Actively Managed to Lower Supply Costs.

Power Marketers Offer Alternative Supply Options

In my review of the opportunities facing your communities, it appears that commercial power marketers (e.g., Constellation, Next Era, etc.), have not always received sufficient recognition as potential power supply providers. These companies have both i) a proven track record of serving other Illinois communities, and ii) can provide intermediate options between continuing to rely on coal or immediately shifting to 100% renewable energy.

Proven Track Record: As a technical advisor to the City of Chicago’s 100% renewable power supply procurement effort, I have seen first-hand the power of competitive procurement for energy services. In 2019, the City of Chicago was unhappy with its default offering from its prior electricity provider. Given the size and duration of its electricity contracts, Chicago chose to release a competitive request for proposals to various energy supply companies. In 2022, **after only three years**, the City announced an innovative, 100% renewable, reliable electricity supply deal that enabled a large-scale solar development in Illinois and also secured an \$400,000 annual community workforce development investment from its supplier. The deal was so successful that subsequently Cook County followed suit and signed an almost identical contract. Meanwhile, the City of Evanston, IL, has regularly negotiated contracts with power marketers, with the most recent contract providing



\$500,000 in revenue to the City at no cost to residents. Other communities could follow this approach by building off of Chicago's RFP (which is available here), engaging cities like Evanston with experience in this area, or hiring one of the many available energy consulting firms.

It is also worth noting that, as these power companies already frequently engage with other important regulatory bodies such as FERC, PJM, and the State of Illinois, they have extensive capabilities to provide other services beyond power supply.

Intermediate Options Between Coal and 100% Renewables: Power marketers own vast, diverse fleets of electricity generation capacity that could be leveraged to supply community needs. For example, Constellation has a fleet of over 34 GW of capacity, including nuclear, natural gas, hydroelectric, and renewable generation. As demonstrated by Chicago as well as Cincinnati (which leveraged a PJM subaccount), these contracts for energy and/or capacity can be paired with power purchase agreements as desired and can be structured to provide fixed pricing to avoid exposure to electricity market price volatility. Additionally, power marketers such as NexEra have strong credit ratings and are therefore able to transact for energy resources with other power marketers and power resources, which could improve the market reach for Naperville, St. Charles, and Winnetka.

As such, your communities do not need to make a binary choice between IMEA's coal assets or 100% renewable power in 2035; rather, power marketers provide a means for your communities to secure reliable power from a variety of existing generation assets. Failing to thoroughly explore these options and ask for potential pricing through a solicitation may impede your communities' abilities to make informed choices on contracts worth hundreds of millions of dollars over decades. Indeed, it is worth considering that, in almost any other circumstance, it would likely not even be legal for communities to sign such a large agreement without a competitive solicitation.

Flexibility Is an Important Consideration in Energy Contracts

Given the growing uncertainty and variety of external factors that may dramatically shift energy markets in the coming decades, it may be prudent to pursue energy supply contracting arrangements that provide communities with the flexibility to adjust their supply options every few years (1-5 years is typical in power marketer contracts). In contrast, the IMEA contract as currently presented locks communities into a 30+ year obligation without providing any individual community with significant ability to shape the supply portfolio.

In recent decades the electricity markets in the United States have seen multiple, large shifts from new technologies (e.g., fracking driving down natural gas costs), the rise of

corporate renewable procurement (companies have signed contracts for [84 GW of clean electricity generation](#) since 2014), regulatory shifts (e.g., CEJA), and most recently the large uptick in demand forecasts as a result of data center proliferation. The susceptibility of electricity markets to change is likely to increase as ecological, technological, financial, and regulatory pressures continue to play out in the coming decades.

These various factors suggest a variety of potential risks that communities should take into consideration. One form of risk, which Customized Energy Solutions has rightly pointed out, is the price volatility that communities could be exposed to by buying wholesale power. However, there also exist a range of other risks. For example, relying heavily on a few generation plants creates **asset-specific risk**, or the risk that a particular asset fails or suffers damages that require significant expense to repair. There is also **regulatory risk** in the form of state, federal, or local policy changes which could impose costs on generation owners. Such regulatory risks may be relevant to IMEA's Prairie State investment given the ongoing [lawsuit against Prairie state](#) as well as potential future cleanup costs associated with its >700 acre coal ash landfill. There is also **provider risk**, or the risk that an individual entity may make poor investment decisions which lock its customers into above market rates – a risk that is heightened for suppliers which operate without significant regulatory oversight or competitive pressure.

In this dynamic market context and given the potential for unexpected factors to shift asset-specific or market dynamics, communities should also be cautious about assuming current costs will persist for decades into the future – particularly when no guarantees or caps are placed on those costs. In particular, communities may wish to note that the proposed IMEA contract, which extends to 2055 and then continues into perpetuity unless actively terminated, offers a blank check to IMEA to cover whatever costs it incurs.

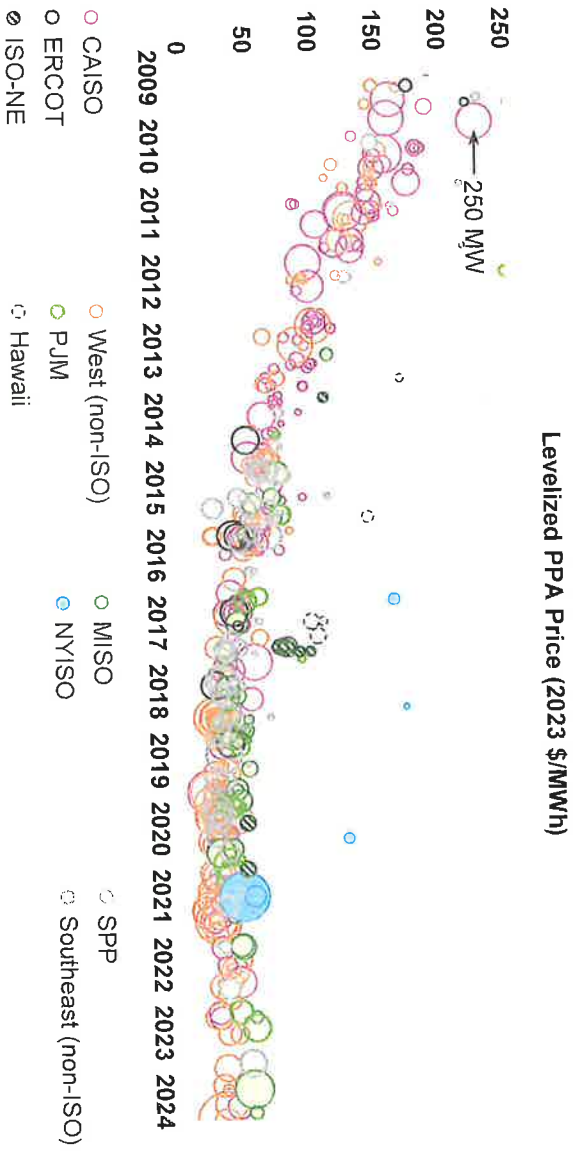
For these types of reasons, some communities have chosen to avoid long-term contracts. For example, Memphis Light, Gas, and Water board of commissioners [unanimously voted against a 20-year contract with TVA](#), citing that it was “too long for an agreement.” Supply contracts offered by power marketers can be structured on 1-5 year time scales that would allow communities regular opportunities to revisit and adjust their options. Moreover, communities could follow Cincinnati's example by sourcing some of their electricity through a long-term PPA while retaining flexibility for the remainder.

Current Renewable Energy Prices Are Unusually High

Most of the conversations regarding the price of renewables have, understandably, centered on recent wind and solar price data. While this is a logical starting point, I want to

highlight that the current IL prices should be taken in context given the long duration of the proposed IMEA contract.

First, as shown in the chart below (taken from [Lawrence Berkley Laboratories' Utility Scale Solar report](#)), utility-scale solar prices in the United States had significantly declined for many years. Wind prices have experienced a roughly [comparable trajectory](#).



This historical perspective suggests that recent increase in prices seen in PJM markets are *not* a function of the inherent costs of renewables. Rather, they are the result of recent increases in electricity demand (principally driven by data center load growth) and constraints in supply (due to factors such as siting, permitting, and interconnection challenges). Importantly, these supply constraints are the result of local factors that can, and arguably likely will, shift as industry increases pressure on the electricity sector and policy makers to meet their growing demand. In the event that the local constraints on renewables are mitigated, Wright's Law (similar to Moore's Law in computers) suggests that these [technologies should benefit from continued cost declines](#) as deployment scales further.

As such, while it is impossible to confidently predict prices 10-let alone 20 to 30-years into the future, communities should understand that the fundamentals of renewable energy suggest it is likely to be among the lowest cost forms of generation in the future. In this event, communities that do secure sufficient flexibility in their power supply arrangements may be better poised to capitalize on low-cost electricity and attract industrial and corporate investment (if desired).



Electricity Demand Should Be Actively Managed to Lower Supply Costs

My last point is that communities such as Naperville, St. Charles, and Winnetka should strongly consider integrating energy reduction strategies into their supply contract discussions to optimize their approaches. Local programs that leverage energy efficiency, virtual power plants, and demand response can provide opportunities for communities to reduce their consumption, particularly at those key hours of the year when capacity requirements are determined. For example, San Antonio's municipal utility, CPS, estimates that their STEP program (a portfolio of commercial and residential energy efficiency, demand response, and solar programs), has saved customers \$657M in avoided capacity payments. While such programs may well be executed in parallel to a power supply contract, they can have significant implications on a community's overall energy costs and, as such, should be considered as part of an overall energy supply strategy.

Conclusion

As Naperville, Winnetka, and St. Charles consider their future energy procurement strategy, my hope is that this memo provides useful insights on a few points:

1. Your communities have a variety of power supply options that could be considered, including power marketers with large, existing generation fleets.
2. Energy markets are expected to be increasingly dynamic, and as such it may be prudent to anticipate greater volatility due to shifts in regulatory priorities, rapid technological advancement, and increasing investment. In a dynamic, uncertain environment, it may be worth making strategic investments to retain flexibility and limit your community's exposure to long-term asset, regulatory, and provider risks.
3. Renewables have a long track record of being low cost and are likely to continue to benefit from economies of scale over the medium-to-long term. The recent price increases in wind in solar in Illinois should be understood as a recent phenomenon driven by supply and demand forces that will likely prompt both market and policy reactions and shifts.
4. A community's overall energy demand and capacity requirements can and should be actively managed in an integrated fashion with supply decisions to reduce communities' overall costs.

Thank you for your attention and consideration. If you have questions on the above points or perspectives, I would be happy to meet with you to discuss these matters further.

Regards,

Stephen Abbott

sabbott@rmi.org

Mar 30, 2025

Mr. Halkias,

I am writing to inform you of the positive things Prairie State has done for Marissa High School. I am Joseph Wheeler and I am the teacher and coordinator for Marissa Jr./Sr. High School Alternative School: Project UP. In this program, students who struggle in a general education classroom are given the opportunity to attend a smaller self-contained classroom so the students can focus on their course work and receive more one-on-one instruction. Since the beginning of this program, which started in 2016, Prairie State has mentored our students twice a month. The students enrolled in this program are at risk of dropping out. The mentors at Prairie State have not only helped the students gain work experience, but they have also encouraged the students to study and do their best in school and graduate.

The employees, who volunteer to take time out of their busy schedule to work with the students, do a great job of working with the students. Students have learned the day-to-day business and how the power plant operates. Many of our students have taken the safety tutorials and exams given to the employees that were recently hired. A great deal of emphasis is on safety and making sure all precautions and procedures are in place for all employees, visitors, and vendors. While job shadowing, students worked with a professional to improve their resumes. Students received first hand experience on warehouse operations and clerical duties. Some of the students who have aspirations on using technology get to work with the full time employees who work in the technology department. I believe the greatest impact Prairie State job mentors have had on my students is simply the time they spent to talk and answer questions. Many of the students are nervous the first time they go to Prairie State, but the kindness of the mentors has made them feel comfortable and they all talk about the experience on the bus ride home.

One of the first items the students learn is how efficient and clean the power plant is. The plant is located 7 miles from the High School which makes the ten minute drive useful to hear about all the information the students received. Several of our former students are currently employed at Prairie State. On our final visit each year, the job mentors give us a party which has always been one of the best days of the school year. We really appreciate all Prairie State has done for our students at Marissa and look forward to starting up in August to begin our 10th year working together.

Joseph Wheeler

Marissa Alternative School: Project UP Coordinator/Teacher

PRAIRIE STATE

Energy Campus

POWERING THE PEOPLE

The Prairie State Energy Campus provides 2.5 million families with electricity every day. Learn more about the cleanest coal-fueled power plant in Illinois.

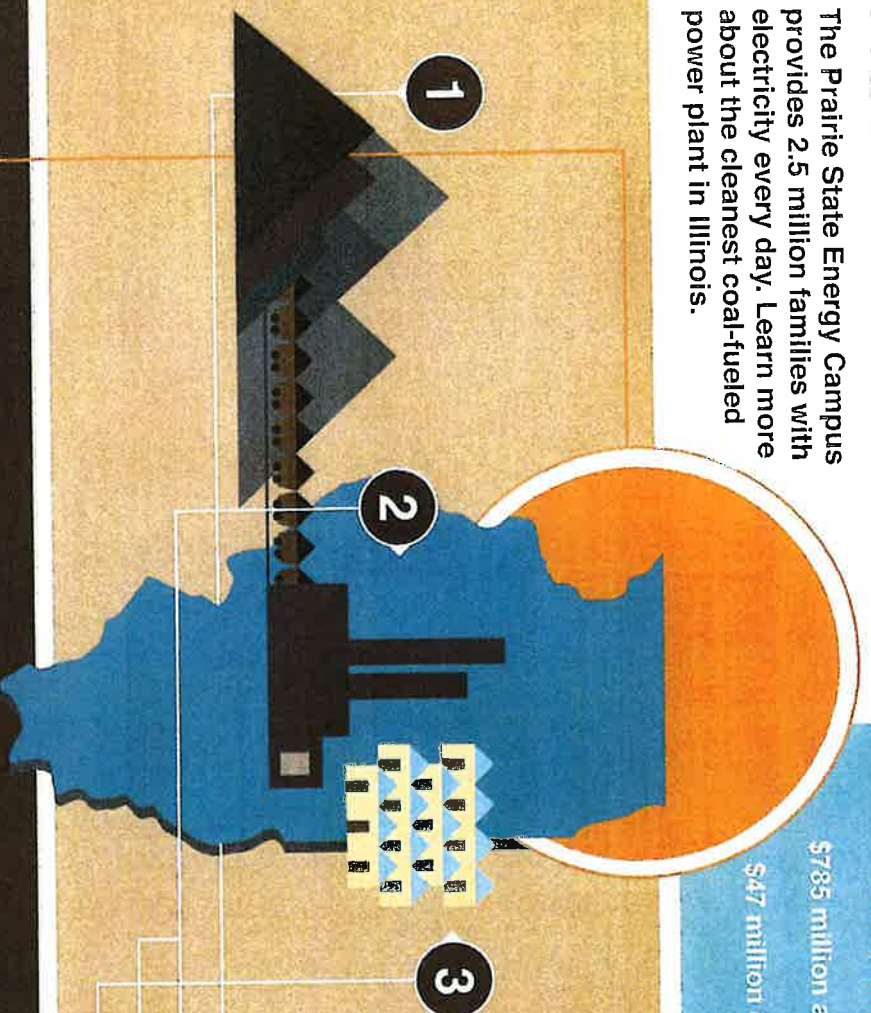
ILLINOIS JOBS & ECONOMIC IMPACT

650 well-paying, full time jobs

\$45 million annual investment in the Illinois union workforce - utilizing the skills of more than 1,000 boilermakers, pipefitters, millwrights, iron workers, electricians, laborers and carpenters

\$785 million annual economic impact to region

\$47 million contributed to local taxing districts



ENERGY IN TRANSPORT

Prairie State's mine mouth design eliminates emissions associated with fuel delivery and provides energy security without the risk of fuel. After converting coal to energy, Prairie State safely delivers it to member-owners, who get power to everyone else.

- Coal
- Power Plant
- Public Power Utility
- Homes and Businesses

EFFICIENT, RELIABLE ENERGY

Prairie State's power plant incorporates supercritical technology in the boiler. This technology effectively produces more energy per ton of coal, with less CO2 emissions.

INVESTING IN CLEAN TECHNOLOGY

We've invested \$1 Billion in equipment that significantly reduces the top 4 monitored air pollutants, creating one of the cleanest coal-fueled power plants in the world.



INVESTING IN OUR LOCAL COMMUNITIES

\$61,000 awarded throughout 10 years of scholarship programs.

Around 150 local organizations supported each year through our charitable giving program.

Clothing and toys provided to over 2,500 local children through 17 years of holiday drives.



2024 SUSTAINABILITY STATISTICS: WE POWER TOMORROW

1,264,631 TONS
OF GYPSUM
BENEFICIALLY
REUSED

1,205,387 TONS
OF FLY ASH
BENEFICIALLY
REUSED

1,120,639 TONS
OF CO2
OFFSET



Louis Halkias

Re: Energy Analytics Contact form: Louis Halkias

Tue, Feb 4, 2025 at 8:29 AM

Cc: Portia Roberts

Dear Mr. Halkias,

Thank you for your kind words about the op-ed. I am attaching the entire report on which it is based.

There is a huge amount of literature on resource costs. The fundamental problem with wind/solar (the environmental groups recoil from nuclear, even though it is emissions-free) is that it is intermittent and requires backup from battery storage, which is hugely expensive. That's why so-called "levelized costs of energy" (LCOE) for wind and solar are deceptive and cannot be used to compare with generating resources that are always available. Moreover, you can read about fires at battery storage plants, most recently the large fire at PG&E's Moss Landing facility (the fourth fire there since 2019). When you include back-up costs, wind/solar are far more costly than natural gas. Furthermore, higher electricity costs mean reduced economic growth because consumers/businesses must spend more on electricity, which leaves less to spend on other goods, less to invest, and raises the costs of goods and services.

Finally, I would point out that Naperville's ending its contract will have no measurable impact on climate. China is building hundreds of new coal plants – in part, for the electricity needed to manufacture wind turbines and solar panels to sell to the U.S.). Nothing the U.S. does will have any impact on climate.

I hope this is helpful.

Regards,

Jonathan

Jonathan A Lesser, PhD

President, Continental Economics, Inc.

Senior Fellow, National Center for Energy Analytics

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Begin forwarded message:

From: "Louis Halkias via

[i.com](#)>

Subject: Energy Analytics Contact form: Louis Halkias

Date: February 3, 2025 at 16:45:45 EST

To:

Reply-To:

[Quoted text hidden]



2024-12-NCEA-Electrification Without Electricity-Lesser.pdf
412K

Jonathan is the President of Continental Economics with over 35 years of experience working and consulting for regulated utilities and government. He has addressed critical economic and regulatory issues affecting the energy industry in the U.S., Canada, and Latin America, including gas and electric utility structure and operations, cost-benefit analysis, mergers and acquisitions, cost allocation and rate design, asset management strategies, cost of capital, depreciation, risk management, incentive regulation, economic impact studies, and general regulatory policy. Jonathan has prepared expert testimony and reports for numerous utility commissions and international regulatory bodies and has testified before Congress and numerous state legislative committees, and also served as arbiter in disputes between regulators and regulated utilities. Jonathan has also designed economic models to value nuclear, fossil fuel, and renewable generating assets. He is the coauthor of three textbooks: *Environmental Economics and Policy* (Addison Wesley Longman, 1997), *Principles of Utility Corporate Finance* (Regulatory Economics Publishing, 2011), and the widely used, *Fundamentals of Energy Regulation*, 3d ed (Regulatory Economics Publishing, 2020), as well as numerous academic and trade press articles. Jonathan was previously an Adjunct Fellow with the Manhattan Institute for Policy Research. He is also an Editorial Board member for *Natural Gas & Electricity* and earned a B.S degree in Mathematics and Economics from the University of New Mexico, and M.A. and Ph.D. degrees in Economics from the University of Washington.



Louis Halkias

Trimble County Generating Station

John Ogburn

Mon, Apr 7, 2025 at 5:02 PM

To: Louis Halkias

Mr. Halikias,

My name is John Ogburn, I am the current County Judge Executive in Trimble County, KY. I currently manage our county government agencies, Road Department, Emergency Management, Emergency Ambulance Service, Animal Control, Solid Waste Management, Planning and Zoning, Building Inspection, & County Finances. We currently have around 60 employees. Before this position, I was a Field Service Engineer for Metso Outotec, traveling about the globe, working in the Mining and Construction industry. This company acquired several product lines of equipment throughout the world to corner the market in Mining, Bulk Material Handling, Filtration, etc..... Prior to that, I was employed by Louisville Gas and Electric-Kentucky Utilities, Trimble County Generating Station, as a Material Handling Lead Operator/ Maintenance Technician, working in coal and limestone unloading and making sure both coal-fired units had their supply of coal every day. I had a crew of 6 fulltime employees and a support crew of 6 part time employees. We were responsible for unloading coal barges from the river and limestone for the pollution control system. In my career I have seen how important these plants are to small communities, I have also seen the damaged caused to communities that lose them and the loss of jobs and lives ruined because of shutting down coal plants, now we are seeing the affects of these poor decisions with rolling brown outs, lack of reliable transmission systems, etc.... The small Ohio, Kentucky, Pennsylvania, Indiana, Illinois, Arizona, Oregon, & West Virginia towns disappear or become drug and crime ridden without the employment of these plants and their supply chains. It is really sad that we are shutting coal down and other countries are using up our resources, with no benefits to the end users, the rate payers.

I am for a clean environment but am also for cheap energy that companies can afford to manufacture good in the United States, pay good wages and offer national security for our country. Wind, solar and renewable energy are great ideas in theory but are not sustainable and not reliable and usually cost most energy usage than the payoff. LGE-KU generating station, works with our community to help with school projects, community events, etc.... The county does, collect property taxes from the company, however it is negotiated with the Public Service Commission of Kentucky and is probably far less than it should be comparable speaking to other companies operating in our community. I don't blame the company I blame our lawmakers in Frankfort for allowing it. We still get a substantial amount from them. The company does have 250 full and part time employees. The company does help financially with local project as well.

I have worked with most of the management at the plant and do believe they do what is best for the environment. The plant is a very safe and offers steady income for many in our community. They produce several by-products that are useful to many industries, some help our local farmers. Several local farmer's take advantage of the large footprint of land and get to farm the remaining crop ground, so this helps our local citizens. The company is serious about compliance

with local, state, and federal EPA laws. Our local government and community would much rather see more coal fired generation or nuclear generation than wind or solar fields that destroy our remaining farm ground. In fact, we have enacted ordinances at the local level that would make it costly for wind and solar companies to operate here in Trimble County. Not that we don't think they are great ideas at small scales on businesses and at farms, but not in the industrial size models that are devastating to small rural counties. The Trimble Station Employees volunteer through the year at our community events and projects as well.

Trimble County is glad to have LGE-KU in our community.

John D. Ogburn Jr.

Trimble County Judge Executive

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**Louis Halkias****Prairie State Generating Company**

1 message

Jewell Meyer

Mon, Mar 31, 2025 at 11:01 AM

To:

Mr. Louis Halkias,
Chairman of the Naperville Public Utility Advisory Board
Naperville, IL

I have been involved in the local government of Washington County for over 30 years. As Chairman of the Washington County Board, I have experienced the beginning of the building and continued development of the Prairie State Generating Company. They are well respected by many in our communities. Their work has increased tax income for Washington County in many ways.

1. It has resulted in the building of a new school facility K-12 in Okawville.
2. Our county built a new judicial building and completely restored our existing historic courthouse.
3. Some of the resources were used for a newly constructed Emergency System Ambulance building.
4. The income has helped build local infrastructure.
5. Prairie State is actively raising money and supporting charities and fundraisers in our community.
6. They have produced and continue to produce good jobs for this area.
7. Being a good steward of the local environment is important and Prairie State and its management have worked to insure that our communities provide a safe and clean environment.
8. We have not had any negative issues about our air and water.
9. They run a state of the art electric generating company and coal mine.
10. They also make useful byproducts from burning coal that include material for fertilizer, gypsum for wallboard, and cement ingredients.

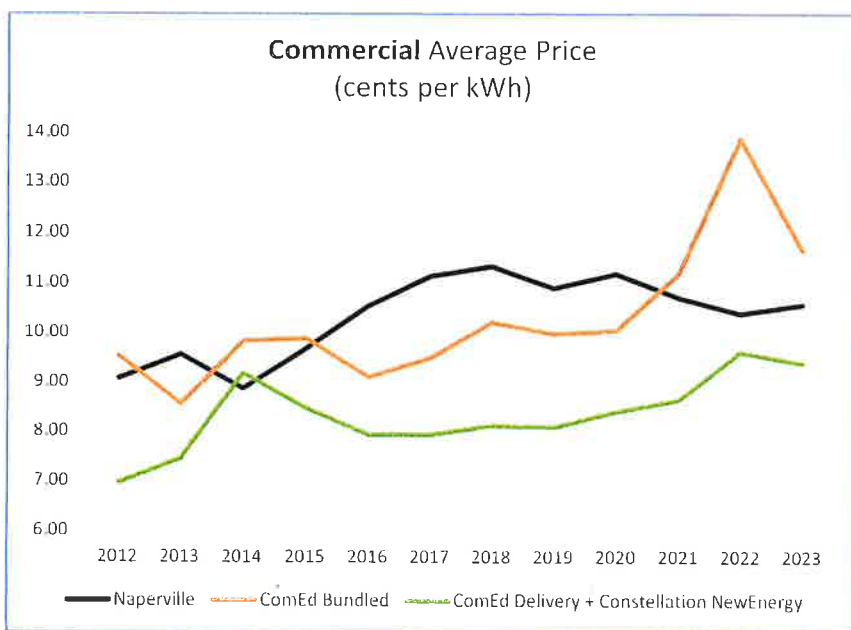
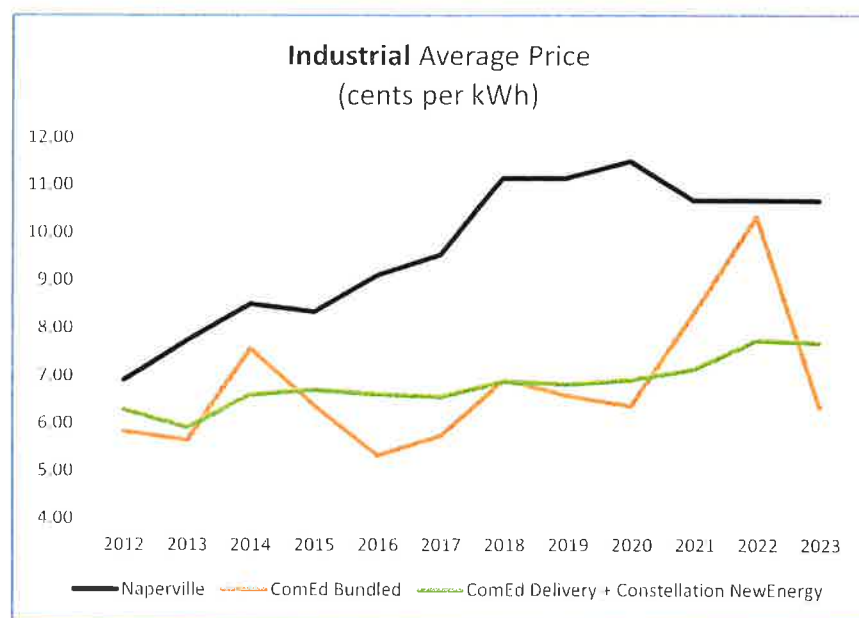
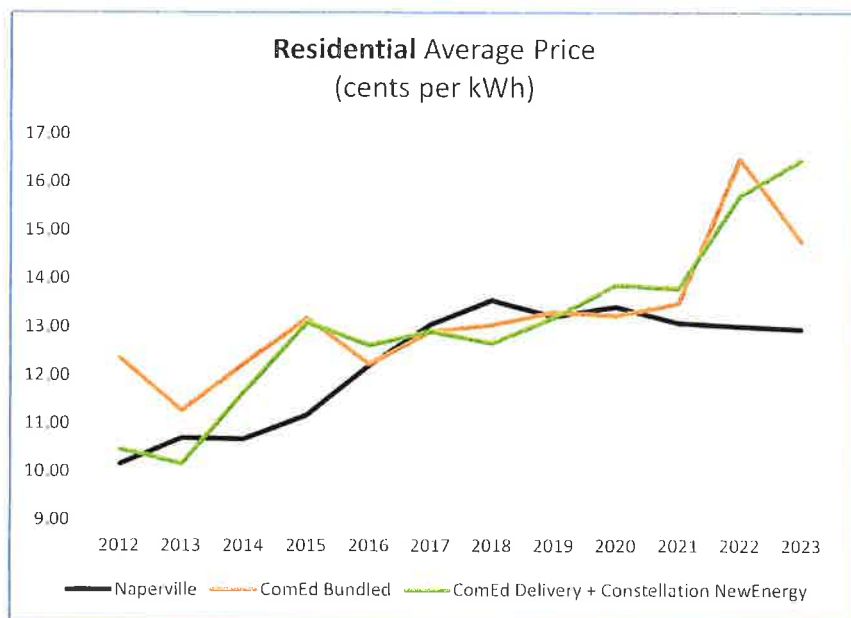
We have experienced a good relationship with Prairie State and its management and this has proven to be very beneficial to Washington County.

Thank you.

Respectfully,

David A Meyer
Chairman of the Board of Washington County Illinois

Naperville vs. ComEd Electric Rates Comparison



Further Discussion of Results

Our comparisons support Naperville's report that Naperville residential customers pay less for electricity than ComEd customers, but our commercial and industrial comparisons provide a different picture.

Averages alone cannot tell us a more complete story, so we suggest that Naperville consider further research to understand the billing characteristics and the types of customers that are impacted.

Commercial ratepayers include our public and private schools, our houses of worship, and our community organizations that we financially support. Commercial and industrial customers are also an important part of our local economy and tax base.

Note that EIA-861 does not offer any breakout of data to tell us about Naperville's power supply costs vs. local Naperville distribution costs, so these comparisons do not provide any analysis on Naperville's IMEA power supply costs.

But our ARES example using ComEd Delivery + Constellation NewEnergy does illustrate the potential cost benefit of power supply choice, especially for commercial and industrial customers. That's where the average price differences with ComEd Bundled and Naperville are greater.

Source: Sales data reported in the U.S. Energy Information Administration (EIA) Form EIA-861, Annual Electric Power Industry Report. Since over 60% of the total kilowatt-hours delivered to ComEd customers is purchased through ARES suppliers., in addition to comparing with ComEd bundled we include ComEd delivery with an ARES example. And we chose the largest ARES provider, Constellation NewEnergy.