

**RESPONSES OF
THE COALITION TO
REQUEST EQUITABLE ALLOCATION OF COSTS TOGETHER
AND THE ELECTRICITY CONSUMERS RESOURCE COUNCIL
TO THE RESOURCE ADEQUACY STUDY POST-WORKSHOP QUESTIONS OF THE
ILLINOIS POWER AGENCY, ILLINOIS COMMERCE COMMISSION AND
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

Charter Dura-Bar, Inc., Magid Glove & Safety Manufacturing Company LLC and CITGO Petroleum Corporation (collectively, “The Coalition to Request Equitable Allocation of Costs Together” or “REACT”) and the Electricity Consumers Resource Council (“ELCON”), by and through their attorneys CJT Energy Law, LLC, respectfully provide these responses to the June 18, 2025 Post-Workshop Stakeholder Questions issued by the Illinois Power Agency (“IPA”), Illinois Commerce Commission (“ICC”) and Illinois Environmental Protection Agency (“IEPA”) (collectively, the “Agencies”). ELCON and REACT look forward to collaborating with the Agencies, their consultants and other stakeholders to share and gather the data and insights needed to inform the development of the Resource Adequacy Study.

Question 1: The Agencies recognize this study process is purposefully targeted in its nature, with Section 9.15(o) providing clear goals and expectations of the resource adequacy study and resulting report. What additional goals, objectives, or evaluation metrics should be considered, either as part of this study process or future resource adequacy study efforts?

First and foremost, the Agencies should fully assess the risk of blackouts and the accompanying costs. PJM, MISO, and NERC have all warned of looming capacity shortfalls driven by accelerating load growth and the retirement of key generating units - developments that will outpace the deployment of traditional transmission upgrades. The Agencies should fully evaluate and quantify the severe consequences: widespread blackouts would threaten public safety, disrupt daily life, and impose enormous costs on Illinois consumers and the broader regional economy. The Agencies also should consider adopting a resource adequacy evaluation methodology that identifies the ability of the regional energy grid to support electricity requirements over extended periods of adverse weather. For instance, resource adequacy models should consider scenarios where historically cold or hot weather is experienced for a full seven (7) days. The purpose of this approach would be to consider the efficacy of various capacity and supply options over a series of days instead of hours.

Question 2: Which variables are the highest priority to explore? Further, are there important policies or drivers missing in addition to those outlined in the preceding stakeholder workshop that could help shape scenario development?

The Agencies should prioritize quantifying both the risk and the costs of blackouts. In their various analyses, the Agencies should compare the costs and scalability of proposed solutions with the potential cost of outages. Customer-centric options should be fully modeled to determine the ways in which additional customer engagement in the clean energy transition can lower overall costs using market-based solutions. The Agencies should prioritize non-wires alternatives (e.g., energy efficiency; demand response; deployment of microgrids, virtual power plants and combined heat and power assets), maximizing the use of existing transmission infrastructure and utilizing existing transmission rights-of-way, over the deployment of new transmission assets.

Question 3: Which of the following drivers are most critical to explore in the resource adequacy modeling scenarios and why?

- a. Extreme weather. Critical.
- b. Demand growth. Critical.
- c. Thermal retirements. Critical.
- d. Transmission build and future needs. Moderate.
- e. Generation resource diversity. Critical.
- f. Out-of-state reliance on generation resources. Not critical.
- g. Some other driver not described above. N/A.

Question 4: Are there known or expected developments in federal or state policy that should be integrated into scenario development? Please explain in detail and provide references where possible.

The study process should include a detailed analysis of which peaker plants in Illinois play a critical role in grid stability and resilience, including peak supply, frequency regulation and black start capabilities. Scenarios should contemplate recent federal legislation including the One Big Beautiful Bill (i.e. what is the potential impact on the financial viability of wind and solar deployments moving forward after federal tax credits are eliminated) and state legislation allowing expedited approval of generating resources in the Midwest (i.e. Indiana allowing utilities to fast-track approvals of new generating resources to meet new industrial loads).

Question 5: How should cost implications or other findings beyond potential reliability shortfalls be presented or considered to support constructive policy decisions?

The analysis should utilize a standardized method for assigning an economic cost to outages. The “Interruption Cost Estimation (ICE) Calculator sponsored by Lawrence Berkeley Lab is an example of such a calculation methodology. The Agencies also should incorporate the July, 2025 “[Analysis of Potential Pathways to a Clean Energy Future in Illinois](#)” prepared for the American Gas Association.

Question 6: What blind spots or gaps in the RA Study process do you worry might be overlooked or otherwise not addressed?

The RA Study should fully evaluate the economic and environmental benefits of extending the runaway for at least a subset of the peaker plants in Illinois. The analysis should fully explore potential market incentives for non-wires alternatives (e.g., energy efficiency; demand response; deployment of microgrids, virtual power plants and combined heat and power assets), maximizing the use of existing transmission infrastructure and utilizing existing transmission rights-of-way. The Agencies should also explore operability of energy systems under long term (up to 7 days) of extreme weather should be the standard for evaluating resource adequacy.

- a. Are the identified blind spots or gaps unique to customer segments, modeling scenarios, market conditions or other targeted parameter?

The blind spots identified above are related to the modeling scenarios. The RA Study should capture the ability of large energy users to efficiently and meaningfully impact the grid in response to appropriate price signals.

- b. How could the identified blind spots or gaps be addressed? (e.g. through additional scenarios, targeted data inputs, utilizing specific modeling, etc.)

The Agencies should build upon the analysis performed by PA Consulting submitted in the first REAP proceeding as a starting point for the RA Study. Further, modifying the scenarios to report hourly resource adequacy during extended periods of very cold weather (i.e. polar vortex”) and hot weather (i.e. “heat dome”).

Question 7: Have any peer jurisdictions developed scenario(s) through the completion of their own resource adequacy assessments or studies that should also be considered by the Agencies through this Resource Adequacy Study?

- a. Provide details concerning the scenario(s), which jurisdiction developed the scenario, and provide a link to the supporting detail(s).
- b. Is the assessment part of a broader resource adequacy assessment, or an more detailed integrated resource planning effort?

- c. Are there any market conditions or policy considerations that are unique to the jurisdiction and/or the scenarios referenced?

Question 8: Are there recommendations for specific data sources that could be utilized in this study?

- a. Are there preferences for certain input assumptions that should be made?
- b. What prior or concurrent studies could be referenced that might add value or ensure alignment with similar or adjacent work (e.g., queue assumptions, RTO projections)?

Question 9: Are there specific transmission constraints, expansions, or projects that should be considered and reflected in a model scenario? Further, Are these transmission considerations intended to target and/or solve specific challenges? Please explain, provide supporting documentation justifying inclusion, and provide pertinent reference materials including reports or studies.

The transmission constraints between MISO South and MISO Central should be considered. The timing and scaling of PJM transmission upgrades resulting from thermal resource retirements in Illinois should also be considered.

Question 10: Are there specific assumptions that should be considered concerning generation resources, including buildout (queue, pace, technology availability) or retirements, both in-state and regionally in the RTO markets?

The modeling should establish scenarios that reflect the requirements of CEJA as they relate to generation retirements to clearly identify the implications of further retirements of dispatchable capacity.

- a. Which proposed assumptions should be considered as part of the base case and which are best considered as part of a prospective scenario? Provide any available references to RA studies, IRPs, or comparable assessments and reports to support your recommendations.
- b. Which assumptions are contingent upon specific policy and/or legislative conditions being met or otherwise enacted? Please plain in detail.

Question 11: As a component of the RA Study, the Agencies will be seeking to obtain utility and RTO load forecast projections and the underlying assumptions behind the load forecasts. In addition to these utility forecast assumptions, what additional assumptions should also be considered, either embedded in a base case or considered in scenarios? Further, what data sources should be drawn upon, supporting any load forecast modifications? (i.e. large load / electrification growth)

- a. Provide details on why these additional assumptions should be considered during the modeling process?

- b. Are any proposed load forecast assumptions directly impacted and/or predicated upon specific to policy, legislative, or other conditions being met and/or otherwise enacted? Please explain in detail.

Question 12: Are there any additional considerations – data inputs, policy, drivers, or assumptions – that Stakeholders believe the Agencies should consider, not already explain in response to the preceding questions? Please explain in detail.

Given the serious risks capacity shortages pose to Illinois consumers and the regional economy, the Agencies should not delay in developing potential near-term solutions to reduce the risk of blackouts and minimize their potential impact while longer-term renewable generation development and transmission planning reforms and deployments are in progress.

ELCON and REACT look forward to collaborating with the Agencies, their consultants and other stakeholders to gather and share the data and insights that will help inform the Agencies' Resource Adequacy Report.

Respectfully Submitted,

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Petroleum Corporation (collectively, "The Coalition
to Request Equitable Allocation of Costs Together"
or "REACT") and

The Electricity Consumers Resource Council
("ELCON")

By /s/ Christopher J. Townsend

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