



IEPA/IPA/ICC Resource Adequacy Study
Response to Agency Questions
October 28, 2025

The Commonwealth Edison Company (ComEd) appreciates the opportunity to offer some additional thoughts and suggestions regarding the critical issue of progress towards Illinois' ambitious goal of creating an equitable, clean energy future as described in the Climate and Equitable Jobs Act (CEJA)¹. As was noted in July, in the years since CEJA's passage, ComEd has observed increasing demands for the interconnection of large load customers which makes it vital that Illinois policymakers understand the options for achieving CEJA's goals without compromising other policy priorities such as economic development. ComEd offers these additional comments for consideration as the Agencies² continue this important work.

Regarding inputs and assumptions, ComEd continues to urge the Agencies to gather data such that a holistic picture of load growth, generation capacity, and energy deliverability can be viewed against a backdrop of increasing customer energy costs and overall economic pressures on affordability. The key factors remain the load forecast and impacts from AI and data centers, as well as potential new generation sources, and in particular, new sources to consider include the recently submitted large load adjustments to PJM, as well as the results of PJM's Transition Cycle 1, to determine new generation projects potentially moving forward.

Additionally, while we appreciate that the modeling to date has focused on the physical, in order to determine the most cost-effective and affordable way to deliver on the goals of CEJA, we believe that it's critical to consider the market impacts. Energy prices should be modeled in a variety of scenarios, including with and without the gas plants, and if the RTOs were to designate units as Reliability Must-Run (RMR). And to the question raised by the Agencies, power plant retirements outside of Illinois must also be considered, again because of their potential impact to energy prices.

Finally, as ComEd has suggested before, we hope that the State will continue to be open to additional research and resources as they might become available from ComEd and other stakeholders. As noted in July, ComEd continues to look at transmission security and generation resource adequacy in Illinois, as well as the impacts of utilities moving from RTOs and other related state policy changes. ComEd will share this data as it becomes available.

¹ Public Act 102-0662.

² The "Agencies" refer to the Illinois Environmental Protection Agency (IEPA), the Illinois Commerce Commission (ICC), and the Illinois Power Agency (IPA).