

To: IPA.ContactUS@illinois.gov

Subject: Agency RA Study – Workshop 2 Responses [ICJC Member Organizations]

Date: October 27, 2025

Dear Illinois agencies,

The undersigned organizations are members of the Illinois Clean Jobs Coalition's (ICJC) Power Sector Committee and provide comments in response to the agencies' [second post-workshop stakeholder questions](#).¹ Although our organizations are ICJC members, the views in these comments are our own and do not necessarily represent the views of the entire coalition.

Our comments consist of a memo, included below, prepared by Chelsea Hotaling and Anna Sommer with [Energy Futures Group](#) (EFG).² Ms. Hotaling and Ms. Sommer have extensive experience with various types of energy planning and modeling exercises.

Many of the signatory organizations participate in Integrated Resource Plans (IRPs) in other states, particularly in litigated IRPs, and possess extensive experience in robust energy systems modeling, including capacity expansion modeling and production cost modeling—methods used in this current Illinois study process. EFG has collaborated with many of us in multiple IRPs across the region, and we look forward to continuing our work with them throughout this proceeding and in any future energy systems modeling and energy plan development in Illinois.

We wish to call particular attention to EFG's recommendations for best practices in conducting stakeholder processes as part of resource planning efforts. To be effective, stakeholder engagement must allow for earlier transparency into modeling assumptions and must provide clarity on how stakeholder feedback is or will be incorporated into the planning design and data assumptions.

Having effective stakeholder engagement is even more crucial here, where state agencies are conducting the assessment versus the traditional context of regulated utilities in other states. We recognize that the current resource adequacy study process is time-constrained and challenging for all involved. But as Illinois and its agencies move forward in future resource planning efforts, we urge a greater emphasis on

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https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/20251016-stakeholder-questions_ra-study-final-16oct2025.pdf

² <https://energyfuturesgroup.com/team/>

transparency and collaboration with stakeholders through incorporating best practices such as those shared by EFG below.

For any questions or follow-ups to these comments, please contact:

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Topic Two Stakeholder Questions

Question 1: During the October 8 Workshop #2 Session, Stakeholders actively sought insight into the RA Study model inputs and assumptions, to which the Agencies issued a response to workshop questions. In addition to the responses provided, what additional information are stakeholders interested in obtaining concerning the modeling approach and methodology for the RA Study? Please list any specific questions regarding the modeling approach and/or inputs.

Response:

In response to the request for stakeholder comment following the first Workshop Session, Energy Futures Group ("EFG") submitted several questions on the RECAP model and the modeling process.

As it relates to modeling performed in RECAP, we have the following questions that will help us better understand model configuration and how that might impact LOLE results:

- What weather years are modeled in RECAP? Do weather years receive a different probability assignment or are they all weighted equally?
- How does RECAP scale the historical load profiles to reflect the forecasted demand for the study year evaluated?
- Does RECAP incorporate load forecast errors in the study? If so, what level of load forecast errors are modeled and how are they determined?
- Will RECAP reflect weather-correlated outages for thermal resources, especially considering cold weather outages?¹

¹ Please see pages 7-8 of the MISO LOLE 2025-2026 Report. Retrieved from <https://cdn.misoenergy.org/PY%202025-2026%20LOLE%20Study%20Report685316.pdf?v=20250313114401>

Please see slide 8 of a PJM presentation on LOLE modeling. Retrieved from <https://www.in.gov/iurc/files/0-2024-6-6-IURC-Meeting-Resource-Adequacy-and-Accreditation-in-PJM.pdf>

- Are resources in RECAP dispatched economically or are there any assumptions about resources being must run to help manage model run time? If resources are not dispatched economically in RECAP, how is the unit dispatch determined?
- Does RECAP use hourly chronology?
- How does RECAP model planned maintenance (is it modeled with specific outage dates or is it a rate that is optimized and typically scheduled during low risk periods?)

We also have several items to note since we are unsure how they will be reflected in the study and ask that additional information be provided to stakeholders:

- As it relates to comparing LOLE results, how will the MISO four season construct be reflected, i.e. will the LOLE results be reported on an annual or seasonal basis?
- When modeling the PJM and MISO regions, will those regions' portfolios be adjusted to reach a .1 LOLE assumption (i.e. adding perfect resources until a .1 LOLE is reached), or will those regions only reflect resources either hardcoded into the model or selected within PLEXOS? We ask this question to help us understand if this will impact what the LOLE might look like for these regions, since the PJM and MISO interaction with the Illinois zones may influence the LOLE results.
- Slide 30 of the Resource Adequacy Study Workshop #1 Session² indicated that imports / exports will be limited by transmission interconnections between zones. Does this mean that at any time, if the Illinois region is in a shortfall and PJM is not, that Illinois will be able to import up to that transmission interconnection at any hour over the study?
- Slide 30 of the Resource Adequacy Study Workshop³ indicated that "Future portfolio scenarios will be aligned across all zones to ensure consistency". It is not clear what "zones" means. Do the zones reflect only Illinois, PJM, MISO, or all three? In addition, does this mean that capacity expansion within PLEXOS

² Retrieved from
<https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/20250616-presentation-ra-study-workshop1-final-16june2025.pdf>

³ Retrieved from
<https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/20250616-presentation-ra-study-workshop1-final-16june2025.pdf>

will be limited in some way? And if the portfolios are all aligned, what impacts do the scenario assumptions have?

We have additional questions on the information presented during the Workshop #2 Session:

- How do the retirements modeled for the PJM footprint align with the current deactivation notices that PJM has received?⁴ How do the MISO and PJM retirements modeled align with information reported by the EIA for projected generator retirements?⁵
- How are the PJM Reliability Resource Initiative (“RRI”) projects⁶ and the PJM Expedited Fast Lane Process⁷ factored into the modeling? For example, when reviewing the queue projects, will these projects receive a higher likelihood of coming online? And if not modeled as a going in resource to the model, are these projects informing the build limits modeled in PLEXOS?
- How are the build limits for MISO and PJM being developed for the PLEXOS modeling?
- What resource costs are being modeled for each technology in PLEXOS?
- What planning period is being modeled in PLEXOS?
- Slide 26 of the presentation says “200% data center load growth over the next decade even with a conservative view (haircut) from PJM topline totals”. What kind of “haircut” was applied to the PJM topline totals? How was the “haircut” determined? Was a similar “haircut” applied to the MISO load forecast?
- Slide 26 of the presentation indicates that forecasts were provided by Ameren and ComEd. Is there information on what level of commitments Ameren and ComEd have from the customers included in the forecast? Were any modifications made to the load forecasts provided by Ameren and ComEd?
- Slide 25 of the presentation says, “Scenario analysis is underway to examine the portfolio of resources that may be needed to fill remaining resource adequacy needs under different cost and availability assumptions.” In Workshop #1, slide 33 indicated there would be a scenario design to look at policy designs and external forces. It is not clear what variables will be changed for the scenario analysis. Can the scenario assumptions for this analysis be

⁴ <https://www.pjm.com/planning/service-requests/gen-deactivations>

⁵ EIA Monthly Electric Generator Inventory 860M.

⁶ <https://www.pjm.com/-/media/DotCom/committees-groups/committees/pc/2025/20250506/20250506-rri-addendum---post-meeting.pdf>

⁷ <https://insidelines.pjm.com/pjm-reaches-next-milestone/>

provided to stakeholders? Will there be any scenarios modeled for alternative load growth forecasts or load flexibility?

Question 2: Referencing the response to workshop questions provided by the Agencies to Stakeholders during the RA Study Workshop #2, do stakeholders have any follow-up questions to the responses that could be addressed by the Agencies, either through the RA Study process or that could be considered in future RA Study efforts or activities? Please provide a list of questions or additional considerations.

Response:

The response on why a 2035 study year was chosen instead of 2030 says, “Within the resource adequacy balance analysis, RTO-published ELCCs are used from 2026 – 2030. E3 projected 2035 system reliability using its RECAP model to examine how reliability risks in each region may change over time, beyond the 2030 timeframe. This examination will inform the development of ELCC projections that will serve as inputs to the long-term portfolio modeling in PLEXOS.” If the goal is to examine how reliability risks change over time, can clarification be provided on why 2030 is looked at to determine if shortfall risks exist, but 2035 is being looked at in RECAP for reliability risks? Will both 2030 and 2035 be evaluated in RECAP? In order to see how the reliability risks change over time, it seems like the RECAP modeling would have to look at both years. And if one study year must be picked, why wouldn’t 2030 be of more importance than 2035 given the statutory requirements?

A few of the responses to stakeholder requests for modeling inputs/data used by E3 referenced that information on inputs could be published along with other key model inputs in the RA Study Report. We appreciate that there is a challenging dynamic in terms of completing significant modeling on an abbreviated schedule. However, the spectrum of feedback that stakeholders can give is significantly narrowed without having a window into modeling assumptions prior to the release of the RA Study Report. For instance, one of the questions asked of stakeholders is around retirement assumptions. Stakeholders can provide general feedback for this request, but more meaningful feedback could be provided if stakeholders knew which plants are assumed to retire in this modeling process.

We offer the following recommendations on how stakeholder engagement and involvement can be improved for future processes. In order to ensure that the process is collaborative, and that stakeholder feedback is taken into consideration with enough time to be able to incorporate that feedback into the modeling well in advance of the release of the report, we suggest implementing these additional steps as part of the stakeholder process:

- *Use an online data sharing platform (e.g., Drop Box, Sharefile, etc.) to provide data files to stakeholders.*
- *Provide direct and clear responses to stakeholder input, such as through additional calls or as part of the technical conferences, so that stakeholders can understand how their feedback was considered.*
- *Commit to providing data that stakeholders can react to and provide feedback on in advance of the completion of studies.*

EFG participates in a wide variety of Integrated Resource Plan (“IRP”) stakeholder processes in other jurisdictions. The best practice processes use a model that expands on these requests and provides data at multiple points in time and holds multiple meetings to discuss that data. We’re happy to provide more information on that if there is a future opportunity to improve upon this stakeholder process.

Question 3: Referencing the Workshop #2 presentation topics, what key issues or challenges do stakeholders believe are most important to consider in the analysis of future resource adequacy needs within the next five years (to 2030)? Do the identified issues or challenges change for a 2030-2035 study period? If yes, how? Please describe.

Response:

There are several items that could result in differences between 2030 and 2035 including load, retirement assumptions, and assumptions for new resource builds. Based on the information provided in the Workshop #2 presentation, load growth is projected to rise through 2035 for PJM and MISO, but the forecast for Ameren accelerates before 2030 and then levels off. Retirement assumptions could also influence the risk if dates, depending on what level of retirements are assumed before 2030 and then between 2030 and 2035. Replacement of those retiring units also depends on assumptions made for new generation availability. Modeling out to 2035 allows for more time to consider additional projects coming online from both the MISO and PJM generation queues. It is not clear what resource build limits will be assumed in the model when looking out to 2035.

Question 4: A key consideration influencing model scenario analysis and conclusions is the impact of out of state power plant retirements. How should power plant retirements outside of IL (in MISO and PJM) be considered in the analysis? Provide any exemplary references or reports that provide insights and direction that could be considered as a component of the RA Study analysis and modeling.

Response:

You may wish to rely upon the PJM deactivations list, EIA data, and other sources such as the MISO LOLE study.

Question 5: Following the RA Study Workshop #2, are there any prevailing stakeholder questions that were not answered? Please provide a list of questions.

Response:

Please see our responses to questions 1 and 2.