

Illinois Manufacturers' Association Response to Second Round of Stakeholder Questions for the Illinois Resource Adequacy Study

Submitted October 28, 2025

The Illinois Manufacturers' Association (IMA) appreciates the opportunity to provide comments in response to the October 2025 stakeholder questions issued by the Illinois Power Agency (IPA), Illinois Commerce Commission (ICC), and Illinois Environmental Protection Agency (IEPA). Ensuring a reliable and cost-effective electric system remains essential to Illinois' economic competitiveness. Founded in 1893, the IMA is the nation's oldest and one of the largest statewide manufacturing trade associations, representing nearly 4,000 member companies and facilities across Illinois. Manufacturing employs more than 650,000 Illinois residents and contributes approximately 14 percent of the state's total gross domestic product. The IMA continues to advocate for energy policies that balance reliability, affordability, and safety, prioritizing outcomes that sustain the growth and competitiveness of Illinois' industrial base. With this context in mind, the IMA respectfully submits the following responses to the October 2025 stakeholder questions.

Question 1 – Additional information on modeling approach and inputs

The IMA appreciates the opportunity to provide input on the Agencies' ongoing Resource Adequacy Study and requests additional transparency regarding the modeling approach and underlying assumptions. Given the direct connection between electric reliability, cost, and manufacturing competitiveness, it is critical that stakeholders understand how key inputs are treated in the analysis. Specifically, greater clarity is needed around the assumptions that drive future electricity demand, including industrial load growth, electrification trends, and expected demand-response participation. Manufacturers are often large, inflexible loads that cannot readily curtail production in response to price signals. It would therefore be helpful to understand whether the modeling differentiates between flexible and inflexible demand and how large-load additions such as new manufacturing facilities, industrial expansions, and data centers are represented in baseline and sensitivity cases. The IMA also encourages the Agencies to describe the reliability metrics being used, such as loss-of-load expectation (LOLE) or effective load-carrying capability (ELCC), and to explain how fuel availability, price volatility, and gas-deliverability risks are handled for thermal units. Because both PJM and MISO are revising their capacity-accreditation frameworks, it would be valuable to know whether those reforms are being reflected in this study's methodology and assumptions.

Question 2 – Follow-up questions to agency responses

The IMA appreciates the Agencies' responsiveness during the October 8 workshop and offers several follow-up questions for further consideration. First, additional clarity would be useful on how the model will treat inter-regional power transfers between MISO Zone 4 and PJM-ComEd.

Illinois' import capability is a major determinant of actual resource adequacy, and stakeholders need to understand whether the modeling applies fixed transfer limits or dynamically accounts for congestion and transmission constraints. Second, the IMA seeks explanation of how differing resource-adequacy definitions across the two RTOs will be reconciled, particularly where reserve-margin calculations or accreditation practices diverge. The Association also recommends including distributed resources and behind-the-meter assets, such as combined-heat-and-power facilities, industrial cogeneration, and on-site storage, in the modeling framework to reflect their contribution to local reliability. Some manufacturers already operate self-generation systems that can materially influence both demand and available capacity. Finally, the IMA urges coordination between this Resource Adequacy Study and the forthcoming 2026 Integrated Resource Plan process to ensure consistency of assumptions regarding demand growth, retirements, and transmission development, and to avoid duplication of modeling efforts.

Question 3 – Key issues for 2025-2030 and 2030-2035

For the 2025-2030 period, the IMA believes the most pressing challenge will be maintaining system reliability and affordability amid accelerated retirements of fossil-fuel generation and the concurrent build-out of renewable and storage resources. Ensuring that sufficient dispatchable capacity remains available to meet peak demand is essential, as interconnection delays and supply-chain constraints have slowed renewable project completion. These delays heighten the risk of capacity shortfalls and price volatility. Between 2030 and 2035, the reliability landscape will evolve further as electrification expands within the transportation and industrial sectors. Many manufacturers are expected to increase electricity use as they transition processes from fossil fuels to electric alternatives. In addition, sustained growth in data-center and high-load facilities will contribute to higher peak demand. The IMA encourages the Agencies to evaluate these trends carefully and to consider transmission-buildout timelines, reserve-margin requirements, and load-growth sensitivities. Accounting for these factors will help ensure that Illinois' transition to a cleaner energy mix remains both affordable and reliable.

Question 4 – Out-of-state retirements

Out-of-state generation retirements in MISO and PJM are a critical consideration in assessing Illinois' future resource adequacy and should be incorporated comprehensively into the study's scenarios. Because Illinois relies heavily on imported power, its reserve margin depends on both in-state capacity and regional availability. The IMA recommends that the Agencies base assumptions on verified RTO data such as MISO's Generator Interconnection Queue, PJM's Generation Deactivation notices, and recent forward-capacity auction results. The study should test system resilience under multiple sensitivity cases where retirements occur more rapidly than anticipated for example, 25 percent, 50 percent, and 75 percent faster than baseline assumptions to quantify Illinois' exposure to regional shortages. These cases would help identify how much local generation or storage might be required to maintain reliability under stress conditions. The IMA also recommends cross-checking these assumptions against independent datasets such as the U.S. Energy Information Administration's Form 860 and EPA eGRID to enhance transparency and consistency.

Question 5 – Prevailing unanswered questions

The Illinois Manufacturers' Association requests clarification on whether the list of generator reductions and retirements that the Illinois Environmental Protection Agency shared with E3 will be made publicly available as part of the draft Resource Adequacy Study. Transparency around these inputs is essential for stakeholders to understand the assumptions driving the modeling outcomes and the projected reliability impacts.

Additionally, the IMA seeks clarification regarding slides 32 and 33 of E3's presentation, which show no coal resources included in the resource stacks as of 2030. The Clean Energy Jobs Act does not require the retirement of all coal-fired units by that year, and it would be helpful for stakeholders to understand whether this modeling outcome reflects a policy assumption, an economic dispatch result, or another analytical decision.

The IMA also asks whether the Resource Adequacy Study will identify how much of Illinois' imported electricity originates from out-of-state fossil generation. This information is important to accurately assess both the reliability and emissions implications of Illinois' reliance on imported power.

Finally, the IMA would appreciate additional detail regarding slide 13 of E3's presentation, specifically the assumption that the value of incremental solar and battery storage becomes negligible beyond a certain point. Clarifying the analytical threshold for when marginal resource value declines and the underlying data supporting that determination would help stakeholders better understand the modeling framework and its implications for future resource planning.

Resource adequacy planning must prioritize outcomes—reliable, affordable and safe energy for all customers over prescriptive technology mandates. A balanced, fuel-neutral approach that integrates reliability, cost, and environmental objectives will best position Illinois to achieve its clean-energy goals without undermining industrial competitiveness. The IMA appreciates the Agencies' continued collaboration and looks forward to engaging further as the study progresses.