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## 2026 Illinois Resource Adequacy Study Mitigation Plan Post-Workshop Stakeholder Questions

*Illinois Power Agency &  
Illinois Environmental Protection Agency*

### Background & Introduction

The Illinois Power Agency (IPA), Illinois Commerce Commission (ICC), and Illinois Environmental Protection Agency (IEPA) issued the [2025 Resource Adequacy Study](#) (RA Study) Report on December 15, 2025. This report and its dependent analysis were driven out of the requirement set forth in the Illinois Environmental Protection Act Section 9.15(o). In brief, the report served to provide a detailed overview of the state of the Illinois energy market, explain the evolution of that market as a participant in the broader Regional Transmission Organization markets (MISO and PJM), and evaluate the risk of reliability shortfall across various drivers, market conditions, and related factors. The RA Study identified three core findings:

- (1) There are resource adequacy challenges in PJM and MISO which are likely to affect the costs and reliability of electricity supply for Illinois businesses and consumers.
- (2) There are pathways for Illinois to achieve its climate goals in the electricity sector while ensuring a reliable electric grid, using available commercialized technologies.
- (3) Illinois has the responsibility, authority, and policy tools to conduct planning, identify solutions, and implement actions to address these challenges.

On January 27, 2026 the IPA, IEPA, and ICC held a stakeholder workshop. This workshop served to provide participating stakeholders with insights into the RA Study methodology and resulting modeling assessments – near-term (2026-2035), long-term (2030-2040) – and conclusions. It also began discussions to frame the RA Study Mitigation Plan process and the Integrated Resource Plan (IRP) process that will be conducted pursuant to Public Act 104-0458, also known as the Clean and Reliable Grid Affordability Act (CRGA). Discussions focused on identifying points of alignment including schedule, convergent focus of the Mitigation Plan and IRP processes, and seeking stakeholder input on opportunities to better align the processes.

Both a [recording](#) of the workshop and the [presentation](#) used during the workshop can be accessed on the [IPA's RA Study webpage](#).

Additionally, the ICC has both announced a forthcoming Integrated Resource Plan (IRP) workshop and issued a “Request for Comments” seeking stakeholder feedback on a series of questions to inform the IRP process. The workshop is to be held on February 18, with the question set having

already been issued and responses due February 9, 2026. Full details surrounding the workshop and questions can be found on the ICC's [IRP webpage](#).

Following the January RA Study Mitigation Plan Workshop, the IPA and IEPA are interested in obtaining additional stakeholder feedback to inform the Mitigation Plan modeling and analysis. Below are a series of questions grouped according to two topics: "Technical" and "Mitigation Plan/IRP Alignment". Through these questions the Agencies are seeking specific information from stakeholders with the intent to inform the next steps of the Mitigation Plan development. Stakeholders are requested to review the questions and provide written responses as instructed below. The Agencies request that stakeholder responses are detailed, providing links or reference materials where appropriate in response to the questions.

Importantly, **stakeholders are encouraged to respond to both the ICC Request for Comments and the series of IPA and IEPA questions below**. The Agencies have purposefully developed the question sets to limit overlap, with stakeholder feedback from one set being reviewed by all Agencies to inform both the RA Study Mitigation Plan and IRP processes. For example, the ICC Request for Comments set includes specific questions surrounding modeling, scenario design, sensitivities, and data that are not replicated in the question set below; however, the IPA and IEPA will be reviewing responses to the ICC request to inform the Mitigation Plan. The same will be done by the ICC with regards to the question set below.

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### Response Schedule

- + Stakeholder Question Issuance: January 30, 2026
- + Stakeholder Responses: Due to IPA by Monday, February 16, 2026 by 5:00 p.m. CPT

### Additional Stakeholder Response Instructions:

- All responses are to be submitted to the IPA at: [IPA.ContactUS@illinois.gov](mailto:IPA.ContactUS@illinois.gov)
- Responses shall include the following header in the email "subject" line:
  - [Stakeholder Name] Response - RA Study Jan2026 Questions
- Confidentiality
  - Any written responses, data, attachments or other information submitted by stakeholders that is confidential must be labeled as such.
  - If any stakeholder response to a question is confidential, stakeholders shall provide two copies of the responses – 1) the original, confidential version to be reviewed by the Agencies (and will not be posted publicly), and 2) a redacted version of the responses which can be posted publicly on the RA Study webpage.
  - If confidential documents are included as attachments accompanying any responses to a questions, stakeholders must clearly denote the confidentiality in the document name and in the reference to the document in the written response. Such documents will not be posted publicly.

## **Technical Questions (Mitigation Plan Inputs & Analysis)**

- + **Question 1:** Are there any specific analysis, modeling, scenarios, or sensitivities that were not completed or incorporated as part of the RA Study process (recently completed), and that stakeholders *did not include in the response to the ICC Request for Comments* (due February 9) that should be considered by the Agencies as part of the Mitigation Plan modeling and analysis?
  - If yes, please details on such recommendations, including their intended focus or methodology, and usefulness.
  - Please provide any citations or references to support your recommendations, including data sets or inputs (or references to where those data sets or inputs can be found) that are necessary to complete the analysis.
  - If modeling, scenarios or sensitivities were not recommended as part of the ICC Request for Comments process, please explain why they should be included in the Mitigation Plan analysis and not the IRP process?
  
- + **Question 2:** Is there any new or updated data or information that has been issued or otherwise has been made available that was either not utilized in the RA Study, became available after RA Study modeling and analysis was already completed, and/or was *not recommended for inclusion in the ICC Request for Comments* that should be considered in the development of the Mitigation Plan?
  - If yes, please provide references. (*The Agencies prefer direct links and/or submission of the referenced material.*)
  - If not recommended as part of the ICC Request for Comments process, please explain why they should be included in the Mitigation Plan analysis and not the IRP process?

**Question 3:** The primary focus of the Mitigation Plan analysis will be on what solution sets of resources and/or policy options can be accessed over various terms (periods of time) to mitigate electric reliability risks and meet resource adequacy needs. A function of the analysis includes expectations and timing surrounding CEJA-driven fossil generation facility retirements throughout Illinois (specifically coal). The initial deadline for such retirements by coal facilities is 2030. The Agencies are seeking further insight from coal generation owners/operators or any other stakeholders with pertinent and detailed information – requesting clarity around when the final determination surrounding closure is required. This includes when a determination to remain operational for a period of time into and beyond 2030 is required. Specifically:

- What is the ‘drop-dead’ date (at least by year) that facilities must be notified that facility retirement is delayed ensuring the facility can remain operational? (*e.g., facility owners must receive notification to continue operation by Q1 2029 to remain operational into or beyond 2030*)

- What are the specific considerations that impact any such date? Please provide details and the timing-based impacts of those considerations. *(this may include investments in expanded emissions technology, substantive investments in facility assets to ensure facility remains operational, fuel)*
- Please explain if any such timing considerations include RTO or federal reliability must run (RMR) provisions which could mandate a facility remain operational for a specified period of time.

**+ Question 4:** A substantive driver identified and modeled through the RA Study is load growth, heavily influenced by data center interconnection forecasts. Since issuance of the RA Study, the Agencies are aware of a recent update to PJMs load forecast, inclusive of data center interconnection projections. During the January 27<sup>th</sup> RA Study Workshop, questions and comments were received surrounding data center load forecasts, requesting further consideration of how data center interconnections are impacting load forecasts used in the RA Study and/or to be used in the Mitigation Plan.

- In addition to the forecasts considered in the RA Study (utility forecasts and RTO forecasts) and the recent PJM load forecast update, are there any additional load growth forecasts and/or sensitivities that should be considered?
- If yes, please provide reference(s) to the forecasts and a detailed breakdown of the sensitivities that should be considered (including over relevant time horizons).

**+ Question 5:** Are there any additional factors that should be considered or explored in greater details in addition to those provided in response to questions 1-4, above, to support the development of the Mitigation Plan?

#### **Mitigation Plan & IRP Process Alignment**

**+ Question 6:** Both the Mitigation Plan required under Section 9.15(o) and the Integrated Resource Plan required under CRGA begin with an assessment of Illinois energy resource needs and require a proposal for meeting those needs leveraging a broad solution set (emission reduction requirement relaxation; new generation resources; energy storage; transmission development; demand-side options) optimized across a fairly consistent set of metrics (including cost, emission impacts, environmental justice community impacts, and ensuring “adequate, reliable, efficient, and environmentally sustainable electric service”).

- What suggestions do you have for how the IPA, IEPA, and ICC can most effectively merge these processes to keep parties from duplicative work and to ensure clarity and certainty of administrative/regulatory outcomes?
- Are there any unique considerations which you believe the IPA, IEPA, and ICC must navigate in working to merge these workstreams?
- Would you be supportive of coordinating administrative filings and consolidating plan approval proceedings?