ADVANCED ENERGY UNITED™

2026 Illinois Resource Adequacy Study Mitigation Plan – Post 01/30/2026 Workshop Stakeholder Questions

Comments of Advanced Energy United (Included in Blue Font)

Technical Questions (Mitigation Plan Inputs and 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?

No, there are too many additional analysis, modeling, scenarios, or sensitivities that should be considered in the RA Study Mitigation Plan at this time. Advanced Energy United (United) has included a variety of recommendations on modeling scenarios, modeling analysis, and sensitivities within its comments in response to the ICC's Request for Comments related to the IRP Workshop. The only additional item that United would like to flag at this time is for the state agencies to properly consider the role that demand-side resources can play on the distribution-level, even if they cannot be bid into the wholesale market, especially in the context of a Virtual Power Plant. Regardless, United asks the State Agencies to consider the Comments that were submitted in response to the ICC's Request for Comments in the context of this RA Study Mitigation Plan Workshop (and vice versa), however, United believes that the

ICC's IRP Workshop has the potential to be a more robust and holistic pathway towards meeting Illinois' energy resource needs.

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?

United has already provided new/updated data that was not utilized to its full extent in the RA Study within its comments in response to the ICC Request for Comments related to the IRP workshop process. These data sources include the 2024 National Renewable Energy Laboratory's Annual Technology Baseline (2025 data is expected to be released later in 2026), as well as the most recent 2025-2026 MISO Indicative Resource Class-level Unforced Capacity Direct Loss of Load Results (which will be updated by MISO in 2026).

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.

Advanced Energy United is not a coal generation owner/operator, and therefore does not have specific information related to the timing of determination surrounding when a closure is required.

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 27th 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).

Within the comments that were submitted in response to the ICC's request for comments related to the IRP workshop process, United recommended that a "Data Center Integration Variability" modeling scenario be considered which would allow different resource portfolios to be considered across varying levels of data center integration. This concept and modeling scenario was utilized in Indiana by various utilities for their recent IRPs. For example, AES Indiana's 2025 IRP modeled four different levels of large load integration (no load, low load, mid load, and high load)

across each scenario that was developed, which led to AES Indiana developing two preferred action plans; one to reflect resource additions that will be added to the portfolio regardless of the size and timing of a large load customer, and one to reflect resource additions that will be added only after large load customers come online. United recommends that a similar strategy be developed for the ICC IRP process and/or the Resource Adequacy Study mitigation plan in order to properly consider a wide range of large load integration given the volatile nature of this market at the current time. Additionally, alongside a "Data Center Integration Variability" modeling scenario, it would be useful for the ICC IRP process and the Resource Adequacy Mitigation plan process to consider the impacts on resource adequacy if large load customers utilized their own generation to meet their load.

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?

Not this time. As mentioned previously, United has submitted additional factors that should be considered in its comments in response to the ICC's request for comments related to the IRP Workshop process, and asks that the State Agencies review these comments.

Mitigation Plan and 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?

United recommends that the RA Mitigation Plan process and the ICC's IRP process be consolidated and combined where possible to avoid duplicative workflows and utilize the analysis' that have been completed for the Resource Adequacy Study. Specifically, United recommends that the State Agencies combine the two workshop processes into one conjoined process, as both efforts are working towards nearly identical goals – to properly forecast and ensure adequate resources to meet Illinois' energy needs in the future. This means utilizing the same stakeholder workshops, administrative filings, and, approval proceedings moving forward to help avoid administrative burden on both the State Agencies and the relevant stakeholders. Two reports will likely still be needed for the ICC IRP Workshop and the RA Mitigation Plan, however, the content of the reports can be very similar to one another. Overall, United is supportive of coordinating and combining workloads and processes where necessary.