

Ameren Illinois Company's Response to RA Study Jan 2026

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?

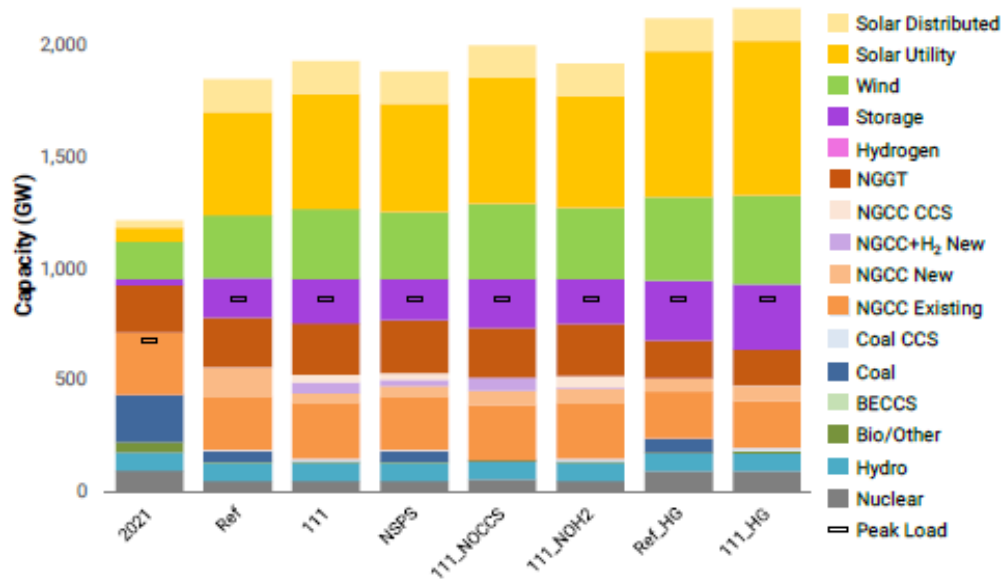
- o If yes, please details on such recommendations, including their intended focus or methodology, and usefulness.
- o Please provide any citations or references to support your recommendations, including data sets or inputs (or references to where those data sets or inputs can be found) that are necessary to complete the analysis.
- o 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?

Yes,

Response 1a:

Recommend adding respective Peak Load values to stacked-bar capacity charts (Installed Capacity and Accredited Capacity) on Slides 38-41 of the Resource Adequacy Study Workshop deck dated 1/27/26, and to similar charts going forward. The comparison is useful in illustrating the relative capacity levels of various technologies against peak load projections for a reliable portfolio.

EPRI routinely includes Peak Load in their Capacity-by-technology charts of reliable portfolio alternatives. The example below is from EPRI's Analysis of EPA's Proposed New and Existing Source Standards for Power Plants, dated January 26, 2024, Product ID [3002028858](#). Multiple EPRI studies and documents have similar Peak Load vs Generation Capacity charts, including the Zero CO2 Electric Sector Policy & System Reliability report (3002026594, March 2024), the 2022 REGEN Scenarios Analysis (3002024235, December 2022), and the LCRI Net-Zero 2050: U.S. Economy-Wide Deep Decarbonization Scenario Analysis (December 2022).



Response 1b:

Recommend including a 12x24 heat map (example below) of max and average incoming energy flows from the reliability model, by line/source, if possible, for the proposed solution(s). Understanding the timing (breadth) and amount (depth) of the incoming energy flows required to maintain a reliable system will help to quantify and understand the market risk, and potentially indicate which supplemental generation resources may best help mitigate those risks. Even lines designed to import firm baseload power, like NECEC, can fall short of meeting expectations, and, unfortunately, at inopportune times.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	30,371	31,284	54,524	33,528	95,497	113,085	100,855	134,746	100,541	15,739	11,267	39,579
2	37,547	33,384	63,405	43,865	116,996	127,865	105,800	145,719	114,920	20,446	12,087	38,184
3	33,786	28,749	61,881	44,395	115,115	126,703	105,662	146,299	118,638	24,198	10,921	36,529
4	32,802	31,094	63,778	42,773	109,152	120,252	99,239	143,872	118,128	18,881	6,119	36,199
5	27,022	29,584	61,481	36,803	97,398	110,100	94,193	136,397	103,904	11,487	5,628	32,492
6	26,806	31,215	42,378	21,480	80,578	101,318	91,487	130,324	89,322	(1,598)	(3,561)	26,650
7	19,026	28,602	30,668	19,670	75,180	92,263	94,994	129,857	92,766	(3,556)	(16,150)	21,492
8	23,685	40,355	50,345	34,466	83,811	94,716	95,736	134,800	97,518	14,281	(7,751)	22,701
9	40,976	55,197	59,422	39,644	84,894	90,827	98,084	138,203	97,603	23,981	7,991	30,966
10	48,131	53,413	63,154	40,004	82,247	83,124	97,216	135,768	93,981	26,233	14,816	28,850
11	40,855	53,407	67,262	43,096	76,009	78,053	92,370	132,794	85,216	18,115	13,937	28,794
12	33,614	50,112	66,362	39,445	71,054	70,115	81,974	128,367	74,297	12,074	8,236	26,565
13	32,064	44,582	63,659	39,920	68,823	59,861	72,785	125,549	69,079	14,017	3,586	28,302
14	30,018	39,556	61,531	37,147	68,572	53,055	69,885	122,569	65,578	14,374	1,952	26,462
15	29,755	34,404	58,027	32,461	66,188	46,223	63,523	114,551	57,386	11,846	2,897	24,640
16	25,624	31,565	52,340	27,415	59,155	42,262	61,782	103,569	51,595	2,407	2,755	25,751
17	20,997	28,659	42,688	22,032	53,054	37,957	61,036	102,778	49,244	(7,282)	(157)	20,652
18	23,034	28,091	38,165	10,612	52,807	37,915	73,452	109,533	56,205	(6,067)	4,749	25,060
19	32,814	35,978	35,743	2,126	58,250	50,281	93,752	139,980	83,678	1,527	12,023	31,815
20	32,996	38,616	37,430	1,943	69,362	76,145	123,899	162,225	96,239	10,322	13,629	31,510
21	32,583	35,354	45,255	13,654	91,853	92,957	130,614	168,288	96,030	16,472	11,735	28,257
22	29,257	33,645	47,256	20,427	92,399	98,382	131,415	168,049	93,153	15,267	10,448	29,390
23	28,674	31,287	48,645	25,311	88,861	100,051	121,313	151,134	89,222	14,398	9,020	29,013
24	23,969	26,893	47,610	23,545	69,076	89,139	96,595	121,359	81,397	11,726	11,536	29,705

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?

Response: *Ameren is not aware of any new or updated data or information.*

- o If yes, please provide references. (*The Agencies prefer direct links and/or submission of the referenced material.*)
- o 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:

- o What if 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*)

Response: *Per the MISO tariff, Ameren Missouri at minimum would necessitate one-year advanced notice to timely submit the Attachment X or Attachment Y form associated with generation resource retirements. The MISO has 90 days to study the change of status [retirement]. EXAMPLE: Venice units are required to retire by EOD 12/31/2029 due to CEJA, thus notification, at minimum, would be needed by 12/31/2028.*

- o 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*)

Response: *Other factors, including, but not limited to, expanded emission technology or other substantive investments in facility assets would necessitate earlier notification to adequately analyze, plan and make decisions. Earlier and advanced notifications of delaying a facility retirement is unique for each consideration. Notice of delayed retirement three years in advance of retirement date is preferred. Ameren Missouri desires a two-year extension of operations if the IPA/IL EPA delays the current retirement date to continue operation.*

- o 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.

Response: See response in first bullet point related to the MISO Tariff Attachment Y and Attachment X processes.

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.

- o 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?

Response: Ameren is not aware of any additional load growth forecasts and/or sensitivities.

- o 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 detail in addition to those provided in response to questions 1-4, above, to support the development of the Mitigation Plan?

Response: none at this time.

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").

- o 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? Use a single modeling consultant, take advantage of continuity from the RA study into the mitigation plan and IRP, and synchronize the scenarios to be analyzed in the mitigation plan and IRP analyses.
- o Are there any unique considerations which you believe the IPA, IEPA, and ICC must navigate in working to merge these workstreams? Ensure that IRP objectives, scenarios and data sources are defined early to leverage the initial work on the mitigation plan analysis.
- o Would you be supportive of coordinating administrative filings and consolidating plan approval proceedings? **Response: Yes.**