Constellation Response – RA Study Jan 2026 Questions

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?

Constellation has no additional specific analysis, modeling, scenarios, or sensitives that were not completed or incorporated as part of the RA Study process that Constellation did not already include in our February 9, 2026 response to the ICC Request for Comments.

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?

Constellation has no new or updated data or information to provide that was not utilized in the RA Study or was not already recommended for inclusion in our response to the ICC Request for Comments.

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 it 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.

The 2030 initial deadline for CEJA-driven fossil fuel generation facility retirements applies to certain natural gas-fueled facilities, not just to coal. It is unclear why the IPA limits this question to only coal facilities. In fact, per the RA Study's own analysis, there will be more CT retirements than coal retirements in 2030.[1] The Agencies should consider extending the retirement dates of certain gas units, potentially with set run time limits or applying a social cost of carbon to units that operate past the CEJA retirement deadline. This could allow the state to enjoy the benefits of having these gas units available during emergency conditions, without the risk of the units operating as baseload resources, increasing GHG emissions. This provides more time for new resources to come online.

As an example, Constellation recently closed on the acquisition of Calpine, including the combustion turbine peaking plant in Zion, IL. The Zion Energy Center is a relatively new facility, providing around 500 MW of lower carbon natural gas-powered electricity. It is dual-fuel capable, making it more reliable in tough conditions. It can be online within 30 minutes and can start and stop multiple times a day when weak renewable production occurs. This is precisely the type of modern facility that should be considered for the flexibility discussed above.

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

[1] RA Study at 128, Figure 5-11.

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).

Constellation knows of no additional forecasts that should be considered.

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?

Please see Constellation's response to Question 3.

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?

Constellation has no suggestions at this time on how the IPA, IEPA, and ICC can most effectively merge these processes.