

IL Resource Adequacy Study Mitigation Plan Post-Workshop Stakeholder Questions  
Comments of Clean Grid Alliance  
Submitted February 16, 2026

Clean Grid Alliance (“CGA”) submits the following feedback on the Illinois Resource Adequacy Study (“RA Study”), per the January 29<sup>th</sup> Mitigation Plan Workshop and feedback solicitation of the Illinois Agencies (the Illinois Commerce Commission, the Illinois Power Agency, and the Illinois Environmental Protection Agency).

*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?*

**At this time, CGA does not have additional recommendations beyond those from our comments on the IRP Request for Comments #1 issued by the Illinois Commerce Commission (“ICC”) in January.**

*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?*

**CGA encourages the Agencies to review new data and information about resource performance and power prices in the aftermath of Winter Storm Fern.** The storm brought below-freezing temperatures, snow, and ice to much of the U.S. in late January of this year. Preliminary analysis shows that wind, solar, and storage performed well,<sup>1</sup> contributing to lower real-time electricity prices in regions with higher renewable resource penetration.<sup>2</sup> Conversely, PJM experienced natural gas power plant outages that contributed to power price surges up to \$700/MWh during the storm’s peak.<sup>3</sup> The Agencies should investigate the storm’s impact on resource performance and power prices in MISO North-Central and PJM.

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<sup>1</sup> Latitude Media. “Armed with new batteries and winterized plants, ERCOT survives Fern”. (January 27, 2026). Accessed at:

[https://www.latitudemedia.com/news/armed-with-new-batteries-and-winterized-plants-ercot-survives-fern/?\\_cldee=Y0SGB0MYXcGBDZAKmHvtEEt17UVP5eP-xLefmd36epJL\\_tPtVyLFrQ5n\\_GTebX\\_y&recipientid=contact-e5f4597b5f3bf011b4cc6045bdefc57b-35854fef0ee146c98b203acc29daee9d&esid=956c5484-4bfd-f011-8406-7ced8dcb161](https://www.latitudemedia.com/news/armed-with-new-batteries-and-winterized-plants-ercot-survives-fern/?_cldee=Y0SGB0MYXcGBDZAKmHvtEEt17UVP5eP-xLefmd36epJL_tPtVyLFrQ5n_GTebX_y&recipientid=contact-e5f4597b5f3bf011b4cc6045bdefc57b-35854fef0ee146c98b203acc29daee9d&esid=956c5484-4bfd-f011-8406-7ced8dcb161)

<sup>2</sup> American Clean Power Association. “Clean energy saved consumers 2+ billion during Winter Storm Fern”. (February 2026) Accessed at:

[https://cleanpower.org/wp-content/uploads/2026/02/Fern\\_Chart\\_update-1.png](https://cleanpower.org/wp-content/uploads/2026/02/Fern_Chart_update-1.png)

<sup>3</sup> Reuters. “Power plant outages surge in Eastern US amid restricted gas supplies and frigid weather”. (January 26, 2026.) Accessed at:

[https://www.reuters.com/business/energy/power-prices-surge-winter-storm-spikes-demand-us-data-center-alley-2026-01-25/?utm\\_campaign=Newsletter&utm\\_medium=email&hsenc=p2ANqtz-QBRinIkaHI16X6wKsZL-Ho7A-p0Ewyz33RV6fgep4dRHTUjNKphaPBB18FzNMVMMQoqLzDp79JhyABNvi-bMEMNqZw&hsmi=400360088&utm\\_content=400360088&utm\\_source=hs\\_email](https://www.reuters.com/business/energy/power-prices-surge-winter-storm-spikes-demand-us-data-center-alley-2026-01-25/?utm_campaign=Newsletter&utm_medium=email&hsenc=p2ANqtz-QBRinIkaHI16X6wKsZL-Ho7A-p0Ewyz33RV6fgep4dRHTUjNKphaPBB18FzNMVMMQoqLzDp79JhyABNvi-bMEMNqZw&hsmi=400360088&utm_content=400360088&utm_source=hs_email)

*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).*

**CGA advises the Agencies to reevaluate the data center load forecast against the potential for planned load to be served with behind-the-meter-generation (“BTMG”).** In [a February 2026 report](#), the data center tracking firm Cleanview found that 30% of all planned data center capacity in the U.S. will utilize BTMG, including a data center located in Illinois. Most of these data center and BTMG projects involve gas-fired generators and are already under construction, per the report’s analysis of permit documents, site plans, and equipment contracts. The firm further notes this approach is “an increasingly common development strategy.” Thus:

- The Agencies should consider how BTMG for data centers could impact energy and capacity markets and resource needs in Illinois and determine whether a “haircut” to the load forecast based on some percentage of data center BTMG is warranted.
- If a data center load forecast evaluating the impact of BTMG is determined to warrant further study, the Agencies should pair that analysis with the assumption emissions will increase, assuming BTMG will largely be from gas-fired power plants.
- Sensitivities applied to data center load forecasts should be modeled over 5-year horizons to align with timeframes under Section 9.15(o) of the Climate and Equitable Jobs Act (“CEJA”) and by extension, Section 16-201 of the Public Utilities Act.

*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?*

**At this time, CGA does not have additional recommendations beyond those from our comments on the IRP Request for Comments #1 issued by the Illinois Commerce Commission (“ICC”) in January.**

*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?*

**CGA recommends merging the RA Study and Integrated Resource Plan (“IRP”) as much as possible, given there is no statutory deadline associated with the RA Study mitigation plan filing with the ICC.** This gap provides the flexibility for process alignment, enabling the Agencies (i.e., the ICC, the Illinois Power Agency, and the Illinois Environmental Protection Agency) to simultaneously achieve workstream efficiencies and meet desired regulatory outcomes from both Section 9.15(o) of CEJA and Sections 16-201 and 16-202 of the Public Utilities Act per the 2025 Clean and Reliable Grid Affordability Act (“CRGA”). The IRP is meant to ensure Illinois has “sufficient electricity resources to serve Illinois customers in a manner that is adequate, safe, reliable, affordable, efficient, environmentally sustainable, at the lowest cost over time [i.e., the IRP’s 20-year timeframe]”.<sup>4</sup> The IRP should, therefore, supersede the RA Study, which has a more limited scope and which addresses only the ensuing five years.

**CGA recommends the IRP should:**

- (1) Build on the RA Study** with updated and improved model inputs, assumptions, sensitivities, methodologies, and data sources. These modifications to the model inputs, assumptions, sensitivities, methodologies, and data sources of the RA Study should be based on stakeholder feedback submitted in the ICC’s Request for Comments #1 and to this current set of technical questions on the RA Study.
  - (2) Produce a Short-Term Action Plan** spanning the 5 years following implementation of the IRP that the Agencies can simultaneously treat as a “mitigation plan” for the kinds of risks identified in the 2025 RA Study.<sup>5</sup> The Agencies, then, would not need to develop an independent response to the 2025 RA Study findings that would be potentially duplicative of or siloed from any near-term actions identified in the IRP.
- *Are there any unique considerations which you believe the IPA, IEPA, and ICC must navigate in working to merge these workstreams?*

The Agencies will likely have to navigate challenges related to merging results of studies conducted by separate entities if a different consultant is selected for the IRP. CGA believes the best way to address methodological and process discrepancies will be to build on the RA Study

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<sup>4</sup> Public Utilities Act. Section 16-201(b).

<sup>5</sup> Note IL Public Utilities Act. Sections 16-201(f)(3) and (6). The IRP is required to “include a discussion of the steps needed to implement the plan, including, but not limited to, options and steps to bring on new or increased energy generated from any recommended resources for the 5 years after the plan would be implemented ...” (p. 876).

process as we recommend above, and to establish a transparent stakeholder engagement process that incorporates widely recognized best practices, such as those described in the [2024 Lawrence Berkeley National Laboratory and Synapse Energy Economics report on IRP](#).

- *Would you be supportive of coordinating administrative filings and consolidating plan approval proceedings?*

**Per our responses to the first bullet point of Question 6, yes, CGA supports this, and further urges the Agencies to ensure adequate stakeholder participation in any coordinated or consolidated filings and proceedings.** The schedule provided for the “Plan” and “Post-Filing ICC Steps” (see below) per Section 9.15(o) of CEJA could reasonably be replicated for the merged RA Study and IRP process contemplated here. In other words, this schedule could be applied to the submission of the IRP rather than to a stand-alone RA Study mitigation plan, while still satisfying the RA Study mitigation plan submittal process outlined in CEJA.

## 9.15(o) - Schedule



**There are a series of explicit targets and milestones contained within the Statute, establishing the broad schedule for each study cycle.**

This is the “RA Study” discussed herein.

- **Process Cadence:** Every 5 years, starting in 2025
- **Report:** to be issued publicly by December 15<sup>th</sup> of each year (starting Dec. 15, 2025)
  - Issued to the General Assembly
- **Plan:** If the report finds a resource adequacy shortfall a plan to alleviate the shortfall shall be developed, including a stakeholder workshop and stakeholder 60-day comment period, to be filed with the ICC within 30-days following the stakeholder comment period.
- **Post-Filing, ICC Steps:**
  - +60-day period for objections to be filed; followed by
  - +30-day period for ICC to determine if an evidentiary hearing is necessary
  - Within 90-days of plan filing: ICC to also host 3 public hearings
  - If an evidentiary hearing is required, ICC shall enter an order within 180 days

**Source:** Agencies Collaborative, “[RA Study Workshop 1](#)”, slide #10 (June 16, 2025).

CGA concludes our comments and thanks the Agencies for another opportunity to engage.