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?

ComEd Response:

Refer to our responses provided in the ICC Request for Comments (Attachment 1)

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?

ComEd Response:

As noted in our response to the ICC Request for Comments we recommend the following data sources should be used that were not utilized in the RA Study, and we generally encourage the Commission to ensure the costs, benefits, and feasibility of all resources are evaluated.

- Leverage Danovo Energy (formally Quanta Technologies) study transmission data and its "least-regret" transmission project list that was deemed justifiable under all four examined resource portfolios
- MISO and PJM transmission plans
- Leverage RTO/ISO resource assumptions (i.e. PJM ELCC)
- Leverage generator interconnection queues
- Regulated, utility-specific integrated resource plans (IRP) in neighboring states (Iowa, Indiana, Kentucky, Michigan, Missouri, and Wisconsin and possibly Minnesota). These IRPs provide insight into the load growth expectations and each vertically integrated utility's generation expansion plan including anticipated unit retirements in many cases, and which utilities, if any, expect to have surplus capacity in 2030 or 2035.

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) 2026 Illinois Resource Adequacy Mitigation Plan; Post-Workshop Stakeholder Questions; Illinois Power Agency & Illinois Environmental Protection Agency 4
- 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.

ComEd Response:

Recognizing the likelihood of high retirement scenarios coming to fruition due to age of generation assets, public policy activities (including CEJA) and market conditions, commencing in October 2023, PJM and stakeholders, including ComEd, began discussions focused on strengthening Reliability Must Run (RMR) processes to maintain grid stability during the approaching high retirement environment,

Key changes developed included increasing deactivation notice requirements from 3 months to 1 year and establishing frameworks for RMR units to be treated as necessary capacity supplies. Following the stakeholder process, PJM implemented refinements to how RMR units are compensated and modeled in energy and capacity markets, ensuring they remain available during emergencies. RMR units that have announced deactivation but remain in operation can now be counted as a generation supply resource if PJM relies on them for capacity emergencies. Although the reforms aim to address the roughly 40 GW of expected retirements in PJM by 2030, as relates to this inquiry, it is correct to consider that PJM could mandate a facility remain operational for a specified period of time beyond its scheduled retirement date.

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).

ComEd Response:

As noted in our response to the IRP first request for comment, updated load forecasts—such as PJM and MISO projections as well as utility level forecasts that account for large loads identified through cluster studies—should be considered, along with forward-looking

transmission forecasts and generation forecasts that reflect both existing resources and potential expansion under a Renewable Portfolio Standard.

Our recommendation is to also evaluate a range of sensitivities across the demand side. This includes assessing scenarios with significant large load growth including the broader adoption of distributed generation, demand response including large load curtailment, and storage; varying levels of electrification—especially the adoption of heat pumps, which can heavily influence winter peaks; as well as impacts from energy efficiency, demand response, and differing storage cost trajectories.

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?

ComEd Response:

In addition to our responses provided in the ICC Request for Comments (Attachment 1), the IPA might also consider adopting a clean procurement policy that connects REC procurement with generation to better align the State's goals around affordable, reliable, and clean energy.

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?

ComEd Response:

To ensure efficiency and meaningful coordination across agencies, the IPA, IEPA, and ICC should consolidate these planning requirements into a single, unified proceeding, preferably within the Integrated Resource Plan (IRP) framework. Because both the Mitigation Plan under Section 9.15(o) and the CRGA's IRP begin with evaluating statewide energy resource needs and propose solutions across a similar set of options, a merged process would reduce duplicative work, improve transparency, and give stakeholders greater certainty regarding regulatory outcomes.

In merging these processes, it is essential to consider the timing and purpose of *all* related plans, not just the Mitigation Plan. Several other plans are interconnected with resource planning, including the REAP (currently being withdrawn and revised), procurement plans, Multi-Year Grid Plans (MGPs), and Energy Efficiency and Demand-Side Management Plans (EEPS). If the IRP becomes the umbrella framework, each of these plans could serve as specialized components of the broader IRP, for example, transmission planning, demand-side programs, DER support, and procurement needs. This structure would allow agencies to maintain statutory responsibilities while ensuring alignment within one comprehensive planning process.