



CITY WATER, LIGHT AND POWER
CITY OF SPRINGFIELD, ILLINOIS

MISTY BUSCHER, MAYOR
DOUG BROWN, CHIEF UTILITY ENGINEER

February 13, 2026

Acting Director James Jennings, Illinois EPA
Director Brian Granahan, Illinois Power Agency

Re: RA Study Jan2026 Questions Regarding Mitigation Plan

Submitted via email to: IPA.ContactUs@illinois.gov

Director Jennings and Director Granahan:

The City of Springfield, Office of Public Utilities d/b/a City Water, Light and Power (“City” or “CWLP”) respectfully submits the following comments to the Illinois Environmental Protection Agency (“Illinois EPA”) and the Illinois Power Agency (“IPA”) in response to the request for feedback on the Stakeholder Questions released in response to the completion of the Resource Adequacy Study required by Section 9.15(o) of the Environmental Protection Act (“EPAct”) and in preparation for the Mitigation Plan required by the same provision. These comments will address Question 3 under Technical Questions (Mitigation Plan Inputs & Analysis) and Question 6 under Mitigation Plan & IRP Process Alignment.

The City of Springfield, the capital city of Illinois, owns and operates a municipal utility referred to as City Water, Light and Power that provides electric power to approximately 68,000 customer meters that serve the residents and commercial businesses of Springfield and surrounding areas. CWLP also operates a fully integrated supply, purification, transmission and distribution water utility that provides drinking water to 160,000 people in a service area that includes Springfield, the villages of Grandview, Jerome, Leland Grove, Loami, Rochester and Southern View along with the Sugar Creek Public Water District, the Williamsville-Sherman Water Commission, the Round Prairie Water Commission and certain unincorporated areas adjacent to the City. CWLP currently operates one 200MW coal-combustion generation unit, Dallman Unit 4, that utilizes Illinois coal and came online in late 2009. Three older units placed into service in 1968, 1972 and 1978 (Units 31, 32 and 33, respectively) were taken out of service in 2020 and 2021, following the completion of CWLP’s first formal Integrated Resource Plan in recent memory. CWLP also operates three peaking generators, two that are oil-burning and one with dual-fuel operating capabilities, with a combined capacity of 144 MW.

CWLP is registered as a distribution provider, generation operator, generation owner, load serving entity, resource planner, transmission operator, transmission owner, and transmission planner within the North American Electric Reliability Corporation (NERC). CWLP also operates as a local balancing authority within the Midcontinent Independent System Operator (MISO). CWLP is directly interconnected with the Ameren transmission system at six locations. The Ameren Lanesville 345/138 kV substation was completed in December 2004 and interconnects the Commonwealth Edison/PJM 345 kV transmission system to the CWLP 138 kV transmission system. The most recent interconnections with Ameren were completed in June 2009 and include the Interstate – San Jose 138 kV (now Interstate – Shockey) and the Interstate – East Springfield 138 kV (now Interstate – Dirksen). In March 2001, CWLP joined MISO as a transmission owner. CWLP has no interconnections with any other facilities in any other RTOs.

Under “Technical Questions (Mitigation Plan Inputs & Analysis)” Illinois EPA and IPA requested feedback in 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 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)

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)

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.

While CWLP is not impacted by the 2030 date referenced in the question, as one of the few entities in Illinois that 1) has operated and retired coal plants **and** 2) conducts comprehensive resource planning for its customers, CWLP has important insights to inform this inquiry.

First, while the issues with coal plant retirements are unique and merit examination, it is important to note that it is not just coal facilities that are impacted by the 2030 date. That date also begins the retirement deadlines for certain natural gas plants which may create serious reliability concerns during extreme weather periods. The States surrounding Illinois are making efforts to replace their retiring coal fleet with new natural gas plants with modern pollution controls. While in Illinois, the 2045 retirement date for all gas plants (including CWLP's Interstate facility) makes the construction of new facilities larger than 25MW in Illinois economically and practically unfeasible. That is to say that even the 2045 date is setting the stage for continued near term resource inadequacy, even if the 2030 date were adjusted.

With regard to coal plants in particular, in 2018 CWLP began an integrated resource planning process to determine whether to invest in environmental controls at our three aging coal units – Dallman 31, 32 and 33. At the conclusion of that study at that time, it was determined these units were not economical, and the investment in such improvements was not justifiable. The decision was made to retire them on a staggered schedule – Units 31 and 32 by December 31, 2020 and Unit 33 not later than September 15, 2023. In hindsight, many plants were making a similar analysis at that time and choosing to retire their units. By the time Unit 33's retirement date arrived, the economic factors that led to the initial decision had shifted dramatically and the reliability concerns were beginning to reveal themselves. Nevertheless, as the Unit 33 retirement date approached, decisions were made to forego maintenance activities that would be unjustified by the remaining useful life and eventually a large repair was needed that could not be justified by the time left to operate. As retirement deadlines approach, plant owners act rationally. Major maintenance is deferred, large repairs without a clear payback are avoided, and facilities are more likely to permanently shut down at the first significant failure. This means coal plants will retire earlier than planned, reducing available capacity sooner than expected. If the Illinois EPA and IPA have determined that the remaining handful of coal plants impacted by the 2030 deadline may possibly be needed for resource adequacy, the only way to protect against the reality that deferred maintenance and environmental compliance issues will make those retirements inevitable is to send the signal as soon as possible that this will be an option.

From a practical system-planning perspective, it is already too late to make decisions that would allow coal plants to retire by 2030 and be reliably replaced by other resources. At this point (2026), the time needed to permit, finance, build, and place replacement capacity into service has already passed, even under optimistic assumptions. If coal plants retire, they must be replaced by resources that can provide reliable, on-demand power. In practice, that means dispatchable generation such as natural gas or other firm resources. However, those replacements cannot be built in time. New gas-fired generation alone faces 4 to 5 year lead times just for major equipment, not including environmental permitting, siting, financing, interconnection, and construction. Other dispatchable alternatives face equal or greater challenges.

This risk is not theoretical. During real-world system conditions of Winter Storm Fern on January 24 and 25, 2026, the bulk of energy supplied was by dispatchable resources such as natural gas, coal, and nuclear. Wind and solar contributed but did not carry the system during critical peak hours.

Renewable resources depend on weather and time of day, while system reliability during peak and contingency conditions still depends on resources that can be dispatched when needed. Renewables can supplement retiring coal generation, but they are not a replacement unless sufficient dispatchable capacity is already in place, which cannot occur by 2030. While batteries can be a dispatchable resource, they can discharge once before needing to recharge. During Fern, load was high for an extended period of time while MISO called for all available resources and CWLP's peaking units were called upon to operate for extended periods of time that could not have been met by the current battery technology.

Another lesson CWLP learned from the retirement process was that while MISO requires a specific amount of notice prior to a retirement or suspension date to study reliability (currently four quarters or approximately a year), the reliability study they perform is not a resource adequacy analysis by any means. When Unit 33 was placed on forced outage due to a repair that was needed, CWLP was informed by MISO that the fact it had been placed on an extended forced outage meant they streamlined and skipped over even the basic reliability studies that were conducted on Units 31 and 32. So, while the RTO retirement process is an important reliability backstop, it is not a substitute for resource adequacy. It will not address the concern that only Illinois can control which is whether we will have enough energy when we need it without being overly dependent on dirtier out-of-State imports.

Lastly, the environmental upgrades CWLP was evaluating for Units 31, 32 and 33 would have taken multiple years to complete even when CWLP had been in a sustained process of evaluating costs and alternatives. There is no doubt that any Illinois plant not currently preparing to meet post-2028 environmental obligations today, would need to start planning immediately to be able to do so in a responsible manner. If Illinois waits until the last minute and expects facilities to just continue operating, it is setting up an inevitable scenario where they will not be meeting the environmental standards that CWLP has worked to reach for Dallman 4. CWLP is not aware of whether there are merchant coal plants in Illinois that would continue to operate if the 2030 date was lifted, but since most of those plants are subject to 2028 deadlines for environmental compliance and were planning to retire before 2030, it is essential that the Agencies send signals immediately if that option is going to be available.

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?***
- o Are there any unique considerations which you believe the IPA, IEPA, and ICC must navigate in working to merge these workstreams?***
- o Would you be supportive of coordinating administrative filings and consolidating plan approval proceedings?***

CWLP is sympathetic that the Illinois EPA and the IPA are faced with new statutory requirements that in many ways repeat and overlap the existing statutory requirements from Section 9.15(o). However, for the reasons highlighted above, to delay Mitigation Plan Recommendations with regard to the 2030 retirement dates while waiting for the statute to take effect to conduct a full Integrated Resource Plan study and then continuing to wait while that study is conducted and completed before bringing recommendations to the ICC regarding the 2030 deadlines seems like a recipe for failure. The Resource Adequacy Study found a resource adequacy shortfall that is caused in part by thermal retirements. While it also found that delaying thermal retirements alone will not solve the shortfalls long term, the only responsible response to that finding is to plug the hole and prevent the situation from getting worse for those pieces of the problem that are in our control.

CWLP appreciates the opportunity to provide feedback on the Mitigation Plan required by Section 9.15(o) of the Environmental Protection Act. Please reach out to me at deborah.williams@cwlp.com if you have any questions.

Sincerely,

Deborah J. Williams

Deborah J. Williams
Regulatory Affairs Director