



February 16, 2026

Illinois Power Agency
Illinois Environmental Protection Agency

RE: Illinois Farm Bureau Response – RA Study Jan2026 Questions

Illinois Farm Bureau (IFB) appreciates the Illinois Power Agency (IPA) and Illinois Environmental Protection Agency (IEPA) seeking comments to inform the development of the Resource Adequacy (RA) Study Mitigation Plan. IFB supports an Illinois energy policy focused on meeting or exceeding our energy needs by using a blend of renewable and non-renewable sources, considering sound agricultural land use and protection of the environment, and reducing the burdens placed on farmers and ratepayers.

Below are responses from IFB to some of the questions outlined in the Stakeholder Question document. IFB chose not to respond to all questions, so those not included below were intentionally omitted.

Question 1

IFB provided input to the Illinois Commerce Commission (ICC) on their Request for Comments regarding the Integrated Resource Plan (IRP). IFB would ask that the IPA and IEPA take note of the suggestion made in those comments that a study of direct land use requirements for each type of generation potentially added to Illinois' electric grid be completed. The development of new energy generation creates direct land use impacts by removing farmland from agricultural production and shifting it to electricity production. Illinois farmland is a finite resource necessary for providing food and fuel for our state, nation, and the world. The direct land use impact of resource portfolios should be considered to ensure they serve Illinois consumers in an efficient and environmentally sustainable manner by minimizing direct land use from additional resource additions.

Question 6

The legislative language authorizing the RA Study Mitigation Plan emphasizes reducing or delaying emissions reduction deadlines if necessary to meet resource adequacy shortfalls. The language authorizing the IRP emphasizes expansion of existing programs prior to delaying emissions reduction deadlines to meet resource adequacy shortfalls. The IPA, IEPA, and ICC must carefully navigate these differences. The RA Study Mitigation Plan should be completed, or its development carefully timed, so that mitigation recommendations to reduce or delay emission reduction deadlines included in the Mitigation Plan are incorporated into the IRP.

Thank you for your consideration of these comments. Should you have any concerns, please feel free to contact me.

Sincerely,

Bill Bodine
Director of Business and Regulatory Affairs
Illinois Farm Bureau



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