RESPONSES OF THE ILLINOIS MANUFACTURERS' ASSOCIATION

The Illinois Manufacturers' Association ("IMA") submits the following responses to the Illinois Power Agency's Technical Questions regarding development of the Mitigation Plan under Section 9.15(o) of the Illinois Power Agency Act.

IMA represents manufacturers and large energy users across Illinois. For our members, reliable and affordable electric service is foundational. Industrial facilities cannot curtail operations without significant economic harm, supply chain disruption, and workforce impacts. Accordingly, IMA's responses emphasize operational realism, supply adequacy, and near-term reliability mitigation.

Question 1:

Are there specific analyses, modeling, scenarios, or sensitivities that should be considered as part of the Mitigation Plan modeling and analysis?

IMA Response:

Yes. The Mitigation Plan should incorporate modeling assumptions that reflect real-world operational constraints rather than theoretical system equilibrium.

First, modeling should include a supply-aware large load sensitivity. In practice, large-load interconnections do not occur independent of supply conditions. If reserve margins are insufficient, load additions are delayed or staged. Modeling should therefore evaluate both an unconstrained growth scenario and a reserve-margin-contingent growth scenario.

Second, the Plan should include early retirement sensitivities for CEJA-impacted fossil resources, including both coal and natural gas. Retirement risk is influenced by market revenues, compliance costs, workforce considerations, and capital investment requirements. Assuming all resources operate through statutory deadlines without risk understates potential reliability exposure.

Third, reliability modeling must move beyond average metrics and quantify hourly performance and outage duration. The Plan should model multi-hour and multi-day shortfall risk, import limitations during stress events, and correlated forced outages. Duration matters significantly to industrial operations.

Finally, the Plan should evaluate voluntary participation scenarios for customer-sited and self-direct resources, including behind-the-meter storage, on-site generation, and demand flexibility. These resources can provide incremental peak mitigation and localized reliability benefits without full rate-base investment.

Question 2:

Is there new or updated data that should be incorporated into the Mitigation Plan?

IMA Response:

Yes. The Mitigation Plan should incorporate updated PJM and MISO load forecasts reflecting accelerating data center development and electrification trends. Interconnection queue attrition rates, recent forced outage data, updated ELCC values, and evolving federal interconnection policies should also be reflected.

Reserve margin projections have shifted materially in recent planning cycles. The Mitigation Plan must rely on the most current data to ensure accuracy in adequacy assessment.

Question 3:

What considerations affect retirement timing and continued operation of CEJA-impacted resources?

IMA Response:

Continued operation decisions require advance planning. Facilities approaching statutory retirement dates often require 18–24 months of advance notice to support workforce retention, fuel procurement, major maintenance scheduling, and capital investment decisions.

If mitigation relies on extended operation, modeling should recognize realistic operational lead times. Delayed policy decisions may render continued operation infeasible even if statutory relief is later provided.

Additionally, the Agencies should evaluate the feasibility and cost implications of Reliability Must Run designations and ensure that any such mechanisms align with CEJA timelines and customer cost considerations.

Question 4:

Are there additional load growth sensitivities that should be considered?

IMA Response:

Yes. Modeling should evaluate geographic clustering of large loads and associated transmission constraints. Large-load additions frequently occur in discrete increments rather than gradual growth patterns.

Sensitivity cases should include staged interconnection timing, industrial reshoring scenarios, and supply-aware interconnection limitations tied to reserve margins. Modeling should also assess whether localized customer-sited deployments can offset clustering impacts.

Question 5:

Are there additional reliability considerations the Agencies should address?

IMA Response:

Yes. The Plan should distinguish clearly between dispatchable and non-dispatchable capacity contributions and evaluate inverter-based resource performance under disturbance conditions.

The Agencies should quantify outage hours, duration risk, and estimated economic disruption exposure. Reliability must function as a threshold requirement. Mitigation resources must close firm reliability gaps for the full duration of potential stress events.

Affordability analysis should reflect total system cost impacts, including ratepayer exposure associated with emergency procurement, accelerated buildouts, or extended resource operation.

Question 6:

How should the Mitigation Plan be coordinated with the Integrated Resource Plan (IRP)?

IMA Response:

While the Mitigation Plan addresses near-term reliability and the IRP addresses longer-term planning, coordination is appropriate to ensure consistent baseline inputs.

IMA recommends establishing common datasets across proceedings, avoiding duplicative modeling assumptions, and harmonizing customer participation frameworks where applicable. However, mitigation measures necessary to address near-term adequacy risk should not be delayed pending full IRP completion.

IMA respectfully submits that reliability and resource adequacy are threshold requirements; demand growth must be modeled in a supply-aware framework; early retirement risk must be incorporated; duration-based reliability metrics are essential; and voluntary customer participation mechanisms can complement system reliability efforts.

IMA appreciates the opportunity to provide these responses and looks forward to continued engagement as the Mitigation Plan develops.