2026 Illinois Resource Adequacy Mitigation Plan
Post-Workshop Stakeholder Questions &
Nicor Gas Company Responses

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Introduction

Northern Illinois Gas Company d/b/a Nicor Gas Company ("Nicor Gas" or the "Company") appreciates the opportunity to submit responses to the 2026 Illinois Resource Adequacy Mitigation Plan Post-Workshop Stakeholder Questions. While Nicor Gas supports consolidating the Mitigation Plan and the Integrated Resource Plan ("IRP") proceedings for administrative economy as discussed below, the Commission-created Future of Gas ("FOG") proceeding should also be re-evaluated and paused until the Mitigation Plan and IRPs are fully developed and approved. Any proposed legislative solutions or policy recommendations emanating from the FOG proceeding must, at a minimum, take into account and be informed by the approved-Mitigation Plan and IRP. Doing so avoids placing additional (and unnecessary) stress on an already constrained electric grid, streamlines the Mitigation Plan, IRP, and FOG processes, improves the quality and feasibility of the recommendations emerging from the FOG proceeding, and maintains affordability and reliability for customers as longer-term solutions to the resource adequacy challenges are developed and implemented.

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?

Response: Other than the proposals set forth in Nicor Gas' Responses to the ICC's Request for Comments, which are incorporated herein by reference, Nicor Gas has nothing additional to offer at this time.

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?

Response: Other than the proposals set forth in Nicor Gas' Responses to the ICC's Request for Comments, which are incorporated herein by reference, Nicor Gas has nothing additional to offer at this time.

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*)
- 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.

Response: This question is inapplicable to Nicor Gas as it does not own/operate coal generation.

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).

Response:

- As noted in the Resource Adequacy Study ("RA Study"), the load forecasts used in the RA Study "represent lower amounts of data center loads than the total estimates published by either PJM or MISO" and that "total data center loads could also be higher than the trajectories assumed in this report."[1]

- The Agencies should consider more than one data center load forecast scenario. Instead of simply relying on the "lower amounts of data center load" as the RA Study did, the Agencies should model low, medium, and high data center load projections, especially since data centers are "the primary driver of load growth in the latest forecasts from utilities and the RTOs" according to the RA Study.[2]

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?

Response:

- The RA Study makes clear that absent new generation development or increased imports, "neither the ComEd zone nor MISO LRZ 4 zone currently has sufficient in-state and planned resources to reliably meet 2030 requirements under several potential scenarios."[3] However, there appears to be a growing disconnect between the findings of the RA Study and the direction of certain policy proposals being advanced by the Commission in parallel proceedings—most notably within the FOG stakeholder process.

- While the RA Study and associated Mitigation Plan focus on addressing anticipated electric capacity shortfalls and grid reliability risks, certain FOG stakeholders have advocated for proposals and policies that would significantly increase electric load,

[1] Illinois Commerce Commission, Illinois Power Agency & Illinois Environmental Protection Agency, 2025 Resource Adequacy Study, 178 (Dec. 15, 2025), https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/ 20251215-illinois-ra-study-2025-final.pdf.

[2] *Id*. at vi.

[3] *Id*.at 180.

including mandated electrification, electrification incentives without hybrid options, and the elimination of natural gas main and service line extensions. Advancing such policies in the face of documented electric resource adequacy shortfalls risks exacerbating the very reliability challenges the Mitigation Plan is intended to address. Electrifying end uses such as home heating, water heating and cooking that are currently served reliably and affordably by the natural gas system would further strain the electric grid and could substantially increase costs for customers (among other adverse consequences).

- Therefore, the Mitigation Plan should explicitly recognize these reliability constraints and include a pause or reassessment of policies or ongoing discussions related thereto that would accelerate electric load growth without regard to grid readiness. This includes pausing stretch energy codes, "beneficial electrification" programs that do not allow for hybrid solutions, and line extension policies that eliminate line extension assistance for new gas customers. Such measures would help ensure that Illinois avoids placing additional stress on the electric system while maintaining affordability and reliability for customers as longer-term solutions to resource adequacy challenges are developed.

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?

Response:

- The Mitigation Plan and the IRP proceedings are ripe for synergies given that both address very similar (often overlapping) subject matter and both necessitate similar evaluations before the same forum (e.g., both focus on identifying key resource adequacy challenges and prospective solutions to those challenges). Thus, consolidation makes substantive, procedural, and practical sense.

- Not only that, the Commission should re-evaluate the ongoing FOG proceeding, including whether it remains necessary or should be temporarily paused, until after the Mitigation Plan and IRP are fully developed and approved. Since the inception of the FOG proceeding, Nicor Gas has repeatedly urged the Commission to develop an analysis of Illinois' current and foreseeable energy needs so that stakeholder discussions concerning decarbonization of the gas distribution system were informed by and rooted in empirical data rather than unfounded, speculative assumptions.[4] The RA Study – i.e., the impetus for the Mitigation Plan and IRP proceedings – provides the kind of objective, baseline analysis that the FOG proceeding has lacked from inception.

- Pausing and re-evaluating the FOG proceeding until the final approval of the Mitigation Plan and IRP will facilitate more informed and realistic discussions about the feasibility, affordability, and impacts of decarbonizing the gas system. Once there is approval of a Mitigation Plan and IRP, decarbonization opportunities can be meaningfully evaluated – not in a vacuum – but in the context of Illinois' actual and foreseeable energy landscape, including the electric resource adequacy and electric grid reliability challenges discussed in the RA Study.

- Consolidating the Mitigation Plan and IRP proceedings and pausing the FOG proceeding will ensure all interested stakeholders are reasonably informed and notified of various developments and deadlines (e.g., stakeholder workshops, filing of comments, etc.) as part of one consolidated process rather than holding separate, piecemeal workshops and requiring the submission of separate comments that elicit duplicative or overlapping feedback with different deadlines.

- Nicor Gas' proposal also aligns with recent recommendations from the National Association of Regulatory Utility Commissioners ("NARUC"). Given that "the electric industry is more reliant than ever on the gas industry to fuel electricity generation," NARUC urged state utility regulators and system planners "to better align the gas and electric industries to maintain and improve the reliability of gas and electric energy systems on which our nation depends."[5] This is particularly true in Illinois where, in 2024, 20.5% of total natural gas deliveries were used to support electricity generation.[6] As a result, NARUC emphasized that "the need for harmonization [between the electric and natural gas sectors] is crucial, regardless of one's long-term perspective about future energy policy…."[7] Similarly, the National Petroleum Council (NPC), which is

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[4] *See, e.g.,* Nicor Gas Comments to FOG Workshops Phase 1, Workshop #2 (Apr. 8, 2024), https://icc.illinois.gov/api/web-management/documents/downloads/public/future-of-gas/Nicor%20Gas%20Comments%20Workshop%20April%208%202024%20Meeting.pdf; Nicor Gas Comments to FOG Workshop Phase 1, Workshop #3 (Apr. 22, 2024), https://icc.illinois.gov/api/web-management/documents/downloads/public/future-of-gas/Phase%201_April-22-2024%20Meeting_Comments%20from%20Nicor%20Gas.pdf; Nicor Gas Comments to FOG Workshops Phase 1, Workshop #4 (Apr. 29, 2024), https://icc.illinois.gov/api/web-management/documents/downloads/public/future-of-gas/Phase%201_April-29-2024%20Meeting_Comments%20from%20Nicor%20Gas.pdf.

[5] National Association of Regulatory Utility Commissioners Task Force on Gas-Electric Alignment for Reliability (GEAR), *Report and Recommendations*, 1, 31 (Nov. 2025), https://bit.ly/GEARFinal.

[6] *See N. Ill. Gas Co. d/b/a Nicor Gas Co.*, Docket No. 26-0099, Direct Testimony of Mark Pruitt (Jan. 9, 2026), 8-9 Nicor Gas Ex. 3.0. In northern Illinois alone, 40.1% of all utility-scale nameplate electricity generating capacity in 2024 was natural gas fueled. *Id*. at 9.

[7] *Id.* at 7.

chartered by the United States Secretary of Energy under the Federal Advisory Committee Act of 1972, forewarned that "[t]he reliability of the United States energy system increasingly depends on effective coordination between the natural gas and electric sectors."[8] Among other recommendations, NPC advocated for the development of comprehensive long-term planning that "considers gas-electric interdependencies to optimize reliability and cost for customers" and "supports a healthy alignment between the natural gas and electric sectors."[9] Consolidating overlapping Mitigation Plan and IRP proceedings and pausing the FOG proceeding until after the approval of the Mitigation Plan and IRP respects the deepening interdependence between the gas and electric systems and avoids the risks and consequences of misalignment (e.g., affordability and reliability) that both NARUC and the NPC have publicly warned about.

[8] National Petroleum Council, Reliability Energy: Delivering on the Promise of Gas-Electric Coordination, 10 (Dec. 3, 2025), https://gas-electric.npc.org/files/2025_Reliable_Energy.pdf.
[9] *Id*. at 130