

IPA/IEPA Post-Workshop Stakeholder Questions – *SOO GREEN HVDC LINK RESPONSES*

Stakeholder Question Issuance: January 30, 2026

Stakeholder Responses: Due to IPA by Feb 16, 2026 by 5:00 p.m. CPT

All responses are to be submitted to the IPA at: IPA.ContactUS@illinois.gov

Responses shall include the following header in the email “subject” line:

SOO GREEN HVDC LINK PROJECTCO LLC Response - RA Study Jan2026 Questions

Confidentiality: Any written responses, data, attachments or other information submitted by stakeholders that is confidential must be labeled as such.

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. o If modeling, scenarios or sensitivities were not recommended as part of the ICC Request for Comments process, please explain why

1. As pertains to the assessment of additional transmission infrastructure for the purpose of expanding access to a more diverse mix of generation resources, SOO Green believes that rigorous and holistic analysis should be part of the evaluation of options and their specific contributions.

A. Modelling to assess and optimize mitigation plans to address the risk of resource adequacy shortfalls should include:

- *Both power flow and power market modelling and simulations. Power flow modelling should be conducted to assess project contributions to enhancing overall grid reliability, ensuring access to a wider and more diverse cohort of generation capacity sources, and impact on grid congestion. Included in this should be an understanding of the effects of incremental inter-regional power flows across the MISO-PJM seam as such flows could strengthen the overall effectiveness of both markets in different ways.*
- *Market modelling should be conducted to assess the impact that individual projects and their associated capacity and energy contributions could have on electricity pricing for consumers. A key output of analysis will be minimization of financial burdens on Illinois rate payers. Although investing in the system to ensure resource adequacy has a cost and that point should not be ignored, all parties should acknowledge that the best solutions for Illinois will address improved system reliability, reduce inefficiency cost (like from transmission congestion), greater access to more diverse (in terms of type of asset and geography) capacity resources, increase ability to enable other State benefits (such*

as economic development, social justice benefits, enabling CEJA compliance, etc.), AND delivery of best cost-benefit impact in a balanced approach.

- B. See response 4 below. Modeling and analysis needs to take into account the impacts on Illinois that are influenced by actions all across both PJM and MISO. Market pricing, resource adequacy, and system stability/reliability should be considered on an RTO-wide basis to see the full effect on Illinois.*

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?

- 2. Given the long lead times for new projects (siting, permitting, regulatory, PJM/MISO interconnection, etc.) and the extended procurement lead times today on power equipment of all types, there are needs in the State that must be fulfilled in the 2030-2033 timeframe which likely are already at high risk to not get built in time. Having acknowledged in the RA study that short falls and system reliability challenges are already likely to occur after 2030, all of the State agencies involved need to invoke a “time is of the essence” mind set when it comes to the studying and selection of project options for implementation. If the mitigation plan process can be conducted faster and can lead to actionable outcomes at the soonest possible point in time, then we would recommend proceeding with that. All of the outputs from the resource adequacy study process and the development of mitigation plans can serve as inputs to the IRP.*

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 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).
- 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.

3. *In addition to the inputs you are requesting from the fossil fueled plant community, you should also take realistic note of the actual ability of replacement renewable resources to meet future needs. Certain discount factors should be applied to account for permitting and execution delays; and the full cost impact including the costs and implementation challenges of building new transmission to connect those resources to the grid also needs to be considered. We believe that it is also advisable to recognize the value of geographic diversity when it comes to increasing dependence on weather-affected generation sources. You do not want a future situation where over-reliance on weather-affected generation resources all built in one or two micro-climates or regions can seriously degrade your resource adequacy strategies. In summary portfolio diversity (both in terms of generation types and geography) needs to be a core component of Illinois' resource adequacy strategy.*

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 PJM's 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).

4. *Power grids and energy & capacity markets are all interconnected. Instantaneous nature of electricity generation (supply) and consumption (demand) means that causes all around Illinois (all across PJM and throughout MISO) have implications IN Illinois. The modelling and analysis (especially when it comes to market effects) needs to cover a broad enough area so all the material interdependencies that will impact Illinois are taken into account. Of course, this adds complexity but if you do not do this, you will likely mis-read the needs and timing for specific actions & projects that will be needed. It is also advisable to account for the execution risk factors associated with some of the large programs (like MISO's MVP 1 and 2 projects, both the timing and actual feasibility for these to proceed at all). Once again, over-reliance on individual IRP Tx portfolios from RTOs in their early stages and the positive effect they may have on your ability to mitigate future resource adequacy risk, could result in a misleading view of the future network*

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?

5. *We have noticed a tendency to always shade study and modelling assumptions to the most conservative perspectives which typically lead to "rose colored glasses" conclusions or at the very least minimize the need for decisive action. In part, this behavior has led to a reactive, defensive, and last-minute operating behavior that usually results in ineffective and costly scrambling to avoid*

catastrophic problems. We would advocate for a simulation and modeling/analysis philosophy that considers a range of assumptions. For example, on the topic of load growth, you should consider adopting 3 cases for analysis of impacts: High Case (100% of all proposed data centers go into service); Medium Case (50% of data centers go into service); Low Case (25% of proposed data centers go into service), but also keep in mind that it is high likely that if data centers do not follow through on proposed plans to build in Illinois, they will likely build those same data centers in adjacent states (Indiana, Ohio, Iowa, Wisconsin, Missouri). In those cases, there will still be a market/system reliability & adequacy impact on Illinois.

In addition to the “face value” costs and benefits of different alternatives, we believe that you should also be considering the specific execution risks and details of each development project option under consideration. Siting & permitting risk, eminent domain risk, supply chain considerations, schedule & construction risk, etc. are all factors that can discount your ability to count on an individual project’s ability to actually deliver the expected results when you need them. All of this is important when you evaluate options and prioritize projects that give the best combination of certainty of delivery and cost/benefit.

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?
6. *In order to optimize the use of information being collected across several discrete programs and workstreams, we would suggest the following:*
- A. *Use a common project template (adjusted for specific project types...generation vs transmission vs demand response vs energy storage, etc.) across all the different agencies and programs (i.e. REAP recommended project process, IRP, RA analyses, etc.). In this way, project recommendations can be used interchangeably across the different programs.*
 - B. *Standardize the evaluation methods used across different programs, but tailor evaluation methods by project type (adjusted for specific project types...generation vs transmission vs demand response vs energy storage, etc.) so, you can pick up the nuances of the different asset classes appropriately.*
 - C. *Evaluate specific project types holistically. For example, generation projects should include in their evaluation the costs, risks, schedule impacts of not only the generation asset itself, but also the transmission investments/projects required to optimally connect it to the grid. Transmission projects should be assessed not only for the costs and risks of the asset but also the attendant*

system and market impacts for enabling the connectivity of a wider & more diverse set of generation resources.

- D. All evaluations should also include consideration of the enabling activities (ability to obtain site control, permitting risk, eminent domain delay/cost risk, supply chain delays, status of design (for cost certainty reasons) which will impact your ability to count on the on time/on budget promises of each specific project.*
- E. Consider evaluation criteria that also assesses the benefits to reliability and supply risk mitigation that come from ensuring a geographically diverse set of generation resources (for example, as stated in Item3, an over-reliance of weather-dependent resources from within one region or micro-climate zone would not be considered prudent portfolio risk management).*
- F. Additional value should be ascribed to assets/projects/resources that have the flexibility to serve as part of a State-directed contract arrangement between project and large load consumer (i.e. data center).*
- G. Consideration of the Socio-Economic benefits associated with projects such as downstream benefits of attracting new manufacturing and other industries as a result of increased reliability, resiliency, and affordability of clean power.*
- H. We would be supportive of coordinating administrative filings across the various agencies who have work streams or programs in order to support the evaluation and consideration of certain projects in parallel.*