Vistra Corp.'s Comments in Response to the IPA-IEPA Post-Workshop Resource Adequacy Study/Mitigation Plan Questions

Vistra Corp. (Vistra) is responding to the Illinois Power Agency (IPA) and Illinois Environmental Protection Agency (IEPA) Resource Adequacy Study (RAS)/Mitigation Plan (MP) Post-Workshop Questions. Given the substantial commonality and overlap between the RAS/MP process and ICC Staff's Integrated Resource Planning (IRP) process, Vistra is submitting, in response to the Post-Workshop Questions, its Comments dated February 9, 2026 submitted in response to the IPA-IEPA First Request for Comments (FRC). As with the IRP FRC, Vistra's Comments in response to the Post-Workshop Questions are based on consideration of both questions posed in the Post-Workshop Questions and Vistra's response to the IRP FRC.

For emphasis, Vistra highlights the following points. As stated in Vistra's IRP FRC Comments, the two most important scenario drivers in developing an IRP for Illinois, and therefore in developing RAS Mitigation Plans, are the disposition of fossil-fueled generation (in particular, natural gas-fueled) in Illinois, and load forecasts, i.e., projections of future demand on Illinois' energy resources. Illinois' natural gas-fueled generation fleet comprises resources that are already in place (with capital costs, for the most part, paid for years ago), flexible and dispatchable in response to load shifts and peak demands (unlike intermittent resources), and, more generally, capable of meeting both peak-period demand and energy needs in the event of higher-than-projected system load. Therefore, delay in CEJA-mandated retirement dates (to 2035 or beyond as needed) for these units, along with delay in implementation and/or modification of CEJA-mandated emissions limits, should be treated as a foundational block in the Mitigation Plan scenarios under analysis and, ultimately, in adoption of a Mitigation Plan to avoid a resource shortfall.

The addition of more intermittent renewable generation, energy storage projects, or various demand/customer-side solutions do not provide the same ability to address a resource adequacy shortfall as does utilization of the existing natural gas-fueled generation fleet, and in addition they have historically required ratepayer funded subsidies to support development. Modeling for development of a Mitigation Plan should include measuring the reduction in the potential resource shortfall by various combinations of delays in CEJA-mandated fossil-fueled unit retirements and CEJA-mandated emissions limitations.

With respect to load forecasts, Vistra expressed its opinion in its IRP FRC response that forecasts of substantial data center-driven load increases in the near term, followed by a longer subsequent period with much lower load growth, may be unrealistic given the development processes (and hurdles) for data centers. Vistra believes modeling to develop a Mitigation Plan should include multiple scenarios of load growth in varying configurations over an extended period. Among other things, such analyses will help evaluate the flexibility of various resource types to respond to unanticipated levels of load.

Finally, as an administrative matter and for efficiency, in response to Post-Workshop

Question 6, Vistra would not object to coordinating administrative filings and consolidating plan approval proceedings, i.e, the RAS/MP proceeding with the IRP proceeding.

These Comments are provided by:

Arnie Quinn, Senior Vice President, Regulatory Policy
Vistra Corp.
Arnie.Quinn@vistracorp.com

Kristina Montgomery, Senior Director, State and Regional Policy Engagement
Vistra Corp.
Kristina.montgomery@vistracorp.com