

IPA Integrated Resource Planning Workshop #1: Scenarios

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Question 1

Do the proposed scenarios reflect a reasonable range of the most impactful and most uncertain drivers? If not, what key drivers or assumptions should be added, removed, or modified?

The proposed scenarios address a reasonable range of supply, demand, and policy variables. We do not take issue with the overall framework. However, one category of driver is absent from all proposed scenarios and sensitivities: workforce pipeline supply as a constraint on clean energy development timelines. The IRP scenarios require building significant volumes of solar installations, energy efficiency upgrades, and HVAC infrastructure in Illinois by specific years. The model selects those resources based on cost, policy, and interconnection assumptions. It does not include any input for whether enough trained workers are available to execute those timelines. The model assumes the workforce exists. That assumption has not been tested. The 2025 Illinois Resource Adequacy Study, which forms the foundation for this IRP, identifies development timeline risk as a material factor in resource adequacy outcomes. The study notes that new clean energy resources typically take five to seven years to develop. It also finds that under scenarios with development delays, electricity shortfall risks arrive sooner and grow more severe. Workforce availability is a component of those development timelines and belongs in the framework. E3 conducted a study for Virginia's Joint Legislative Audit and Review Commission in December 2024 examining data center grid impacts. That study identified development capacity constraints, of which workforce is a component, as a material factor affecting buildout timelines. We request that the same analytical standard be applied in Illinois. Additionally, CRGA Sections 16-201 and 16-202 establish evaluation of equity impacts and opportunities as one of six mandatory IRP planning elements. At Workshop 1, this requirement was presented on a slide and not discussed further. No scenario driver, sensitivity, or data source was proposed to operationalize it. A statutory requirement that produces no modeling input has not been satisfied. We request that the Agencies specify how this requirement will be addressed and what data will be used to measure it. We are submitting these comments on behalf of the CEJA Workforce Development Hub, Joliet Junior College Region, one of sixteen regional hubs established under the Climate and Equitable Jobs Act. Our hub serves Will County and the surrounding Chicagoland area and trains workers for solar installation, energy efficiency, HVAC and electric vehicle technology, and advanced manufacturing. As of DCEO's April 1, 2026 Annual Report, the Illinois Clean Jobs Workforce Network Program has produced 745 cumulative graduates, engaged 96 employer partners statewide, and achieved an average starting wage of \$22 per hour for placed graduates. This is the workforce pipeline the IRP's buildout scenarios depend on. It is not currently an input to the model.

Question 2

Are there additional scenarios that should be considered to better capture plausible future outcomes? If so, which of the current proposed scenarios would you remove? If so, which of the current proposed scenarios would you remove?

We are not recommending removing any of the proposed scenarios. All of them address meaningful and distinct planning questions, and removing any would reduce the range of futures the IRP is able to evaluate. We recommend supplementing the existing framework rather than replacing it. The one additional scenario consideration we raise is related to the equity requirement under CRGA Sections 16-201 and 16-202. The IRP is legally required to evaluate equity impacts and opportunities. None of the current scenarios tests what happens to development cost, timeline, and community outcomes at different levels of Equity Eligible Contractor participation in the clean energy buildout. An Equity Eligible Contractor is a business that has met CEJA's labor and equity standards and qualifies for preferential treatment in clean energy procurement. CRGA directs \$7 million per year specifically to support EEC participation. A scenario or sensitivity that varies EEC participation rates would allow the Agencies to evaluate whether that investment is sufficient to produce meaningful equity outcomes at the buildout scale the IRP requires, and what the cost and timeline differences look like at different participation levels. We present this in more detail in our sensitivity proposals.

Question 3

What data sources, studies, or inputs should be used to inform key scenario parameters?

We recommend three public data sources directly relevant to the workforce pipeline and equity gaps identified above.

1. DCEO Illinois Clean Jobs Workforce Network Program Annual Report, April 1, 2026.

This document provides cumulative graduate counts by region and training track, 96 named employer partners across 16 regions, an average starting wage of \$22 per hour for placed graduates, 76 days average time from graduation to employment, and demographic breakdowns showing that approximately 79 percent of 2025 applicants across the statewide network came from Environmental Justice Communities or R3 areas (40 percent from communities designated as both EJC and R3, 31 percent from R3-only communities, and 8 percent from EJC-only communities). This is the supply-side data for the clean energy workforce pipeline in Illinois. At Workshop 1, E3 stated that the IRP relies on public data sources for transparency. This document meets that standard and has not been referenced in any workshop material.

Source: dceo.illinois.gov/ceja.html

2. IPA Energy Workforce Equity Portal.

The IPA's own portal lists registered Equity Eligible Contractors by region and trade. This data maps directly to the geographic zones used in both the IRP and the REAP and represents the contractor pipeline through which CEJA's buildout requirements are intended to flow.

Source: energyequity.illinois.gov

3. Illinois Executive Order 2026-01, signed February 18, 2026.

Governor Pritzker's Executive Order 2026-01, signed February 18, 2026, is primarily focused on accelerating nuclear power development in Illinois. However, it establishes a direct precedent relevant to this comment. Section XI directs DCEO to assess workforce needs for new nuclear facilities, and Section VI states that information gathered through this process ""shall be included in the deliberations for the IRP process required under CRGA."" This establishes that DCEO workforce assessments belong in IRP deliberations. We request that the same integration apply to DCEO's existing Illinois Clean Jobs Workforce Network data for the clean energy workforce pipeline.

Source: illinois.gov/government/executive-orders/executive-order.executive-order-2026-01.2026.html

Question 4

Do these load scenarios capture a reasonable range of the most impactful drivers? If not, what specific drivers of load are missing?

The three load scenarios provide a reasonable range for the primary drivers of load uncertainty. The treatment of data center growth as the dominant variable in the high load scenario is well-supported by the Resource Adequacy Study findings, and the methodology for distinguishing near-term confirmed projects from projected growth rates is sound. We offer one observation. The high load scenario is built around data center construction in the ComEd zone. Data center operations do not create employment in the solar, energy efficiency, or HVAC trades the hub network trains for. Data center construction does, through the solar installations, energy efficiency upgrades, and HVAC infrastructure required to power those facilities. The load scenarios correctly model the demand side of this dynamic. The supply side of the labor market needed to execute that buildout is not modeled in the current framework. We raise this not as a missing load driver but as a supply-side workforce variable that the load scenario design makes visible. The higher the load scenario, the faster the required buildout pace, and the more directly workforce pipeline capacity becomes a constraint on whether that buildout can happen on the timelines the model assumes. Under the high load scenario in particular, workforce pipeline capacity would face its greatest test. That test is not currently in the model.

Question 5

For this study, sensitivities are defined as changes to a single input or assumption within a given scenario. Please suggest 1-3 sensitivities that you believe are particularly valuable to test. For each sensitivity include:

-Which input should be varied (resource cost, interconnection timelines, etc.)

-What scenario the sensitivity should be applied to

We propose three sensitivities applied to the Base Case scenario.

Sensitivity 1: Development timeline delay of 12 to 18 months. Variable: earliest online dates for solar, energy efficiency, and HVAC projects in the ComEd zone and MISO LRZ 4. Change: push dates back 12 to 18 months from model-assumed timelines. The 2025 RA Study identifies development delays as a material risk to resource adequacy outcomes (Section 1.3). LBNL's Queued Up 2024 Edition documents that interconnection wait times grew from under 2 years (2000-2007) to a median of 5 years for projects built in 2023, with only 19% of projects entering queues from 2000-2018 ever built (RA Study, Section 1.2, p. iv, footnote 2). LBNL identifies interconnection backlogs, transmission upgrade costs, and regulatory processes as primary constraints. We submit that workforce availability is an additional component of development capacity not yet reflected in the IRP framework. This sensitivity would show how the resource adequacy picture changes if construction timelines slip due to workforce supply constraints.

Sensitivity 2: Energy efficiency program achievement at 100%, 75%, and 50% of targets. Variable: MWh savings from CRGA-required utility energy efficiency programs effective June 1, 2026. The IRP load forecast assumes these programs hit their targets. Delivering them requires certified energy auditors, weatherization technicians, and HVAC installers — roles trained across the Illinois Clean Jobs Workforce Network. If the pipeline cannot produce graduates at the rate those programs require, savings fall short and the load forecast is overstated. This sensitivity makes that risk visible before the plan is finalized.

Sensitivity 3: Equity Eligible Contractor participation at low, medium, and high levels. Variable: share of clean energy contracts awarded to Equity Eligible Contractors (EECs). CRGA directs \$7 million per year to EEC support and requires the IRP to evaluate equity impacts and opportunities under Sections 16-201 and 16-202. No scenario or metric has been proposed to operationalize this requirement. This sensitivity would test what different EEC participation levels look like in cost and timeline terms, show whether the \$7 million investment is sized appropriately for the buildout the IRP requires, and convert a legal obligation into a measurable outcome in the plan.

Question 6

Are you interested in being added to our distribution list to be kept up-to-date on news and important information related to the IRP? If so, please provide your contact information in the following section.

Yes