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?

As noted on Slide 8 of the April 7, 2026, presentation, the Mitigation Plan is to focus on "addressing reliability risks with practical strategies focused on 2026-2035"", while the Integrated Resource Plan is to focus on "resource planning for the evolution of the Illinois electric system from today through 2045". The following recommendations relate to both the near- and longer-term aspects of the scenarios presented to stakeholders for comments.

The presentation identified both near-term and longer-term drivers. Given the near-term potential for capacity shortages in Illinois, near-term drivers are more relevant and should be prioritized in the planning process. On this point, CGA offers the following feedback:

The modeling plan fails to consider two (2) potential key supply-side drivers: early exit of fossil-fueled power plants, and delayed deployments of new capacity resources of all types in Illinois. As noted in the Chicago Tribune's editorial of February 17, 2025, at least one peaking natural gas power plant representing over 1 gigawatt (GW) of capacity is scheduled to exit the northern Illinois market before the step down in emissions required by CRGA. Alone, this represents a material change in the outlook for available capacity in Illinois. If similar steps were to be taken at other plants, the impact would be severely negative to resource adequacy. Thus, any other similar planned actions should be considered in modeling. The IRP should also add a scenario that considers extended, increased gas construction, fuel, and transmission costs, due to factors like turbine scarcity driving up procurement costs, increased fuel costs due to market volatility, and pipeline upgrade/reservation costs.

Additionally, changes in federal energy policy coupled with the ongoing interconnection delays and the regular pace of energy project development all continue to challenge rapid deployment of new capacity resources in Illinois. As such, the current energy project development environment is another impactful and uncertain driver that should be reflected in the scenarios.

Based on the above, CGA strongly recommends that the scenarios be recalibrated to consider the potential impacts of early capacity exits and delays to new capacity deployments in the near-term. Understanding the scale of these challenges is needed to identify the urgent action that is needed to accelerate the deployment of new capacity from clean energy sources such as wind, solar and battery energy storage.

For the long-term drivers, CGA supports the addition of a technology driver scenario that evaluates advanced long duration storage or other clean-firm resources coming online sooner than other proposed technologies identified in slides 26 and 27 of the April 7, 2026 presentation. DOE data from the Pathways to Commercial Liftoff: Long Duration Energy Storage report (2003, p. 17) shows that multi-day storage will comprise at least 28-35% of total U.S. storage needs between 2030-2050, so modeling should match a similar trajectory for the IRP period. CGA also supports reinstatement of federal tax incentives for renewable energy by 2030.

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?

CGA appreciates that the number of scenarios in the portfolio must remain manageable.

Page 23 of the presentation identified three load forecast cases (Low, Base, and High Cases). However, the portfolio does not include scenarios that contemplate a "low" case for generating capacity. Based on recent developments with specific capacity resources and the ongoing conditions in the development sector, CGA recommends that one or more "Supply Constrained" scenarios be included in the portfolio which represent the market conditions identified above in CGA's response to item 1 above.

Also, CGA supports the addition of a technology driver scenario that specifically evaluates advanced long duration storage or other clean-firm resources coming online sooner than other proposed technologies, and more aggressively than assumed in the proposed scenarios. For instance, Form Energy's commercial projects for long-duration iron-air batteries now surpassed 75 GWh (30 GWh agreement with Xcel Energy to help power a new Google data center, 12 GWh agreement with Crusoe to support the buildout of AI infrastructure, 1 GWh agreement with FuturEnergy Ireland). Clearly, long duration batteries are commercially viable and available and should be prioritized as a near term solution for Illinois' capacity needs.

Question 3

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

Many of the data sources identified in the presentation are public in nature and therefore accessible to all parties. However, CGA requests that assumptions and data sets used in scenario development and analyses be made available to stakeholders in a timely manner. Specifically, the CGA requests that initial assumptions and data sets be posted no later than May 1, 2026, and then updated no less frequently than every two (2) weeks until a final report has been completed. This regular refreshing of assumptions and data sets will enable stakeholders to review changes in assumptions and source data over the development of the analyses and allow for parties to test and validate modeling results.

CGA refers to slide 10 of the presentation as the basis for the following recommendations for data sources to support the scenario analyses:

- Load Forecasts. Various commercially-available resources provide data on the size, timeline, and state of development of data centers. These resources coupled with outreach to the datacenter industry would provide foundational information to establish the maximal and then likely scale of development of data centers in Illinois. Additionally, RTO reports such as the MISO Long Term Load Forecast and the OMS-MISO Survey should be referenced to provide context and validation for modeling assumptions.
- Existing Resources. The Generator Availability Data System (GADS) maintained by NERC provides invaluable data for accurately modeling the expected output of PJM and MISO generation fleets. These data can be used to create realistic simulations of resource availability, especially under stress conditions. The data show a wide range of outage rates which would be critical to the final scenario outputs.
    - Distributed resources. ComEd, Ameren Illinois, and MidAmerican Energy should be able to provide estimates and reports concerning the scale, availability and responsiveness of distributed generation assets that are connected to their local delivery networks. Further, the utilities should be able to provide accurate projections for the growth in these as well as local demand response programs that can support system reliability.
- Candidate Resources. The interconnection queues for PJM and MISO could present material information concerning utility scale projects proposed for deployment in Illinois.

Question 4

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

No comments.

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

- Supply Constrained (1+ early fossil fuel retirements) - Applied to base case

- Supply Constrained (50% reduction in clean energy resource deployments) - Applied to the Base Case
- Accelerated battery energy storage deployments (up to 8,000 MW) in Illinois. The sensitivity should also capture the deployment of long duration energy storage in line with the DOE pathways report which estimates that more than 1/3 of U.S. storage capacity will come from multi-day/long duration (10 hours or longer) and the remainder with 10-24 hour technologies. - Applied to the Base Case and High Case
- Reinstatement of federal tax incentives beginning by 2030 - Applied to Base Case (assuming this is not already a part of the base case or sensitivities - could not find reference to it in posted materials)

Question 6

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