

Integrated Resource Plan (IRP) Stakeholder Workshop #1: Scenarios

Initial Comments and General Observations

ComEd appreciates the goal of capturing a robust set of scenarios that may play out over the 20 years in scope for the IRP, particularly in light of the abbreviated timeline in which the analysis needs to be conducted. We also appreciate the extensive discussion and insight afforded through the workshops conducted the week of April 6, 2026.

ComEd also appreciates the efforts by state agencies to initiate and advance discussions around a number of interrelated topics that are addressed separately in statute. A long-term outlook and approach to building out the State’s energy infrastructure to meet economic, environmental, and energy policy goals will optimize a system where the grid, load, and generation resources are all interdependent. For example, efficient transmission development to address new loads can accelerate economic development while also ensuring supply resources can interconnect to ensure reliability and maximize the benefits of load growth for customers. Likewise, the state’s power procurement process is a critical part of the picture, and the IPA’s recent initiation of its long-term clean energy procurement planning has significant implications for the viability of possible generation development scenarios. This includes any potential implications of procurement resulting from changes at PJM/MISO (including any “bring your own generation” policies or the reliability back stop procurement) and/or implications from Illinois’ study of RTO membership per 220 ILCS 5/16-126.2. These issues have significant implications for the IRP.

Finally, from a process perspective, ComEd remains interested in two elements broadly applicable to the IRP:

- Will the IRP / Mitigation Plan offer any recommendations for regulatory, market, or legislative processes?
- What is the expected format for the Aug/Sep draft results? And to what degree will data and assumptions be made available prior to that date? We appreciate that data associated with resource assumptions, as an example, has already been made available.

Stakeholder Questions

- *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?*

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

Response:

Below is a list of our more substantive questions, comments, or clarifications as it pertains to the scenarios and data sources.

- Confirm that any new nuclear (uprates, new build) is intended to be captured in the RPS additions indicated in slide 24 (grey shaded area).
- Confirm how the Future of Gas proceedings and recommendations may influence the scenarios or sensitivities are captured.
- Neither of the presentations explicitly describes the overall modeling process (slides 9-12 from the Resources Workshop come closest), but it would be helpful to diagram how the various analytics and models will work together. It is not currently clear whether some or all of the models will be used for each scenario, and how. Specifically:
 - Will a least cost capacity expansion plan be developed for each scenario, with accompanying system cost projections? How will the results be used to develop recommendations?
 - RA modeling – Will this be conducted for each scenario/portfolio, or only a subset?
 - Portfolios within IL will not likely materially change future ELCCs at the RTO level by themselves. However, some are based on scenarios with likely different RTO-level dynamics. For example, high load growth in IL is likely related to high load growth across the RTOs, and therefore there would be different RA situations for those scenarios, different overall portfolios, and likely different ELCCs. This should be considered – possibly at least in considering some interaction with RECAP for some of the scenarios.
 - Of note, pertinent to the next question, without such information on model usage, it is difficult to provide specific recommendations on the best sensitivity concepts worth evaluating.
- We understand from the scenario workshop on April 7 and the resource workshop on April 10 that “new VPP resources” refers to a representative bundle of demand side management resources (e.g. a certain portion of solar, flexible load, and storage) but would like to confirm the

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expected cost to implement will not be an input or output of the analysis, nor will the representative bundle be optimized or varied from a static assumed bundle.

- The workshop discussion confirmed that the scenarios will take existing Federal policy as a given. However, we believe it would be helpful to consider them at least for sensitivities (as noted under the sensitivity section) since they would impact affordability implications of the various paths.
- In modeling the core policy cases, we understood from the materials and discussion that the analysis will hold the ratios of behind-the-meter versus utility scale generation fixed. Please confirm whether that is the case, and if so, consider that development of distributed resources is likely going to continue to be easier and more rapid than larger-scale resources for some period of time at a minimum, particularly in scenarios with more elevated relative supply costs where end user interest may be higher.
- We assume that when the materials suggest that a “Net Zero” outcome is net of imports and exports, that implies that Illinois is importing on-peak fossil generation while exporting off-peak renewable generation. We would also like to confirm how storage export is counted in this scenario.

Finally, as related to data sources, consider whether IPA’s historical results from REC procurements give it a large database of projects from which to extrapolate cost, performance, and completion rate assumptions without compromising commercially-sensitive information.

- *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?*

Response:

ComEd suggests removing the RPS Resource flexibility component from the scenario with CEJA extension and replacing it with a CEJA Extension High Load case. This would effectively offer a CEJA Extension with and without Net Zero scenario sensitivity. We expect RPS flexibility would prove to be a low impact driver.

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

Response:

In addition, the sources referenced in the workshop materials, we believe that comparing forecasted load growth implications for the various scenarios against historical periods will provide a helpful calibration for whether the scenarios are realistic while capturing a broad enough range of outcomes.

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

Response:

We should confirm what assumptions are being made around data center growth outside of IL as well as what constitutes a “data center.” Non-Illinois data centers within the relevant RTOs (MISO, PJM) should be increased proportional to Illinois data centers data, which could be based on the current load forecast breakdown across PJM and MISO. In the case of PJM, the data is available and provides numbers for Illinois relative to the other zones.

- How does the study propose defining a data center as “in development?”
- How is the study contemplating efficiency in data centers? Does it believe its scenarios or sensitivity approach will capture the possibility of significant advances in efficiency and/or how the data center market may develop (inference vs. learning, larger scale vs. edge, etc.)?

We also would like to confirm to what degree should reshoring or other industrial uses be an incremental driver of load growth to consider independent of data centers or electrification?

- *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*

Response:

We believe the following items should be run as sensitivities. Given they are global in nature, it is hard to imagine limiting the scenarios to which they should be applied, but we have proposed some limited application if necessary.

- Fuel costs (i.e. natural gas) – likely only important for the scenarios exploring alternative decarbonization paths
- Import capacity – can probably just focus on first three core scenarios
- Factors that will impact balance between upfront costs and ongoing costs – these likely need to be considered for all of the scenarios under “system evolution futures” and “alternative decarb paths” such as interest rates and inflation projections.
- Market Design assumptions, including seasonal construct, margin reserve requirements, and capacity accreditation – while this may be a scenario variable that changes based on E3’s analytical approach, sensitivities associated with a PJM seasonal framework and other assumptions could be interesting in select scenarios

Lastly, with respect to import capability, we recommend a sensitivity with and without a cap on imports, which would demonstrate how relying on outside resources may or may not impact future reliability. As noted above, this is an example where running a separate REAP process and holding the grid fixed will constrain the degree to which optimal solutions can be found that prioritize the varying goals around affordability, reliability, economic development, and energy policy goals. There is likely an opportunity to explore the potential role of transmission through sensitivities; to that end, consider adding sensitivities on transmission expansion between zones, particularly in the Baseline, the Net Zero Case, and at least one case with High Load.