IPA Integrated Resource Planning Workshop #1: Scenarios
April 7, 2026

Respondent Name	Respondent Organization	Respondent Email Address	Respondent Zip Code
Chris Townsend	CJT Energy Law, LLC on behalf of Coalition to Request Equitable Allocation of Costs Together (REACT)	chris@cjtenergylaw.com	60601

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 scenario framework reflects several important drivers of future system conditions; however, it is unclear whether the framework fully captures the most consequential source of uncertainty for Illinois: the interaction between state policy requirements and near-term resource adequacy risks that increase the chance of rolling blackouts throughout Illinois.

The presentation appears to take inconsistent positions regarding the role of policy in the IRP and Mitigation Plan. For example:

* Slide 8 notes that the charter of the Mitigation Plan which has a focus of "addressing reliability risks with practical strategies focused on 2026-2035"" and allows for "limited flexibility in emissions timelines only if necessary to maintain reliability."

* Slide 9 states that "Changes in Illinois Policy (Limited Authority)" as well as "Changes to Regional Capacity Markets and RTO rules" and "Approval of Specific Projects" are outside the scope of the process.

* At the same time, Slide 27 then proposed evaluating a "CEJA Extension" and "cost and benefits of delayed shutdown" within the IRP.

Taken together, these elements suggest that the IRP will evaluate the reliability implications of existing policy constraints but may not fully address whether those constraints themselves should be modified to maintain reliable service. This creates a potential gap in the planning framework. If policy-driven retirements are identified as a driver of near-term capacity shortfalls, the IRP should clearly articulate whether and how those issues should be addressed -- either through the Mitigation Plan or through recommendations to policymakers for legislative solutions.

In addition, the proposed reliance on RTO load forecasts introduces a significant source of uncertainty that should be addressed more explicitly in scenario design. Recent experience with large-load growth, particularly from data centers, demonstrates that load forecasts can change rapidly and may not fully capture emerging trends in real time. The source of core data in these scenarios is a material issue in that decisions based on inaccurate load forecasts could exacerbate already deteriorating reliability and rising costs for Illinois consumers. There is no evidence to suggest that the RTOs have "the correct methodology" to make such projections. For this reason, RTO forecasts should not be treated as a single deterministic input, but rather as one of several data sources used to inform a range of plausible load outcomes.

To improve reliability planning and support least-cost outcomes for consumers, the IRP should:

- Incorporate multiple load forecast inputs, including utility data, stakeholder information on large-load development, and independent analyses;
- Treat load growth as a range of outcomes, rather than a fixed forecast; and
- Evaluate how different load trajectories affect both reliability and system costs.

Finally, the scenario framework should more explicitly consider the role of customer-driven resources as a source of flexibility and near-term capacity. Distributed generation, storage, and demand response deployed by customers can provide cost-effective solutions to emerging reliability challenges, particularly where large-load growth is concentrated.

By more clearly addressing the interaction between policy constraints, load uncertainty, and customer-driven solutions, the IRP can better identify pathways that maintain reliability while minimizing costs for Illinois consumers.

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?

The proposed scenario framework captures a range of policy and technology futures; however, refinements are needed to ensure that the IRP remains focused on identifying practical, near-term solutions to the resource adequacy challenges identified in the Resource Adequacy Study.

First, the scenario set should be structured to prioritize evaluation of conditions that are most relevant to reliability risks in the 2026-2035 timeframe. Several proposed scenarios -- particularly those within the “Alternative Decarbonization Paths” and “System Evolution Futures” categories -- focus on long-term or highly uncertain outcomes that may be less informative for near-term planning decisions. Other Proposed scenarios that are more theoretical than practical should be deprioritized or removed to ensure that this process remains focused on minimizing the risk of rolling blackouts, including: “Net Zero”, “Net Zero + High Load”, and “Illinois Resource Prioritization”.

Second, the IRP should include at least one reliability stress scenario that evaluates system performance under combined adverse conditions. Such a scenario should include:

- High load growth (e.g., data centers and electrification);
- Delays in resource deployment;
- Limited availability of imports from regional markets; and
- Reduced performance of key resources during extreme conditions.

This type of scenario is essential to ensure that the IRP identifies solutions that maintain reliability under realistic and challenging conditions.

Finally, the IRP should evaluate resource adequacy on an hourly basis across all scenarios. Assessing whether sufficient capacity is available in each hour of the study period will provide a more accurate representation of system reliability, highlighting particular times when the reserve margin is not attained and will better support comparisons among resource types based on their operational characteristics and cost. This level of detail is necessary to identify least-cost solutions that maintain reliable service under varying system conditions.

Question 3

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

The IRP should rely on a diverse set of data sources and studies that reflect both historical performance and forward-looking uncertainty, with a particular emphasis on inputs that support robust reliability analysis and identification of least-cost solutions.

First, the IRP should incorporate findings from reliability-focused studies, including the North American Electric Reliability Corporation ("NERC") report "Inverter-Based Resource Performance Issues Report Findings from the Level 2 Alert" (November 2023). That report, which analyzed disturbances including the 2022 Odessa, Texas event, highlights potential performance limitations of inverter-based resources under certain grid conditions, including ride-through capabilities during system disturbances.

As Illinois and the surrounding region increase reliance on inverter-based resources, it will be important for the IRP to reflect these performance characteristics in its modeling assumptions. In particular, the IRP should evaluate system response to the sudden loss of generation from inverter-based resources during peak demand conditions and assess the implications for resource adequacy and reliability.

Second, with respect to load forecasting, the IRP should incorporate multiple data sources rather than relying on a single forecast. The scenarios should reflect that large-load development, including data centers, is likely to be influenced by the availability and timing of new capacity resources. To the extent that sufficient capacity cannot be developed within a reasonable timeframe, projected load growth is unlikely to materialize in Illinois.

In addition, while RTO forecasts (PJM and MISO) provide a reference point, recent experience suggests that load growth -- particularly from emerging large-load customers -- can evolve rapidly and was not fully captured in their baseline projections. Accordingly, for the base case the IRP should use utility load forecasts for existing and expected non-data center demand as a foundation, supplemented by a range of data center growth scenarios that are constrained by realistic assumptions regarding available capacity and deployment timelines.

To improve accuracy and support least-cost planning, the IRP should:

- Incorporate utility-specific load forecasts, particularly for non-data center loads;
- Utilize stakeholder-provided information regarding large-load development;
- Model a range of potential data center growth outcomes; and
- Evaluate how load growth may be constrained by the availability and timing of new capacity resources.

This approach will better reflect the interaction between demand growth and system capability, while avoiding over-reliance on any single forecast.

Third, the IRP should use realistic assumptions regarding the deployment of new generation resources, including wind and solar. Historical experience suggests that Illinois will fall short of its RPS goals and that interconnection delays, supply chain constraints, and evolving federal policy all introduce uncertainty into the pace of new resource development.

Rather than relying on a single growth trajectory, the IRP should model a range of deployment outcomes for renewable resources and evaluate how these outcomes affect both reliability and system costs. This will ensure that the IRP identifies resource portfolios that are robust under varying conditions.

Finally, the IRP should incorporate data on customer-driven resources, including distributed generation, battery storage, and demand response. These resources can provide cost-effective and scalable contributions to system reliability, particularly in areas experiencing concentrated load growth. Including credible data on customer adoption and performance will help ensure that the IRP fully evaluates solutions that both maintain reliability and reduce overall system costs.

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, while the proposed load scenarios capture several important drivers -- such as data center growth and electrification -- they do not consider that capacity in Illinois may exit more rapidly than anticipated under the CEJA “zero emissions” schedule.

Existing generation resources may exit the Illinois market more rapidly than anticipated due to market conditions, operational considerations, or changes in regional dispatch patterns. Recent developments illustrate this risk. For example, publicly reported information indicates that a portion of the Elwood natural gas facility, which has historically provided capacity into the ComEd zone of PJM, may be reallocated to serve load in other regions. Such changes can materially affect the capacity available to serve Illinois load, independent of statutory timelines.

This dynamic is important because load growth and resource availability are closely linked. To the extent that available capacity declines or is redirected to other markets, projected load growth --

particularly from large customers -- may not materialize as expected or may require higher-cost solutions to maintain reliability.

Accordingly, the IRP should enhance its load scenarios by:

- Evaluating load growth in conjunction with realistic assumptions regarding the retention, retirement, and reallocation of existing generation resources;
- Incorporating scenarios where available capacity is reduced due to market-driven factors; and
- Assessing how these conditions affect both system reliability and the cost of serving load.

Incorporating these considerations will provide a more complete and realistic assessment of future system conditions and help identify least-cost solutions that maintain reliable service for Illinois consumers, appropriately addressing the near-term reliability cliff identified in the Resource Adequacy Study.

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

The IRP should prioritize sensitivities that directly test the system's ability to maintain reliable electric service under realistic conditions while identifying least-cost solutions and evaluating the role of customer-driven resources. The following sensitivities are particularly important:

Sensitivity 1: Early Retirement / Capacity Reduction

- Input varied:

Reduction in available capacity due to early retirement or reallocation of existing generation resources (e.g., 1–3 GW reduction in available capacity relative to base assumptions)

- Scenario applied to:

Base Case and High Load scenarios

- Rationale:

Recent developments indicate that existing generation resources may retire or be redeployed more rapidly than anticipated due to market conditions or regional dynamics. This sensitivity evaluates the impact of reduced capacity on system reliability and cost, particularly during near-term periods identified as high risk in the Resource Adequacy Study. It will also help identify the value of flexible, near-term solutions -- including customer-driven resources -- that can mitigate emerging shortfalls.

Sensitivity 2: Accelerated Load Growth (Capacity-Constrained)

- Input varied:

Higher-than-expected load growth from large customers (e.g., data centers and industrial demand), combined with constraints on the timing and availability of new capacity

- Scenario applied to:

High Load and Base Case scenarios

- Rationale:

Load growth is highly uncertain and closely linked to the availability of capacity resources. This sensitivity evaluates how accelerated demand affects reliability and system costs under realistic constraints, and highlights the importance of scalable, cost-effective solutions -- including demand response, distributed generation, and storage -- that can be deployed quickly to support system needs.

Sensitivity 3: Resource Performance and Availability (Including IBR Performance)

- Input varied:

Reduced availability or performance of key resources, including:

- higher forced outage rates for dispatchable resources; and
- reduced effective capacity contribution from inverter-based resources under certain grid conditions

- Scenario applied to:

Base Case and High Flexible Future scenarios

- Rationale:

System reliability depends not only on installed capacity, but also on resource performance during periods of system stress. This sensitivity evaluates the impact of reduced resource availability, including potential limitations associated with inverter-based resources, and ensures that the IRP identifies portfolios that remain reliable under realistic operating conditions.

Collectively, these sensitivities:

- Test the system under conditions most relevant to near-term reliability risks;
- Support identification of least-cost solutions by evaluating cost impacts under uncertainty; and
- Highlight the role of customer-driven resources as flexible, scalable options to address emerging capacity needs.

Question 6

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