

IRP Stakeholder Comment: Workshop 1

CEJA Workforce Development Hub | Joliet Junior College

Document	IRP Stakeholder Workshop 1: Scenarios
Submitted to	Joy Nicdao-Cuyugan, Stakeholder Meeting #1 Comment Form
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The CEJA Workforce Development Hub at Joliet Junior College appreciates the opportunity to submit comments on the Illinois Integrated Resource Plan (IRP). Our hub is one of sixteen regional training centers established under the Climate and Equitable Jobs Act (CEJA) to prepare workers from underserved communities for clean energy careers. We serve Will County and the surrounding Chicagoland region within the ComEd service territory.

Our primary messages are:

- The IRP is planning a 20-year clean energy buildout without any input for the workforce needed to execute it. DCEO's annual report documents that workforce, and it has not been referenced in any workshop material.
- The state law that created the IRP requires evaluation of equity impacts and opportunities. No scenario, data source, or metric has been proposed to actually measure this. A legal requirement without a measurement plan has not been satisfied.
- Governor Pritzker's Executive Order 2026-01 already directed DCEO to connect workforce data to the IRP. These comments support that directive.

About the CEJA Workforce Development Hub

Our hub trains workers for solar installation, energy efficiency, HVAC and electric vehicle technology, and advanced manufacturing. These are the trades that install and maintain the clean energy infrastructure the IRP plans to build.

As of DCEO's April 1, 2026 Annual Report, the Illinois Clean Jobs Workforce Network Program has produced the following outcomes since launching in 2024:

Figure	What It Represents	Source
3,129	Total applicants since launch	<i>p. 2</i>
745	Cumulative graduates through end of 2025	<i>p. 2</i>
153	Placed directly in clean energy jobs	<i>p. 8</i>
29	Transitioned to advanced training	<i>p. 8</i>
3	Placed in Registered Apprenticeship Programs	<i>p. 8</i>

112	Placed in other full-time employment	<i>p. 8</i>
96 employers	Partner companies that have hired graduates statewide	<i>p. 1, p. 10</i>
\$22/hr	Average starting wage for placed graduates	<i>p. 1, p. 6</i>
76 days	Average time from graduation to employment	<i>p. 5</i>
\$49.4M	Total program funding since launch	<i>p. 1</i>
16 regions	Areas with active hub programming statewide	<i>p. 2</i>

Of particular relevance to the IRP: across the statewide hub network, approximately 79 percent of 2025 applicants came from Environmental Justice Communities or R3 areas. Specifically, 40 percent came from communities that are both EJC and R3 designated, 31 percent from R3-only communities, and 8 percent from EJC-only communities. R3 areas are communities the state has designated as having faced concentrated poverty and high incarceration rates; EJCs face disproportionate environmental burdens. These are the populations the IRP's equity requirement is designed to benefit. Our hub, serving Will County and the Chicagoland region, operates within this network and serves the same equity populations. (Source: DCEO Annual Report, April 1, 2026, p.1.)

Question 1: Scenario Drivers, Additional Scenarios, and Data Sources

The workforce pipeline is not in the model.

The IRP scenarios project building significant amounts of solar, energy efficiency systems, and HVAC infrastructure in Illinois over the next 20 years. The model selects what to build based on cost, policy requirements, and how long projects take to develop. What it does not include is any data on whether enough trained workers are available to execute those timelines.

The state's own [2025 Resource Adequacy Study](#) identifies development timeline delays as a material risk to resource adequacy outcomes. It cites [Lawrence Berkeley National Laboratory research](#) showing that interconnection wait times, the time from submitting a grid connection request to reaching commercial operation, grew from under 2 years for projects built in 2000-2007 to a median of 5 years for projects built in 2023. Only 19 percent of projects that entered the queue from 2000 to 2018 were ever built. (RA Study, Executive Summary, Section 1.2, p. iv, citing LBNL, Queued Up: 2024 Edition, April 2024.) LBNL identifies interconnection study backlogs, transmission upgrade costs, and regulatory processes as the primary documented constraints. We submit that workforce supply is an additional component of development capacity that belongs in the same analytical framework.

E3 conducted an analysis of data center infrastructure impacts for Virginia's Joint Legislative Audit and Review Commission in December 2024. That study examined constraints on the pace of clean energy infrastructure development, including interconnection timelines, permitting, and construction capacity. We submit that workforce supply is one component of construction capacity that belongs in this same analytical framework, and we request that E3 apply comparable development capacity analysis to Illinois.

At Workshop 1, E3 stated that the IRP relies on public data sources for transparency. DCEO's Annual Report is a public document containing the workforce pipeline data described above. It meets E3's own stated standard for inclusion and has not been referenced in any workshop material.

Source: E3/IPA Workshop 1 Transcript, April 7, 2026 icc.illinois.gov/informal-processes/Integrated-Resource-Plan

The equity requirement needs a measurement plan.

CRGA Sections 16-201 and 16-202 require the IRP to evaluate equity impacts and opportunities as one of six mandatory planning elements. At Workshop 1, E3 listed this requirement on a slide. No scenario, data source, or metric was then proposed to actually measure it.

Source: CRGA, Public Act 104-0458, Sections 16-201 and 16-202 ilga.gov/documents/legislation/PublicActs/104/104-0458.htm

The Illinois Clean Jobs Coalition noted in its reply comments that *"we were concerned that minimal effort was expended to ensure that environmental justice stakeholders were represented at the first IRP workshop,"* and specifically called for outreach to Equity Eligible Contractors (EECs). An Equity Eligible Contractor is a business that has met CEJA's labor and equity hiring standards and is eligible for preferential treatment in clean energy procurement. Our hub participants become Equity Eligible Persons when they complete training, and the contractors that hire them become EECs. This population was absent from the room.

Source: ICJC Reply Comments, ICC IRP Docket, submitted by Madeline Semanisin, NRDC icc.illinois.gov/informal-processes/Integrated-Resource-Plan

The Governor already directed DCEO into this process.

Governor Pritzker's Executive Order 2026-01, signed February 18, 2026, is primarily focused on accelerating new nuclear power development in Illinois. However, it establishes a direct and relevant precedent for the IRP process. Section XI directs DCEO to assess workforce needs to support the construction and operation of new nuclear facilities. Section VI states that information gathered through this process *"shall be included in the deliberations for the IRP process required under CRGA."* The EO establishes that DCEO workforce assessments are directly relevant to IRP deliberations. We submit that the same integration is warranted for DCEO's existing Illinois Clean Jobs Workforce Network data, which documents the clean energy workforce pipeline the IRP's buildout depends on.

Source: Illinois Executive Order 2026-01 illinois.gov/government/executive-orders/executive-order-executive-order-2026-01.2026.html

Recommended data sources.

We recommend three public sources not currently referenced in the IRP framework:

- DCEO Illinois Clean Jobs Workforce Network Program Annual Report, April 1, 2026, workforce supply data by region, training track, employer, and wage. dceo.illinois.gov/ceja.html
- IPA Energy Workforce Equity Portal: registered EEC contractors by region and trade, mapped to the same geographic zones the IRP uses. energyequity.illinois.gov
- Illinois Executive Order 2026-01 workforce assessment: the data DCEO was directed to collect and include in IRP deliberations. illinois.gov/government/executive-orders/executive-order-executive-order-2026-01.2026.html

We do not recommend removing any of the proposed scenarios. We recommend supplementing the framework with the workforce pipeline data above.

Question 2: Load Scenario Drivers

The three load scenarios capture the primary drivers of electricity demand uncertainty well. The treatment of data center growth as the dominant variable in the high load scenario is consistent with the Resource Adequacy Study's findings.

One observation: the high load scenario is built around data center construction in the ComEd zone. Data center operations do not create jobs in the solar, energy efficiency, or HVAC trades the hub network trains for. The construction of the infrastructure to power those data centers does. The load scenarios correctly model the demand side of this equation. The workforce supply needed to execute that construction is not modeled anywhere in the current framework. The higher the load scenario, the more directly that gap matters.

Question 3: Proposed Sensitivities

A sensitivity is a test that changes one variable in an existing planning scenario to see how much the results change. We propose three. Each targets a different aspect of the workforce and equity gap we have identified, and each is applied to the Base Case scenario, which represents E3's expected planning outcome.

Sensitivity 1: What if workforce constraints delay clean energy construction by 12 to 18 months?

Variable: Earliest online date for solar, energy efficiency, and HVAC projects in the ComEd zone and southern Illinois grid zone.

Change: Push those dates back 12 to 18 months from what the model currently assumes.

Apply to: Base Case scenario.

Why this range: The [Lawrence Berkeley National Laboratory Queued Up: 2024 Edition study](#) documents that interconnection wait times, the time from submitting a grid connection request to commercial operation, grew from under 2 years for projects built in 2000-2007 to a median of 5 years for projects built in 2023. Only 19 percent of projects entering the queue from 2000 to 2018 were ever built. The 2025 Resource Adequacy Study cites this research directly when establishing that new resources take five to seven years to develop. (RA Study, Section 1.2, p. iv, footnote 2.) The 12 to 18 month range represents a conservative lower-bound estimate of the workforce-related portion of that documented delay growth, applied specifically to the installation and commissioning phase of projects where workforce availability is the most direct constraint.

Why it matters: If projects run late because trained workers are not available in sufficient numbers, the electricity shortfall risks identified in the Resource Adequacy Study arrive sooner and hit harder. The IRP currently builds its projections on the assumption that construction will happen on time. This test asks what happens if that assumption is wrong and gives policymakers a concrete basis for evaluating whether current workforce investment is keeping pace with the buildout the plan requires.

Sensitivity 2: What if energy efficiency programs fall short because not enough workers are trained to deliver them?

Variable: Energy savings achieved through utility energy efficiency programs under CRGA, which requires expanded programs starting June 1, 2026.

Change: Test program achievement at 100%, 75%, and 50% of targets.

Apply to: Base Case scenario.

Why it matters: Energy efficiency programs reduce overall electricity demand, which directly reduces how much new generation Illinois needs to build. The IRP's load forecast already assumes these programs will hit their targets. But delivering them requires certified energy auditors, weatherization technicians, and HVAC installers. These roles are trained for across the Illinois Clean Jobs Workforce Network, with different hubs specializing in different tracks. Our hub specifically trains HVAC and energy efficiency workers. If the network is not producing graduates at the rate those programs need, the savings will fall short and the IRP's projections will be overstated. This sensitivity makes that risk visible before the plan is finalized. (Sources: CRGA, Public Act 104-0458; DCEO Annual Report, April 1, 2026, p. 2.)

Sensitivity 3: What does Equity Eligible Contractor participation look like at different levels, and what does it cost?

Variable: Share of clean energy project contracts awarded to Equity Eligible Contractors (EECs), businesses that have met CEJA's labor and equity hiring standards.

Change: Test low participation (current baseline from IPA Equity Portal data), medium, and high participation levels. Measure the effect on project cost and timeline.

Apply to: Base Case scenario.

Why it matters: CRGA directs \$7 million per year to support EEC participation in clean energy contracts. The IRP is legally required to evaluate equity impacts and opportunities under CRGA Sections 16-201 and 16-202. Without a sensitivity that tests what different EEC participation levels actually look like in cost and timeline terms, the equity requirement remains a legal obligation with no measurable outcome in the plan. This test would show whether the existing \$7 million investment is sized appropriately for the buildout the IRP requires, and what meaningful equity participation actually costs at scale.

Closing

At Workshop 1 on April 7, 2026, a stakeholder asked whether IRP scenarios would inform the workforce and contractor capacity needed for regional clean energy development. E3 responded that this question belongs in the Renewable Energy Access Plan (REAP) process. The REAP studies transmission lines and grid infrastructure constraints under a separate legal mandate. It does not study workforce pipeline supply. The question raised at Workshop 1 is not answered anywhere in Illinois' current energy planning process. These comments place it on the official record.

Source: IRP Workshop 1 Transcript, April 7, 2026 icc.illinois.gov/informal-processes/Integrated-Resource-Plan

We request that the Agencies direct E3 to incorporate DCEO's workforce pipeline data as a public data input, include the three sensitivities above in the modeling process, and specify how the equity impacts requirement under CRGA Sections 16-201 and 16-202 will be operationalized in the final IRP.

These requests do not ask E3 to redesign the IRP or extend its timeline. They ask the Agencies to account for the workers who will build what the plan requires, and to ensure that the communities the law was designed to benefit have a measurable presence in the plan that governs their opportunities.

We appreciate the opportunity to participate in this process and look forward to continued engagement through the remaining workshops.