

**Supplemental Comments of the
Coalition to Request Equitable Allocation of Costs Together (“REACT”)
Regarding Scenario Definitions to be Used in Developing the Integrated Resource Plan**

The Coalition to Request Equitable Allocation of Costs Together (“REACT”) submits these Supplemental Comments regarding the April 7, 2026 Workshop hosted by the Illinois Commerce Commission (“ICC” or “Commission”) and Illinois Power Agency (“IPA”) addressing the scenario definitions that will be used in the development of the Integrated Resource Plan (“IRP”).

I. Executive Summary

The Illinois Resource Adequacy Study (the “Study”) identified tightening reserve margins and potential reliability risks in both the PJM and MISO regions that serve Illinois. The Mitigation Plan and Integrated Resource Plan (the planning process is referred to herein as the “IRP”) are intended to address these challenges by identifying practical options for delivering additional capacity into Illinois in both the near term (2026–2035) and the long term (2026-2047). If projected capacity shortfalls are not addressed through careful planning and timely resource development, Illinois consumers could face reliability challenges during periods of peak demand, including the potential for outages -- including rotating or “rolling” blackouts -- affecting households, businesses, and critical infrastructure. In addition, tight reserve margins are likely to result in elevated capacity costs, increased price volatility, and reduced economic competitiveness as large-load businesses evaluate alternative locations.

The IRP proposes to use a range of scenario analyses to evaluate options for meeting Illinois’ future capacity needs. Ideally, these scenarios will identify the volume, type, and cost of resources required to maintain reliable and affordable electric service. However, based on the April 7, 2026 presentation regarding the proposed modeling approach, REACT has identified several areas where the scenario framework would benefit from refinement to better support reliable and least-cost outcomes.

First, the proposed modeling scenarios do not fully reflect the potential for net reductions in available capacity in Illinois. Addressing reliability risks must remain the primary objective of the IRP. The gap analysis should transparently identify the timing, magnitude, and duration of potential resource adequacy shortfalls, including through the use of hourly reliability metrics and realistic assumptions regarding resource performance, retirements, and deployment timelines.

Second, the proposed modeling approach appears to rely heavily on a limited set of forward projections for load growth. While RTO forecasts provide a useful reference point, recent experience demonstrates that load growth -- particularly from large load customers -- can evolve rapidly and may not be fully captured in their baseline projections. The IRP should therefore incorporate multiple data sources and evaluate a range of plausible demand outcomes to ensure that capacity needs are neither overstated nor understated, thereby protecting consumers from both reliability risks and unnecessary costs.

Third, the proposed scenarios do not sufficiently evaluate system performance under real-world stress conditions. Recent reliability events in other regions have demonstrated that outages often occur when systems are operating under constrained conditions and multiple resources become unavailable simultaneously. The IRP should prioritize sensitivities and scenarios that test system performance under these conditions, including unplanned outages and reduced resource availability. Incorporating these stress conditions will improve the identification of resource portfolios that maintain reliability at the lowest reasonable cost.

Finally, the IRP should more fully evaluate the role of customer-driven resources, including distributed generation, storage, and demand response. These resources represent scalable, near-term solutions that can contribute to system reliability while helping to manage costs for Illinois consumers.

II. The Scenarios Improperly Ignore the Reality of Net Losses of Native Capacity

The IRP should more fully evaluate the potential impacts of early retirement, reallocation, or reduced availability of existing generating resources. Recent developments illustrate this risk. Public reporting indicates that a significant portion of the Elwood generating facility (approximately 1,350 MW of nameplate capacity) may be reallocated to serve load in other regions, with a substantial share no longer available to meet demand in northern Illinois. This change—reportedly influenced by market and policy conditions -- represents a material reduction in available capacity, comparable in scale to the loss of a large baseload nuclear reactor shutting down.

A. The IRP Should Consider Continued Capacity Erosion Ahead of 2030.

The potential for accelerated, market-driven changes in resource availability does not appear to be fully reflected in the current modeling framework. The IRP should evaluate scenarios in which existing capacity declines more rapidly than assumed, including through early retirements or reallocation of resources to other regions.

In addition, it is unclear whether the IRP assumes that planned renewable generation and energy storage deployments will fully meet projected timelines and the State's RPS goals. Given the repeated failure of the State to achieve RPS targets and the uncertainty related to interconnection delays, supply chain constraints, and broader market conditions, it would be prudent for the IRP to evaluate scenarios in which resource additions lag expectations. These combined dynamics could result in continued net capacity erosion, increasing the risk of reliability challenges in Illinois.

B. The IRP Should Prioritize Near-Term, Actionable Scenarios

To ensure that the IRP identifies practical solutions to near-term resource adequacy challenges, the scenario framework should prioritize scenarios that reflect realistic system

conditions and actionable planning horizons. While long-term or policy-driven scenarios (*e.g.*, “Net Zero”, “Net Zero + High Load”, and “Illinois Resource Prioritization”) provide useful context, they should be balanced with a strong focus on near-term reliability risks and feasible mitigation strategies. Accordingly, the IRP should emphasize scenarios that incorporate:

- Realistic assumptions regarding resource availability and deployment timelines;
- Potential reductions in existing capacity; and
- The interaction between capacity availability and load growth.

Focusing on these conditions will better support identification of solutions that maintain reliable electric service and minimize costs for Illinois consumers.

III. The Scenario Framework Improperly Relies on Limited Data Inputs and Lacks Transparency Regarding Modeling Outputs

The IRP proposes to evaluate three load projections (Low, Base, and High). The High Case incorporates projections of significant load growth, including assumptions derived in part from RTO forecasts. While these projections are intended to capture potential future demand, their use raises important questions regarding the underlying assumptions and the extent to which they reflect realistic system conditions.

In addition, the modeling outputs associated with these scenarios have not been fully described. This lack of transparency limits the ability of stakeholders to evaluate results, test assumptions, and propose cost-effective solutions to identified capacity needs.

A. Load Forecasting Should Reflect Uncertainty and the Relationship Between Demand and Available Capacity

Fully forty percent (40%) of all scenarios proposed for the IRP rely on the High Case Load Forecasts, which are based on “Data Centers in development plus high growth rate for Illinois from utility and RTO forecasts”. As recently as 2023, the RTOs were projecting flat to falling load growth in Illinois, but now project never-before-seen levels of load growth. This recent experience

demonstrates that the RTOs' load forecasts -- particularly for emerging large loads -- can change rapidly and may not fully capture evolving market conditions.

Importantly, projected load growth is closely tied to the availability of capacity. To the extent that sufficient generation and infrastructure are not developed within a reasonable timeframe, some anticipated load growth may not materialize within Illinois. In this sense, certain load projections may represent conditional demand rather than likely demand outcomes.

Accordingly, the IRP should:

- Incorporate multiple data sources, including utility forecasts, stakeholder input, and independent analysis;
- Evaluate a range of plausible demand scenarios rather than relying heavily on a single high-growth projection; and
- Explicitly consider the interaction between load growth and available capacity when assessing future system needs.

This approach will help ensure that capacity requirements are not overstated and that consumers are not exposed to unnecessary costs resulting from overbuilding.

B. The IRP Should Provide Transparent and Detailed Modeling Outputs

The IRP modeling process should produce transparent and detailed outputs that enable stakeholders and policymakers to fully evaluate system performance under each scenario. In particular, the IRP should assess resource adequacy on an hourly basis across all scenarios.

Hourly modeling is necessary to:

- Identify periods in which reserve margins are constrained;
- Evaluate the contribution of different resource types during critical system conditions; and
- Support detailed cost analysis, including the evaluation of least-cost solutions.

Providing this level of detail will improve the ability of the Commission and stakeholders to understand system risks, evaluate tradeoffs among resource options, and identify solutions that maintain reliable electric service at the lowest reasonable cost.

IV. The Scenario Framework Should More Fully Evaluate Realistic System Risks

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. As Illinois relies more heavily on variable renewable generation, it is important that modeling frameworks reflect real-world operating conditions, including variability in resource performance and the potential for system stress events.

For instance, as the grids in Illinois depend more on solar and wind resource, there is increased risk for inverter-based resources causing system disturbances under certain grid conditions (*see* “Inverter-Based Resource Performance Issues Report Findings from the Level 2 Alert” (North American Electric Reliability Corporation, November 2023)). The IRP should incorporate sensitivities that reflect these performance considerations to ensure that resource portfolios are robust under a range of operating scenarios.

To better align modeling with near-term reliability risks, the IRP should prioritize the following candidate scenarios:

A. Candidate Scenario: Early Retirement / Capacity Reduction

This scenario evaluates the potential for existing generation resources to retire, be reallocated, or otherwise become unavailable more rapidly than assumed due to market, operational, or policy factors. It should be applied to the Base Case and High Load scenarios and should include sensitivities reflecting reductions of 1–3 GW of available capacity.

This analysis will help quantify 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 highlight the value of flexible, near-term solutions -- including customer-driven resources -- that can mitigate emerging shortfalls.

In this context, the IRP should explicitly evaluate the potential contribution of existing and enhanced “self-direct” program structures. Illinois’ Self-Direct Renewable Portfolio Standard program, if appropriately modified, could provide a pathway for large customers to procure renewable energy in support of the State’s goals and directly engage in capacity development. Similarly, customer-deployed battery storage – particularly with modified incentive structures that facilitate large customer participation -- can provide flexible, dispatchable capacity during peak demand periods.

The IRP should assess the scale, timing, and cost-effectiveness of these customer-driven investments, including how program design features -- such as participation limits, incentive levels, and project size caps -- affect deployment. These resources represent one of the most scalable near-term capacity solutions available and can help improve reliability while leveraging private capital.

B. Candidate Scenario: Accelerated Load Growth / Capacity-Constrained

This scenario evaluates conditions in which higher-than-expected load growth from large customers (e.g., data centers and industrial demand) is combined with constraints on the timing and availability of new capacity (e.g., partial realization of planned resource additions).

This analysis should be applied to the Base Case and High Load scenarios and should assess how accelerated demand affects system reliability and costs under realistic constraints. It will also highlight the importance of scalable, cost-effective solutions—including demand response, distributed generation, and storage—that can be deployed quickly to support system needs.

C. Candidate Scenario: Resource Performance and Availability

This scenario evaluates system performance under conditions where resource availability is reduced due to outages or performance limitations (including Inverter Based Resources, or “IBR”). Key sensitivities should include higher forced outage rates for dispatchable resources and reduced effective capacity contributions from certain resource types under stressed grid conditions.

Applying this scenario to the Base Case and High Load scenarios will help ensure that the IRP identifies resource portfolios that remain reliable under realistic operating conditions and can maintain service during periods of system stress.

V. Conclusion

REACT appreciates the opportunity to submit these Supplemental Comments and urges the Commission to ensure that the IRP remains focused on maintaining reliability at the lowest reasonable cost while enabling meaningful customer participation.

Renewable generation, energy storage, energy efficiency, and other distributed resources will play an important and growing role in securing and stabilizing Illinois’ electricity grids. Nothing in these comments should be interpreted as opposition to the continued development of all of those resources. Rather, REACT emphasizes that the IRP must evaluate all resources using realistic assumptions regarding performance, deployment timelines, and availability during system stress conditions, as well as their overall cost impacts for consumers. The IRP must identify the combination of resources that can reliably meet demand across all hours of the year based on transparent and operationally grounded assumptions.

The Commission should require that the IRP explicitly incorporate these principles, including robust evaluation of capacity attrition, realistic load growth assumptions, stress testing of resource performance, and full consideration of customer-driven solutions such as distributed generation, storage, and self-direct program participation.

If the IRP relies on unrealistic assumptions or fails to capture key risks, Illinois consumers may face service disruptions, increased costs, and reduced economic competitiveness. A framework grounded in transparency, realistic assumptions, and customer participation will better position Illinois to maintain reliability while achieving cost-effective outcomes.