

**COMMENTS OF THE ILLINOIS COMPETITIVE ENERGY ASSOCIATION IN  
ADVANCE OF THE MAY 5, 2026 INTEGRATED RESOURCE PLAN WORKSHOP**  
**April 28, 2026**

The Illinois Competitive Energy Association (“ICEA”), a trade association representing leading competitive retail suppliers of electricity and natural gas, appreciates the opportunity to provide feedback in advance of the May 5, 2026 Integrated Resource Plan (“IRP”) stakeholder session. ICEA members that provide electric supply themselves or through affiliates own, operate, and contract for generation—including large portfolios of renewable generation, renewables paired with storage, and stand-alone storage of all sizes—as part of providing Illinois customers with competitive supply service. ICEA members and other alternative retail electric suppliers (“ARES”) are a critical partner on the front lines of developing, buying, or contracting with new renewable resources and new storage resources.

ICEA notes that these comments should be read in tandem with a legislative proposal provided by ICEA, which clarifies that ARES should not be direct counterparties of IRP contracts and that costs should be spread across ratepayers. To do otherwise would involve following the failed “initial clean coal facility” or “repowered or retrofitted clean coal facility” pathways set out in statute that failed to yield development of new clean coal projects. The IRP should follow the model of renewable procurements under Section 1-75(c) and (c-5), other credit procurements under Section 1-75(d-10), and upcoming utility-scale storage procurements under Section 1-75(d-20) of using utility counterparties only.

ICEA further notes that it is unclear how an ARES’s obligations to procure resources should be set, especially given that many ARES have preexisting supply and storage resources in Illinois of all sizes that will be relied on for reliability in the near-, medium-, and long-terms. ICEA expresses no position at this time how ARES or ARES customers’ share should be calculated other than calculating an amount each ARES is responsible for is critical to allowing ARES to privately procure from new renewable and new storage resources to meet such goals.

**Question 1:** What do stakeholders see as the purpose of this procurement mechanism in the context of the other IPA procurement mechanisms (i.e. the IPA’s Electricity Procurement Plan, Long-Term Renewable Resources Procurement Plan, and forthcoming Energy Storage Procurement Plan)?

**ICEA RESPONSE:** ICEA believes the purpose of the procurement mechanism related to the IRP is to address resource adequacy shortfalls that are not addressed by other sources.<sup>1</sup> Other sources include preexisting generation and other IPA competitive procurements but also can and should include development by the competitive market independent of IPA procurements. Specifically, procurement of new renewable or new storage resources by alternative retail electric suppliers (“ARES”) or their affiliate should be an alternative pathway that allows ARES to privately procure resources for their customers so that the IPA does not have to. ARES customers should then benefit from any cost efficiencies and not pay for duplicate resources (to the new renewable or new storage resources procured by the ARES) procured through the IPA IRP procurement process. ARES can self-develop or partner with leading developers/owner-operators to help meet goals *at no cost to ratepayers*

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<sup>1</sup> Of course, any identification of shortfalls will take into account PJM and MISO current rules and changes.

*not served by the ARES.* The costs of ARES self-compliance will be exclusively borne by the ARES's own customers.

The IPA should also ensure that distributed stand-alone storage resources receiving net metering under Section 16-107.5(1-10) that are under contract and under development (including those pending sale or contract) are counted toward both the general state and ARES-specific resource adequacy obligations. These projects—like other distributed energy resources—play an important role in ensuring local adequacy in addition to resilience and reliability.

**Questions 2:** What gaps exist in the current IPA procurement mechanisms, or in the competitive market structures, that this procurement mechanism could address in part or in full?

**ICEA RESPONSE:** The first step is identifying competitive market participants that have made commitments to develop new renewable and storage assets to partially or fully offset the resource adequacy needs of their customer base. Those resources may be utility-scale or may be distributed (eligible for net metering). The second step is then ensuring the IPA is procuring only for the remaining gap. The third step is allocating costs—through a uniform per kWh charge—only to the extent that the customer's supplier did not separately procure new renewable or new storage resources.

**Question 3:** What resources (including specific technologies and characteristics such as fuels or emissions) or products (energy, capacity, renewable energy credits (RECs), etc.) should be targeted within this procurement mechanism and why?

**ICEA RESPONSE:** First, the IRP should set a uniform standard—applicable to both ARES procuring new renewable or new storage resources—and the remaining identified shortfall to determine how individual projects are translated into resource adequacy compliance. This standard may be fuel, technology, or project-specific. Second, ARES commitments to procure new renewables or new storage should be evaluated based on those standards to determine the extent to which that ARES has separately procured part or all of its portfolio's IRP resource adequacy obligation. Third, the IPA should determine the optimal procurement mix based on cost, timeline to energization, and risk to energization.

**Question 4:** What contract lengths should be considered for the targeted resources or products and why?

**ICEA RESPONSE:** ICEA has no objection to the length of IPA contracts with new resources, so long as the following criteria are met: ARES are not signatories to such contracts and that costs of any such contracts are assigned to ARES or ARES customers only to the extent that ARES are not procuring new renewable or storage resources to address their respective share of resource adequacy shortfall. ICEA also assumes that the length of IPA contracts with new resources will take into account the product(s) to be procured and broader PJM/MISO trends and market rules as appropriate. ICEA notes that a requirement that ARES serve as counterparties to clean energy contracts is a departure from Illinois precedent whereby ARES have independently managed supply and capacity through wholesale market transactions based on customer demand and competitive market signals. ARES should not be required to bear the long-term financing

**and development risk associated with renewable resource development. Rather, as part of ARES procuring new renewable or new storage resources through purchase, PPA, or other contractual structure, the ARES should receive credit to their resource adequacy obligations for the length of the contract—including useful life for owned systems. Because of fluctuations in retail markets, ARES must take a nuanced approach to longer-term commitments even when those commitments provide valuable resources (such as capacity or other values) that can be used as wholesale components of retail supply.**