

Long-Term Clean Energy Procurement Framework

Comments of Clean Grid Alliance in Response to Request for Feedback #3

June 11, 2026

Clean Grid Alliance (CGA) appreciates the opportunity to provide another round of feedback on the Long Term Clean Energy Procurement Framework. In response to the third request for feedback, CGA submits the following.

Question 3: Aside from need determination, in what other ways should this procurement mechanism link to the IRP or Resource Adequacy Study / Mitigation Plan processes?

- The long-term clean energy procurement should be viewed as a tool that can be used to procure capacity based on minimum system demands projected over the IRP study period. The initial procurement should seek to fulfill a portion of the projected need based on the 2025 resource adequacy study. The size of subsequent (post-2027 EPP) procurements should be scaled based on IRP findings.

Question 5: Given the IRP and mitigation plan studies will not be completed ahead of the 2027 EPP, should there be any procurement conducted under this mechanism in advance of the final studies? If so, why? How should the need be determined? What considerations (if any) should be part of this procurement decision and process that may differ from future procurements performed after subsequent planning processes such as IRP and mitigation plan?

- Yes, CGA believes the Agency should conduct an initial long term clean energy procurement starting with the 2027 Electricity Procurement Plan. The need for this procurement has already been clearly identified in the 2025 Resource Adequacy Study report, which stated as follows: “The RA Study’s analysis reinforces that **substantial new capacity from renewable, storage, and clean firm resources will be needed** even if Illinois retains a portion of its existing thermal fleet.”¹ Including a mix of short-term resource procurements through the capacity markets, mid-term procurements of energy and capacity pursuant to the electricity procurement plan, and long-term clean energy and capacity procurements utilizing this new procurement mechanism will create a portfolio that appropriately mitigates short- and long-term risks associated with market volatility. Initiating a procurement

¹ 2025 Resource Adequacy Study, at xx (Dec. 15, 2025) (emphasis added).

with the 2027 EPP will allow the IPA to begin to address the identified need and ensure that these new clean capacity resources can be available by 2030.

- Considerations for this initial procurement may include an analysis of resources already in the interconnection queue that may be brought online relatively quickly, gaps in the products available in Illinois and the types of resources that they incentivize development of, and what's needed to replace fossil fuel plants that are scheduled to exit the market.
- Additionally, CGA recommends a procurement target of 10-15% of resource adequacy obligations.

In addition to feedback on the items above in response to IPA's request, CGA would like to take this opportunity to reinforce our comments submitted earlier in this process that IPA should be considering procurement of all clean energy resource types, including storage, and including storage beyond that which is eligible for the current indexed-storage credit procurement (i.e. hybrid and co-located storage should be considered). This is especially important given the ability of storage to lend increased capacity values for renewable energy resources.

CGA looks forward to reviewing the agency's proposal in the 2027 EPP and providing additional comments at that time.

Respectfully submitted this 11th day of June, 2026

Elizabeth Wheeler, Director of Regulatory Advocacy
ewheeler@cleangridalliance.org