

Invenergy’s Response to IPA’s Third Request for Comments on a Long-Term Clean Energy Procurement

Invenergy appreciates the opportunity to provide responses to the Illinois Power Agency’s (“IPA” or “Agency”) third request for comments on the development of a long-term clean energy procurement framework. As a company founded and headquartered in Illinois, and the nation’s largest privately held developer, owner and operator of clean energy solutions, Invenergy is committed to supporting the state’s goals and accelerating cleaner, more reliable, affordable energy.

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?

Invenergy Response:

Based on the already-identified need in the 2025 Resource Adequacy Study (“RA Study”) and the statutory language in CRGA that states a procurement shall be held accordingly, Invenergy believes a procurement in the near term beginning with the 2027 Electricity Procurement Plan (EPP) must occur. As Invenergy previously set forth in our comments, Illinois does not need and should not wait until the initial IRP process is finalized before starting the Long-Term Clean Energy Procurement (LTCEP).

As the EPP is an annual exercise, the plans in 2028 and beyond should be revised as necessary and appropriate following the IRP and Mitigation Plan. However, given the near-term nature of the state’s resource adequacy needs, the initial procurement should focus on new clean resources with an ability to achieve commercial operation by 2030-2032 to meet these near-term goals. Additionally, Illinois should not leave any new clean generation resources on the table at a time when expiring tax credits risk providing Illinois ratepayers with the lowest-cost clean resources. The distinction between 2027 and 2028 procurement is material and costly.

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?

Invenergy Response:

An initial 2027 procurement target should support the stated need in the RA Study. In addition, the IRP and Mitigation Plan would consider the adoption of future long-term clean energy procurements that would slightly reduce the need for other new procurements to address resource adequacy shortfalls; and similarly, this procurement mechanism should continue to be evaluated in each successive EPP and amended as necessary from IRP and Mitigation Plan findings.