

LiUNA Midwest Region Response – LTCEP Question Set 3

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?*

The Clean and Reliable Grid Act does not require an IRP or mitigation plan to be finalized ahead of the Agency procuring new clean resources through long-term procurement. Instead, the statute states,

(b-10) Beginning with the procurement plan for the delivery year commencing on June 1, 2027, in recognition of the potential need to facilitate additional supply to address any resource adequacy challenges [...] upon an identification of need by the Commission in the resource adequacy report prepared pursuant to subsection (o) of Section 9.15 of the Environmental Protection Act [...] the procurement plan shall also include the procurement of energy, capacity, environmental attributes, resource adequacy attributes, or some combination thereof intended to serve all retail customers. [...]

The legislation is clear: (a) a procurement can be conducted under this mechanism; and (b) the need determination is tied to the resource adequacy report which identified a resource adequacy shortfall for which additional supply will be needed. Future long-term procurements can be considered or revised as appropriate following the IRP or Mitigation Plan, but there is clear direction for the Agency to propose a procurement in the 2027 Electricity Procurement Plan.

LiUNA supports a long-term clean energy procurement to be held in 2027 that will bring online new generation at the speed Illinois needs and create new job opportunities for Illinois workers in the process.