

**PUBLIC COMMENTS ON THE DRAFT 2027 ENERGY PROCUREMENT PLAN
ON BEHALF OF THE ILLINOIS COMPETITIVE ENERGY ASSOCIATION**

September 16, 2026

The Illinois Competitive Energy Association (“ICEA”) appreciates the opportunity to participate in the public comment process for the Draft 2027 Energy Procurement Plan (“EPP”). ICEA provides comments on a single issue: design and future proposal of a Long-Term Clean Energy Procurement (“LTCEP”). While ICEA supports the IPA’s proposal to *not* undertake a LTCEP as part of this annual energy procurement cycle, the IPA helpfully sets out its current thinking on LTCEP and invites comments to better address issues going forward.¹ Thus, ICEA provides comments in the spirit of refining the LTCEP framework going forward.

As an initial matter, ICEA notes that many of the goals of the IPA—alignment with clean energy objectives, planning-driven and need-responsive procurement, competitive neutrality, affordability, and flexibility—align best with an ARES self-procurement approach.² As ICEA explained in LTCEP comments from earlier this year, the ARES self-procurement approach would entail the following steps:

- Identification of an overall resource adequacy gap and allocation of any such gap to all load serving entities serving ComEd and Ameren retail customers;
- Identification of minimum standards for each load serving entity to meet such gap in whole or in part, such as converting nameplate capacity of new renewables, storage, or renewables paired with storage, to supplement minimum standards already identified in the EEP.³
- Identification of minimum standards for new build generation or storage, such as prevailing wage requirements.
- A deadline by which an ARES must commit to meeting their gap in whole or in part and reasonable interim milestones.

ARES self-procurement has several advantages over the IPA undertaking LTCEP on behalf of all customers or load-serving entities that should be recognized in the EEP. First, ARES resource procurements are not (and cannot be) paid for by anybody other than that ARES’s own customers. Second, each ARES has the flexibility to use contracting structures common in the market—such as tolling agreements for energy storage or non-unit contingent procurements for new renewables—that may attract more prospective commercial counterparties than a typical IPA procurement that does not currently accommodate those structures. Third, many ARES or their affiliates currently develop, own, and operate generation themselves (in Illinois, across the country, or both), allowing ARES to rely on existing internal expertise or external partners.

Of course, self-procure may not be right for all ARES or fully utilized by all ARES. Each ARES should be given the flexibility to choose self-procure for some or all of their obligations. That

¹ ICEA also participated in three rounds of stakeholder comments offered by the IPA during Spring 2026. (*See* EPP at 115 (identifying past stakeholder feedback opportunities).)

² *See* EEP at 117 (setting out “Guiding Principles” for future LTCEP procurements).

³ *See* EEP at 118-119. ICEA notes that in addition to procurement of new renewables, an ARES could seek to decrease the peak usage of their preexisting customers through mechanisms such as demand response, non-inverter based resource virtual power plants (such as smart thermostats), or energy efficiency.

flexibility—paired with commitments and interim milestones to ensure ARES that elect to participate are in fact doing so—will allow the competitive wholesale market to flourish and bring benefits to the broader retail market, as intended by the Public Utilities Act (the source of LTCEP authority).⁴

As a result, any discussion of LTCEP should also include an option for ARES self-procurement. Furthermore, as recognized in the EEP, the Integrated Resource Plan and the Mitigation Plan will further define the needs that LTCEP would address,⁵ meaning that ARES self-procurement should be considered and addressed in those venues as well.

In addition to including self-procurement, ICEA has two additional recommendations for improvements to the EEP discussion of LTCEP:

- *First*, in the Guiding Principles discussion, the IPA should consider preservation of the benefits of the competitive retail market for all participating customers of all rate classes.
 - As demonstrated by the Office of Retail Market Development’s switching statistics, many ARES customers—both in terms of number and peak load contribution—are in competitively declared customer classes. For instance, according to June 2026 switching statistics, ARES customers in competitively declared classes accounted for over 6.6GW of ComEd’s peak load.⁶ While Ameren does not provide peak load contribution by customer class, generally speaking ARES usage is comparable or higher for most customer classes.
 - Even ARES-served customers in residential and small commercial classes were nearly 2.8 GW of peak load contribution in ComEd.⁷
 - These customers provide a substantial portion of each utility’s peak demand and thus their choices of supply option should be protected and preserved.
- *Second*, the IPA should not recommend an LTCEP procurement unless and until it resolves the precise product to be procured and what values ARES customers would receive for payments they must make. For instance, if LTCEP procures physical capacity and energy, the IPA must demonstrate how ARES customers will receive and obtain actual benefits from such physical energy and capacity procurements. Without that information, it is impossible to determine whether an LTCEP procurement is competitively neutral or whether it harms ARES customers by forcing them to pay for products or services that do not benefit them.

ICEA thanks the IPA for its consideration of these comments, and respectfully requests that these comments be reflected in the Energy Procurement Plan (and, as appropriate Integrated Resources Plan and Mitigation Plan) that the IPA files in the coming months.

⁴ See 220 ILCS 5/16-101A(b) and (d).

⁵ See EEP at 119.

⁶ See <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ficc.illinois.gov%2Fapi%2Fweb-management%2Fdocuments%2Fdownloads%2Fpublic%2Felectric-switching%2Ficc-monthly-report-2026-comed.xlsx&wdOrigin=BROWSELINK> (“ComEd Switching Statistics”). Total was calculated summing cells I30-N30.

⁷ Total was calculated using ComEd switching statistics and summing cells C30-H30.