

ILLINOIS POWER AGENCY
Utility-Scale Energy Storage Procurements



Request for Information
September 23, 2026

Updates on IPA's Storage Work & Request for Feedback

Following the conclusion of the Summer 2026 Energy Storage Procurement and the resulting approval of the results by the Illinois Commerce Commission, the Illinois Power Agency (Agency) is commencing a stakeholder feedback process to support both the development of forthcoming energy storage procurement events in 2027 and to inform the development of the Energy Storage Procurement Plan. Through this Request for Information and future workshops and feedback requests, the Agency is seeking to solicit lessons learned and insights on the recently completed procurement event, obtain recommendations for future procurement event design and timing, and provide broader insights and recommendations surround energy storage procurement.

Wrap Up of 2026 Procurement

The Agency appreciated the active and robust feedback provided by participants leading up to and through the Summer 2026 Energy Storage Procurement. Comments received were essential in making the procurement successful. Results of the procurement were [announced by the IPA on September 2, 2026](#).

Looking Ahead

Across the next year, the Agency will collect stakeholder feedback, evaluate market inputs and schedules, and ultimately undertake *at least* one of the additional procurement events called for in CRGA, as well as begin developing the first Energy Storage Resources Procurement Plan with a draft plan being released on June 1, 2027. Additionally, the [Resource Adequacy Mitigation Plan](#) and the [Integrated Resource Plan \(IRP\)](#) grid planning processes will be underway and are expected to inform energy storage procurement and planning activities. These planning activities will provide critical insight on the future energy storage procurement efforts.

In order to ensure effective future procurements, **the Agency is requesting retrospective feedback on the Summer 2026 Procurement**, as well as **prospective input on considerations for forthcoming procurement(s) in 2027** and the drafting of the Energy Storage Resources Procurement Plan.

Feedback Submission Process

Stakeholders are encouraged to review the questions listed below and provide feedback and insight. Stakeholders may respond to some or all questions listed herein. At this time the Agency will not be issuing responses to feedback received, although the Agency may reach out to stakeholders to seek additional information, explanation, or materials.

Stakeholders should follow the instructions provided below when developing responses, paying attention to confidentiality provisions and response deadlines.

Stakeholder Response Instructions:

- All responses are to be submitted to the IPA at IPA.Storage@illinois.gov by October 28, 2026 5:00 p.m. CPT
- Responses shall include the following header in the email subject line:
 - [Stakeholder Name] Response – EnergyStorageRFI_Sept2026
- Responses will be published on the [IPA's Energy Storage webpage](#)
- Responses should include contact details including *at least* one contact name, title, email, and phone number.
- Responses should include the RTO that the stakeholder primarily develops or intends to develop projects in, if applicable.
- Confidential Treatment of Materials Submitted
 - Any written responses, data, attachments or other information submitted by stakeholders that contain confidential information must be clearly labeled as such.
 - If confidential information and/or materials are included in any submission, stakeholders must clearly specify the confidential material within the document, identify the confidential nature of the submission by including the word “confidential” in the document name and in the reference to the document in the submission. Confidential materials will not be publicly posted.
 - Stakeholders that submit confidential information shall provide two copies of the responses – 1) the original, confidential version to be reviewed by the IPA (*will not be posted publicly*), and 2) a redacted version where only the confidential provisions are redacted - which will be posted publicly on the [IPA's Energy Storage webpage](#).

Section A - Feedback on the Summer 2026 Energy Storage Procurement

The initial procurement was bound by both requirements in CRGA and recommendations made in the [*2025 Energy Storage Procurement Report to the Governor, the General Assembly, and the Illinois Commerce Commission*](#). The Summer 2026 Energy Storage Procurement was the first energy storage procurement undertaken by the Agency under CRGA, thus any and all feedback provided on the Summer 2026 Procurement supports continuous improvement in future procurement events. Please review the questions below related to the initial procurement and provide feedback accordingly.

1. If you were unable to participate in the procurement, please provide feedback on factors that impacted your inability to participate (project development timing, project permitting, market conditions, interconnection processes, etc.). Any/all feedback related to this question is helpful, including feedback on factors outside the IPA's jurisdiction but nonetheless directly influenced your choice to not participate.
2. Please provide feedback, if any, related to the **successes** of the Summer 2026 Energy Storage Procurement.
3. Please provide feedback, if any, related to the **challenges** of the Summer 2026 Procurement.
4. Please provide feedback on the **access to information** and **clarity of communication channels** for the Summer 2026 Procurement.
5. Is there any additional feedback on the Summer 2026 procurement event you want to provide to the Agency?

Section B - Feedback on the Upcoming 2027 Procurement(s)

Building upon the results and insights from the Summer 2026 Energy Storage Procurement, the Agency is working to develop additional provisions to support the continued expansion of energy storage procurements towards the 3,000 megawatt procurement goal. The Agency has outlined questions below for feedback that contemplate various aspects of the upcoming 2027 utility-scale energy storage procurement. The statutory limitations for the 2027

procurement¹ are included as an appendix for reference. Please review the questions below related to the 2027 procurement and provide feedback accordingly.

Procurement Timing

Following the Summer 2026 Procurement, the Agency is seeking to identify the ideal timing and cadence of energy storage procurement events.

1. Is it most advantageous for the IPA to conduct a single procurement event per RTO in 2027 with a higher offered target of MW to be procured, or a greater number of procurement events per RTO in 2027 with a lower offered MW target in each?
 - a. Please explain why the preferred approach is ideal.
2. Should the Agency seek to align procurement timing with specific RTO interconnection milestones? Are there certain RTO study phases that are more important to consider than others (e.g. when non-refundable fees must be paid to the RTO)? Please explain your answer in detail.
3. Is there a preferred time of year for a procurement event? (Spring = March-May; Summer = June-August; Fall = September-November; Winter = December-February). Please explain why the preferred approach is ideal.
4. Should procurement events occur for both RTOs at the same time, or should they be split up, occurring at different points in the year (e.g. PJM in March and MISO in August)? Please explain why the preferred approach is ideal.
 - a. Please keep in mind in your response that bid fees would necessarily need to be increased to cover separate RTO procurement events given the inefficiencies lost by holding both RTO procurements at the same time.

Procurement Size & RTO Split for Capacity to be Procured

Section 1-75(d-20)(3)(A) of the IPA Act outlines the specific procurement target and split of that target between RTOs clearly for the initial procurement. For the additional procurements, the procurement target and RTO split is to be determined by the IPA.

5. Recognizing that statutory provisions require storage procurements in 2027 and 2028 to include a commercial operations deadline of December 31, 2030, should the Agency seek to procure the total of the remaining 2,400 MW of the 3,000 MW goal in 2027 procurement event(s)? In the alternative, should the Agency seek to incrementally reach the 3,000 MW goal through extending procurement targets out through procurement events into 2028?

¹ See *Appendix A* of this document for the full list of statutory requirements for the 2027 Procurement from CRGA.

- a. Please explain why the preferred approach is ideal.
 - b. Please also clarify if there is adequate time for an energy storage project to be contracted for, developed, and fully operational in less than two years (i.e. if a procurement event was held in 2028 with commercial operation required by December 31, 2030).
6. What factors should inform how the total amount of MW targets procured are split between the RTOs?
 - a. Should the Agency utilize the same RTO percentage split from the Summer 2026 Procurement or choose a different split? (*Note: Split in the Summer 2026 Procurement was 43% MISO/57% PJM*)
 - b. Please explain in detail and provide documentation if your response relies upon underlying data assumptions (e.g. RTO project queues, resource adequacy needs, etc.).
7. How should unfilled target amounts from a past procurement be rolled forward? Should underfilled targets be fully assigned to the same RTO in the next procurement event, partially assigned to the same RTO by some methodology, or should some other process be applied? Please explain why the preferred approach is ideal.

Resource Type to Be Procured

Section 1-75(d-20)(3)(A) of the IPA Act required that the Agency procure only standalone storage resources for the initial procurement. Looking ahead to procurements in 2027 and 2028, the Agency has more flexibility in the type of storage resources that can be procured to meet the 3,000 MW procurement goal.

8. Should the Agency consider a different resource type for the 2027 procurement (i.e., hybrid or co-located storage resources)? If yes, please explain why. (*Note: Per statute, energy storage projects procured via the additional procurements must still have a COD of 12/31/2030, with some room for extensions in limited circumstances*)
9. Please provide feedback on the concept of the Agency procuring energy storage resources **co-located with generation**.
 - a. What is a suitable definition to utilize for co-located storage resources? Please provide information on where the referenced definition is currently being utilized in the market.
 - b. What potential opportunities could co-located resources provide?
 - c. What potential challenges could co-located resources provide?
10. Please provide feedback on the concept of the Agency procuring **hybrid** energy storage resources.

- a. What is a suitable definition to utilize for hybrid storage resources? Please provide information on where the referenced definition is currently being utilized in the market.
 - b. What potential opportunities could hybrid resources provide?
 - c. What potential challenges could hybrid resources provide?
11. Clearly explain your interpreted difference between a hybrid energy storage resource and a co-located energy storage resource. Please include operational differences, how the RTO markets evaluate/value the resources, and if/how such resources can be evaluated against each other and/or stand-alone energy storage resources through a competitive RFP (or if such resources require separate evaluation).
12. If another type of resource is preferred by a stakeholder, please explain what contract type best aligns with this resource type and why.

RFP Requirements

For future procurement(s) in 2027 and beyond, the IPA will need to develop a new set of RFP requirements. Final RFP requirements utilized for the Summer 2026 Procurement can be found on the Procurement Administrator's website on the [Final Materials page](#).

13. What changes would you like to see the Agency incorporate into the 2027 procurement requirements?
- a. Please note that there are statutory limitations to the 2027 procurement, which are listed in Appendix A to this document. Any proposed changes must comply with the statutory requirements for this procurement.
14. Should the Agency consider project maturity requirements that are more or less strict than those utilized for the Summer 2026 Procurement?
15. How should the Agency best strike a balance between ensuring projects are sufficiently mature (thus can meet the statutory 12/31/2030 commercial operations deadline), while simultaneously not creating too rigorous of a requirement scheme (which could limit the competitiveness of the procurement)?

Indexed Storage Credit (ISC) Contract

For each procurement the IPA holds, a contracting mechanism specific to that procurement is developed. The final ISC Contract utilized for the 2026 procurement can be found on the Procurement Administrator's website on the [Final Materials page](#).

16. Should the Agency retain the ISC contracting mechanism for the 2027 procurement? Please explain why the preferred approach is ideal.
17. If the Agency retains the Indexed Storage Credit contracting mechanism for the 2027 procurement, are there specific changes that stakeholders would like to see made to

the [2026 Indexed Storage Credit Contract](#)? If so, please note the changes, cite to the section and sub-section of the ISC contract, and explain why the changes are necessary.

- a. Please note that there are statutory limitations to the 2027 procurement, which are listed in Appendix A to this document. Any proposed changes must comply with the statutory requirements for this procurement.

18. Is there another preferred contract type that stakeholders would like to see the Agency research and propose in future procurements? If so, please provide details on where the Agency can find examples of the preferred contract type and especially if it is being currently used in deregulated and restructured markets.

- a. Please detail if any proposed alternative contract type requires post-procurement event negotiations (i.e. further negotiations on contract terms, facility operations, etc.).

Adjacent State Project Qualification via Public Interest Criteria

The Agency developed public interest criteria for adjacent state projects for the Summer 2026 Procurement². The Agency is seeking feedback on alternative concepts in order to develop public interest criteria for projects sited outside of Illinois for future procurements. Any proposed criteria must:

“demonstrate(s) ... that the operation of such facility or facilities will help promote the State's interest in the health, safety, and welfare of its residents, including but not limited to minimizing sulfur dioxide, nitrogen oxide, particulate matter and other pollution that adversely affects public health in this State, increasing fuel and resource diversity in this State, enhancing the reliability and resiliency of the electricity distribution system in this State, meeting goals to limit carbon dioxide emissions under federal or State law, and contributing to a cleaner and healthier environment for the citizens of this State”³.

19. Please provide a detailed description of the public interest criteria proposed and how the criteria would ensure that adjacent state projects are serving the public interest of Illinois.

² [Requirements for adjacent state projects for the Summer 2026 Procurement](#)

³ See IPA Act at Section 1-75(c)(1)(I)

Appendix A – Statutory Requirements for the 2027 Procurement

Legal Authority from IPA Act	Statutory Requirement
Section 1-75 (d-20) (3) (E)	All projects must utilize a 20-year contract.
Section 1-75 (d-20) (3) (D)	The procurement may allow for alternative contracting structures (such as tolling agreements), if such contract structures and agreements do not create contractual obligations on utilities that are not contingent on full and timely cost recovery, avoid negative financial impacts on the utilities, and are agreed upon by the participating utility.
Section 1-75 (d-20) (3) (B)	The procurement must be conducted in a manner that: • Maximizes projects available in the PJM and MISO queues; • Ensures the likelihood of project development through the development of project maturity requirements; • Enables sufficient competition for price competitiveness; • Aligns with RTO study phase timing, to the extent practicable.
Section 1-75 (d-20) (3) (A); Section 1-75 (d-20) (3) (B)	The procurement may include storage resource types other than stand-alone storage resources (such as co-located or hybrid storage resources).
Section 1-75 (d-20) (8)	All projects must be developed in accordance with the prevailing wage and project labor agreement requirements of the IPA Act.
Section 1-75 (d-20) (9)	Labor Peace Agreements are required for all projects.
Section 1-75 (d-20) (7)	All projects must meet Minimum Equity Standard and Equity Accountability requirements as required by the IPA Act.
Section 1-75 (d-20) (4) (C)	All projects must be interconnected to the MISO Zone 4 or PJM ComEd Area.
Section 1-75 (d-20) (3) (B)	Project selection between the RTOs must follow either: • A geographic split similar to the ratio in the first procurement for project allocation between the RTOs; • An alternative geographic split proposed by the agency based on project availability in advanced stages of the RTO queues; or • A split that is informed by RTO planning activities that indicate capacity shortages or resource

	adequacy issues and that reflect assessments made through the IRP process (if available).
Section 1-75 (d-20) (6)	The procurement must follow the geographic requirements of Sec. 1-75(c)(1)(I) of the IPA Act.
Section 1-75 (d-20) (6)	Procurement bidders will be assessed a bid fee of at least \$10,000 per bid by the Agency.
Section 1-75 (d-20) (6)	The Agency may also assess bidder and supplier fees to cover the cost of procurement events and develop collateral requirements to maximize the likelihood of successful project development.
Section 1-75 (d-20) (10)	Procurement bidders must certify that they are not an electric utility as defined under 16-102 of the Public Utilities Act serving more than 10,000 customers in the State.
Section 1-75 (d-20) (3) (B)	Projects must commit to reaching commercial operation by 12/31/2030 or an alternative date proposed by the Agency, subject to extension for: • A delay due to interconnection of the energy storage system, • A delay in obtaining permits necessary to build or operate the energy storage system, or • Other circumstances at the discretion of the Agency.
Section 1-75 (d-20) (6)	Bidders shall demonstrate experience in developing to commercial readiness, where "developing to commercial readiness" means having notice to proceed in owning or operating energy facilities with a combined nameplate capacity of at least 100 megawatts.
Section 1-75 (d-20) (10)	The Agency shall not select energy storage resources sourced from an energy storage system whose costs were being recovered through rates regulated by the State or any other state on or after January 1, 2017 for procurement.
Section 1-75 (d-20) (5)	The Agency shall procure cost-effective energy storage resources intended to facilitate the successful development of energy storage projects. "Cost-effective" means a bidder's bid price that does not exceed confidential price benchmarks.
Section 1-75 (d-20) (3) (F)	The Agency shall submit its proposed selection of successful bids for the procurement to the Commission for approval.