

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Power Agency	)	
	)	ICC Docket No. 26-_____
Petition for Approval of the 2027 IPA	)	
Electricity Procurement Plan Pursuant to	)	
Section 16-111.5(d)(4) of the	)	
Public Utilities Act.	)	

**VERIFIED PETITION FOR APPROVAL OF THE ILLINOIS POWER AGENCY’S 2027
ELECTRICITY PROCUREMENT PLAN PURSUANT TO 220 ILCS 5/16-111.5(d)(4)**

Pursuant to the authority granted by the Illinois Power Agency Act, 20 ILCS 3855/1-5, *et seq.*, and the Illinois Public Utilities Act, 220 ILCS 5/1-101, *et seq.*, the Illinois Power Agency (“IPA” or “Agency”) hereby submits to the Illinois Commerce Commission (“Commission” or “ICC”) for consideration and approval its proposed plan for the procurement of electricity for certain customers of Ameren Illinois Company (“Ameren Illinois”), Commonwealth Edison Company (“ComEd”), and MidAmerican Energy Company (“MidAmerican”) (collectively referred to as the “Utilities”) through the Electricity Procurement Plan for the period of June 2027 through May 2032 (the “2027 Plan” or “Plan”) accompanying this Verified Petition.

The 2027 Plan sets forth recommendations related to the procurement of electricity, capacity, and associated transmission services to meet the load requirements and supply needs of eligible retail customers¹ served by the Utilities. The Plan is designed to meet the statutory mandate “to ensure adequate, reliable, affordable, efficient, and environmentally sustainable electric service at the lowest total cost over time, taking into account any benefits of price

¹ “Eligible retail customers” are defined in Section 16-111.5(a) of the Public Utilities Act as “those retail customers that purchase power and energy from the electric utility under fixed-price bundled service tariffs, other than those retail customers whose service is declared or deemed competitive under Section 16-113 and those other customer groups specified in this Section, including self-generating customers, customers electing hourly pricing, or those customers who are otherwise ineligible for fixed-price bundled tariff service.” 220 ILCS 5/16-111.5(a).

stability.”²

In accordance with Section 16-111.5(d)(3) of the Illinois Public Utilities Act (“PUA” or the “Act”), the Commission is required to enter its Order confirming or modifying the Plan within 90 days after filing, on or before December 29, 2026.³ The IPA respectfully requests that the Commission confirm and approve the 2027 Plan submitted with this Petition.

PROCEDURAL BACKGROUND

In accordance with Section 16-111.5(d)(2) of the PUA, and after timely receipt of the Utilities’ load forecasts on or before July 15, 2026, the IPA posted its draft of the 2027 Electricity Procurement Plan to its website on August 17, 2026 (hereinafter the “Draft Plan”).⁴ Utilities and other interested parties were given 30 days following the date of the posting to provide comments to the IPA on the Draft Plan; the Act requires such comments to be “specific, supported by data or other detailed analyses, and if objecting to all or a portion of the procurement plan, accompanied by specific alternative wording or proposals.”⁵ The PUA requires the Agency to hold at least one virtual or in-person public hearing within each utility’s service area to receive public comment on the Draft Plan.⁶ Consistent with the Agency’s practice since 2020 and in accordance with the Act, the IPA held these three public hearings virtually over the Zoom platform on September 14, 2026, with the participation links for those hearings published within the notice of the Draft Plan’s release. No parties provided public comments at the three public hearings held by the IPA. As explained further below, written comments were received from six external stakeholders.

Under the Act, the IPA had 14 days following the end of the 30-day review period to revise

² 220 ILCS 5/16-111.5(d)(4).

³ Pursuant to Section 16-111.5(d)(3) of the PUA, the Commission must enter its order confirming or modifying the Electricity Plan within 90 days of this filing. The December 29, 2026 deadline has been computed in accordance with the provisions of Section 1.11 of the Illinois Statute on Statutes (5 ILCS 70/1.11).

⁴ See 220 ILCS 5/16-111.5(d)(2).

⁵ Id.

⁶ 220 ILCS 5/16-111.5(d)(2).

the Draft Plan as necessary based on the comments and to file the Plan with the Commission. The accompanying Plan fulfills that filing.

Following submission of the 2027 Plan, within five days, any person objecting to the Plan may file its objection with the Commission.⁷ Objections to the 2027 Plan are thus required to be filed with the Commission in the resulting docketed proceeding by Monday, October 5, 2026, and any party seeking to appear or intervene should do so prior to submitting objections.

CHANGES IN THE 2026 PLAN

The 2027 Plan generally proposes to maintain the block energy and capacity products offered through the 2026 Plan, with one significant change related to the strategy in the ComEd service territory. Beginning with the 2024 Plan, the Agency has hedged only 50% of ComEd's forecasted eligible retail customer load during the summer delivery months and 30% during the non-summer months with the remaining 50% of summer delivery supply obligation and 70% of non-summer delivery supply obligation being served through direct market settlement – not bilateral contracting through the block energy procurements. While the supply obligation was open to spot market pricing, such costs were offset by Carbon Mitigation Credits purchased by ComEd. The Carbon Mitigation Credits contracts are set to terminate at the conclusion of the 2026-2027 Delivery Year, and therefore, this 2027 Plan necessarily includes a ramping up of procurement volumes in anticipation of returning to hedging 100% of ComEd's forecasted eligible retail customer load starting in the 2027-2028 Delivery Year.

Additionally, the IPA has introduced a new chapter focused on the implementation of the Long-Term Clean Energy Procurement mechanism established through the introduction of the new subsection (b-10) of Section 16-111.5 of the Public Utilities Act. Public Act 104-4058 became

⁷ 220 ILCS 5/16-111.5(d)(3).

effective on June 1, 2026 and this is the first Electricity Procurement Plan to address this authority. Consistent with the State's ongoing planning efforts, including the development of the Resource Adequacy Mitigation Plan and Integrated Resource Plan ("IRP"), the IPA is not proposing to undertake an LTCEP procurement in this 2027 EPP. Instead, the Agency has proposed inclusion of summary principles and conditions to be considered at such a time in the future when the LTCEP mechanism is proposed to be utilized. The Agency requested stakeholder feedback relevant to future consideration of the mechanism when it issued the Draft Plan.

Lastly, the IPA sought stakeholder feedback on alternative ways to obtain more granular fuel mix data while ensuring any such alternative means does not impact the bid event or results. The Agency's consideration of written comments and revisions to the Draft 2027 Plan are detailed below.

COMMENTS ON THE DRAFT PLAN

The Agency received written comments on the Draft 2026 Plan from five stakeholders, Ameren Illinois, Advanced Energy United and Clean Grid Alliance ("United and CGA"), ComEd, the Illinois Competitive Energy Association ("ICEA"), and SOO Green HVDC Link ("SOO Green"). The Agency also received written comments from one concerned individual, on their own behalf. The individual commentor offered primarily typographic corrections and recommendations to enhance the clarity of certain details provided within the 2027 Plan which were largely adopted in the filed version of the 2027 Plan. Ameren Illinois also provided various typographic corrections which were also largely adopted in the filed version of the 2027 Plan.

ComEd provided a technical correction to the Energy Procurement Targets for ComEd, which the Agency adopted. ComEd also provided a response to the Agency's request for feedback on alternative ways to obtain more granular fuel mix data. ComEd stated that it supports the Agency's proposal to continue to collect fuel mix data from winning bidders through the 2027 Plan. Additionally, ComEd suggested three alternatives for the IPA to consider: (1) require bidders

to include more granular fuel mix data to identify electricity procured from carbon-emitting resources, (2) develop an Illinois-specific or procurement-specific residual fuel mix using publicly available generation and market data, or (3) consider standardized annual supplier portfolio fuel mix reporting based on suppliers' overall generation and procurement portfolios rather than the specific utility load obligation. The IPA appreciates these suggestions, and will continue to collect fuel mix data, which ComEd supported. The IPA is actively seeking solutions to increase specific fuel mix information from winning suppliers without increasing the burden or barriers placed on those same suppliers. The Agency appreciates the concepts provided by ComEd and will continue to consider these alternatives in the future, but does not propose pursuing them at this time.

SOO Green provided a comment generally seeking clarification on the eligibility of Inter-Regional Transmission Converter Stations for procurements of standard wholesale products. The IPA has clarified that 220 ILCS 5/16-111.5(b)(3)(iv) sets out the examples of standard wholesale products, and that same provision specifies that the term "high voltage direct current converter station" is defined in Section 1-10 of the IPA Act. In its written comments, SOO Green also included specific updates regarding the SOO Green HVDC Link beyond what is publicly available. The IPA updated the Plan to provide reference to this information such that those parties reading the 2027 Plan are able to associate the narrative in the 2027 Plan to the comments provided by SOO Green. Additionally, SOO Green provided a comment seeking revision to the characterization of the SOO Green HVDC transmission link, which the IPA has declined to adopt in favor of its publicly available overview of the project.

ICEA, Ameren Illinois, SOO Green, and United and CGA provided comment on the Agency's LTCEP proposal. Ameren Illinois' written comments provided recommendations for the LTCEP that were generally consistent with the Guiding Principles the IPA set out in Section 9.3.1 of the Plan. Ameren supports the deferral of the development of a detailed LTCEP procurement

framework until after the ongoing IRP process, recommends that the procurement design should be determined through the IRP process, emphasizes customer affordability as a primary consideration, cautions that an initial procurement should be limited in scope, urges that competitive procurement structures should be prioritized, recommends that the products and contract terms be evaluated following any determination of need found by the IRP, and encourages the Agency to consider cost allocation based on cost-causation principles. The IPA appreciates these comments and will continue to consider them as it continues to develop the LTCEP in future Plan years.

ICEA also provided written comments supporting the IPA's proposal not to undertake a LTCEP under the 2027 EPP while also providing recommendations on the design of a future LTCEP. Such recommendations include advocating for any future LTCEP to include an option for ARES "self-procurement," and recommending the IPA to include preservation of the benefits of the competitive retail market for all participating customers of all rate classes. Additionally, ICEA suggests that IPA should not recommend an LTCEP procurement unless and until it resolves the precise product to be procured and identifies the values ARES customers would receive for their required payments. The IPA will continue to consider these inputs as it undertakes future implementation activities in subsequent plans.

In its written comments, SOO Green requested an addition to Chapter 9 stating "[a] future identification of need under Section 16-111.5(b-10) would draw on the resource-adequacy gaps quantified through the IRP and Mitigation Plan, and eligible resources – including qualifying clean-generation-associated HVDC transmission facilities – would be evaluated on the basis of their delivered energy, capacity, and resource-adequacy value to Illinois." The additions proposed by SOO Green are not directly in line with the exact statutory text, which could lead to confusion if included in the 2027 Plan. Further, the proposed language would be extraneous, with

clarifications applied in future Electricity Procurement Plans informed by the processes that create such an identification of need.

United and CGA provided written comment recommending that the IPA propose to use the LTCEP within the 2027 EPP and develop a framework for the procurement mechanism so that the LTCEP can be utilized swiftly in 2027 and so that it is ready following the Commission's decision on the IRP. United and CGA specifically request that the IPA resume the dedicated LTCEP mechanism stakeholder process to resolve outstanding implementation questions. United and CGA further argue that the identification of need required under 220 ILCS 5/16-111.5(b-10) is met by the 2025 Resource Adequacy Study, in which the ICC, IPA, and IEPA jointly concluded there is a risk of a resource adequacy shortfall. The IPA appreciates United and CGA's feedback, but disagrees with its proposal. The LTCEP mechanism is intended to facilitate the development of additive new clean energy resources that address broader statewide electric system needs identified through the state-led planning processes, including the Integrated Resource Plan. Given the gravity accompanying decisions to leverage ratepayer funds to support new project development, any proposed LTCEP must be planning-driven and need-responsive. As an Integrated Resource Plan is still under development, the IPA is concerned that prematurely proposing a detailed LTCEP mechanism prior to the completion of those processes will result in a LTCEP mechanism that may not suit the outcome of those planning processes.

In response to United and CGA's proposal to hold LTCEP-specific discussions, to the Agency notes that the Electricity Procurement Plan is an annual process and stakeholder discussions to support the development of the 2028 Plan are expected to begin in early 2027. Throughout 2027, the Agency will also be developing its 2028 Long-Term Renewable Resources Procurement Plan ("LTP") and its initial Energy Storage Resources Procurement Plan. Each plan's development will include robust stakeholder feedback opportunities and each will be developed to

be complimentary to each other and consider, to the best of their ability, the impacts and consideration of the ongoing Resource Adequacy Mitigation Plan and the IRP activities in process. With this understanding, the Agency finds it is premature to commit ratepayer money until there is a clear understanding of identified gaps that could be best filled through use of the LTCEP. If, in the future, a gap is identified and the LTCEP mechanism is determined to be the appropriate approach to bridge the gap, the Agency will then put forward a proposal to employ the LTCEP mechanism through the Electricity Procurement Plan in development at that time.

The Agency appreciates all comments and feedback that stakeholders have taken time to provide.

PROCEDURAL STEPS

As discussed above, any person objecting to the Plan must file an objection with the Commission within five days of the filing of the Plan, on or by Monday, October 5, 2026.⁸ As with past years, parties may file objections based on alternative policy recommendations or legal arguments, and the Commission may take those written objections into consideration in approving or modifying the Plan in accordance with its authority under Section 16-111.5 of the PUA. In addition, the Commission has ten days from the filing of objections to determine if a hearing is necessary.⁹ At this time, the IPA does not believe a hearing is necessary for the Commission consider or approve the 2027 Plan.

PROPOSED BRIEFING SCHEDULE

In prior years, the presiding Administrative Law Judge has instituted a briefing schedule

⁸ 220 ILCS 5/16-111.5(d)(3).

⁹ In the past, the Commission has interpreted Section 16-111.5(d)(3) as requiring a Commission determination within 10 days after Objections are due (see, e.g., Docket No. 12-0544, Notice of Administrative Law Judge Ruling dated October 10, 2012, wherein the determination came 12 days after the filing of the annual procurement plan and 7 days after objections were due); if the Commission determines that this is the appropriate deadline, it must rule on a hearing by Thursday, October 15, 2026.

by issuing a Notice to all parties approximately one week after the commencement of the docket.

For consideration of the 2027 Plan, the IPA proposes the following briefing schedule:

- Responses to Objections must be filed and served by Wednesday, October 21, 2026;
- Replies to Responses shall be filed and served by Wednesday, October 28, 2026;
- The expected date for the ALJ's Proposed Order is Thursday, November 12, 2026;
- Briefs on Exceptions must be filed and served by Thursday, November 19, 2026; and
- Reply Briefs on Exception must be filed and served by Wednesday, December 2, 2026.

This proposed schedule largely mirrors the schedules utilized for prior annual IPA procurement plan approval proceedings. This proposed schedule allows the Commission sufficient time to review the matter prior to its December 17, 2026 Regular Open Meeting, which is the Commission's last scheduled meeting prior to the statutory deadline for approval of the 2027 Plan on December 29, 2026.

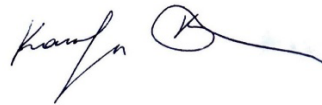
CONCLUSION

The Illinois Power Agency's 2027 Annual Electricity Procurement Plan is consistent with the requirements of the Public Utilities Act and the Illinois Power Agency Act, meets the needs of the customers it serves and should be approved by the Commission. The IPA reserves the right to file responsive comments and any corresponding edits to its 2027 Plan, and respectfully requests the Plan's approval in this proceeding.

September 30, 2026

Respectfully submitted,

Illinois Power Agency

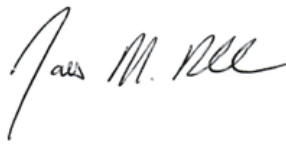
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STATE OF ILLINOIS
COUNTY OF COOK

VERIFICATION

Pursuant to 83 Ill. Admin. Code 200.130 and 735 ILCS 5/1-109, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Verified Petition for Approval of the Illinois Power Agency's 2027 Electricity Procurement Plan are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

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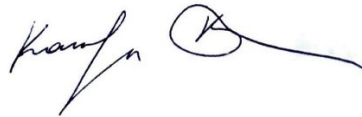
James Rouland
Bureau Chief, Planning & Procurement,
Illinois Power Agency

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NOTICE OF FILING

Please take notice that on September 30, 2026, the undersigned, an attorney, caused the Illinois Power Agency's Verified Petition for Approval of the IPA's 2027 Electricity Procurement Plan Pursuant to 220 ILCS 5/16-111.5(d)(4), the 2027 Plan itself, and the Appendices thereto to be filed via e-Docket with the Chief Clerk of the Illinois Commerce Commission in a new proceeding.



Karalyn Berman