



# Preliminary Integrated Resource Plan

*Questions and Answers +  
Public Comments as Provided*

**March 3, 2026**

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The municipal power agency or municipality shall provide attendees with a reasonable means of providing public comment in writing and of accessing the recording

And

The municipal power agency or municipality shall review public comments and provide responses that reasonably address all relevant issues or questions raised by such comments...The municipal power agency or municipality shall prepare a document with responses to public comments...no later than 90 days after the close of the comment period.

Comments, questions, and topics that are substantially similar to one another have been grouped for simplicity and clarity.

Public comments are included at the end of this document, and the public hearing may be viewed [here](#).

For any questions or comments about this document, please contact Max Weiss, Assistant City Administrator at [mweiss@bataviail.gov](mailto:mweiss@bataviail.gov).

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# Questions and Answers

## Alternative Energy Sources

- 1) Has the City of Batavia considered, as part of its recent Wastewater Treatment Plan upgrades, considered the possibility of an anaerobic digester or beneficial reuse of wastewater byproducts for electricity generation?
  - a. Yes. Our wastewater treatment plant already uses anaerobic digesters and reuses byproducts, which helps reduce the plant's energy use. However, expanding this system would be very difficult because of space limitations and high costs. Even if we did expand, the extra energy produced would be very small compared to the city's overall electricity and capacity needs.
- 2) Why is Geothermal Power not explored further?
  - a. Geothermal energy works best in places with lots of underground heat, like Iceland or parts of the western U.S. Illinois doesn't have that kind of heat underground, so we can't use it to make electricity. In fact, Illinois has zero<sup>1</sup> geothermal power plants. Homeowners can install geothermal heating and cooling systems, which reduce home energy usage, but those don't generate electricity for the grid<sup>2</sup>.
- 3) Has hydropower on the Fox River been considered?
  - a. Yes, but it's not practical. Hydropower needs a big difference in water height between upstream and downstream to work well. The Fox River doesn't have that kind of drop. Building a dam big enough for meaningful power generation would likely cause issues upstream. It also wouldn't make much electricity, especially during droughts, which are becoming more frequent<sup>3</sup>. The Army Corps of Engineers generally does not favor existing dams<sup>4</sup> on the Fox River, so getting a permit for a new dam may be challenging.
- 4) Could existing windmills be converted into electric generating windmills?
  - a. This hasn't been studied, but it's very unlikely. Traditional windmills and modern wind turbines are built for completely different purposes. Converting

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<sup>1</sup> [Geothermal Energy- University of Illinois Extension](#)

<sup>2</sup> [Geothermal Heat Pumps- Department of Energy](#)

<sup>3</sup> [Drought is Intensifying in Illinois- Illinois State Climatologist](#)

<sup>4</sup> [U.S. Army Corps of Engineers Study Recommends Removing Nine Fox River Dams- Kane County Connects](#)

them would require major changes to meet today's safety and environmental standards, so it's not considered feasible.

- 5) Why does the IRP not consider small modular nuclear reactors?
  - a. It does mention them<sup>5</sup>, but right now these reactors aren't commercially available at a scale that makes sense for Batavia. They're still in development, so while they could be an option in the future, they aren't practical for us today.
- 6) Could the City of Batavia and Fermilab partner to either host generation assets or provide energy to Batavia?
  - a. Yes, that's possible. Batavia already has transmission lines and a substation on Fermilab's property. If Fermilab develops an energy project, connecting it to Batavia's grid would be technically feasible. A partnership could be explored in the future.

## Renewable Energy & Storage

- 1) Why was a 4-hour Battery Energy Storage System (BESS) prioritized over other duration batteries?
  - a. The IRP currently focuses on a 4-hour battery because that is the most common and well-understood option in our region. It aligns with PJM's market rules, which recognize 4-hour batteries for capacity value, and it fits Batavia's peak demand pattern, which typically lasts only a few hours in the afternoon<sup>6</sup>. Longer-duration batteries were not analyzed in detail because they are still emerging technologies, have higher costs, and do not offer clear additional benefits under current market conditions. That said, the City is continuing to monitor technology and policy changes, and future plans could revisit longer-duration storage if it becomes more practical or cost-effective. Brattle recommends that Batavia monitor 4+ hour duration batteries for the future.
- 2) Is there excess solar generation from Batavia residents, or businesses, that could be accessed during peak loads, such as via a battery or other storage system?
  - a. No, Batavia does not currently have significant excess solar generation from residents or businesses. As of 2024, the City has about 1.9 MW<sup>7</sup> of

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<sup>5</sup> See IRP page 64- Supply-Side Resource Options Not Considered

<sup>6</sup> See IRP page 46- Projected Net System Load- 24 Hour Shape

<sup>7</sup> See IRP page 32- Batavia Historical Distributed Solar and EV Count

distributed solar capacity, which is only around 2% of our peak load. Most of this capacity is behind-the-meter and not available for grid use during peak periods. While storage could technically help capture excess solar, the amount of surplus energy today is very small, so this is not a meaningful option at this time. Should solar expansion grow, this may become a more viable option.

- 3) How are battery prices expected to change into the future?
  - a. The IRP notes that battery costs have been declining and are expected to continue falling over time<sup>8</sup>. In the scenarios modeled, technology cost trends assume gradual reductions, with faster cost declines in the high market price scenario and slower declines in the low-market price scenario. This means batteries are likely to become more affordable in the future, though the pace of cost reduction depends on market conditions and supply chain factors.

## Natural Gas Reciprocating Engine (RECIP)

- 1) What is the estimated cost of a Natural Gas Reciprocating Engine (RECIP)?
  - a. The IRP estimates the capital cost for a 10 MW Natural Gas Reciprocating Engine (RECIP) at approximately \$8.4 million, with additional fixed O&M costs of about \$5 million over its life and variable dispatch costs of roughly \$6.8 million. These figures are based on industry benchmarks and assume a 30-year economic life<sup>9</sup>.
- 2) Please explain the process and costs for retrofitting the RECIP to burn clean fuels when CEJA requires it?
  - a. We have not developed a cost estimate of future retrofits for burning alternative fuels, including hydrogen. Moreover, based on historical observations, we understand that such retrofits are rarely done overnight, but rather such transitions take time (i.e., several years), as the manufacturers figure out operational or retrofitting options, including developing advanced replacement parts. We note that the cost of such retrofits could be smaller than the future fuel cost fluctuation.
- 3) How is the Natural Gas RECIP expected to help if the city's exposure is 25+ MW, and the gas plant is only 10MW? Will it still reduce PJM peak costs?

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<sup>8</sup> [Cost Projections for Utility-Scale Battery Storage- National Renewable Energy Laboratory](#)

<sup>9</sup> See IRP page 72- Cost Comparison among All Candidate Resources

- a. The draft IRP results show that a 10 MW RECIP resource would reduce Batavia's costs. 10 MW was selected as a practical way to compare among the different technologies. In the Final IRP, we will evaluate different sizes for each new resource option.
- 4) The report states that the city should study a Natural Gas RECIP in the late 2020s. Does this mean that the city would have another study, and then decide on whether to do a RECIP, or does this IRP represent a commitment to move ahead with a Natural Gas RECIP?
  - a. The IRP does not represent a commitment to construct a Natural Gas Reciprocating Engine (RECIP). It recommends that the City study the feasibility of a RECIP in the late 2020s as part of its ongoing resource planning process. This means that before any decision is made, the City would conduct a more detailed analysis of feasibility, costs, benefits, regulatory compliance, and alternatives at that time. The IRP is a planning document, not an authorization to proceed with construction, and its recommendations are intended to guide future evaluation rather than commit the City to a specific project.
- 5) How does a Natural Gas RECIP support 25% greenhouse gas emission reduction goals?
  - a. The natural gas reciprocating engine (RECIP) is assumed to have lower emissions intensity than the average PJM generation fleet. Adding the RECIP, therefore, is projected to reduce overall emissions relative to the status quo, which relies on market purchases from PJM, which contains coal<sup>10</sup>.
- 6) Given that our peak load exceeds 55MW primarily in the summer, would the RECIP sit idle for most months?
  - a. The operating hours for the new RECIP resource depend on the market conditions (including the PJM energy prices and delivered price of natural gas to the RECIP resource). In the draft IRP analysis under the Reference Scenario, we estimated the new RECIP would run at an annual capacity factor in the range of 10% to 40% depending on the year<sup>11</sup>. We estimated that about 60% of the operating hours in 2035 are in non-summer months.

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<sup>10</sup> [Markets and Operations- PJM](#)

<sup>11</sup> See IRP Page 70- Preferred Portfolio: Costs and Revenues

- 7) How would the city share the expected savings from a Natural Gas RECIP with ratepayers?
- a. The IRP does not set rates, but if Batavia were to build a Natural Gas RECIP and it resulted in lower wholesale power costs or reduced exposure to market volatility, those savings would flow through the City's cost-of-service model. In practical terms, this means that with more predictable and stable energy costs, the City could allocate more funds to repair and upgrade infrastructure without requiring as large of an increase in customer rates. The goal would be to use the financial flexibility created by the RECIP to maintain reliability and improve infrastructure while keeping rate impacts as low as possible.

## Prairie State Energy Campus (PSEC) & Market Exposure

- 1) Can you explain the Prairie State Energy Campus (PSEC) situation, and how it impacts our electric utility and long-term planning?
  - a. Prairie State Energy Campus (PSEC) is a large 1,600 MW coal-fired power plant located in southern Illinois<sup>12</sup>. Batavia is contractually obligated to purchase a fixed share of its output through the Northern Illinois Municipal Power Agency (NIMPA)<sup>13</sup>. This arrangement was designed to provide long-term price stability and reliable baseload power for member communities like Batavia. PSEC began operation in 2012 and was intended to serve as a cornerstone resource for municipal utilities for decades. Initially costs for the plant exceeded estimates, and rates were higher than anticipated to cover the overages<sup>14</sup>.

Under Illinois' Climate and Equitable Jobs Act (CEJA), coal-fired generation must achieve zero carbon emissions by 2045, and halve emissions by 2038<sup>15</sup>. This means PSEC will either need to cut production or use other compliance measures. These requirements create uncertainty for Batavia's long-term resource planning because PSEC currently represents a significant portion (55MW of ~88 MW) of our energy supply portfolio.

Despite being coal-based, PSEC has recently provided cost advantages for Batavia. This is primarily due to high capacity prices in the PJM market.

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<sup>12</sup> [Prairie State Energy Campus](#)

<sup>13</sup> [Northern Illinois Municipal Power Agency \(NIMPA\)](#)

<sup>14</sup> [Prairie State coal-fired plant to cap costs- Chicago Tribune](#)

<sup>15</sup> [Electric Generating Units and Large Greenhouse Gas-Emitting Units- IEPA](#)

Because Batavia's PSEC entitlement includes both energy and capacity, the City avoids paying the full market price for capacity that other utilities must purchase. In recent years, PJM capacity prices have risen sharply, making Batavia's fixed-cost PSEC allocation relatively more economical compared to market purchases. In short, while PSEC's *energy* costs are stable, the real savings come from avoiding volatile and expensive *capacity* charges. Long-term, as capacity prices rise, we expect the costs associated with PSEC to drop, as the plant earns additional revenues from the market.

Looking ahead, PSEC's compliance costs or eventual retirement will significantly affect Batavia. If PSEC retires or becomes uneconomic due to carbon compliance costs, Batavia will lose this hedge against capacity price volatility. This risk is a key driver behind the IRP's recommendation to explore new resources such as solar, battery storage, and potentially a Natural Gas Reciprocating Engine (RECIP) to maintain reliability and manage costs when PSEC is no longer available. The IRP assumes PSEC remains in service until 2045 but at a declining capacity factor as CEJA deadlines approach, which means Batavia must plan for a gradual transition away from coal-based baseload power.

- 2) How do the changes in capacity prices both present an exposure to the city, and increase revenues via PSEC?
  - a. When capacity prices rise, utilities that rely on the market for capacity see their costs increase significantly. Batavia is partially exposed because we still purchase some capacity from the market for load not covered by PSEC. If prices continue to climb, this portion of our costs will increase, creating financial risk.

At the same time, higher capacity prices make Batavia's PSEC entitlement more valuable. PSEC provides both energy and accredited capacity at a relatively stable cost, so when market capacity prices rise, the relative savings from PSEC grow. In other words, PSEC acts as a hedge: it reduces the amount of capacity Batavia must buy at high market prices, and this difference translates into avoided costs effectively increasing the financial benefit of PSEC.

This dynamic is why the IRP emphasizes monitoring capacity market trends. Rising capacity prices make PSEC more advantageous today, but if PSEC

retires or compliance costs increase, Batavia will lose that hedge and face greater exposure to volatile capacity markets.

- 3) Do the proposed portfolios eliminate Batavia's market exposure?
  - a. No, the proposed portfolios in the IRP do not completely eliminate Batavia's market exposure. Each portfolio reduces exposure by adding resources like solar, battery storage, or a Natural Gas RECIP, which provide energy and capacity value. However, Batavia will still rely on the PJM market for a portion of its energy and capacity needs, especially during periods of high demand or when local resources are unavailable. The portfolios are designed to mitigate risk and volatility, not fully remove it. Complete elimination of market exposure would require Batavia to be fully self-supplied with accredited capacity and energy, which may not be practical or cost-effective under current conditions. It could also expose Batavia to a different type of risk (i.e., stranded assets).
- 4) Do certain portfolio options do better at reducing that market exposure?
  - a. Yes, certain portfolio options are expected to reduce Batavia's market exposure more effectively than others. Portfolios that include local capacity resources, such as a Natural Gas Reciprocating Engine (RECIP), are expected to provide the strongest hedge because they reduce reliance on PJM's capacity market. A RECIP is projected to save between \$4 million and \$15 million from 2026 through 2045<sup>16</sup>.

Battery storage also helps, primarily by reducing short-term energy price volatility rather than long-term capacity obligations. A battery system is expected to save up to \$6.2 million in the high market price scenario but could result in a loss of up to \$400,000 in the low-market price scenario<sup>17</sup>.

Solar reduces energy purchases during daylight hours but does not significantly reduce capacity exposure because PJM accredits solar at a lower capacity value. Solar is expected to save up to \$2.2 million in the high market price scenario and could lose about \$200,000 in the low-market price scenario<sup>18</sup>.

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<sup>16</sup> See IRP page 73- Evaluation of Alternative Resources

<sup>17</sup> See IRP page 73- Evaluation of Alternative Resources

<sup>18</sup> See IRP page 73- Evaluation of Alternative Resources

Wind reduces energy purchases when it is generating, but like solar, it does not significantly reduce capacity exposure because PJM accredits wind at a low capacity value. Wind is expected to save up to \$5 million in the high market price scenario and could result in a loss of up to \$300,000 in the low market price scenario<sup>19</sup>.

5) What is Batavia’s “profit” from selling excess energy and capacity on the market?

- a. As background, when Batavia consumes more than 55MW of power, there is no excess energy or capacity to sell. Currently, the City regularly exceeds 55MW during the summer and fall months. Therefore, most of our excess energy is sold in the winter or at night, when demand, and therefore prices, are at their lowest. Therefore, we often lose money on energy sales alone, given when we sell our excess.

| Year        | Excess Sales <sup>20</sup> |
|-------------|----------------------------|
| <b>2018</b> | -\$2,450,193               |
| <b>2019</b> | -\$2,760,852               |
| <b>2020</b> | -\$3,042,865               |
| <b>2021</b> | -\$1,441,825               |
| <b>2022</b> | -\$683,663                 |
| <b>2023</b> | -\$3,480,303               |
| <b>2024</b> | -\$3,103,696               |
| <b>2025</b> | -\$2,328,304               |

6) How high have Batavia’s rates historically been due to the Prairie State Energy Campus contract? How has that changed over the years?

- a. When Batavia first entered into the Prairie State Energy Campus (PSEC) contract through NIMPA, the City’s electric rates were relatively high compared to neighboring utilities. This was because PSEC’s costs were largely fixed and front-loaded to cover construction and financing, while market prices for energy were very low in the early 2010s. During that period, Batavia’s rates were often cited as being among the highest in the region<sup>21</sup>, primarily due to the long-term obligation to pay for PSEC capacity and energy regardless of market conditions.

<sup>19</sup> See IRP page 73- Evaluation of Alternative Resources

<sup>20</sup> Data provided by Avant on behalf of NIMPA.

<sup>21</sup> [Class-action suit filed over Batavia energy deal- Chicago Tribune](#)

Over time, this situation has improved significantly. As PJM market prices, especially capacity prices, have risen, Batavia's fixed-cost PSEC entitlement has become more advantageous. Today, PSEC acts as a hedge against volatile and increasing market costs, and Batavia's rates have become much more competitive compared to other municipal and investor-owned utilities. In fact, the IRP notes that current rates are now closer to the regional average, and the financial benefit of PSEC has grown because capacity prices in PJM have increased sharply in recent years. Batavia's rates are now generally lower than Commonwealth Edison<sup>22</sup>.

## Demand & Load Analysis

- 1) Many residents have purchased electric vehicles, so it is perplexing that load has remained stable even as that occurs. Can you explain why the load has been flat even with EVs?
  - a. Despite increasing electric vehicle (EV) adoption among Batavia residents, overall system load has remained stable and even declined slightly due to offsetting efficiency improvements. As of 2024, Batavia had approximately 89 EV customers, contributing roughly 1 MW of incremental load which is a very small percent of the City's 85 MW peak demand. While we recognize that the EV adoption figures in this IRP are likely conservative and we are seeking updated data from the Illinois Secretary of State, the impact of EVs on system load has been outweighed by widespread implementation of energy efficiency measures, including LED lighting and high-efficiency appliances, which have reduced consumption across residential and commercial sectors. Most EV charging occurs during overnight off-peak periods, which does not materially affect Batavia's summer peak demand profile. Combined with flat native load growth and incremental distributed solar generation, these efficiency gains have resulted in an overall decline in annual energy consumption since 2018, despite the growth in EV ownership.
- 2) Can the City of Batavia break down demand into residential, commercial, and industrial demand?

The table below is developed by applying the historical customer class share across residential, commercial, and industrial customers to the City's gross load forecast.

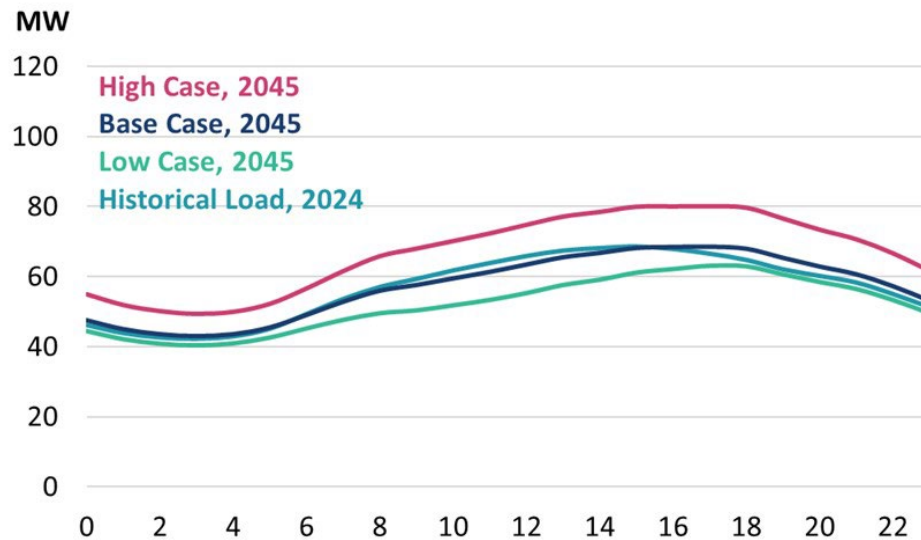
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<sup>22</sup> [Electric Service Comparisons 2024- City of Batavia](#)

|      | Energy (GWh) |            |            |       | Peak Demand (MW) |            |            |       |
|------|--------------|------------|------------|-------|------------------|------------|------------|-------|
|      | Residential  | Commercial | Industrial | Total | Residential      | Commercial | Industrial | Total |
| 2025 | 91.0         | 139.2      | 187.3      | 417.5 | 18.9             | 28.9       | 38.9       | 86.7  |
| 2026 | 91.1         | 139.2      | 187.5      | 417.8 | 18.9             | 28.9       | 38.9       | 86.8  |
| 2027 | 91.1         | 139.3      | 187.6      | 418.1 | 18.9             | 28.9       | 38.9       | 86.8  |
| 2028 | 91.2         | 139.5      | 187.8      | 418.5 | 18.9             | 28.9       | 39.0       | 86.8  |
| 2029 | 91.3         | 139.6      | 188.0      | 418.9 | 18.9             | 29.0       | 39.0       | 86.9  |
| 2030 | 91.4         | 139.8      | 188.2      | 419.3 | 18.9             | 29.0       | 39.0       | 86.9  |
| 2031 | 91.5         | 139.9      | 188.4      | 419.9 | 19.0             | 29.0       | 39.0       | 87.0  |
| 2032 | 91.7         | 140.1      | 188.6      | 420.4 | 19.0             | 29.0       | 39.1       | 87.0  |
| 2033 | 91.8         | 140.3      | 188.9      | 421.0 | 19.0             | 29.0       | 39.1       | 87.1  |
| 2034 | 91.9         | 140.5      | 189.2      | 421.6 | 19.0             | 29.0       | 39.1       | 87.1  |
| 2035 | 92.1         | 140.7      | 189.5      | 422.3 | 19.0             | 29.1       | 39.1       | 87.2  |
| 2036 | 92.2         | 141.0      | 189.8      | 422.9 | 19.0             | 29.1       | 39.2       | 87.3  |
| 2037 | 92.3         | 141.2      | 190.1      | 423.6 | 19.0             | 29.1       | 39.2       | 87.4  |
| 2038 | 92.5         | 141.4      | 190.4      | 424.2 | 19.1             | 29.1       | 39.2       | 87.4  |
| 2039 | 92.6         | 141.6      | 190.6      | 424.9 | 19.1             | 29.2       | 39.3       | 87.5  |
| 2040 | 92.8         | 141.8      | 190.9      | 425.5 | 19.1             | 29.2       | 39.3       | 87.6  |
| 2041 | 92.9         | 142.0      | 191.2      | 426.2 | 19.1             | 29.2       | 39.4       | 87.7  |
| 2042 | 93.0         | 142.3      | 191.5      | 426.8 | 19.1             | 29.3       | 39.4       | 87.8  |
| 2043 | 93.2         | 142.5      | 191.8      | 427.4 | 19.2             | 29.3       | 39.4       | 87.9  |
| 2044 | 93.3         | 142.7      | 192.1      | 428.1 | 19.2             | 29.3       | 39.5       | 87.9  |
| 2045 | 93.5         | 142.9      | 192.4      | 428.7 | 19.2             | 29.3       | 39.5       | 88.0  |

- 3) Why does the IRP not account for the load from the planned Hut 8 Data Center?
  - a. The planned Hut 8 Data Center was not included in the IRP load forecast because planning for this facility was in early stages at the time of analysis. The IRP states that the 50 MW data center “would be supplied exclusively from wholesale market purchases” and therefore was not modeled in the hourly load forecast or resource portfolio evaluation. The final IRP (scheduled for 2026) will incorporate this load and assess its implications for cost, reliability, and infrastructure needs.
- 4) How many houses already have a smart thermostat?
  - a. This is not known.
- 5) On slide 46, how does Batavia’s load change hour by hour during the peak three months of electric usage?
  - a. During Batavia’s peak electricity months (June through August), demand is lowest overnight, rises quickly in the morning, and stays elevated through the afternoon before peaking in the early evening. Compared to the annual average, summer loads during the peak three months are higher at nearly every hour of the day, with the biggest increases occurring during hot afternoon and early-evening hours when cooling use is highest.

See the chart below for the average load by hour of the day during the months of June-August.



- 6) Does the study include consideration of the electrification of water heaters, furnaces, etc.?
  - a. The IRP considered the potential impact of end-use electrification, including electric water heaters, furnaces, and other appliances, as part of its load forecast development. Based on a survey of current Batavia customers, the analysis assumes no significant electrification beyond electric vehicle adoption during the planning horizon. Customers indicated limited expectations for converting major end-use systems to electric alternatives, and historical trends support this assumption<sup>23</sup>. Most households that do switch tend to do so at the end of equipment life, making the transition gradual and less prone to sudden shifts in demand compared to EV adoption. As a result, incremental electrification was modeled as having a very small impact on system load and was softened for the final load forecast cases. This assumption will be revisited in future IRP updates if policy changes, technology costs, or customer preferences indicate accelerated electrification adoption.
  
- 7) Can you explain how we are required to pay for peak PJM load capacity? Does this mean we pay for capacity even if we do not use it?

<sup>23</sup> [Energy Portfolio Survey Results Memo](#)

- a. Under PJM market rules, each load serving entity pays for hourly energy consumption in addition to paying for the cost of procuring capacity to serve its annual peak load plus a reserve margin during the PJM system peak conditions<sup>24</sup>. The payment for the capacity product is for the participating resources' commitment to be available and ready to provide power during the times with peak load or tight supply conditions.
- 8) What is UCAP vs. ICAP?
- a. The ICAP value of a resource refers to its “installed capacity” while the UCAP value refers to its “unforced capacity”. The UCAP value accounts for the factors (such as outages, intermittency of operations, limitations on energy output during certain seasons) that reduce the ability of a resource to be available to produce power during the times when they may be needed for maintaining reliable operations of the system.

## Policy, Contracts & Governance

- 1) Does the IRP address options for replacement energy or modifying the City's Power Purchase Agreement with NIMPA that would allow the city to procure its own replacement energy? If not, why?
- a. This IRP does not evaluate options for modifying Batavia's existing Power Purchase Agreement<sup>25</sup> (PPA) with the Northern Illinois Municipal Power Agency (NIMPA) or procuring replacement energy independently. The NIMPA contract is a long-term, binding agreement that obligates Batavia to pay for Prairie State Energy Campus bond payments and pass-through costs through 2041, regardless of the facility's operating status. Under the contract terms, NIMPA, not Batavia, will procure replacement energy from the market following the planned reduction in emissions at PSEC. Because these provisions limit Batavia's ability to unilaterally alter its supply arrangements, the IRP focuses on strategies within the City's control, such as adding local generation resources and implementing demand-side programs, to hedge against market volatility and manage future cost risk.
- 2) Is it more appropriate for the City of Batavia, or NIMPA, to be seeking additional power generation resources?

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<sup>24</sup> [PJM Manual 18- PJM](#)

<sup>25</sup> [Power Sales Agreement, As Amended- City of Batavia](#)

- a. NIMPA is a project-based organization with three members: Batavia, Geneva and Rochelle, which was formed only to explore joint ownership of a generating facility which resulted in partial ownership of PSEC. It is likely more appropriate for Batavia to seek additional generation resources on its own, however, it could also be done jointly with other municipal electric utilities in a project-based organization, whether NIMPA or some partnership with other utilities.
- 3) Will the developers of the Batavia Data Center be required to generate their own electricity from renewable resources?
- a. The IRP assumes that the planned Batavia Data Center will be served through wholesale market purchases and does not impose any requirement for the developer to generate electricity from renewable resources. At the time of this analysis, planning for the data center was in early stages, and no contractual or policy provisions mandating on-site renewable generation had been identified. Future IRP updates will evaluate the implications of this load and any applicable state or local requirements related to renewable energy sourcing.
- 4) Has the City of Batavia considered discussions with the Batavia Data Center to partner on natural gas generation, considering their own likely backup generators?
- a. The City of Batavia has not engaged in discussions with the developers of the planned Batavia Data Center regarding a partnership on natural gas generation. At this time, the IRP assumes that the data center will be served through wholesale market purchases. While data center developers typically install backup generators for reliability, these units are designed for emergency use and do not function as continuous power generation resources. They differ significantly from a utility-scale natural gas generating station in terms of capacity, operational characteristics, and regulatory compliance<sup>26</sup>. Future planning efforts may explore opportunities for collaboration if mutually beneficial arrangements can be identified, but such considerations were outside the scope of this IRP.
- 5) At what point is the IRP final and no longer unalterable?

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<sup>26</sup> [Data Centers' Use of Diesel Generators for Backup Power Is Commonplace—and Problematic- Inside Climate News](#)

- a. The IRP remains a draft until it is formally adopted by the Batavia City Council. Upon adoption, the IRP becomes the City's official planning document; however, it is not unalterable. The Council retains full authority to amend the IRP at any time as circumstances, priorities, or market conditions change. This flexibility ensures that the IRP can evolve to reflect new information, emerging technologies, and policy developments while continuing to serve as a guiding framework for resource planning.
- 6) Can you provide the contract and RFQ used for this project?
- a. [RFQ](#)
  - b. [Master Services Agreement](#)
  - c. [Task Order 1](#)
- 7) Does Batavia's contract with NIMPA allow selling excess capacity and energy to others when we are not using our full allotment?
- a. Batavia's contract with NIMPA permits the City to sell excess energy into the PJM market when its demand is below the 55 MW of firm supply provided under the agreement. These transactions allow Batavia to earn revenue from surplus energy, which helps offset overall power costs. However, the contract does not provide for separate sale of capacity rights; capacity revenues from Prairie State are applied as a discount to Batavia's energy price under the contract terms.
- 8) Has Batavia explored selling its electric utility?
- a. No.
- 9) Would the City of Batavia consider entering into contracts with residents or business for electric generation or producing fuel for electric generation?
- a. At this time, the IRP does not propose that the City of Batavia enter into contracts with residents or businesses for electric generation or for producing fuel used in electric generation. Such arrangements (e.g., power purchase agreements for behind-the-meter distributed generation, community-scale resources, renewable natural gas, or other fuel supply) would require careful evaluation of the City's obligations under the NIMPA contract, PJM market participation rules, interconnection and metering standards, environmental permitting, and municipal procurement policies. While the City may consider these options in future planning cycles, the present IRP focuses on strategies within the City's direct control (utility-scale

supply additions and demand-side programs) to manage cost and capacity risk.

## Financial & Economic Considerations

- 1) How much has the City of Batavia spent on this analysis? How much staff time has been allocated?
  - a. The City is expected to spend approximately \$1 million on the project. Please note this also includes a cost-of-service study and infrastructure resiliency study, as well as rate design. Staff time has not been tracked separately from other work, but estimates are roughly 500 hours total across all staff when complete.
- 2) As natural gas prices rise and fall, would the City not become subject to the same wild electric price swings as PJM?
  - a. While natural gas prices are a key driver of wholesale electricity prices in PJM, Batavia's exposure to these swings is partially mitigated by its long-term NIMPA contract, which provides 55 MW of firm, round-the-clock energy and capacity through at least 2038, and 27.5 MW thereafter. This contract acts as a hedge against short-term volatility in energy prices. However, Batavia remains exposed to market prices for any energy purchased beyond the NIMPA allotment and for capacity obligations, which are expected to rise significantly over time. As a result, while the City is not fully insulated from natural gas price fluctuations, its exposure is substantially lower than that of entities relying entirely on PJM market purchases. The IRP recommends additional hedging strategies, such as deploying a natural gas reciprocating engine (RECIP) and implementing demand-side programs, to further reduce this risk.
- 3) How does the average bill over time change with the recently passed rate increases?
  - a. The average residential bill over time would increase by 3% on a per KWh basis, and by \$3.75 per month. The general shape of the bill increases over time is not significantly altered.
- 4) Does this analysis consider the loss of federal, state, and other tax credits for energy sources?
  - a. Yes. The IRP analysis explicitly considers the loss or phase-out of federal, state, and other tax credits for energy resources. The modeling assumes that all candidate resources are ineligible for federal tax credits, including the

Investment Tax Credit (ITC) and Production Tax Credit (PTC), and notes recent policy developments accelerating phase-outs and imposing restrictions such as foreign component sourcing rules. These assumptions were incorporated to provide a conservative and realistic estimate of resource economics under current and anticipated policy conditions. Many renewable and storage portfolios modeled in this IRP would have been more economically attractive prior to the removal of tax credits for wind and solar under the One Big Beautiful Bill (OBBB)<sup>27</sup>. As a result, the IRP's resource cost comparisons reflect scenarios without reliance on tax incentives, ensuring recommendations remain robust even if such credits are unavailable.

- 5) What is the Net Present Value for each of the portfolios?
  - a. Via IRP Page 72. All dollars in 2025. Assumed reference scenario with optimal online year.

| Status Quo    | 10MW BESS     | 10 MW Solar   | 10MW Wind     | 10MW Solar + BESS | 10MW RECIP    |
|---------------|---------------|---------------|---------------|-------------------|---------------|
| \$382,626,000 | \$382,475,000 | \$382,643,000 | \$382,724,000 | \$382,095,000     | \$378,601,000 |

## Environmental & Climate Impact

- 1) Why does the report not consider the consequences if the state or federal government was to force the closure of coal fired power plans earlier, such as in 2040?
  - a. The Draft IRP report considered future environmental policies and rules that are currently in effect. Additional analyses for select scenarios can be considered in the Final IRP (scheduled to be conducted later this year).
- 2) Does the report consider how climate change will impact electric distribution and generation over the next 15 years? What is the expected environmental impact of the preferred portfolio?
  - a. The IRP does not include a detailed analysis of how climate change will directly impact electric distribution infrastructure or generation performance over the next 15 years. That analysis is being performed as part of the Infrastructure Resiliency Study. Instead, the IRP focuses on market, policy,

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<sup>27</sup> [FAQs for modification of sections 25C, 25D, 25E, 30C, 30D, 45L, 45W, AND 179D under Public Law 119-21, 139 Stat. 72 \(July 4, 2025\), commonly known as the One, Big, Beautiful Bill \(OBBB\)- IRS](#)

and technology drivers such as fuel price volatility, capacity market trends, and compliance with Illinois' Climate and Equitable Jobs Act (CEJA).

Environmental considerations are incorporated through portfolio screening and emissions comparisons. The highest performing portfolio, adding a 10 MW natural gas reciprocating engine (RECIP), is projected to reduce overall emissions relative to the status quo, which relies on market purchases, and has lower emissions intensity than the average PJM generation fleet<sup>28</sup>. More full analysis of the impacts of any given portfolio will be considered in the final IRP.

While cleaner portfolios (solar, wind, storage) offer greater emissions reductions, they were found to potentially increase customer costs in the Reference Scenario. The IRP recommends demand-side programs as near-term steps to reduce consumption and greenhouse gas emissions, and notes that all portfolios modeled would reduce emissions compared to current reliance on PJM market purchases.

- 3) On slide 20, the City's energy policy states a 25% reduction of emissions goal below 2019 levels. Why is 2019 chosen?
  - a. This follows the Kane County Climate Action Plan, which proposes a goal of 25% greenhouse gas emission reduction by 2030<sup>29</sup>.

## Demand-Side Management

- 1) What demand side programs are considered in the IRP?
  - a. The IRP evaluated several demand-side programs aimed at reducing Batavia's exposure to high PJM capacity and energy prices by lowering or shifting peak demand. Programs modeled include Residential and Commercial Time-of-Use (TOU) pricing, which incentivizes customers to shift usage away from peak hours; Electric Vehicle (EV) TOU pricing and EV Managed Charging programs, which optimize charging schedules to reduce peak load; and a Residential Smart Thermostat program that automates cooling adjustments during peak periods. These programs were selected based on their proven performance in other jurisdictions, alignment with Batavia's system needs, and customer preferences. While additional options

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<sup>28</sup> [Generation Fuel Mix- PJM](#)

<sup>29</sup> [Kane County Climate Action Plan - Kane County](#)

such as manual and automated demand response for large commercial and industrial customers and behind-the-meter battery storage were identified for future consideration, they were not explicitly modeled in this draft due to the need to build out programs designed for that specific focus. Collectively, these demand-side resources offer cost-effective, quickly deployable strategies to improve system reliability and reduce long-term capacity costs.

- 2) By how much will a pre-cooling strategy reduce the peak demand, and what effect will such a strategy have on an average homeowner?
  - a. A pre-cooling strategy is typically linked to a time-varying rate (TVR) or price signal to encourage customers to shift consumption to “off-peak” usage. Relatedly, this response depends on the strength of the price signal relayed to customers. On a simple time-of-use (TOU) rate with a peak to off-peak price ratio of 2:1 (the designated peak period is twice as expensive as off-peak periods), we have observed reductions in peak demand of approximately 4% through pilots and rate treatments across the globe. With a stronger price signal, the observed peak demand reduction will be higher, albeit empirically, at a lower rate. In practical terms, this means that the average homeowner may have to increase their thermostat by a few degrees during the designated peak hours or ensure that high usage appliances (dishwashers, A/C, EV, water heater, electric ovens, etc.) are not running all at the same time during the peak hours. Through our work on TOU pilots and rate treatments, we have also observed that *moderate response to TOU price signals* (by reducing usage during peak periods) can unlock monthly bill savings on the order of approximately 2% to 7%. The savings are driven by both the magnitude of price response as well as the strength of the TOU price signal. Bill impacts are typically a function of average utility costs as they are embedded in electric rates. A significant benefit of peak demand reduction as a result of TOU/TVR pricing, is avoided capacity and energy costs as a result of reducing the overall system peak demand, which may result in future bills being significantly lower than otherwise.
- 3) Does ComEd have a Commercial time of use rate?
  - a. ComEd does not have fixed time of use rates and instead allows customers to buy power at the hourly price, called ComEd’s Rate BESH<sup>30</sup>. While customers may be able to lower their bills by shifting large power uses (i.e.

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<sup>30</sup> [Hourly Pricing- ComEd](#)

washing machines, hot water heaters, EV, etc.) to evening or overnight hours, it also leaves customers exposed to volatile swings in the hourly pricing market. Capacity prices are also passed on to customers on an hourly basis. ComEd notes that “savings are not guaranteed.”

Batavia does not intend to offer a program that directly exposes customers to an hourly price. Batavia is likely to have fixed rates for program participants by the time of day and pass utility-level savings via the fixed rates.

# Public Comment Submissions

October 31 through December 31, 2025

Public comment is provided as submitted.

## **Comment #1**

Much like Batavia's ill-advised decision to put all of its energy eggs in the Prairie State basket, I feel this IRP focuses too much on fossil fuels instead of using the opportunity to diversify our energy portfolio. The last thing we need is to own another fossil fuel plant, one that would likely come with unknown or unaccounted-for costs. The IRP ignores the fact that 43.4% of residents are willing to pay more for a wider diversity of energy options, including solar, battery capture, and wind. Energy conservation programs and rooftop solar would go a long way to easing the pressure on the municipal electricity system, and these are not included in the IRP. Please do not invest in a backward, undersized fossil fuel plant, and instead let us direct our energies forward with energy conservation measures and clean energy solutions.

## **Comment #2**

Given that the 30 year RECIP life span appears to be totally incompatible with the Batavia 2050 carbon neutral directive, solar+battery is the best solution on the supply side. Long overdue TOU pricing will be a benefit for all on the demand side.

## **Comment #3**

I wanted to comment on the general strategy the Brattle group took. While it was correct to look at the economic scenarios and predict needed resources to meet Batavias core goals as provided by the city, I feel there was a critical element missing.

The city needs to make some statement or create an objective in their plan that will guide the city to less emissions and a greener future.

The Brattle people did not and typically do not put this into their plans.

Our city administration needs to add the component to the strategy.

This is a critical step that is missing.

For example, one could say;

Expansion of renewables will be accelerated by using xyz.

I also found it odd that the report did not consider potential consequences if the state or federal government was to force the closure of coal plants by say 2040. It was not even

considers?

In general - the report was good but incomplete.

**Comment #4**

This plan seems... dated. It relies on fossil fuels and old technology. Batavia would be better served by a plan that incorporates solar, wind, etc, with battery backup/storage, utilizing newer technology that is more carbon neutral and more sustainable. Both solar and wind are the energies of the future - not the past.

**Comment #5**

I hope the meeting will be on BATV sometime for those of us who cannot attend the meeting tonight.

**Comment #6**

As a Batavia resident for 34 years I am committed to our city. I also am very concerned about the environment. I do not want Batavia to own another fossil fuel generator that harms the air and water. Instead I want clean, flexible energy sources for Batavia's future electricity. Please be sure Batavia is part of the solution for a cleaner environment for our children. Thank you.

**Comment #7**

Implementing ANY plan that did not rely first and foremost on renewable energy sources would be shortsighted and inappropriate. A plan that puts fossil fuels first is not a plan for the 21st century.

**Comment #8**

Why Batavia's New Energy Plan Isn't Good for Residents

I've dug into the IRP the City is promoting, and here's the problem: it's being sold as "affordable and reliable," but the actual plan does the opposite.

1. It's built on guesses, not guarantees.

The whole thing is based on projections that PJM capacity prices might rise 3–5x in the future. "Might" shouldn't justify multi-million-dollar commitments from taxpayers.

2. The recommended solution is a new natural gas plant.

This comes with major long-term costs: fuel volatility, maintenance, staffing, future carbon regulations, and debt. Instead of reducing risk, we'd be committing to decades of fixed expenses — even if we don't end up needing the plant.

3. The plan protects the utility, not the ratepayers.

By building our own gas generation, the City shields itself from market risk — by locking residents into higher guaranteed rates. We take the financial hit either way.

4. There's zero transparency on actual rate impact.

No clear cost breakdown. No rate comparison. No alternative scenarios. We're being asked to trust a plan without seeing what it will cost us.

5. Cheaper, cleaner options are barely considered.

Demand reduction, community solar, storage partnerships, and efficiency programs can reduce peak load without building anything. Other towns do this. Batavia could too — but this plan skips straight to the most expensive path.

6. It contradicts Batavia's own climate goals.

We set targets for emissions reduction and carbon neutrality. A new gas plant locks us into the opposite direction — and we'll pay again later when we're forced to retire it early.

7. Batavia already lived through Prairie State.

Residents are still paying for the last long-term power deal that was sold as “stable and affordable.”

This IRP looks like the same mistake in a new package.

Bottom line:

This plan raises financial risk, increases long-term costs, and ignores better, cheaper alternatives. Batavia deserves a plan that protects ratepayers, not one that protects the utility from uncertainty.

We can — and should — demand better.

#### **Comment #9**

I am most interested in a carbon neutral option for Batavia's peak energy shaving. The IRP does not take into account the possibility of carbon taxes, which could be literal, or an understanding of our carbon footprint. Please take into consideration the second

option which the IRP seemed to highlight, the Solar with battery storage. This would hedge our financial interests as well as our moral obligations.

#### **Comment #10**

##### Summary:

The City of Batavia (COB) needs to explore additional non-fossil fuel options aside from a proposed small natural gas peaker power plant.

##### Background:

According to a Canary Media article, electricity costs in the PJM Interconnection market, where COB buys energy, are rising due to rapid data center growth and slow construction of new power plants, leading to higher capacity prices. COB will face increased capacity costs in 2027–2028, contributing to utility bill hikes on top of already expected 1.5%–5% rate increases starting in June 2026. PJM has a large backlog of over 100 gigawatts of mostly renewable projects stuck in its queue, and although new gas peaker plants were fast-tracked, they will not be available until 2030 or later. As a result, projections from the Natural Resources Defense Council suggest that by 2028, the average family's monthly electric bill could increase by about \$70.

##### CEJA Implications:

If COB should deploy a new “public GHG-emitting unit”, the Illinois Climate and Equitable Jobs Act (CEJA) contains a key deadline. Any new large greenhouse-gas emitting natural gas-fired plants must cut greenhouse gas emissions by 50% by 2030, 75% by 2035 and 100% by 2045. In essence, CEJA forces new large gas peakers to be transitional, requiring rapid emission cuts that push for their eventual replacement by renewables to meet the state's 2045 carbon-free power goal. Any new gas plants would need to meet these aggressive decarbonization paths, making them short-term assets. The COB should know if a 50% reduction in output by a new gas peaker plant during high peaking loads may apply to the proposed new public GHG-emitting unit. In addition, if the peaker plant has an output below 25 MWe, can it be useful in significantly reducing PJM peaking costs? Adding a small unit may not solve the problem, as it may not significantly reduce the PJM peak-load cost that PJM will impose on COB. The Integrated Resource Plan (IRP) covers 20 years and forecasts peak loads between 80 and 100 MW. Why build a small unit if a large unit is forecasted?

##### CRGA Implications:

Furthermore, the IL House and Senate passed a bill, The Clean and Reliable Grid Affordability Act (CRGA), to be soon signed by Governor Pritzker and will go into effect on June 1, 2026. Even though CRGA does not outright prohibit fossil fuel peaker plants, it

heavily incentivizes alternatives like stationary battery energy storage systems (BESS) and virtual power plants (VPP) to reduce reliance on gas-fired peaker plants, aiming to cut peak demand and costs and creating a path to phase gas-fired peakers out as clean resources scale up. The Act focuses on building clean capacity (storage, renewables, nuclear) and managing demand, making fossil-fueled peakers less necessary and economically disadvantaged over time. While the act officially begins in mid-2026, several key aggressive milestones and planning phases occur earlier:

Spring 2026: The Illinois Power Agency (IPA) will begin preparing for the first utility-scale BESS procurement.

June 1, 2026: Utilities (ComEd, Ameren, and specific gas utilities) must file updated three-year Energy Efficiency (EE) plans.

June 1, 2026: Utilities must propose details for a "scheduled dispatch" program for customer-owned batteries.

August 31, 2026: Deadline for the IPA to conduct the initial procurement of approximately 1,000 MW of 4-hour battery storage.

November 15, 2026: State agencies must submit the first Integrated Resource Plan (IRP) to the Illinois Commerce Commission (ICC).

January 1, 2027: New 2% annual energy savings goals for ComEd take effect.

Late 2027: Utilities are required to submit full proposals for multi-faceted Virtual Power Plant (VPP) programs.

2030: Deadline to reach a total of 3 GW of utility-scale battery storage capacity.

#### BESS Feasibility:

Depending on the energy capacity needed (measured in MWh), the area required for a utility-scale BESS could range from  $\frac{1}{4}$  acre for a 20MW/40 MWh system to 5 acres for larger capacities in typical applications. A flat, easily accessible, industrial-zoned land near a substation is ideal, thereby reducing the need for additional land. Placing a BESS near an existing substation significantly lowers costs by leveraging existing transmission infrastructure and point of interconnection, avoiding expensive new distribution lines. This approach would meet CGRA's goals and potentially address the near-term need for COB peaking power.

One example of a BESS supplier is Form Energy. It manufactures a stationary BESS, that is capable of cost-effectively storing and discharging energy up to 100 hours. Unlike lithium-ion batteries, which can only provide power for a few hours at a time, Form

Energy iron-air batteries can deliver power for multiple days and provide a sustainable, safe solution for meeting the growing demand for grid security and resilience.

In addition, Several companies install BESS in Illinois, including EPCs (Engineering, Procurement, Construction firms) like Dashiell Corporation and the Blattner Company as well as specialized firms such as BESS Power Corporation, often working with utilities like ComEd. Developers and installers can work within the framework set by PJM, manage interconnection approvals, leverage Illinois's incentives, and integrate system design with the grid.

Since stationary battery costs are dropping, I believe that a utility-scale BESS should be reevaluated more thoroughly to confirm that the cost and startup time reflect the latest technology that is less costly, more secure, and more resilient.

#### DERMS/VPP Feasibility:

Other US utilities are tapping into their ratepayers' homes and businesses for green Distributed Energy Resource Management Systems (DERMS) to supply power during peak periods and provide a monthly credit to their customers for purchasing it. DERs like rooftop solar, battery storage, EV chargers, thermostats, and microgrids are actively managed and integrated into their energy sources through programs, dashboards, and grid modernization to help customers generate power, manage demand, and connect these resources to their grid, with new tech enabling better forecasting and faster restoration.

Key examples and implementations include:

#### ComEd (Illinois):

Challenge: Integrating large wind projects threatened transformer overload on distribution lines.

Solution: Deployed a DERMS to manage the new resources, preventing instability and enabling connection by orchestrating DERs to balance the load.

#### Avista Utilities (Washington):

Program: Spokane Connected Communities Pilot.

Assets: Offers incentives for smart thermostats, residential batteries, heat pumps, and building controls.

Goal: Creates a VPP to provide demand response and grid support, demonstrating value for diverse DERs.

Duke Energy (North Carolina):

Offers customers tools to view their DER data and participate in demand response. They are also investing heavily in grid upgrades and renewable capacity to support this shift.

Tesla (Various Locations):

VPPs: Aggregates home batteries (Powerwalls) and EV chargers into VPPs, offering grid services and market participation, often in California.

EnergyHub (Platform Provider):

Deployments: Supports numerous utility VPPs (e.g., with utilities like National Grid, PSE&G) for peak demand reduction, frequency regulation, and managing solar/storage.

Assets Managed: Thermostats, water heaters, solar inverters, batteries, EVs.

Virtual Peaker (Platform Provider):

Focus: Manages behind-the-meter IoT devices (thermostats, EV chargers, batteries) for utilities to create VPPs and enhance grid flexibility.

My Observation:

It would appear that the Batavia City Council is rushing to have a signed contract for a natural gas peaker plant so it is grandfathered before June 1st, 2026 when the new law takes effect. This approach may be legal, but Batavia is apparently eliminating all sustainable and cleaner options of the CRGA Act by using only fossil fuels as a source of electrical energy.

I wish that the City of Batavia would become the “~ City of Energy’ in the 21st century by again reviewing the above sustainable green alternatives rather than jumping back to 20th century solutions.

#### **Comment #11**

In order to prevent further escalation of the cost of electricity, Batavia should immediately revoke all existing permits and plans for data centers.

#### **Comment #12**

A new gas plant is not what I want for Batavia. The coal plant is an embarrassment that we are still paying far too much for. We need a solution that controls the variable costs of labor and NG. Solar is the answer. Our town was built by windmills and we have Fermi in

our backyard on the forefront of fusion energy. We would be taking a step back and emptying our pockets on greenhouse gases and unknown construction costs and continuing operating costs. If 1000 of the 10000 residents put solar on their roofs or if the schools had solar panels and battery packs we could add capacity and reduce the load and improve the grid. \$20M in the form of a city rebate can supplement the costs of 1000 solar panel systems in the city. Giving money back to the citizens that have been paying through the nose for electricity. We would not have to abide by the state net metering regulations because we would own the power generation and transmission lines. Every solar customer would be its own substation increasing reliability to the grid by providing power on a micro level to localizes areas. When overhead lines are disrupted, fewer customers will be without power. Tesla is now part of the community. They offer Megapack batteries for entire towns and many have reported wonderful results, reducing cost, storing unused power for service disruption, peak demand and maximizing solar harvesting. \$20M would yield us about 20 MW needed for the present and future. The best part is these systems last more than 25 years with little maintenance and no further costs other than the initial installation. Therefore we can reduce grid load, costs and reap the environmental benefits while being on the forefront of technology and building our reputation instead of tearing it down with fossil fuels.

**Comment #13**

- Do not tie Batavia to building, maintaining and operating a natural gas reciprocating engine for the next 30 years!
- Do not just emphasize the financial aspects of the options, but take into consideration environmental costs as well.
- Batavia residents want flexible, clean energy investments like solar, battery storage and programs that reduce energy use during peak periods that can scale up or down as Batavia's needs change.
- The plan needs to provide options that include renewable energy sources presented in concise, accurate language that makes sense and lets Batavians know the true financial and environmental impacts of each option.

**Comment #14**

Batavia needs to focus on the future and endorse using renewable and green energy. Ongoing use of fossil fuels is limiting and not forward thinking. What's the use of being the "energy city" if we avoid new and greener sources of energy?

**Comment #15**

I want City Council to learn from past Prairie State experience--no more ownership of electricity generators, especially those run on fossil fuels.

I want Batavia's future energy sources to be more clean and green.

**Comment #16**

Batavia residents want CLEAN energy for our future and not to let Batavia repeat past mistakes such as the deal (investing in) with Prairie State!

**Comment #17**

It is important to me that Batavia not enter into another long term contract or make a large investment that limits our options for transitioning to cleaner, more renewable energy sources. We need to be positioned to move beyond fossil fuels as soon as it is legally and economically feasible.

**Comment #18**

Mr. Weiss, Mayor Schielke, and City Council members,

I am writing to formally oppose the IRP's recommendation to build a Natural Gas RECIP facility. After reviewing the October 2025 Draft IRP, I believe there are critical flaws that put Batavia ratepayers at financial risk.

**1. The Study is Incomplete**

On Page 40, the IRP explicitly states: "The new 50-MW data center load was not included in this load forecast." It is fiscally irresponsible to propose a 30-year infrastructure investment (the RECIP) when the single largest load addition in the City's history has not yet been fully evaluated. The Council cannot approve this or any solution when the IRP has admittedly not fully modeled the problem. The IRP should be paused until the Data Center's 50 MW load is fully integrated into the base case.

**2. Hydrogen/"Clean Fuel" Gamble (CEJA 2045 Risk)**

The IRP acknowledges that the Illinois CEJA law bans municipal gas generation in 2045. On Page 13, the consultants justify building a gas plant anyway by claiming it can "burn clean fuels... post-2045." This relies on speculative future technology. Green hydrogen infrastructure does not currently exist at scale in Batavia. By approving this plant, the City is betting ratepayer money on a fuel supply chain that is currently hypothetical. If that supply chain fails to materialize, we will be left paying debt on a stranded, illegal asset.

**3. Hidden Subsidy**

The IRP recommends the gas plant to hedge against "Capacity Market" price spikes. However, the new Data Center will essentially double our peak capacity obligation. If we

build a City-owned plant to "shave" the peak caused by a private Data Center, residential ratepayers are effectively subsidizing the Data Center's reliability. The IRP should evaluate a "Mandatory Curtailment" scenario where the Data Center is contractually required to self-supply its own capacity during peak hours, potentially removing the need for City-owned generation entirely.

I urge the Council to reject the option to construct a Natural Gas Reciprocating Engine. Please direct staff to update the Load Forecast to include the Data Center and re-evaluate a "Storage-First" portfolio that does not rely on speculative post-2045 fuel switching.

**Comment #19**

Max-

As a long time resident of Batavia ( July, 1979), I am extremely concerned about the types energy sources that may be used in Batavia's future. Hopefully, the City Council and other "leaders" have learned something from their past experiences with Prairie State and will strive to better educate themselves about energy purchase/usage for the citizens of our wonderful community.

My comments are as follows:

No more ownership of electricity generators- especially those run on fossil fuels.

Priority use of clean and green energy sources.

No signing of early extensions of any energy related contracts without full research and transparency to the community.

Pleased feel free to contact me should you have questions regarding my comments.

**Comment #20**

I'd value Batavia's continued push to distance itself from power plant infrastructure and to instead focus on being nimble with future opportunities, as municipal power infrastructure and generation options evolve over the next generation. CEJA mandates, larger municipal precedents, climate change perception shifts and power generation & storage options are all unknowns for the next 20 years. Let's not assume owning another fossil fuel burning system is automatically the correct choice. The recommendations of one conservative consultant do not constitute the only correct path forward.

**Comment #21**

Batavia's IRP is a positive step in managing the future of energy in Batavia--kudos. However, the preliminary draft raises critical questions and identifies shortcomings that

must be addressed. Many community members are likely to comment on the minimal inclusion of supply-side solutions and the inflexible and backward-looking RECIP option. Therefore, I will comment on the exclusion of NIMPA as a factor in this IRP.

NIMPA's website states that it "was established in 2004 for the purpose of effecting joint development of electric energy resources for the production, transmission and distribution of electric power and energy." Because the agency already serves Batavia, the RFP must analyze NIMPA's potential role in helping Batavia face the challenge it shares with the other 2 members: procuring sustainable energy sources with the goal of maintaining consistent, affordable rates.

Should Batavia or NIMPA be considering a battery project? Mark Pruitt, an energy consultant for several Illinois municipal utilities, has completed a study reported in CleanPower.Org: "A recent study by Mark Pruitt, former director of the Illinois Power Agency, founder of The Power Bureau, and a professor at Northwestern University, found....that better energy storage is the most cost-effective, immediate, and attainable long-term solution, an assertion many clean energy advocates agree with."

NIMPA could play a key role in implementing such a solution for Batavia and its members. The IRP must investigate NIMPA's potential involvement.

Brattle Group's draft IRP is too limited in utilizing natural gas. The city needs to explore alternative energy sources before investing in fossil fuels.

#### **Comment #22**

My overall concern with the draft IRP is that it does not reflect the values and priorities of Batavia. This is illustrated in 2 examples:

1. In September 2025, Batavia City Council adopted an Energy Policy that set out Batavia's priorities for energy resource planning: resiliency, sustainability, affordability and adaptability.

Three of these four priorities are missing from the draft IRP's statement of purpose in the first Key Observation: "The IRP is intended to identify planning efforts to ensure reliability, maximize energy affordability, and meet state energy policy requirements." (emphasis added) Because "resiliency", "sustainability" and "adaptability" are missing from this Key Observation, the draft IRP clearly fails to address Batavia's environmental, energy-efficiency and climate-change values and priorities.

Both the purpose and, more importantly, the content of the IRP must be revised to achieve all of the values and priorities set out in Batavia's Energy Policy.

2. A natural gas reciprocating engine is being recommended by the draft IRP for its "capacity credits". However, the benefit of these capacity credits is outweighed by 5

considerations that clearly demonstrate the draft IRP’s weaknesses:

- The cost of owning another fossil fuel asset entrenches Batavia in another old and outdated energy strategy and economic model. Batavia unwisely committed itself to a coal-burning power plant until 2055. Batavia must seek future energy opportunities that do not unwisely commit it to a gas-burning electric generator for the next 30 years.
- The claim that the natural gas reciprocating engine is the only option that will “pay for itself” is theoretical and speculative. There is no guarantee that this will be true.
- The demand for natural gas generators by private industries and the new tariffs make the cost of a gas engine uneconomical for a public utility like Batavia’s.
- The overall capacity-credit advantage of a gas engine represents only a 1% savings over other options like battery storage. This is an economically insignificant and meaningless benefit.
- 10MW of electricity produced by a gas engine represents only 20-30% of the power Batavia buys on the market. The city would still have exposure to market volatility for 70-80% of its electricity needs during peak usage period. If reducing Batavia’s exposure to market purchases during peak usage periods is a legitimate and desirable goal, then Batavia must seek out and commit to more flexible energy sources that reduce a greater percentage of this exposure.

The IRP must have a broader focus. It must offer a menu of realistic alternatives to the gas engine—alternatives that address Batavia’s priorities for resiliency, sustainability, and adaptability, not just affordability. These alternatives include investments in renewable energy sources and battery storage and programs that reduce electricity use during peak periods.

Finally, the IRP must specifically address Batavia’s contract with NIMPA. Since the IRP is intended to be a 20-year plan, it must begin to identify planning opportunities and risks that address the power Batavia is committed to buy from Prairie State and the replacement power Batavia will need when Prairie State reduces production in 2038 and ends production in 2045, as required by Illinois law. Waiting to discuss Prairie State in a 2030 IRP is too late.

#### **Comment #23**

My comments might be simple but all I can say is do not let the data center project go through. They are becoming a plague in the US. This comment is not about the water. It is about the electrical energy usage.

#### **Comment #24**

I understand there is a 7 year backlog for obtaining gas turbine electric generators which was not discussed. Nor was the pollution the generator would cause. The data center massive electrical demand was not discussed. Will the data center builders be required to generate their own electricity from renewable resources to prevent pollution?

**Comment #25**

As of December 30, 2025, 97 people have signed the petition asking Batavia City Council to:

1. LEARN from the lessons of Prairie State and refuse to accept any recommendation in the draft IRP that relies on fossil fuels.
2. REQUIRE the final IRP to take into consideration future opportunities for Batavia to increase electricity use through growth in the community and to address climate change.
3. LISTEN to the opinions of Batavia residents, a majority of whom (43.4%) indicated that they are willing to pay modest increases for more renewable energy.
4. DEMAND that the final IRP offer alternatives to the 10 MW natural gas RECIP generator by including flexible, modular clean energy investments (solar, battery storage, and demand-response programs) that can scale up or down as Batavia's load changes.

**Comment #26**

I have reviewed both the IRP and the Batavia Energy Policy. I have to agree with the IRP that the Batavia Energy Policy is lacking in details with respect to the plan for achieving the goals set out for 2019 and beyond. I would also be interested in knowing more of what is being done within the City Departments to help achieve the goals of the City. For instance, does the Batavia WWTP plant utilize the digester gas generated at the plant to create energy for the operation of the plant. Many WWTPs do Cogen to create electricity and reduce the energy requirements for the operation of the plant. Other options include Combined Heat & Power (CHP) to heat the digesters & buildings while also generating electricity. While the Batavia plant is relatively small in comparison to others using these technologies, it would be a worthwhile endeavor to be considered to reduce the City energy demand. Especially since the City could be asking Customers to pay a rate premium in the future to meet the goals of the Energy Plan. Especially since I am not willing to pay extra for electricity for environmental reasons. We should be able to find cost effective means in this state to generate and obtain electricity in a cost effective way.

I am also unsure how the Data Center energy demands come into play. Do they get electricity direct from a Power Supply Company or the City of Batavia. If City will supply the electricity, it would appear that the City electrical demand will greatly exceed their

current demand. The costs for the electrical demand can be reduced by making the Data Center to use a cooling system that has it's highest demand during off peak hours. The energy associated with the cooling system is a major source of energy for the Data Center.

Thank you for allowing citizens to review these documents and provide comments.

**Comment #27**

Batavia's final IRP needs to equally address modular and scalable solutions for its energy needs. The draft in its current form does not accurately represent the interest Batavians have in more sustainable energy solutions. We should not lock ourselves into another plant, and we need to learn from our mistake with prairie state. City council needs to meet with citizens to understand their priorities, and work to understand the full range of Batavia's energy options.

**Comment #28**

I feel the city rushed into this decision and needs to consider more sustainable energy options.

**Comment #29**

Natural gas is the best choice to mitigate the price spikes coming. Don't let our community start paying ridiculous prices just so a small segment of our city can virtue signal.

**Comment #30**

I want City Council to learn from past Prairie State experience--no more ownership of electricity

I want Batavia's future energy sources to be more clean and green.

**Comment #31**

No data centers.

**Comment #32**

I wish to comment on the proposed energy policy. I was unable to attend the December 9th meeting

and could not find it on U-Tube Batv Channel 17 even though my 10 year old grandson was helping me (I am 88 and never used U-Tube).

Unfortunately, what the City decides could depend on who is in the White House. The pendulum has swung towards common sense energy solutions vs the previous wind and

sun subsidized policy under the previous administration. Let's ignore politics and look at reliability and economics.

The most current trend is the use of gas turbine generators and thermal storage. All facilities which demand power far in excess of Batavia's needs, hydro, nuclear and geothermal are also an option.

We can rule out hydro and geothermal since their availability in this area are nil. Nuclear is an option, but it is under Comed's control and probably not available without joining Corned.

I did not mention coal as an option even though the current administration has suggested it. As I recall, Batavia and several communities along the Fox signed up for a coal fired plant in Southern

Illinois to supply power for 50 years. What ever happened to that investment?

I believe that gas turbine generators and thermal storage are the most reliable and cost effective

options for our future energy needs. I personally worked on the structural design of a thermal storage facility over 35 years ago. One of my younger colleagues, John Anderpont, designed the system portion of the project. He is still an active consultant and has designed over 200 of these systems world wide. I can put you in contact with him if you wish to pursue this option.

I agree that peak and off hour rates should be considered. However backyard windmills and roof top solar panels should be at the option of the homeowner.

Unless you live in Iceland where geothermal heat supplies all of the energy needs, carbon neutrality is unattainable in Illinois or for that matter most of the United States.

### **Comment #33**

Comment about the Batavia Draft IRP

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#### **PART 1**

The Executive Summary covers 18 items in 9 different areas.

There will be a lot for the Council and Community to discuss in the coming years.

From the Key Observations (pg 4)

There are three recommendations from the Draft IRP:

#6 - Additional generation / storage or demand reduction programs

#7 - Natural gas peaker plant as soon as possible

To advance emissions goals:

#8 - Other demand reduction options such as TOU rates etc.

But slide pg 61 [Summary of Market Price Forecasting Results ] lays out the main recommendations:

1. Increase supply by ownership or contract

Either one should include the rights to capacity, not just energy

2. Reduce peak demand

But at the bottom of the page:

“Since capacity prices will likely increase more than energy prices, procuring a supply-side resource that earns more revenue from capacity will allow Batavia to maximize its savings by maximizing that resource’s net revenues.”

This is really the primary recommendation which the report says can best be met with a gas peaker plant.

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## PART 2

Many residents have expressed concern with this conclusion because any investment here will increase emissions, the opposite of the Batavia Energy Plan goals.

It also limits or delays possible investments in renewable options.

Batavia has been here before, with experts telling the City that they should move, and move fast, to increase their energy production with a fossil fuel plant.

I suggest the council amplify the second recommendation - reducing demand first.

While taking the next year to see what develops

1.) in the energy market and (see Part 2A)

2.) with energy legislation. (see Part 2B)

Because:

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## PART 2A

1.) In the energy market:

A.) Will battery prices continue to fall?

Most new battery installations are being used for demand reduction.

See: Battery Storage System Process Continue to Fall Sharply (12-16-2025)

<https://www.energy-storage.news/battery-storage-system-prices-continue-to-fall-sharply-bnef-and-ember-reports-find/>

And: Energy Storage Deployment is Accelerating Globally - (12-25-2025)

<https://nzero.com/blog/energy-storage-deployment-is-accelerating-globally/>

NOTE: Section 5 - Market Price Outlook is 12 pages long. Battery prices are not discussed.

But in Section 6 (pg. 65):

We recommend Batavia consider these supply-side options because:

- ☐ The technologies are flexible, mature, CEJA-friendly, available in small (<20 MW) capacity increments, and can be owned or contracted
- ☐ They have different use cases as hedges against capacity price and energy price (short term and long term)

— [It would be helpful to highlight this item when reviewing the main recommendations. It appears to be buried here.] —

B.) Will LNG exports succeed or fail?

This is not a given. Anything from the end of the Ukraine war, changes in tariffs, EU increasing renewables could cause a major glut in the gas market.

See: LNG Boom faces glut risk by 2030:

<https://www.oilandgas360.com/u-s-lng-boom-faces-glut-risk-by-2030/#:~:text=EIA%2C%20export%20boom%2C%20glut%20risk,the%20associated%20CP%20Express%20Pipeline.>

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## PART 2B

2.) In legislation:

A.) Will data centers be required to “Bring their Own Energy” and/or be required to adopt “Flexible” operations so that they do not use energy at the peak? Many states are

pursuing such options. There will be a major energy bill in Springfield during the Spring 2026 session that will directly address this.

If this happens, the entire “Capacity Demand” scenarios will have to be redone as the data centers demand is seen as the major driver of the current capacity price increases.

B.) Will there be a “Polluters Pay” bill in Springfield this session as advocates hope?

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### PART 3

In conclusion - the report’s advice to act as soon as possible to build a gas plant needs to highlight the variability included in its assumptions.

This is because the risk of acting too soon may be greater than the risk of taking some more time to consider the options.

Especially since the risks of having another long term ownership of a fossil fuel plant are not included in the report.

Risks such as:

1.) Regulatory risks - increased emissions reduction requirements creating additional expenses.

2.) Legislative risks - “Polluters Pay” legislation or an international Fossil Fuel Non Proliferation Treaty. <https://fossilfuel treaty.org/>

3.) Lawsuit risks -

See: A North Carolina Town is suing Duke Energy -

<https://www.npr.org/2024/12/04/nx-s1-5213784/climate-utility-lawsuit#:~:text=Small%20town%20sues%20its%20electric%20utility%20over%20climate%20change%20:%20NPR&text=Small%20town%20sues%20its%20electric%20utility%20over%20climate%20change%20A,planet%20and%20deceived%20the%20public.>

4.) Market risks - see parts 2A and 2B above.

5.) Marketing Risks - the toxic effect of having an energy portfolio that is high in emissions. This may be a growing concern for any business wishing to compete in an international market that is keeping track of scope 2 emissions.

6.) The risks that the renewable energy build out succeeds, as so many forces are pushing for, and fossil fuels become the expensive option.

See who is advancing action on interconnection issues -

PJM itself:

<https://www.pjm.com/-/media/DotCom/about-pjm/newsroom/fact-sheets/interconnection-reform-progress-fact-sheet.pdf>

And FERC:

<https://www.utilitydive.com/news/ferc-pjm-grid-interconnection-queue-christie/754050/>

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PART 4 - Just how sure are we that a gas plant is the lowest risk?

From pg 1 of the IRP Draft Report:

A final voice on the need to “couch” recommendations with the merit of the underlying assumptions from Brattle:

The analyses and market overview provided in this report are necessarily based on assumptions with respect to conditions or events which may or may not arise or occur in the future.

Actual future outcomes can and will differ, perhaps materially, from those evaluated in these projections.

No one can give any assurance that the assumptions and methodologies used will prove to be correct or that the projections will match actual results of operations

We do not make any representation with respect to the likelihood of any specific future outcome and cannot and do not accept liability for losses suffered, whether direct or consequential, arising out of actions taken by the City of Batavia based on the recommendations contained herein.

**Comment #34**

I attended the public hearing on the proposals for Batavia's energy future. I do not believe it is in the best interest of Batavia's residents to invest in generators that use fossil fuels. Please consider more clean and green energy sources.

**Comment #35**

I see this is the last day from the Batavia app, for comments regarding the energy, you know, issue and or project. Here is the easiest one. Do not allow that data center to be built. It is that simple. Data centers are a plague in the U.S, because unless they are 100% to be proven, simple for server storage, most likely they're going to be used for AI. I know from the discussions, it was said that whatever this one is going to be built. can't do Bitcoin, but it most 100% will be likely used for AI, that is ruining consumer markets when it comes to any sort of, purchasing, especially memory or RAM, as you might know it, so it's a plague. That's all I could say, is do not let that data center to be built. You will have a lot less worry when it comes to energy if that is shut down. So, and I hope whatever's going on with the family medical leave is not a major issue. If it is, you know, a... Hopes are with you, but... good day. Bye.

**Comment #36**

My overall concern with the draft IRP is that it does not reflect the values and priorities of Batavia. This is illustrated in 2 examples:

1. In September 2025, Batavia City Council adopted an Energy Policy that set out Batavia's priorities for energy resource planning: resiliency, sustainability, affordability and adaptability.

Three of these four priorities are missing from the draft IRP's statement of purpose in the first Key Observation: "The... IRP is intended to identify...planning efforts to ensure reliability, maximize energy affordability, and meet state energy policy requirements." (emphasis added) Because "resiliency", "sustainability" and "adaptability" are missing from this Key Observation, the draft IRP clearly fails to address Batavia's environmental, energy-efficiency and climate-change values and priorities.

Both the purpose and, more importantly, the content of the IRP must be revised to achieve all of the values and priorities set out in Batavia's Energy Policy.

2. A natural gas reciprocating engine is being recommended by the draft IRP for its "capacity credits". However, the benefit of these capacity credits is outweighed by 5 considerations that clearly demonstrate the draft IRP's weaknesses:

- The cost of owning another fossil fuel asset entrenches Batavia in another old and outdated energy strategy and economic model. Batavia unwisely committed itself to a coal-burning power plant until 2055. Batavia must seek future energy opportunities that do not unwisely commit it to a gas-burning electric generator for the next 30 years.
- The claim that the natural gas reciprocating engine is the only option that will "pay for itself" is theoretical and speculative. There is no guarantee that this will be true.
- The demand for natural gas generators by private industries and the new tariffs make the cost of a gas engine uneconomical for a public utility like Batavia's.
- The overall capacity-credit advantage of a gas engine represents only a 1% savings over other options like battery storage. This is an economically insignificant and meaningless benefit.
- 10MW of electricity produced by a gas engine represents only 20-30% of the power Batavia buys on the market. The city would still have exposure to market volatility for 70-80% of its electricity needs during peak usage period. If reducing Batavia's exposure to market purchases during peak usage periods is a legitimate and desirable goal, then Batavia must seek out and commit to more flexible energy sources that reduce a greater percentage of this exposure.

The IRP must have a broader focus. It must offer a menu of realistic alternatives to the gas engine—alternatives that address Batavia’s priorities for resiliency, sustainability, and adaptability, not just affordability. These alternatives include investments in renewable energy sources and battery storage and programs that reduce electricity use during peak periods.

Finally, the IRP must specifically address Batavia’s contract with NIMPA. Since the IRP is intended to be a 20-year plan, it must begin to identify planning opportunities and risks that address the power Batavia is committed to buy from Prairie State and the replacement power Batavia will need when Prairie State reduces production in 2038 and ends production in 2045, as required by Illinois law. Waiting to discuss Prairie State in a 2030 IRP is too late.

#### **Comment #37**

Hi Max, I wanted to thank you for the opportunity to attend the information session on December 9th (I had asked the question about EV load assumptions as part of the open Q/A section of the presentation), and for your time in considering the below points on the draft IRP. For background, I'm an engineer with 20 years in the power space as an engineering consultant (both through large firms doing technical/financial due diligence and now under my own company), and have worked with Brattle directly in the past. I've focused a lot on the sensitivities with the goal of increasing transparency and ratepayer benefits as much as possible, as those were common threads throughout the public Q/A discussions.

One other point I'd like to discuss with you is the concept of partnering with the datacenter (DC) developer (don't know the status on that development, but in the event that it goes through), on having them host a recip engine as a "good neighbor" concept, since they'll likely already be planning on having their own backup generation along with ties to our distribution system. This might be a way to secure mutually beneficial power for ratepayers and the DC developer. I'm consulting with datacenter developers now on power strategies, and this is becoming a common point of discussion to support being a good neighbor to the local neighborhoods where DC developers seek to build projects.

I look forward to the opportunity to discuss further with you as part of this draft IRP review process - thank you again!

| # | Section of IRP                     | Commentary                                                                                                                                                                                                                                                                           | Reason / Ratepayer Benefit                                                                                                       |
|---|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| 1 | Load Forecast (Section 4)          | Add high-growth sensitivities showing 25–50% higher EV adoption by 2030 (e.g., 8–12% of registered vehicles by 2030 instead of 3%) and include a 10–50 MW data-center / industrial load upside case. Use 2025 Illinois EV registration data and recent City EV-charger usage trends. | Prevents under-forecasting peak load, which could otherwise add millions in unhedged capacity costs.                             |
| 2 | Market Price Outlook (Section 5)   | Update capacity and natural-gas price forecasts with the actual July 2025 BRA results (\$329.17/MW-day for 2026/27) and the latest forward curves through the December 2025 auction.                                                                                                 | Recent auctions are already 22% higher YoY; outdated forecasts can materially understate ratepayer risk.                         |
| 3 | Scenarios (Key Observation 1b)     | Add at least two new scenarios:<br>• “High Growth / Aggressive Policy” (strong EV/DER uptake + data-center load + HB 2902 fully enacted)<br>• “Accelerated Decarbonization” (stricter CEJA enforcement or federal IRA expansion)                                                     | Current three scenarios do not capture plausible high-impact futures that are already emerging in 2025.                          |
| 4 | Resource Evaluation (Sections 6–7) | Provide explicit customer bill impacts (average residential and C&I \$/month) for every portfolio under each scenario, including land-acquisition and                                                                                                                                | Ratepayers repeatedly stated affordability is the top priority (73% unwilling to pay >10% premium). NPV alone is not sufficient. |

|   |                                    |                                                                                                                                                                                                                    |                                                                                                            |
|---|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
|   |                                    | interconnection costs in built-out Batavia.                                                                                                                                                                        |                                                                                                            |
| 5 | Resource Evaluation (Sections 6–7) | Quantify full CEJA 2045 compliance cost and stranding risk for the recommended RECIP unit (retrofit, hydrogen blending, or decommissioning scenarios).                                                             | Avoids potential stranded-asset costs that would otherwise be borne by ratepayers.                         |
| 6 | Resource Evaluation (Sections 6–7) | Evaluate hybrid and emerging options: • 10-hr or longer-duration batteries (72-78%+ ELCC per BRA) • RECIP + battery hybrid • Vehicle-to-Grid (V2G) potential as EV fleet grows                                     | Provides a broader, least-regrets menu and captures possible future cost declines and new revenue streams. |
| 7 | Demand-Side Options (Section 7)    | Add sensitivity cases for demand-response participation rates of 10%, 20%, 30%, and 40% and quantify total energy savings (not just peak shaving)                                                                  | Increases confidence that DSR can meaningfully offset the need for new generation.                         |
| 8 | Transparency & Appendices          | Include detailed appendices (or a public data room) with: • Hourly load shapes • Full capacity-price time series • ELCC assumptions by year • Spreadsheet model (or at least key input/output tables)              | Enables independent verification and builds ratepayer trust.                                               |
| 9 | Five-Year Action Plan (Section 8)  | Add measurable annual monitoring KPIs: • Quarterly EV registration & charger usage tracking • Annual update of PJM capacity price sensitivity • Trigger levels for revisiting RECIP procurement (e.g., if capacity | Keeps the IRP a living document rather than a static 20-year forecast.                                     |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |                                                          |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------------------------------|--|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | prices exceed some threshold level such as \$400/MW-day) |  |
| <p>I wish to voice my concerns about the Brattle Group's IRP and their conclusion that points to a natural gas powered reciprocating engine power source. I believe that to go with a fossil fuel powered device is the wrong path to take. When looking back at the decision to buy into the coal fired power plant it seemed like a good plan at the time, but with what we know now about the climate, I feel that it should've been voted down. With that said, what will the next 15 years bring for the environment.? I know we can't know for certain what will happen, but to err on the side of conservation seems the best path. What plan will best sustain our need for electricity over the next decades and still not add to the pollution of our planet?</p> <p>I also believe that even though this plan is to address the electrical needs of Batavia during our peak usage times, I believe that we all got caught up in the furor over data centers. I would ask that the city take time to study the issue more, especially when the cost of the reciprocating engine will only give us a 1% advantage over the other options and we'll still have to purchase electricity on the open market during our peak usage times</p> <p>Finally, I would ask that Batavia look at the proposed Orlando IRP as a better way to address this issue. It seems to be a more rounded, in depth approach to the issue.</p> <p>Thank you for all the work you've put into this project,</p> |  |                                                          |  |
| <p><b>Comment #38</b></p> <p>PLEASE do not repeat mistakes of the past. Batavia City Council needs to learn from what happened when we invested in Prairie State Energy.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                                          |  |

Batavia citizens want to move away from energy sources that run on fossil fuel. We want clean energy for our future.

### **Comment #39**

I am writing to formally oppose the IRP's recommendation to build a Natural Gas RECIP facility. After reviewing the October 2025 Draft IRP, I believe there are critical flaws that put Batavia ratepayers at financial risk.

#### **1. The Study is Incomplete**

On Page 40, the IRP explicitly states: *"The new 50-MW data center load was not included in this load forecast."* It is fiscally irresponsible to propose a 30-year infrastructure investment (the RECIP) when the single largest load addition in the City's history has not yet been fully evaluated. The Council cannot approve this or any solution when the IRP has admittedly not fully modeled the problem. The IRP should be paused until the Data Center's 50 MW load is fully integrated into the base case.

#### **2. Hydrogen/"Clean Fuel" Gamble (CEJA 2045 Risk)**

The IRP acknowledges that the Illinois CEJA law bans municipal gas generation in 2045. On Page 13, the consultants justify building a gas plant anyway by claiming it can *"burn clean fuels... post-2045."* This relies on speculative future technology. Green hydrogen infrastructure does not currently exist at scale in Batavia. By approving this plant, the City is betting ratepayer money on a fuel supply chain that is currently hypothetical. If that supply chain fails to materialize, we will be left paying debt on a stranded, illegal asset.

#### **3. Hidden Subsidy**

The IRP recommends the gas plant to hedge against "Capacity Market" price spikes. However, the new Data Center will essentially double our peak capacity obligation. If we build a City-owned plant to "shave" the peak caused by a private Data Center, residential ratepayers are effectively subsidizing the Data Center's reliability. The IRP should evaluate a "Mandatory Curtailment" scenario where the Data Center is contractually required to self-supply its own capacity during peak hours, potentially removing the need for City-owned generation entirely.

I urge the Council to reject the option to construct a Natural Gas Reciprocating Engine. Please direct staff to update the Load Forecast to include the Data Center and re-evaluate a "Storage-First" portfolio that does not rely on speculative post-2045 fuel switching.

**Comment #40**

As a long time resident of Batavia ( July, 1979), I am extremely concerned about the types energy sources that may be used in Batavia's future. Hopefully, the City Council and other "leaders" have learned something from their past experiences with Prairie State and will strive to better educate themselves about energy purchase/usage for the citizens of our wonderful community.

My comments are as follows:

- No more ownership of electricity generators- especially those run on fossil fuels.
- Priority use of clean and green energy sources.
- No signing of early extensions of any energy related contracts without full research and transparency to the community.

Pleased feel free to contact me should you have questions regarding my comments.

**Comment #41**

PLEASE do not repeat mistakes of the past. Batavia City Council needs to learn from what happened when we invested in Prairie State Energy.

Batavia citizens want to move away from energy sources that run on fossil fuel. We want clean energy for our future.

**Comment #42**

I wish to voice my concerns about the Brattle Group's IRP and their conclusion that points to a natural gas powered reciprocating engine power source. I believe that to go with a fossil fuel powered device is the wrong path to take. When looking back at the decision to buy into the coal fired power plant it seemed like a good plan at the

time, but with what we know now about the climate, I feel that it should've been voted down. With that said, what will the next 15 years bring for the environment.? I know we can't know for certain what will happen, but to err on the side of conservation seems the best path. What plan will best sustain our need for electricity over the next decades and still not add to the pollution of our planet?

I also believe that even though this plan is to address the electrical needs of Batavia during our peak usage times, I believe that we all got caught up in the furor over data centers. I would ask that the city take time to study the issue more, especially when the cost of the reciprocating engine will only give us a 1% advantage over the other options and we'll still have to purchase electricity on the open market during our peak usage times

Finally, I would ask that Batavia look at the proposed Orlando IRP as a better way to address this issue. It seems to be a more rounded, in depth approach to the issue.

Thank you for all the work you've put into this project,

#### **Comment #43**

My questions were mainly about the alterability and scheduling of the plan. Is there a point at which the IRP becomes 'locked in' and unalterable? For example, the proposal from the Brattle Group bases some of their decisions on recent changes in federal tax credits. If theoretically, those tax credits returned some years later, making renewable energy sources more economically viable as an auxiliary supply, would the City be able to change the IRP from what is currently proposed?

For the scheduling, the following is listed in the key points of the IRP on the city page:

- To manage risk and maintain affordability, the IRP recommends studying a flexible natural-gas reciprocating engine in the late 2020s to reduce reliance on market capacity purchases.

I was looking for a bit of clarification on this statement. Does this simply mean that the City would have the followup action to, in the late 2020s, commission the same or a different subject matter expert or consultant group to get more details on a reciprocating engine, at which point the City would then determine if they would commit to the reciprocating engine as an auxiliary supply? Or does this statement

as part of the IRP represent a commitment to construct a natural gas reciprocating engine by the City, starting in the late 2020s?

Thanks again for answering my questions, and I really appreciate how much information about Batavia' energy supply and about the proposed IRP is readily available on the city website.

#### **Comment #44**

My questions were mainly about the alterability and scheduling of the plan. Is there a point at which the IRP becomes 'locked in' and unalterable? For example, the proposal from the Brattle Group bases some of their decisions on recent changes in federal tax credits. If theoretically, those tax credits returned some years later, making renewable energy sources more economically viable as an auxiliary supply, would the City be able to change the IRP from what is currently proposed?

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Thanks again for answering my questions, and I really appreciate how much information about Batavia' energy supply and about the proposed IRP is readily available on the city website.

#### **Comment #45**

Slide 1- What is the total amount the city has spent on this effort to date—including staff time spent interacting with the consultant and conducting research—and how much remains to be paid?

Please provide a copy of the fully executed contract as well as any updates or amendments between the city and the consultant as well as the Request for Quote used to solicit their consultation.

Slide 8- Why is our consumption decreasing?

Slide 9- It appears the city is paying NIMPA more to the than the taxpayers are paying in the summer but the taxpayers are paying more than necessary in the other months. This implies the city is running the electric service as a profit center.

Slide 14- How does the RECIP support the 25% GHG reduction goal? Please provide the analysis (including study of NPV from the taxpayer perspective) that shows the city can build, run and maintain a RECIP more effectively than power can be bought from JPM? A consistent message throughout the presentation is the fear of wildly changing NG prices. Would not the city be vulnerable to the same swings as JPM?

Slide 16- How is the thermostat being proposed different than the set-back thermostat I already have in my house? How many houses in Batavia already have a setback thermostat? How much additional savings will a taxpayer get by adding the smart thermostat? Will the city need to raise rates in order to offset these savings and still maintain its profit margin?

Slide 20- Why was the 2019 level chosen as the baseline and what are those levels? HB 2902 has not passed into law rather, it has been in the House Utilities Subcommittee since March 11, 2025 so there is no statutory requirement to create an IRP.

Slide 21- Information elsewhere (slide 34) implies our peak demand is 31-35 MW above the 55 MW capacity. With that in mind, does a 10 MW RECIP satisfy all our peak demands? If not, why is it being proposed and what size do we need to satisfy our current and future peak demands? What incentives are being considered in the Five-Year Action Plan?

Slide 22- What would this slide look like if the recently proposed 2026 rate increases are included? What is the profit margin target the city uses as a part of the rate increase setting?

Slide 30- Why has our power consumption decreased? How much of our 25% GHG reduction has already been met as a result of this?

Slide 35- Implies we are obligated to NIMPA until the end of 2038. If that is true, where does the RECIP fit in? Can we only use it to satisfy peak loads, thus sitting idle for 9 months per year?

Slide 44- Does the analysis consider the loss of tax credits that support adoption? If not, what does the analysis look like when the losses are included?

Slide 45- Does the adoption rate include loss of incentives, and does it include adoption by city-owned vehicles? Has the city discussed making solar panel installation a requirement for homes that add EV charging stations?

Slide 46- What does the chart look like when only the three highest months (June, July and August are plotted)?

Slide 47- The data center should absorb any costs that contribute to increases in the system. As noted in other slides, the city operates its electric service as a profit center, and the data center should be leveraged to generate even greater profits.

Slide 48- It appears the study does not include the adoption of electric furnaces, water heaters or appliances. If it did, the peak load would be in winter. In fact, in Northern Illinois, more energy is required to heat a home than to cool it. How will Batavia achieve its goal of carbon neutrality if no consideration is given to complete electrification of the city?

Slide 58- The slide states "Load serving entities like Batavia are required to purchase enough capacity to cover their peak load (including capacity reserve margins) from PJM's capacity market..." How does this affect the decision to have a RECIP? The text of the slide implies we need to pay PJM for peak load capacity whether we need it or not. Please clarify.

Slide 61- Other than the (city controlled) smart thermostats, what other demand-side management programs are being considered?

Slide 74- The first bullet point on this slide appears to be an incomplete thought: "A RECIP has a high capacity value, meaning that it can maximize the value Batavia can capture from rising capacity prices, and thus the reduction in". What is the point being made?

If the city begins operation of the RECIP in 2028, how will the city go about sharing the \$4 and \$15 million savings with the rate payers? This implies the recently published / proposed increases for 2026 are temporary and will be reversed after 2027. Please confirm that is the plan.

Slide 76- This may also demonstrate the effect of the set-back thermostats that are no doubt ubiquitous in Batavia. Exactly what are examples of “programs designed to reduce customer demand during peak hours in the summer months could deliver system cost savings and reduce Batavia’s exposure to high capacity prices.”?

Slide 77- By how much will a pre-cooling strategy reduce the peak demand and what effect will such a strategy have on an individual homeowner? Is there an analysis that demonstrates the value of this strategy? Without sharing the detailed analysis, at face value, this strategy may lower the overall peak but, at the same time, negate any benefit that could be gained from using a traditional set-back thermostat. Will customers who do not have and cannot afford central air conditioning be penalized for not participating in the smart thermostat strategy?

What is meant by “limited disruption”?

Please share an example of a city that has implemented the Time-Varying Rates.

Slide 79- Slide 29 indicates there are 10,020 residential customers as of December 2024. Slide 79 implies there will be the exact same number of customers who are eligible for a Smart Thermostat. How will the numerous customers that do not have central air conditioning contribute to the Load Reduction?

To meet the projected demand of 541 EV customers by 2030 (up from today’s 89), the city and the electrical contractors will need to connect one new customer every three days, operating continuously, seven days a week, beginning January 1, 2026. Is there a plan and capacity to accomplish this?

Slide 81- In Batavia Township, neighborhood 003, according to the Township Assessor, 50% of the homes do not have central air conditioning. In addition, according to the Batavia United Way, approximately 1/3 of Batavia residents are one flat tire away from poverty. Thus, if the city introduces Residential Time-Varying Rates or Smart Thermostats, they could potentially be penalizing many people who cannot afford a flat tire, much less central air conditioning. How will this be addressed in the plan?

What is the all-in NPV from a taxpayer / electric customer perspective for each of the five options?

Slide 84- What aspects of the five-year action plan directly address the city's goal of 25% reduction of GHG emissions by 2030?

Overall takeaways-

It is not clear that any combination of strategies / elements within this plan will substantively reduce the city's peak electricity demand in summer months to below the 55MW threshold.

In particular, significantly more investigation needs to be performed before implementation of the Smart Thermostat. Given the available evidence in the consultant's plan, it will likely cost the taxpayers a significant amount of money with little to no actual benefit.

It is not clear that any combination of strategies / elements within this plan will substantively reduce the city's GHG emissions.

The RECIP is an interesting strategy. However, it is not clear how it will fully address the peak demand issue nor does it seem to support the carbon neutral by 2050 goal.

Since there is no statutory requirement that has been passed into law that requires Batavia to generate an IRP, the city should shift its focus to reducing GHG emission at the city level. For example, all city (police, fire, city hall, library, park district, etc.) buildings should be equipped with Smart Thermostats. All city vehicles and light trucks should be EV. All contractors that operate within the city on city contracts (school buses, landscapers, road repair, etc.) should be required to operate EVs and battery powered equipment (chain saws lawn mowers, etc.). Since GHG emissions are widely considered to be an emergency, the various surplus / emergency funds already within the city can be used to fund the above efforts with no additional burden to the taxpayers. Once these and other strategies demonstrate with data they reduce GHG emissions citywide and add other value at the city level, they can be presented to the taxpayers for their consideration.

#### **Comment #46**

I saw the presentation from last night at the village hall. I have been a resident in Batavia for seven years.

I am wondering if natural means of energy generation have been considered? There's a river running through the town with small waterfalls. Couldn't the falls be made taller and utilized for electricity generation?

Secondly, there's a windmill used as a sightseeing destination. Could it be made functional to generate electricity? Alternately build a new windmill and use that?

Thirdly, perhaps the village of Batavia could search out a "deal" for its residents to opt for some solar power to be installed in their homes, on a volunteer basis, and the extra energy could be sold back to the electrical entity for public use.

#### **Comment #47**

No matter what action is taken, the cost for energy will increase in the coming decades. That being said, Key Observation 9d: Choosing a green or no solution would cost Batavian households an additional \$3.5-\$4.1 million over 20 years. The gas fired plant cost estimate indicates a 1.1% savings over other alternative solutions. Consider the worst case for 10,000 Batavia households, which is the current estimated number of homes and with limited anticipated increase due to available land within city limits, is a reasonable estimate for future planning. This leads to a \$410 incremental cost or \$20 per year over 20 years per household . Not a significant amount to base the decision. Plus it is not clear if cost reductions for greener energy R&D are taken into account, green may have an advantage. Green solutions must be given stronger consideration. This is problem is facing not only Batavia, but nation wide and globally. What efforts are being conducted on a wider scale to address the future electrical needs? There are many communities the size of Batavia facing the same concerns. Has there been any effort to combine municipalities to work on a solution that would be more cost effective? Additional Comments The ten megawatt peaker plant proposal is only a third of projected needs. This proposal does not address the remaining 20 MW which will have to be sourced from the grid at considerable additional peak prices, making the potential 1.1% savings over alternative solutions mentioned in Key Observation 7a insignificant. Key Observation 2a: Does Batavia's contract with NIMPA's 55 MW allow selling excess capacity to other communities who are in need when our load requirements are satisfied? Basically spot pricing for the open market. The study shows approximately 50GWH annually that is not consumed. Electric vehicle use is

expected to rise over the next ten years to between 30%-50% of vehicles on the road. Current number of households in Batavia is estimated at 10,000. For example take one third of the homes with one or two vehicles per household (3000-6000 vehicles) and each driving an average of 10,000 miles per year yielding 30-60 million Batavian miles. An average EV requires 50-100 kWh to charge and utilizes 250-350 WH per mile. This amounts to 7.5 GWH to 21 GWH. With usage of approximately 450 GWH annually over last six years, electrical vehicles would account for a maximum of 4.6% of electrical energy in the future. During summer peak usage time, how many hours per day are at or below the NIMPA 55 MW capacity? This could be used for battery charging and also used to calculate how much battery storage would be required. As for the May 2025 survey, what level of details were available to the public when the survey was taken? Surveys covering extensive future time periods are not valid because the percentage of those who participated would not necessarily be around to take the full benefit of the proposal over the next two decades. In conclusion, this proposal does not adequately address the needs for future electrical energy capacity for Batavia. Any decision to pursue a gas fired peaker plant should be highly discouraged.

**Comment #48**

Thank you for your time at Thursday's meeting at the library, answering questions and taking feedback on the IRP.

Here are some of the key requests that I and others had:

- Do not tie Batavia to building, maintaining and operating a natural gas reciprocating engine for the next 30 years.
- The June 2025 survey shows that a majority of Batavia residents are willing to pay a modest increase in electricity costs for more renewable energy sources. So please do not just emphasize the financial aspects of the options, but also take into consider environmental costs as well.
- Provide options that include other renewable energy sources presented in concise, accurate language that all Batavians can understand.
- Consider additional ways, such as incentives for electric appliances, to address the effects of climate change.

- Batavia residents want flexible, clean energy investments like solar, battery storage and programs that reduce energy use during peak periods that can scale up or down as Batavia's needs change

#### **Comment #49**

1) Has Batavia evaluated selling its electric utility? Maybe this issue has been previously addressed, but if that is not the case, then the City of Batavia (City) should undertake such an evaluation. I will not provide the merits of selling Batavia's electric utility (Utility) because it may have already been addressed. If that is not the case, I would be willing to provide comments regarding the benefits of selling the Utility.

2) Brattle's Five-Year Action Plan Timeline (slide #84) is a reasonable approach and I commend them for coming to that conclusion. The Utility is facing numerous factors as it goes about its planning (slide #37 Planning Environment). There is a considerable amount of uncertainty related to those factors. Putting together its best estimates of those factors Brattle finds that the various Portfolio scenarios differ by at most 1.1% from the status quo (slide #14). Thus, the best course of action appears to be to take a wait-and-see approach.

Essentially, Brattle is suggesting that is what the City should do while also taking some developmental steps. In particular, build a "1-5 MW RECIP" (from slide #84) over the next couple of years to gain experience and reevaluate the need for more capacity five years from now. Actually, slide #84 is so important to their report that I do not understand why it is not near the front of the presentation. My caveat to their recommendation is that if the City wanted to wait a couple of years (for whatever reason) before moving forward with the RECIP that is a valid approach. There is value in waiting. For example, I believe one can easily make the case that if the City had waited until 2009 in deciding on a potential long-term supply contract it would not have entered into the NIMPA contract as its economics had radically changed by that point in time. Moving forward with the RECIP plan is a good recommendation, but waiting a couple of years is just as acceptable. My main point is that I am not nearly as familiar as you are with all of the dynamics facing the City and Utility so if you want to wait a couple of years that is perfectly fine.

3) Does ComEd have a commercial TOU rate similar to the one envisioned by Brattle? Brattle ascribes considerable benefit to a commercial TOU rate (slide #17). ComEd has one of the most robust demand-side management and energy efficiency programs in the country. Yet, if ComEd has not selected a commercial TOU rate as one of its many tools that should give the City pause in moving ahead with such a rate.

4) I highly recommend the Utility move forward with a residential smart thermostat program as soon as possible. PJM capacity prices are likely to be rather high for the foreseeable future so an off-the-shelf residential demand program (i.e., smart thermostats) is something that should be implemented immediately. Frankly I am surprised that the Utility has not previously implemented a smart thermostat program given that it is a rather cost-effective demand-response program. As a side note, it would be useful to mention in the report what existing interruptible programs the Utility has for its commercial and industrial customers.

5) I would defer making a decision related to electric-vehicle (EV) tariffs and load reduction programs for a few years. EVs are currently found in only one percent of Batavia's households. Waiting until you have a larger number of EVs (e.g., five percent) will allow you to make a more robust decision. Of course, you can collect data in the meantime. For example, how much annual usage (kWh) is attributed to the EV charging stations outside of City Hall?

6) How many residential customers did the Utility have in 2010 and 2023? I find it rather strange that Brattle would reference a population growth estimate in describing the flat load growth over the past several years (slide #30) when the City knows exactly how many residential customers it has added over the past 13 years. A very minor point, but it stuck out as odd to me so I just wanted to pass it along.

#### **Comment #50**

It appears that the concern is mainly with respect to sensitivity of the present purchase arrangement (coal fired plant dedicated to needs), to peak demands and costs in the spot market for electricity. These risks seem to have been analyzed assuming supply by peaker plant. Online search results (Google) suggest the following: existing gas at \$24- \$39 per mwh and new gas turbine at \$48- 109/mwh. It is worth noting that peaker backup by battery storage is widely reported as, "less". Thus, rather than adding new fossil fueled capacity, it may be possible to reserve a

percentage of base load to battery backup for peak demands. A homeowner might for example consider adding a "power wall" to cover peak demand times.

I've always been bemused that the town boasting the invention of the windmill, and posting the name of a prominent east- west street as, "wind energy pass", gets its power exclusively from fossil sources. You are perhaps aware that utility scale solar can be as low as \$38- \$78/mwh, and utility scale wind \$37- 86. Globally, renewables are driving fossil fuels to marginal use if not to extinction.

I humbly also offer a reminder to consider onsite environmental costs. Tree growth through fossil- use Climate change is estimated at 21% increase. While leaf & brush pickup seems to be accommodated by a modest \$5 per month increase to utility bills, it seems likely that future expenses will add arithmetically if not geometrically.

Real estate losses through flood risk are in the neighborhood of \$121- 237 billion nationally. Other losses not reported on the annual budget can be as high as \$1.47 trillion. You'd have to filter off our municipal cost as a percentage, to correctly gauge the opportunity cost of not using renewables..

But the real cost will be to real estate values. Homeowner insurance rates are spiraling upward and the list of municipalities where insurance is unavailable grows each year. REITs are reported to be experiencing lower cash flows as the result, and Zillow has reportedly stopped reporting environmental risks on listings because it hurts business.

#### **Comment #51**

Why is there no mention or consideration for the deployment of SMRs in the IRP.

I know that current construction costs are typically far too high for a small town to afford on its own.

But, there are likely numerous sources of funding and tax credits available for such cutting edge pioneering projects.

While such a project may not be in the cards for the next decade, I think it would be really cool (I can still use that phrase because I'm grandfathered in) to let our citizens know that we're thinking about their future.

Please keep an eye on this technology. It's new right now, so costs are probably around 100 times what we could manage without Federal, State, Environmental Group, and other funding avenues. But, as more companies begin to compete in this market and government agencies begin to push this stuff, we could hit an acceptable price point in the next couple of decades.

#### **Comment #52**

I'm a Batavia resident and have spent nearly a decade working on energy issues professionally across the Midwest, including here in Illinois. I have been reviewing Batavia's draft IRP with consultation from some utility expert colleagues and wanted to share my concerns and observations. Please note reliability, affordability, and sustainability are exactly the right goals and my feedback below shares those objectives.

The draft IRP names a predicted increase in PJM capacity pricing as the primary problem it is trying to solve. I have concerns about how and why Brattle came to that conclusion, but first my primary concerns with the draft are:

- The RECIP peaker proposal is based on inconsistent assumptions resulting in small, uncertain benefit, while opening the city up to a swath of new risk (similar to how Prairie State looked like a good idea on paper at the time)
- The draft drastically underutilizes demand-side solutions that are far more predictable, flexible, and more directly benefit Batavian ratepayers.
- If the intention is also for this to meet the requirements of the Clean and Reliable Grid Affordability Act my understanding is that it will need to include a 'description of all models and methodologies used in performing the integrated resource planning process.' The current draft does not.
  - The draft itself says underlying data and methods should be accessible, but the PJM market model it relies on is proprietary, so right now the public can't see or test the core assumption: the capacity price spike. This is not one of my personal concerns and I'm not sure how Brattle/Batavia solves it, but it seems like a compliance issue with the new law.

I understand why many of the draft IRP's proposals make sense on paper. But these "sensible" proposals, usually modeled by a single consultant, too often guide city leaders into relying on that single source of technical expertise to make decisions that will affect their community far into the future. It's a future consultants won't see, so aren't accountable for, so they favor the metrics of now in what they deliver. It's this exact dynamic that misled so many municipal utilities into NIMPA/Prairie State contracts that seemed like safe decisions at the time, but didn't play out as promised. Avoiding a repeat of that mistake is why I have the following concerns about the process that informed the current draft:

- Consultants like Brattle, Guidehouse, ICF, etc, all maintain proprietary models of RTOs like PJM so that when smaller clients like
- municipal utilities hire them, all they need to do is the local modeling, allowing them to offer an affordable fee. This practice means that the two models, local and regional, do not inform each other and in this case use different assumptions and data to draw conclusions. That's a problem.
  - Brattle's model of PJM concludes that capacity prices will rise in the early 2030's largely driven by forward looking market trends
  - and assumptions: regulations making fossil fuel baseload more expensive, baseload retirements with not enough clean energy coming online to replace it, all with broader EV adoption and a massive buildout of data centers driving up demand.
  - On the flip side of that the Batavia-specific modeling assumes flat local load and only modest electrification, even though the market outlook assumes big mid-2030s cost increases.
  - This disconnect means that they've modeled the question in a completely different reality than they modeled the answer, which should raise questions before we bet on "capacity exposure" as a meaningful concern.
  - Digging deeper, the assumption that Batavia's demand will stay more or less flat over the next 20 years feels shaky at best, especially when the prediction for PJM concludes the opposite. As the IRP states, on a normal day Batavia stays well within our 55 MW of baseload power. At

peak times, that can be as high as 85 MW. That has not changed drastically over the last 20 years, so the local model assumes that flat demand will continue. That's a problem because there's a lot indicating that the next 20 years will look a lot different than the last 20, and the future is what we're trying to plan for in this process. Nationally, the data center boom, electrification, and EV adoption are driving unprecedented demand, yet this draft treats Batavia like it will be an exception because it extrapolates conclusions from historic data.

- The draft uses conservative EV and electrification assumptions based on current behavior and neighboring ComEd forecasts. It does not model the faster adoption curve we're actually seeing. This assumes that everyone who owns an EV has at-home chargers—which is not true for any of the Batavian EV owners I know—and that people will continue to buy EVs at the same rate. The cost of EV's continues to go down as technology advances (which is one of the biggest barriers to adoption) and most major car manufacturers have public plans to transition to all or majority EV line-ups. These factors are strong indicators that the rate of EV adoption in Batavia will increase, and our IRP should reflect that. This logic also translates to the rate of adoption for electric appliances and home upgrades.
- Data centers are upending utility plans across the country and the city council has already approved one for Batavia, while that might be treated as a pass-through when it comes to supply and billing, that power still moves across Batavia's local grid, which means we'll shoulder the maintenance, wear, and potential infrastructure upgrades needed to support that added load. As a large, nearby customer, it could also change how often the proposed gas generator needs to run to maintain reliability, which affects the economics of the IRP's recommendation. That the draft says "We will evaluate the impact of this load in the final version of the IRP," so hopefully this is accounted for, but if nothing else, a single industrial customer with a demand equal to the entire rest of Batavia, illustrates how quickly load can grow and why assuming flat growth might limit our options or set us up for surprises in the future.

- Similarly, technology is changing rapidly. AI is only going to make that happen faster, and as technology is increasingly reliant on AI that advancement will translate to demand. 20 years ago, social media was barely a thing and now it's hard to imagine a work without it. It's not far fetched to imagine a future where robotics or localized-AI based appliances drastically increase household demand. I wouldn't bet on it, but it would be unwise to bet against it, which is exactly what this draft is doing.
  - The IRP does not seem to address what we do with the excess from our 55 MW baseload when Batavia's typical demand is 30-40MW. That's energy sold back to PJM, which would benefit us in a high capacity price scenario, or could be stored for our own peak demand reducing the need for additional generation.
- My last process concern is that the IRP draft misinterprets the June 2025 survey and the Batavia Energy Plan. It states that "Batavia's electric customers prioritize affordability and reliability over decarbonization," which not only presents a false choice, but wasn't the findings of the survey.
  - As shown in the chart on Slide 19: 38.8% responded that they were not willing to pay a premium for cleaner electricity while adding up the other responses shows that 43.4% said they are willing to pay a 5 to 15+% premium for cleaner electricity (an additional 17.8% said they needed more information). Nobody said they were willing to pay a premium for fossil fuels, which is exactly what the proposed RECIP could become if the assumptions its economics are based on are off, even within the margin of error.
  - I also just take qualm with the framing of "mature technology." I'm not sure where that wordage came from, but it is not used once in Batavia's Energy Plan, and is inaccurate in how it is implied. Combustion engine technology is old, but RECIPs as a utility scale asset have been around for about 15 years, approximately the same amount of time as utility scale storage. Solar PV has been deployed since before I was born, and is decisively the most "mature" technology modeled in the IRP. If

“mature” is just code for fossil fuels, our IRP should say as much for the sake of transparency.

With that context understood, I believe the IRP can meet Batavia’s goals of reliability, affordability, and sustainability most effectively by making the following changes:

- The proposed 10 MW RECIP is framed as taking advantage of rising capacity prices to save Batavia money in the long term, however those savings are a narrow bet on what might happen, not guaranteed savings.
  - If capacity prices don’t change in the predicted way; external factors like volatile fuel markets/taxes/tariffs, new regulations or carbon taxes are different than assumed; or if demand from extreme weather events and technology adoption increase peak run times more frequently than modeled, all those savings disappear. As the option that also has the highest and most unpredictable construction, maintenance, and fuel costs, that is a risky bet for a “maybe 1%” savings (1% is within the margin of error for the model).
  - Solar + Storage might look like it saves less on paper, but when uncertainty is applied, the various scenarios carry much less risk.
  - The capital investment itself is cheaper than the RECIP, there is no potential for tax/tariff/fuel cost increases, and if needs change in the future a more distributed generation plan is easier to scale up and adapt to those needs.
- Demand side solutions are also underutilized in the draft IRP and have huge potential to reduce that capacity exposure while also giving tangible savings directly to residents and businesses before it even impacts bills.
  - Exploring smart thermostats, Time of Usage (TOU) rates, and EV managed charging programs is a tentative step in the right direction. With serious commitments to energy efficiency, distributed solar incentives, and other common demand side solutions, Batavia could considerably reduce its projected peak load in a way that is both zero/low cost to the utility itself, and not dependent on external factors like volatile markets.

- Batavia’s own Energy Policy says DSM should come before “significant new capacity additions.”

I am proud to be a Batavian and to live in a town that is first out of the gate running a transparent and collaborative municipal IRP process. We’re moving in the right direction and with the considerations listed above, I think we’re well on our way to creating a strong plan for the reliable, affordable, and sustainable future we all want.

**Comment #53**

I looked at the Plan for Batavia's Future. Briefly, I hope to attend December 9th @ City Hall. I'm interested in the level of interest in embracing a reasonable amount of wind energy. We are a city of energy , be it wind mills or Fermi Lab. Is there a chance with any remaining Fed cooperation we could get a wind turbine or 2 on Fermi Lab property, or on "Batavia proper" property ? This is what I would be interested in. Any thoughts ? Also, on the IRP ,thee acronym PJM is not introduced properly. I don't know what it stands for. And neither did AI "ASK WILSON" :) Thank you, Jim

**Comment #54**

(NOTE: Added to this document on March 13, 2026. Resident submitted this on December 31, but was inadvertently missed)

I was a bit disappointed by the lack of analysis on renewable energy supply options. They present 5 choices, the natural gas RECIP and four varieties of renewable generation and storage, but it appears that a deeper analysis was only provided for the RECIP and not for the renewable options, with essentially only weaknesses being presented and the renewables largely dismissed due to a late 'optimal online year' - and it seems unclear where that online year estimate comes from in the presented data.

Additionally, the proposal mentions volatility in supply-side pricing as a potential future concern - but it seems to me that if Batavia were to construct a natural gas RECIP, this would leave the city similarly vulnerable to volatility in the price of natural gas. While renewables could present higher costs during construction, the price for maintenance and upkeep should be much more stable than natural gas.

Overall, I feel that the proposal does not sufficiently address the city of Batavia and the state of Illinois' sustainability goals (25% below 2019 levels by 2030 and carbon neutrality by 2050). In Key Observation 9c, the proposal simply states that the 2030 goal is unrealistic without further elaboration or a presented alternative goal. If such a goal is unrealistic, it would be useful to know what an appropriate alternative would be (a goal of 25% below 2019 levels by 2032, for example, would still be a meaningful goal as opposed to simply dropping the idea entirely).

The consultant group takes into consideration the phasing out of renewable tax credits, when by the timelines they lay out for the online year of renewable auxiliary supply, those tax credits may return or be even more profitable than they were before. Moreover, I think insufficient analysis is done on the potential cost of Illinois state regulation of energy supply. If the state pushes harder to reach 2050 decarbonization goals, plans such as the natural gas RECIP for auxiliary power could end up being subject to unforeseen fines or penalties.

The following link goes to a United Nations Economic Commission for Europe report with the life-cycle assessment of various power supply generation options over the course of their full lifecycle (construction, maintenance, and shutdown). If you'd rather not click the link, you can find it by searching 'UNECE LCA energy sources 2022.' While we are not in Europe I think these assessments are just as meaningfully applicable here:

<https://unece.org/sed/documents/2021/10/reports/life-cycle-assessment-electricity-generation-options>

Similar to what I mentioned previously the main emissions of renewables is in construction while presenting negligible emissions during actual use. Moreover even

considering carbon capture technologies, renewables still generally produce significantly less emissions over the full lifecycle as opposed to coal or natural gas.

I feel very strongly about Batavia moving in the direction of renewable and sustainable energy, especially in the case where Batavia has decision-making power or ownership opportunity over a potential new auxiliary energy supply. As a less technical point, Batavia of course is very centered on wind and windmills - they decorate popular spots in town and the old Challenger building is still a fun sight on the riverwalk. A windmill even decorates Batavia's flag. As the City of Energy, I think it would thematically do Batavia right and be something we could be proud of and celebrate to have a windmill and energy-inspired city be partially powered by wind. Something so central to our origins, the wind being what helps keeps the lights on in Batavia would make me deeply grateful.



