

**[Committer 10]**  
**Comments on**  
**Draft ISC Contract**

**From:** [Commenter 10]

**Sent:** Mon 6/15/2026 5:51 PM

**To:** Illinois-RFP <Illinois-RFP@nera.com>

**Subject:** Comments on Illinois Power Authority Energy Storage RFP

To Whom It May Concern:

Attached please find [Commenter 10] comments in response to the IPA's Invitation to Comment on the Energy Storage RFP. Thank you for the opportunity to provide our feedback. If you have any questions or concerns, please feel free to reach out.

[Commenter 10]





procurement framework distinguishes between short-duration, long-duration, and multi-day storage resources, reflecting the understanding that duration itself is a meaningful reliability characteristic.

The growing adoption of duration-specific procurement frameworks reflects a broader recognition that future reliability challenges will require a portfolio of storage resources capable of delivering energy across a range of time horizons. Illinois may wish to consider whether additional procurement pathways, evaluation criteria, or other mechanisms are appropriate to ensure that long-duration storage resources are adequately represented within the State's storage portfolio.

Accordingly, [REDACTED] encourages the Authority to recognize eight-hour-and-longer storage resources as a distinct reliability category within the ISC framework. A diverse storage portfolio that includes both short-duration and long-duration resources will provide greater reliability, resilience, and long-term value to Illinois ratepayers than a portfolio composed primarily of four-hour systems. The Authority should also consider whether a dedicated procurement pathway, carve-out, or other mechanism for long-duration energy storage is warranted to ensure that Illinois captures the full range of reliability, resilience, and affordability benefits these resources can provide.

### **Safety, Supply Chain Security, and Public Confidence**

As energy storage becomes an increasingly important component of Illinois' critical infrastructure, procurement frameworks should recognize meaningful differences in technology safety profiles and supply chain security.

Not all battery technologies present the same safety characteristics. Technologies that are non-flammable and not susceptible to thermal runaway can reduce emergency response concerns, simplify permitting processes, and improve public confidence, particularly when deployed near population centers, industrial facilities, and critical infrastructure.

Recognizing these characteristics can help accelerate deployment while supporting the State's public safety objectives.

Similarly, Illinois should consider the strategic benefits of domestically manufactured energy storage systems supported by secure supply chains. As storage becomes a foundational component of electric system reliability, the ability to manufacture, service, maintain, and replace critical infrastructure using domestic industrial capacity becomes increasingly important.

Procurement frameworks that recognize domestic manufacturing, secure supply chains, and reduced dependence on foreign entities of concern can strengthen Illinois' long-term

energy resilience while supporting American jobs, industrial investment, and national security objectives.

## **Conclusion**

█ appreciates the opportunity to provide comments on the Draft Indexed Storage Credit Contract and Preliminary Proposal Requirements. Illinois has an opportunity to build a storage portfolio that delivers reliability, affordability, resilience, and long-term energy security. We encourage the Authority to ensure that the final framework appropriately recognizes the unique reliability contributions of long-duration storage resources, adopts technology-neutral performance standards, evaluates lifecycle value, and incorporates considerations related to safety and supply chain security.

We look forward to continued engagement with the Illinois Power Authority as the ISC framework is finalized.