

**[Commenter 7]**

**Comments on Draft  
ISC Contract and  
Preliminary  
Proposal  
Requirements**

**From:** [Commenter 7]

**Sent:** Mon 6/15/2026 3:49 PM

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

**Subject:** [Commenter 7] Comments on Illinois Power Authority Energy Storage RFP

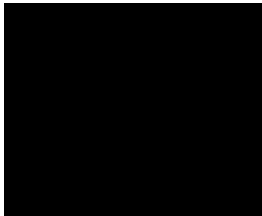
Hello, friends in Illinois.

Attached please find comments on the Illinois Power Authority Energy Storage RFP from [Commenter 7]. We welcome the opportunity to work with the state of Illinois to procure more long duration energy storage resources.

I'd love a receipt confirmation. Many thanks.

Best,

[Commenter 7]



June 15, 2026





Comments on Illinois Power Authority Energy Storage RFP


To: Illinois Power Authority


[Illinois-RFP@nera.com](mailto:Illinois-RFP@nera.com)

To whom it may concern,



 is pleased to submit the following comments regarding the Draft Indexed Storage Credit (ISC) Contract and Preliminary Proposal Requirements.



. We appreciate the Illinois Power Authority's efforts to advance energy storage deployment and support the State's ambitious clean energy, reliability, and affordability goals.

Illinois has established one of the nation's most significant energy storage deployment objectives through the Climate and Equitable Jobs Act (CEJA). As the Authority moves forward with implementation, we encourage consideration of how the current solicitation structure may unintentionally favor four-hour storage resources while limiting participation by long duration technologies that can provide distinct and complementary reliability benefits.

### **Background on Long Duration Energy Storage**

Long duration energy storage (LDES) refers to storage technologies capable of discharging electricity for 8 hours or longer, including both intraday and multi-day. These technologies include electrochemical, thermal, mechanical, and chemical systems.

While short-duration energy storage (SDES, also known as BESS) and LDES are both valuable grid resources, they serve different functions within a modern electricity system.

Four-hour storage is effective for daily energy shifting, ancillary services, and managing short periods of peak demand. However, LDES addresses a different set of challenges, including prolonged peak demand periods, extended renewable energy shortfalls, extreme weather events, and emerging reliability needs associated with electrification and load growth.

Importantly, longer-duration resources can often provide equivalent reliability outcomes with fewer installed megawatts because they are capable of sustaining output for significantly longer periods. As Illinois evaluates pathways to achieve its energy storage goals, maintaining a diverse portfolio that includes both short duration and LDES will improve system resilience and reduce long-term reliability risks.

### **General Observation**

The current draft ISC framework is effectively structured around four-hour storage economics. Payment calculations, Effective Load Carrying Capability (ELCC) assumptions, duration requirements, and Indexed Storage Credit generation formulas are all anchored to the performance characteristics of a four-hour resource.

While longer-duration projects appear eligible to participate, the draft does not currently provide explicit recognition or compensation for the additional reliability value associated with durations beyond four hours. As a result, the framework may unintentionally discourage investment in storage technologies capable of providing 8+, 10, 12, 24 or more hours of discharge.

### **Recommendation 1: Expand Eligibility and Procurement Design to Encourage LDES**

The Authority should consider modifications that explicitly encourage participation by long duration energy storage resources with durations of 8 hours or greater.

Illinois has established a 3 GW energy storage target. Achieving that target through a portfolio that includes both short duration and LDES will provide greater reliability, operational flexibility, and resilience over relying predominantly on four-hour systems.

The Authority should consider creating a pathway within this solicitation that recognizes the distinct reliability value provided by LDES resources.

### **Recommendation 2: Reduce the Minimum Project Size Requirement for LDES**

The draft solicitation's 20 MW minimum project threshold may unnecessarily limit participation by emerging long duration energy storage technologies.

██████████ recommends reducing the minimum project size requirement to 5 MW for projects providing 8 hours or more of storage duration.

Many innovative long duration technologies are currently being deployed at commercial and early-commercial scales below 20 MW. These projects can provide immediate and meaningful reliability and grid resilience benefits while helping establish operational experience, technology diversity, and competitive markets.

Reducing the threshold for LDES resources would encourage broader participation, increase competition, and support innovation while maintaining the Authority's overall procurement objectives.

### **Recommendation 3: Replace the 85 Percent Round-Trip Efficiency Requirement with a Technology-Neutral Performance Standard**

The draft requirement for a minimum 85 percent round-trip efficiency (RTE) may unnecessarily exclude commercially viable long duration energy storage technologies.

Round-trip efficiency is one factor among many that determines the value of an energy storage resource. Other factors include duration, availability, capacity contribution, resilience benefits, cycling capability, and delivered system value.

██████████ recommends replacing the minimum RTE requirement with a technology-neutral performance framework focused on reliability, availability, and system value.

Ultimately, a suite of factors should be considered when evaluating storage resources. These factors are best incorporated into a valuation methodology rather than used as binary eligibility requirements.

### **Recommendation 4: Support for Hourly Availability Reporting**

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██████████ supports the draft requirement for hourly availability reporting.

Availability reporting appropriately measures whether a storage resource is capable of delivering capacity and reliability services when needed. This approach aligns with the fundamental value proposition of storage as a reliability resource and avoids unnecessarily prescriptive operational requirements.

We believe this framework provides a practical and technology-neutral method for evaluating performance across a diverse range of storage technologies.

### **Recommendation 5: Establish a Dedicated Procurement Pathway for Long Duration Energy Storage**

██████████ encourages the Illinois Power Authority to establish a dedicated procurement pathway for long duration energy storage (LDES), either within this procurement cycle or in future procurement rounds.

While the current procurement framework is designed to support deployment of energy storage resources, it is largely calibrated around four-hour storage systems and may not fully capture the reliability, resilience, and grid flexibility benefits provided by eight-hour-and-longer storage technologies.

Other states have recognized the importance of maintaining a diverse storage portfolio that includes long duration resources. For example, New York's Bulk Energy Storage Program and broader 6 GW Energy Storage Roadmap were designed to support a range of storage technologies and durations, recognizing that different storage resources provide distinct reliability, resilience, and operational benefits to the grid. Similarly, Virginia's

