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STATUS UPDATE ON ILLINOIS' COAL TO SOLAR & ENERGY STORAGE INITIATIVE



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EXECUTIVE SUMMARY

This report provides a status update on the implementation and outcomes of Illinois' Coal to Solar and Energy Storage Initiative and offers lessons learned for future clean energy policy at retired and retiring coal plant sites.

This report is based on informal interviews with representatives from Vistra Corp. and the Illinois Power Agency, as well as county and municipal officials in Randolph, Jasper, Montgomery, Lake, and Will counties; property tax records obtained from each county's Supervisor of Assessments; and a review of public program rules, legislative records, and other publicly available documents related to the Initiative. NRG Energy, Inc., which owns two eligible sites, did not respond to requests for comment.

The 2021 Climate and Equitable Jobs Act (CEJA) created Illinois' Coal to Solar and Energy Storage Initiative (Initiative) to incentivize development of utility-scale solar and battery storage projects at retired or retiring coal plants across Illinois. The program aimed to leverage existing infrastructure, support grid reliability, and facilitate economic transition in communities affected by coal plant closures.

The Initiative included two components: (1) the Coal to Solar and Energy Storage Initiative Procurement (Solar REC Program) supporting solar projects with small, co-located battery storage, and (2) the Coal to Solar Energy Storage Grant Program (Battery Grant Program), a grant program intended to fund larger, stand-alone energy storage projects.

A total of 11 eligible plant sites, which were either retired or scheduled to retire, with a combined generation capacity of 8,266 MW, engaged in the Initiative and proposed development projects (See Table 1). Developers completed only three of those projects. Vistra Corp. originally proposed six Solar REC Program projects totaling 294 MW of solar and up to 39 MW of battery energy storage. NRG Energy, Inc. proposed none. Vistra completed Solar REC Program projects at the Baldwin, Coffeen, and Newton plant sites, putting 164 MW of utility-scale solar and 6 MW, of four-hour utility-scale energy storage into commercial service. The three constructed Solar REC Program projects did generate a new stable source of annual property tax revenue that is important for counties that have faced or will face the loss of revenue from coal plant closures.

A total of five stand-alone energy storage facilities were envisioned with a total capacity of 255 MW, but none were economically viable or constructed.

Program design and timelines, interconnection delays, inflation, and other market factors contributed to these outcomes. Unlike other state programs, this program narrowly targeted a small number of large coal plant sites that were recently retired or soon to retire, owned by NRG Energy or Vistra Corp. The fixed incentive REC contract structures for solar and co-located storage, and the grant program for stand-alone storage, proved insufficient to sustain project development under changing economic conditions, including inflation, higher cost of capital, supply chain constraints, and interconnection challenges. For the storage grant program, delays in developing administrative rules further reduced the likelihood of project completion.

Taken together, these factors significantly constrained the Initiative's effectiveness at reusing power plant acreage for utility-scale solar and battery storage. The program produced a limited amount of co-located solar and storage development, but no stand-alone utility-scale battery storage projects.

Because the Initiative could not economically sustain the projects it envisioned, it fell short of its stated goals for grid reliability, resource adequacy, and economic transition. That gap between design and outcomes shows why eligibility, incentives, and implementation timelines need to align with market realities.

The Initiative's developers are not alone in facing these challenges. Many other projects awarded a REC or grant under various state renewable programs have run into significant problems before reaching commercial service. These cumulative experiences have driven policy changes such as the Indexed REC Program, one-time bid adjustments, and greater flexibility for developers.

State policies — including the Indexed REC Program, the Brownfield Solar Program, and the battery procurement created by the 2026 Clean and Reliable Grid Affordability Act (CRGA) — may open opportunities in the years ahead for previously proposed projects, or additional development, at formerly operating or soon-to-retire power plants across Illinois.

The experience of the Coal to Solar and Energy Storage Initiative offers important lessons for future policy design, particularly the need for broader eligibility, adaptive incentive structures, and stronger alignment with market conditions.

KEY TAKEAWAYS FOR FUTURE POLICY

- Broaden and add flexibility to eligibility criteria to reflect the realities of developing at, on, or near power plant sites, or other brownfield properties
- Design incentive structures that can adapt to changing economic conditions, including inflation, cost of capital, supply chain constraints, and interconnection challenges
- Ensure timely program implementation and administrative clarity
- Resolve coal ash permitting and groundwater pollution issues to unlock full site redevelopment potential
- Build on emerging opportunities under the Indexed REC Program, Brownfield Solar Program, and the 2026 Clean and Reliable Grid Affordability Act (CRGA)



Solar and battery storage at Baldwin Coal Plant. *Photo courtesy of Vistra.*

Table 1. Background information and program status of the Illinois coal plants involved in the Coal to Solar and Energy Storage Initiative.

Coal plant	County	Plant Size (MW)	Owner	Operating Status	Coal to Solar Program	Coal to Solar Program status
Baldwin	Randolph	1,156	Vistra	Operating (retired one unit in 2016) 2028 planned retirement	Solar REC Project	68MW Solar & 2MW Battery Storage
Coffeen	Montgomery	888	Vistra	2019 Retirement	Solar REC Project	44MW Solar & 2MW Battery Storage
Duck Creek	Fulton	441	Vistra	2019 Retirement	Solar REC Project	Cancelled
Hennepin	Putnam	282	Vistra	2019 Retirement	Solar REC Project	Cancelled
Kincaid	Christian	1,112	Vistra	Operating; 2027 Planned Retirement	Solar REC Project	Cancelled
Newton	Jasper	617.5	Vistra	Operating; 2027 Planned Retirement	Solar REC Project	52MW Solar & 2MW Battery Storage
Edwards	Peoria	780	Vistra	2022 Retirement	Battery Storage Grant	Cancelled
Havana	Mason	488	Vistra	2019 Retirement	Battery Storage Grant	Cancelled
EEI/Joppa	Masaac	1,100	Vistra	2022 Retirement	Battery Storage Grant	Cancelled
Waukegan	Lake	803	NRG	2022 Retirement	Battery Storage Grant	Cancelled
Will County	Will	598.4	NRG	2022 Retirement	Battery Storage Grant	Cancelled

I. BACKGROUND & INITIATIVE OVERVIEW

BACKGROUND

Over the past decade, a significant portion of the nation's coal generating capacity has retired. To date, 14 of 21 coal-fired power plants have closed in Illinois. In 2024, coal accounted for 12% of the state's electricity generation, a decline from 46% in 2009 (Mattioda et al, 2025). These retirements can create challenges for both electric reliability and host communities, as coal plants have historically provided dispatchable generation, supported local tax bases, and served as major sources of employment. Coal-fired generation facilities have associated infrastructure (e.g. substations, transmission lines) as well as acreage previously reserved for energy production that make them attractive sites for redevelopment, including building solar, co-located solar and energy storage, or stand-alone energy storage projects. Additionally, repurposing these sites can support local economies by creating additional sources of tax revenue and jobs. As a result, there has been significant interest worldwide, including in Illinois, to redevelop these sites.

In 2021, Illinois created a program to incentivize the redevelopment of certain coal-fired power plants into solar and battery storage projects. The Coal to Solar and Energy Storage Initiative (Initiative) was created through an act of the Illinois General Assembly, *Public Act 102-0662*, a large omnibus energy bill also known as the Climate and Equitable Jobs Act (CEJA). Specifically, CEJA created subsection (c-5) of Section 1-75 of the Illinois Power Agency Act to establish the Initiative. Vistra Corp.(Vistra), the company that owns several downstate coal plants, authored and lobbied for the portion of the legislation that created the Initiative (Vistra Energy, 2019). Vistra's stand-alone legislation, prior to incorporation into the omnibus bill, was called the Coal to Solar & Energy Storage Act.

It had bipartisan sponsorship by Senators Michael Hastings, David Koehler, Sue Rezin, Jil Tracy, and Representatives Marcus Evans, Jay Hoffman, and David Welter (Renew Illinois Power, 2021).

NRG Energy, Inc also expressed interest in the then-proposed program and was involved in policy conversations that helped inform the Initiative's final language in CEJA.

The Initiative generated a lot of interest and press attention, both before and after its passage. Appendix A documents several of the articles that were published related to the Initiative.

INITIATIVE OVERVIEW

The Initiative provided financial incentives to develop utility-scale solar and battery storage projects at certain coal generating facilities in the state of Illinois. The Initiative consisted of two components, 1) the Coal to Solar and Energy Storage Initiative Procurement (Solar REC Program) that offered the purchase of renewable energy credits (RECs) from utility-scale solar projects and co-located battery storage facilities at or adjacent to the sites of certain coal generating facilities, and 2) the Coal to Solar Energy Storage Grant Program (Battery Grant Program) that provided grants for larger stand-alone battery energy storage projects at the sites of certain coal generating facilities. Both components of the Initiative were funded by a special fund in the State treasury, the Coal to Solar and Energy Storage Initiative Fund. The Fund was supported by monies collected from ratepayers by electric utilities, a fee known as the Coal to Solar and Energy Storage Initiative Charge. Fees collected by the utilities from ratepayers for the Initiative and not distributed will be refunded to ratepayers in Illinois Commerce Commission reconciliation cases.

PURPOSE & GOALS OF THE INITIATIVE

As summarized in Article 90 of Public Act 102-0662, the purpose of the Initiative was to "incentivize and support conversion and development of recently retired and soon to-be-retired coal-fueled power plants in this State to productive new uses as sites for the generation and provision of electricity from renewable energy facilities and energy storage facilities, thereby contributing to the State's efforts to reduce carbon emission from facilities in this State and increase of the production of the State's electricity needs from clean energy resources."

Goals/purpose/reasoning of the Initiative (as summarized from the legislation in Article 90) included:

- In light of retiring coal-fired power, ensure that sufficient generating resources, including energy storage resources, are available to enable the electric utility grid to meet the demands of Illinois electricity consumers at all times.
- Avoid delay or cancellation of renewable energy projects by targeting the installation of new utility-scale renewable energy facilities at sites that are already suitable for installation of such facilities and can be readily permitted.
- Take advantage of existing infrastructure and other characteristics of coal-fired facilities which make them suitable potential sites for development of new renewable energy generating facilities and electricity storage facilities.
- Help expedite the transition of this State's electric generation fleet to lower-emitting resources while ensuring the availability of sufficient electric energy resources to meet the demands of residential and business electricity consumers in this State.
- Not outlined in the legislation, but a goal touted by Vistra of the Initiative was the generation of tax revenue for communities and job creation.



Solar and battery storage at Baldwin Coal Plant. *Photo by Nick Talan.*

II. INITIATIVE PROGRAM DESIGN & IMPLEMENTATION RESULTS

The following section outlines the details of the Initiative's two programs, the Solar REC Program and the Battery Storage Program. The programs were established and administered in accordance with fairly proscriptive requirements in the CEJA legislation. This section also details the outcomes or results of the two programs.

SOLAR REC PROGRAM

The following section outlines the details of the Initiative's two programs, the Solar REC Program and the Battery Storage Program. The programs were established and administered in accordance with fairly proscriptive requirements in the CEJA legislation. This section also details the outcomes or results of the two programs.

The Solar REC Program was established and administered by the Illinois Power Agency (IPA) based on specific program guidelines outlined in the CEJA legislation. In 2022, the IPA conducted two procurement events for the program to support utility-scale solar projects paired with battery storage at eligible coal plant sites (Illinois Commerce Commission, 2026; Illinois Power Agency, Public Notice, 2022). These procurements created a dedicated stream of Renewable Energy Credits (RECs), which are purchased by utilities, such as Ameren Illinois and Commonwealth Edison (ComEd), to meet the state's Renewable Portfolio Standard requirements. The first April 2022 procurement was open to eligible facilities south of Interstate 80. The second October 2022 procurement was open to eligible facilities north of Interstate 80.

Eligibility for participation was narrowly defined. Facilities qualified only if they met all of the following criteria:

- Burned coal as the primary fuel source as of January 1, 2016;
- Had generating capacity of at least 150 MW;
- Were either operating or retired at the time of procurement;
- Were not owned by a rural electric cooperative, municipal utility, public institution of higher learning, or an association of those entities; and
- Had previously been owned by a public utility.

By design, participation was limited to a relatively small number of large, formerly utility-owned (now owned by independent generation companies) coal plants, shaping both where projects could be developed and which entities were positioned to participate. Given these eligibility criteria, as well as the limited timeframe for the Initiative, Vistra Energy and NRG Energy were the only two companies with eligible sites that indicated interest in the program.

A total of 625,000 annual RECs were available through the Initiative at a price of $30 per REC. As described above, utility purchases of RECs are funded by revenues collected from the Coal to Solar and Energy Storage Initiative Charge on statewide electric customers' utility bills. The procurements for this Initiative also required that a co-located energy storage facility with storage capacity between 2 and 10MW be constructed and operated at the same site as the utility-scale solar project. The fixed REC price for the contract needed to sustain the construction and operations of the solar and storage components.

SOLAR REC PROGRAM OUTCOMES

When CEJA passed, Vistra announced plans to pursue six Solar REC Program projects totaling 294 MW of solar and 39MW of battery storage (Renew Illinois Power, 2021). All six of the projects were selected in the April 2022 procurement, but some project sizes were decreased from those originally announced in September 2021. This procurement represented 464,564 annual RECs (worth $13.9 million) (Illinois Commerce Commission, 2026). No bids were submitted in the October 2022 procurement, which offered the remaining 160,436 annual RECs (worth $4.8 million) (Illinois Power Agency, 2022).

Of the six projects awarded RECs:

- Three were completed and are in commercial operation (Vistra Corp, 2026):
  - Baldwin, Operational in December 2024, (68MW solar, 2MW/8MWh battery storage, and 143,303 annual RECs)
  - Coffeen, Operational in December 2024, (44MW solar, 2MW/8MWh battery storage, and 91,321 annual RECs)
  - Newton, Operational in March 2026, (52MW solar, 2 MW/8MWh battery storage, and 107,712 annual RECs)
- Three were not developed using the Initiative's RECs
  - Duck Creek (20MW solar, 2MW battery storage, and 40,860 annual RECs)
  - Hennepin (24MW solar, 2 MW battery storage, and 40,260 annual RECs)
  - Kincaid (20MW solar, 2 MW battery storage, and 41,108 annual RECs)

The three completed Solar REC Program projects cumulatively put 164 MW of utility-scale solar and 6 MW, of four-hour utility-scale energy storage into commercial service.

Three of the selected Solar REC Program projects were not built, and details on why the projects were cancelled were gathered from public documents and a conversation with a Vistra representative. A March 2024 IPA Policy Study indicated that Vistra would not construct the Hennepin, Kincaid, or Duck Creek Solar REC Program projects.[8] The report said that the project developers cited "economic infeasibility" including "inflation, increases in cost of capital, and challenges in the supply chain," as the reasons for project cancellation. The authors of this report confirmed the cancellation of these projects in a conversation with a Vistra representative. In that conversation, the Vistra representative said they withdrew and cancelled the REC contracts because the "economics no longer worked" and they were also having "interconnection problems." Vistra also noted that by design, the Initiatives financial incentives were only applicable after a project commences its commercial operations. Therefore, pre-development costs, such as engineering or interconnection application fees, for projects that were not constructed could not be recovered. Vistra shared that these costs can be several million dollars per project. Vistra also provided updates to report authors on their plans to continue to pursue some of these projects, and additional projects, in the future. Those updates are included in Part IV.

Each of the constructed projects had a small co-located battery storage project (2MW), and each battery project was smaller than Vistra originally projected. When asked about this, Vistra said that the $30 fixed REC had to cover the construction and operations of the solar and co-located storage. The downsize to the program minimum of 2MW was due to project economics, market conditions, and a desire to move the proposed Solar REC Program projects forward.

NRG Energy did not submit any bids into the October 2022 procurement event. NRG Energy was unresponsive when report authors asked for insights into their decision not to participate in the program.

The $30/MWh fixed REC price for the Initiative was established in the CEJA legislation that passed in 2021, and as described above the procurements took place in 2022. Vistra noted that the $30 price was reduced to that amount as part of the legislative negotiations. The Initiative's Solar REC Program projects receive the $30 REC plus the wholesale energy market price, meaning the overall project revenue fluctuates with the price of electricity. The Initiative's fixed REC price is different from how the REC procurement for utility scale and brownfield solar projects was conducted in 2022 and therefore can not be compared directly. Comparing strike prices across Indexed REC procurements, the average winning strike prices rose substantially from 2022 to 2024. And other general market sources, such as for power purchase agreement prices, generally showed the same sort of increase. Vistra did indicate to report authors that the Initiative's fixed REC price did influence decisions to not proceed with certain projects given the changing economics at the time.

Table 2. Solar REC Program Details and Outcomes for the Coal to Solar and Energy Storage Initiative.

Coal plant	Project Name	Proposed Solar Size	Actual Solar Size	Proposed Battery Size	Actual Battery Size	Status update
Baldwin	Baldwin Solar BESS LLC	68MW	68MW	9MW	2MW	Included in April 2022 REC Procurement. Operational in 2024
Coffeen	Coffeen Solar BESS LLC	44MW	44MW	6MW	2MW	Included in April 2022 REC Procurement. Operational in 2024
Newton	Newton Solar BESS LLC	52MW	52MW	7MW	2MW	Included in April 2022 REC Procurement. Operational in 2026
Duck Creek	Duck Creek Solar BESS LLC	20MW	0	3MW	0	Included in April 2022 REC Procurement. Contract cancelled
Hennepin	Hennepin Solar BESS LLC	50MW	0	6MW	0	Included in April 2022 REC Procurement. Contract cancelled.
Kincaid	Kincaid Solar LLC	60MW	0	8MW	0	Included in April 2022 REC Procurement. Contract cancelled.
Totals		294MW	164MW	39MW	6MW	

*The proposed solar and battery storage project sizes reported here are what Vistra announced publicly after the passage of CEJA (Renew Illinois Power, 2021). The project sizes selected in the April 2022 REC Procurement were slightly lower for some sites.

SOLAR REC PROGRAM TAX REVENUE

Vistra has long advertised the economic and community benefits of their Coal to Solar and Energy Storage Initiative projects. This section of the report examines the tax revenue and jobs that were created from the three Solar REC Program projects that have been constructed to date.

The Solar REC Program projects at the Baldwin and Coffeen plants entered commercial operations in December 2024 and generated substantive property tax revenue in 2025 tax year for the first time, which is payable in 2026 calendar year (Table 3). The Newton solar and storage development was not operational in 2025 so taxes have not yet been assessed. The Baldwin and Newton power plants continue to operate as of June 2026. We also examined the tax revenue from the coal plants that has decreased at each site due to closures and negotiations over assessed value with Vistra (Table 4). The following information was obtained from each county's Supervisor of Assessments.

In total for the 2025 tax year, the solar and co-located battery storage project located on the Baldwin plant property will generate an additional $461,934 in tax revenue for Randolph County. If current tax rates are held flat, Vistra company officials estimate the solar will generate just under $6 million in property taxes over the life of the project. This new tax revenue is a fraction of what the Baldwin coal plant has historically generated for Randolph County. In 2026, Randolph County will receive over $3 million in revenue from the coal plant, through 2025 tax revenue and a payment in lieu of taxes (PILOT) agreement (Table 4). The last PILOT payment will be made in 2027, the year the plant closes, and by 2028 the annual tax revenue is expected to decrease to $474,263. The $3 million in current revenue is already a big decrease from the over $4.8 million that the plant was generating in 2016 before one unit closed and before the PILOT agreement was negotiated.

The solar project at the Coffeen plant property is estimated to produce an additional $258,426 in annual tax revenue. If current tax rates are held flat, Vistra company officials estimate the solar will generate just under $5 million in property taxes over the life of the project. The Montgomery County Supervisor of Assessments did not yet know what the tax revenue from the battery storage facility would be. During the plant's last year of operation, 2019, the coal plant generated $2,123,819 in tax revenue. That was a decrease from $3,927,123 in revenue in 2016. We were unable to confirm if Montgomery County negotiated a PILOT agreement with Vistra, in addition to the tax revenue in the years before or after closure. Site demolition has not been conducted at the Coffeen site and in 2025, six years after closure, the coal plant tax revenue will be $680,000.

The Newton Solar REC Program project was not operational in 2025 so there will be no tax revenue payable in 2026. If current tax rates are held flat, Vistra company officials estimate the solar will generate just under $5 million in property taxes over the life of the project. The solar and co-located storage facility did come online in the first part of 2026, and per a conversation with the Jasper County Supervisor of Assessments, the county is currently negotiating what percentage of the solar tax revenue for 2026 will be collected in 2027. The pre-existing power plant continues to operate, generating property taxes for the community. The Jasper County Supervisor of Assessments estimated that Vistra would pay approximately $650,000 in county tax revenue for 2025. It was also noted that the PILOT payments the county had previously negotiated with Vistra had expired in 2024.

While the new investment in the solar and co-located storage has added to the local property tax base and will be a stable source of annual tax revenue, it does not replace the lost property tax revenue from the power plants that historically operated on the sites.

Table 3. 2025 County tax revenue, payable in 2026, from the Solar REC Program Projects for the Coal to Solar and Energy Storage Initiative.

Coal plant	Tax revenue on parcels before solar	Tax revenue on parcels after solar	Tax revenue on parcels before battery storage	Tax revenue on parcels after battery storage	Total additional revenue from solar & battery storage
Coffeen	$133	$258,559	No data	No data	$258,426
Baldwin	$10,990	$465,785	$12,155	$19,294	$461,934
Newton*	N/A	N/A	N/A	N/A	N/A

*Newton's Solar REC Program project was not operational in 2025.

Table 4. County tax revenue and other revenue from the coal plants in key years for facilities participating in the Solar REC Program of the Coal to Solar and Energy Storage Initiative.

Coal plant	2016* Tax year coal plant revenue	2019* Tax year coal plant revenue	2025* tax year coal plant revenue	Projected coal plant revenue in 2028* tax year, after closure
Coffeen	$3,927,123	$2,123,819	$680,000	N/A
Baldwin	$4,818,873	N/A	$3,106,263**	$474,263
Newton***	$4,728,785	$2,584,072	$442,716	$980,000

*2016 was before the unit closure at Baldwin and the Payment in Lieu of Taxes (PILOT) agreement was negotiated. 2019 was the last year that Coffeen was operational. 2025 was the most recent year in relation to this report. 2028 is the year after the planned closures of Baldwin and Newton.
**Includes tax revenue and a PILOT that was negotiated with Vistra.
***The decrease in tax revenue corresponded with PILOT payments, but we were unable to determine PILOT details from Jasper County

BATTERY GRANT PROGRAM

The Initiative's Battery Grant Program, administered by the Department of Commerce and Economic Opportunity (DCEO), was designed to support stand-alone battery storage projects at former coal plant sites. As established in the CEJA legislation, the program authorized five grants totaling up to $280.5 million, with annual payments based on installed capacity.

Eligibility criteria mirrored the Solar REC Program and further restricted participation to facilities that had retired. Again, given the limited eligibility and the tight timelines, Vistra Energy and NRG Energy were the only two companies with eligible sites. Facilities were required to:

- have at least 150 MW of generating capacity;
- have formerly burned coal as a primary fuel source;
- have retired after 2016;
- not participate in the REC procurement program;
- have been formerly owned by a public utility; and
- not be owned by a cooperative, municipal utility, or public institution.

Projects were required to be at least 37 MW in size, and the grant program allowed for up to three projects in MISO territory and two in PJM territory. The annual grant payments were to be determined based on $110,000 per megawatt of energy storage capacity, with total annual grant payments not to exceed $28,050,000 in any year.

DCEO was to accept applications to the grant program until March 31, 2022 and announce awards no later than June 1, 2022. The energy storage systems were to be placed into commercial operation on June 1 of 2023, 2024, or 2025, with adjustments possible due to factors like grant contracting processes, interconnection agreements, permits, and approvals.

BATTERY STORAGE GRANT PROGRAM OUTCOMES

No grants were issued and no projects were developed under the battery storage grant program, and the deadlines established in the legislation have passed. However, as described below, projects were considered by both Vistra Corp. and NRG Energy, Inc..

On June 1, 2022, Governor JB Pritzker and DCEO announced five recipients for grants from the Coal to Solar Energy Storage Grant Program prior to issuing an administrative rule implementing the program and authorizing the awarding of grants (State of Illinois, Office of Governor). The announcement included two NRG proposed projects at the Waukegan and Will County plant sites, which are in PJM territory. Also included were three Vistra proposed projects at the Havana, Joppa, and Edwards plant sites, which are in MISO territory. The announced battery sizes are included in Table 3 below as the "planned battery size." According to the press release, the five proposed sites were awarded the full $280.5 million allowed by the program. The release announced the program as the, "first DCEO CEJA program that has been rolled out to date."

On July 29, 2024, DCEO adopted the administrative rules necessary for implementing the program, Illinois Administrative Code, Title 14, Part 710, which was two years after the awards were first announced (Illinois General Assembly). During this two year period there were numerous market factors and changes that affected the economics of developing stand-alone energy storage and there were several interconnection delays within the MISO and PJM systems. It's unclear how the time lag between the project announcements in 2022 and the mid-2024 administrative rules adoption may have played a role in the projects not being developed.

As stated above, no grant awards were ultimately made and none of the announced battery storage projects were built. (By law, grants were to be paid in a 10-year period after each project's energization.) Report authors submitted a Freedom of Information Act request to DCEO requesting "...records related to the Coal to Solar Energy Storage Grant Program including grant applications, grant agreements, and correspondence." The FOIA response letter stated, "The Department received one application. There are no Grantees. The Department is not in possession of any grant agreements." The one grant application included in the FOIA was a "Scope of Work" for a 72 MW energy storage system at NRG's Will County site.

Additional details on why projects were not built were gained from publicly available documents and a conversation with a Vistra representative. In Vistra's comments to the Illinois Power Agency on the 2024 Draft Policy Study, they provided insight into the status of the DCEO grants stating that at the time of their comments (Jan/Feb 2024), DCEO had not executed the grant agreements nor adopted final administrative rules for the program (Vistra Corp., 2024). At that time, Vista suggested that their projects be listed as "Under Development/Pending Grant Finalization."

Vistra confirmed in an interview with the authors of this report that their three grant-funded battery storage projects are currently not moving forward under the Initiative, due to "economic factors."

Vistra has confirmed that the economics of storage development changed a great deal from the program design in 2021, to the project announcement press release, and final rule making. It is a public record that Vistra has requested additional time to connect the proposed projects to the grid, which indicates the company continues to pursue some of these projects, and additional projects, in the future through various other mechanisms or programs. Those updates are included in Part IV of this report.

Outreach to connect with NRG Energy by report authors was unsuccessful. In February 2026, report authors spoke with local leaders in both Waukegan and Will County and confirmed that neither project proposed under this program was built. Local leaders were aware of potential projects but no permitting or zoning had been initiated around battery storage at the Waukegan or Will County coal plants.

Given the limited market structures to support energy storage at the time, the stand-alone storage grant program was intended to serve as a bridge to support the construction and operations of utility-scale stand-alone energy storage. Subsequently, the state has created an energy storage procurement through the 2026 Clean and Reliable Grid Affordability Act (CRGA), which is described in more detail in Part V below.

Table 5. Stand-alone Battery Energy Storage Grant Program details and outcomes for the Coal to Solar and Energy Storage Initiative

Coal plant	Solar/Battery Project Name	Planned Battery Size	Actual Battery Size	Status Update
Edwards	Edwards Battery Energy Storage System	37MW	0	$40.7M for 37MW energy storage grant from DCEO was announced in 2022. Vistra never entered into grant agreement and is not moving forward with the project under this program.
Havana	Havana Battery Energy Storage System	37MW	0	$40.7M for 37MW energy storage grant from DCEO was announced in 2022. Vistra never entered into grant agreement and is not moving forward with the project under this program.
EEI/Joppa	Joppa Battery Energy Storage System	37MW	0	$40.7M for 37MW energy storage grant from DCEO was announced in 2022. Vistra never entered into grant agreement and is not moving forward with the project under this program.
Waukegan	Waukegan Energy Storage Center	72MW	0	$79.2M for 72MW energy storage grant from DCEO was announced in 2022. FOIA results confirmed no grant agreement was executed; local officials confirmed project was not built.
Will County	Will County Energy Storage Center	72MW	0	$79.2M for 72MW energy storage grant from DCEO was announced in 2022. FOIA results confirmed no grant agreement was executed; local officials confirmed project was not built.
Total		255MW	0	



IV. FUTURE CLEAN ENERGY REDEVELOPMENT PLANS, OUTSIDE INITIATIVE

VISTRA PLANS

Vistra continues to evaluate a variety of opportunities at its Illinois sites, but future developments would occur outside of the Coal to Solar and Energy Storage Initiative framework. The company shared information about the projects with report authors and has provided information about opportunities to redevelop and redeploy energy technologies at their Illinois plant sites on their "Renew Illinois Power" website, www.renewillinoispower.com ("A First in the Nation").

As the Initiative experience demonstrated, developing co-located energy storage with solar is a complexity that adds substantial cost and presents execution risks. Vistra has pursued the solar-only components of the Duck Creek, Hennepin, and Kincaid projects through various avenues, including bidding the projects into other state procurements.

The company has identified other potential configurations of solar and energy storage at its sites across Illinois. In total, the company has identified acreage at its plant sites that has the characteristics to support up to approximately 158 MW of new utility-scale solar.

Vistra is also currently constructing a 405 MW solar project near the location of its retired EEI/Joppa facility. The project, known as the Pulaski Solar Facility, is not located on the Joppa coal plant property, but will be interconnected to the grid at the former plant site, through an 8-mile transmission line that was constructed (Renew Illinois Power, "Public Notice"). According to Vistra's website, the project is to be online in late 2026. This project was privately financed.

Overall, Vistra shared that the company will have invested more than $1 billion to develop new energy technologies at its Illinois sites, once the Pulaski project comes online in late 2026. These will have added 570 MW of new utility-scale solar generation and 24 MWh of energy storage across the state.

OTHER STATE PROGRAMS

BATTERY STORAGE PROCUREMENT

On January 8th, 2026, Illinois Governor J.B. Pritzker signed the Clean and Reliable Grid Affordability Act (CRGA), which was passed during Illinois' 2025 fall Oveto session, into law. Among its provisions is a directive to the IPA to create a procurement process for energy storage with a goal of 3 gigawatts of energy storage capacity statewide by 2030. For the initial energy storage procurement event, participating projects would be compensated for separate Energy Storage Credits (ESCs) that would function similarly to the IPA's existing REC procurement process, thus incentivizing the creation of large-scale energy storage projects.

Although this policy proposal is not specific to redevelopment at coal plant sites, it is likely to incentivize such projects and could allow for more flexibility in their development. In the face of federal phaseouts of Inflation Reduction Act tax credits incentivizing solar development, CRGA could act as a stabilizing force that enables solar and storage projects at former coal power plants to continue.

BROWNFIELD SOLAR

Illinois has a brownfield solar program that is designed to encourage solar development on lands that have had a past industrial use or environmental contamination that is regulated by a state or federal site program (Illinois General Assembly, Illinois Power Agency Act 20 ILCS 3855/1-10). The total per MWh revenue requirement bid into this program (which then informs the price received for RECs) have historically been higher than those for regular utility scale projects, lower than non-utility scale RECs, and could be used to incentivize projects on coal plant sites. It's noteworthy that CEJA included a change to broaden the definition of brownfield solar to include fully reclaimed and environmentally compliant former coal mine sites, making them eligible for Illinois brownfield solar RECs. While this change didn't apply to coal plant sites, it represents an effort to encourage solar development in areas impacted by the decline of coal.

In Vistra's comments to the IPA on their 2026 Long-Term Plan (Illinois Power Agency, "Comments," 2025), Vistra has suggested potential changes to the brownfield program to help with solar development on coal plant sites. An analysis of these suggestions are beyond the scope of this report, but they do provide an example of how an existing Illinois program could be modified to meet additional policy goals in the future.

REC PROCUREMENT PRIORITY IN ENERGY TRANSITION COMMUNITY GRANT COMMUNITIES

CEJA also created another provision that helps incentivize solar development at and near coal plant facilities. In particular Section 1-75(c)(1)(P) established a provision requiring the Illinois Power Agency to optimize the procurement of Renewable Energy Credits from utility-scale projects located in Energy Transition Community Grant (ETCG) communities. ETCG communities are those that are located within 30 miles of a fossil fuel plant or coal mine that has closed in the last 6 years or will close in the next 6 years. As of the writing of this report, that would include any facility that closed after 2020 or plans to close before 2032.

In order to optimize procurement in those communities, the Agency established the following method in their 2026 Long-Term Renewable Resources Procurement Plan: "bids received by the Agency through competitive procurements for proposed projects located in Energy Transition Community Grant communities will receive a downward price adjustment of 10% of the lowest bid received for use in ranking bids received, thus making those bids more competitive on the basis of price. For example, if the bidder of a project located in an Energy Transition Community Grant community submits a Strike Price of $65 and the lowest bid received is $50, then the Energy Transition Community Grant bidder would receive a downward price adjustment in its bid of $5 (10% of $50). The price adjusted bid of $60 would be evaluated against all other bids, and if selected, the Energy Transition Community Grant bidder would receive the initial bid price of $65. This price adjustment will provide an opportunity to 'optimize' the procurement of Energy Transition Community Grants through a competitive process."

Vistra noted that this incentive is not provided to brownfield projects even when they meet the definition of "utility-scale" of 5 MW or above. They also noted that Battery Energy Storage Projects located in such areas do not include a bid-preference but are a tie breaker in the case of equal bids.

COAL ASH CLEANUP

Issues related to coal ash pollution, cleanup, and permitting may be a factor limiting renewable energy site redevelopment at coal plants in Illinois. Coal ash is the solid byproduct left when coal is burned for electricity, and it is stored in impoundments and landfills at coal plants across the state. Coal ash contains toxic and harmful constituents like mercury, arsenic, selenium, chromium, or cadmium, which can cause a variety of health impacts, such as cancer and brain damage, in humans and are harmful to fish and wildlife (Illinois Pollution Control Board, “Standards,” n/d).

Groundwater pollution caused by coal ash at power plants is a factor limiting renewable energy projects and other redevelopment opportunities. A 2019 report found that about 90 percent (22 of 24) of Illinois’ reporting coal-fired power plants have contaminated groundwater with unsafe levels of one or more toxic pollutants21. Coal ash facilities are subject to state and/or federal rules based on when the plant last operated and when actions were taken to close the coal ash facilities. The pending permitting decisions described below will ultimately approve a plan for how the coal ash is cleaned up. The results of those clean up actions, including how groundwater pollution is addressed, will likely influence if the site is a good candidate for future renewable energy development.

In Illinois, coal ash impoundment management, clean-up, and closure are governed at the state level by the Coal Ash Pollution Prevention Act of 2019 and rules adopted in 2021 by the Illinois Pollution Control Board (35 Ill. Adm. Code 845) which the Illinois Environmental Protection Agency (Illinois EPA) administers (Environmental Integrity Project et al., 2018). These rules created Illinois’ first standards for managing and cleaning up coal ash in coal ash impoundments through a comprehensive state permitting program. They are intended to align with and strengthen the federal coal ash rules (40 CFR part 257) from 2015 (U.S. Environmental Protection Agency, n.d.)

The Illinois EPA has had the majority of the coal ash closure plan permits under review for years. Most were submitted in 2022 and have not moved to the public notice stage of the process, and the rules created no internal deadlines for permit review. Similarly, federal coal ash clean up rules have been changing over the last decade with new rules adopted in 2015 and 2024, as well as 2026 proposed changes. It is likely that the storage of coal ash on site, and the uncertainty around pending permitting decisions with Illinois EPA related to final coal ash clean-up plans, as well as recent federal coal ash rule changes, could be a factor limiting redevelopment of the sites. These uncertainties are particularly significant because of the documented groundwater contamination described above, and the long-term effectiveness of proposed closure plans remains unresolved. Until final cleanup requirements and groundwater protection measures are established, premature site redevelopment could complicate future remediation efforts.

V. INITIATIVE CONCLUSIONS & TAKEAWAYS

The Coal to Solar and Energy Storage Initiative set out to support the redevelopment of certain coal-fired power plant sites, strengthen grid reliability, and facilitate economic transition in communities affected by the accelerated retirement of power plants. The program sought to incentivize the reuse of acres at power plant sites to deploy solar or battery energy storage technologies.

In practice, the Initiative produced limited results relative to these objectives. While three utility-scale solar and co-located storage projects were completed, three planned projects were cancelled. None of the proposed utility-scale stand-alone battery storage projects were developed through the program. Unspent money for the Initiative will be refunded to ratepayers in Illinois Commerce Commission reconciliation cases.

Statutory framework, namely the fixed REC contract, appears to have played a significant role in shaping these outcomes. While Illinois pivoted its existing renewable programs through modifications like the Indexed REC Program, the statutorily required fixed incentive structures did not adapt to changing market conditions, including rising costs, supply chain constraints, and interconnection challenges. Delays in implementation, particularly within the storage grant program, may have further reduced the likelihood of project completion. Eligibility criteria restricted participation to a narrow set of large, formerly utility-owned coal plants, concentrating development to sites owned by Vistra and NRG. Similarly, Vistra and NRG's early involvement in the Initiative design and the limited timeframe for project development may have further limited participation from other companies.

The Initiative did not meaningfully advance stand-alone energy storage deployment, a central component of clean energy transition strategies. The Initiative did provide a learning opportunity for various stakeholders that will be valuable as CRGA is implemented. More broadly, the scale of redevelopment and associated economic activity fell short of expectations. At the same time, the Initiative demonstrates that existing power plant sites can support solar and battery energy storage redevelopment when conditions are favorable, due to existing infrastructure and beneficial interconnection opportunities. The Initiative's projects also show the potential for solar and battery storage to help add to the local property tax base with a stable source of annual tax revenue, although the projects developed to date do not replace the lost property tax revenue from the power plants that historically operated on the sites. Although the Initiative produced high-quality construction jobs for each successful project, its overall per-project full-time job creation impact fell well short of Vistra's initial projections. Further research is necessary to determine why this outcome occurred.

Future policy efforts may benefit from broader and more flexible eligibility criteria that reflect the realities of developing at, on, or near power plant sites, or other brownfield properties, incentive structures that can adapt to changing economic conditions, and timely program implementation and administrative clarity. Modifications to existing programs, like brownfield solar, could expand the opportunity for project development on coal and other fossil fuel facility sites. New policies, like those in CRGA, are introducing new incentives for battery storage that are likely to expand opportunities, including on coal plant sites. Finally, permitting decisions on the final clean-up plans for coal ash and the resolution of groundwater pollution are needed to fully realize the site redevelopment potential. The experience of the Coal to Solar and Energy Storage Initiative provides a useful foundation for improving the design of future programs aimed at repurposing fossil fuel infrastructure.

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APPENDIX A

PRESS ABOUT THE COAL TO SOLAR AND ENERGY STORAGE INITIATIVE

There has been significant interest in the Initiative, resulting in press coverage in local, regional, and national media outlets. There has been little to no press on the cancellation of projects or challenges that the initiative has faced. Below is a list of press related to the projects.

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APPENDIX B

OTHER RESOURCES AND PROGRAMS FOR COAL PLANT REDEVELOPMENT

There has been significant local to international interest in redeveloping coal-fired power plant facilities. Below is a list of resources and programs that have been developed to inform and encourage the redevelopment of shuttered coal plants.

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