

**WIND ON THE WIRES' COMMENTS
ON THE ILLINOIS POWER AGENCY'S
ELECTRICITY PROCUREMENT PLAN
2017 DRAFT PLAN FOR PUBLIC COMMENT – August 15, 2016**

Wind on the Wires appreciates the time and effort the Illinois Power Agency has put into collecting and analyzing the necessary information to develop the 2017 electricity procurement plan. After reviewing the 2017 Draft Plan for Public Comment (“Draft Plan”), Wind on the Wires’ provides the following comments: (1) the IPA should clearly indicate its intent to use the money in the Renewable Energy Resource Fund (RERF) to hold a procurement for renewable energy products in 2017; (2) the IPA should routinely make public its plans for procuring renewable energy products using the RERF.

1. Procure 1 Year RECs using RERF Money

The Draft Plan states that the RERF has over \$116 million dollars (Draft Plan at 105) plus the RERF should receive \$98 million from the state at the end of 2016 or early 2017¹ (though the exact date of borrowing or of repayment is not stated in the IPA Annual Report) plus the RERF is to receive approximately \$80 million in September from ARES alternative compliance payments (*id.*). That totals nearly \$300 million that will be in the RERF by the end of the year or early next year. The Draft Plan contains no statement explaining or defining what the IPA will do with that money in 2017, beyond potentially purchasing RECs from curtailed long term renewable power

¹IPA, *Annual Report: The Costs and Benefits of Renewable Resource Procurements in Illinois Under the Illinois Power Agency and Illinois Public Utilities Act*, at 50, Table V-2 (April 1, 2016).

purchase agreements held by ComEd and Ameren Illinois. The IPA proposes to procure 1 year RECs for wind on behalf of ComEd, thus Wind on the Wires requests the IPA procure a similar product using the RERF money in 2017 and that the IPA host workshops to define the details around that procurement.

2. Public Notice of Intent to Use RERF Money

The IPA does a great job providing information in its annual procurement plans and in its annual report regarding the status of the RERF, however, it would be helpful to stakeholders if the IPA had a process for routinely informing stakeholders and the public regarding its intent to procure RECs using RERF funds. This transparency becomes more important if we are at turning point in which the utilities will be making modest annual or biannual REC procurements, which provides a benchmark against which to procure REC products using the RERF.

The IPA can either foreshadow its procurement plans in the annual procurement plan, or it could dedicate a page on its website for RERF notifications and data. Notice in the annual procurement plan could be a simple statement, such as: Because the IPA intends to procure RECs for the utilities in the upcoming procurement the IPA also intends to hold a procurement of like products in the Fall of next year using money from the RERF.

CONCLUSION

WHEREFORE, Wind on the Wires recommends that the 2013 Electricity Procurement Plan to be submitted to the Illinois Commerce Commission on September 26th incorporate the recommendations made herein.

Respectfully submitted,

_____/s_____
Sean R. Brady

Regional Policy Manager
Wind on the Wires

PO Box 4072
Wheaton, IL 60189-4072
312.867.0609
sbrady@windonthewires.org

DATED: September 14, 2016