



June 27, 2018

VIA EMAIL

Mr. Anthony Star
Anthony.Star@illinois.gov
Illinois Power Agency
160 North LaSalle Street, Suite C-504
Chicago, IL 60601

RE: Ameren Illinois Company's Response to the Illinois Power Agency's Additional Forward Procurements Request for Comments

Dear Director Star,

Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois or the Company) appreciates the opportunity to respond to the Illinois Power Agency's (IPA) June 15, 2018 Request for Comments regarding the Additional Forward Procurements Workshop that occurred on June 12, 2018. Ameren Illinois provides general comments herein, but may provide further and more specific comments as the Company continues to evaluate the IPA's proposals and the contracts under development.

First, as a general matter, Ameren Illinois appreciates the hard work done by the IPA and NERA in creating fair and equitable contracts for the different products to be procured under the Long-Term Renewable Resource Procurement Plan.

Looking at the upcoming contract from a practical perspective, the Company notes that contracts for the Initial Forward Procurement of RECs were finalized less than a year ago and the Company has since executed seven of them. During the development phase of these contracts, all provisions, including but not limited to the delivery, credit, collateral, degradation and project maturity provisions were agreed upon through detailed discussions among the interested stakeholders. Ameren Illinois believes these contracts provide a solid foundation for the Supplemental Forward Procurement of RECs and substantial changes to the contracts are not necessary. Substantial changes would create multiple contract templates for the Utility Scale RECs, which could add a level of complexity that increases the chances of errors during contract administration and/or increases the cost of contract administration.

In summary, Ameren Illinois recommends little to no changes to the Initial Forward Procurement contract templates, with changes limited to those that are necessary to differentiate between the Initial and Supplemental Forward Procurements or clarifications which improve upon the Initial Forward Procurement contract templates.

Sincerely,

A handwritten signature in blue ink that reads "Justin J. Range".

Justin J. Range

CC: Rich McCartney, Jermaine Grubbs