



December 2nd, 2021

Ameren Illinois Company Comments - IPA Long-Term Renewable Resources Procurement Plan Morning Workshop

Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois or the Company) respectfully submits these comments in response to the request from the Illinois Power Agency (IPA) for comments on the upcoming LTRRPP. The Company has provided its comments in response to the slides presented at the morning workshop only. Ameren Illinois appreciates the opportunity to submit comments.

Slide 9 – RPS Budget Accounting

Ameren Illinois believes the IPA may benefit in the future from receiving monthly or quarterly utility data which includes customer collections for the year, expenses for the year and balances of legacy ACP and interest-bearing accounts.

Slide 13 – Utility Scale Procurement Frequency

The Ameren Illinois region may benefit from spring and fall procurements for utility scale RECs (as opposed to just one procurement per year), given the dynamic nature of several factors that could influence bidder interest. These could include supply chain availability of wind turbines and solar panels, interest rates for project financing, labor, changing processes for MISO interconnections, on-going fossil fuel generation retirements, potentially volatile energy and capacity prices in wholesale markets, etc.

Slide 16 – Subsequent Forward Procurement

It is the Company's understanding that contracts executed after June 1, 2021 would have the following allocations:

- Yearly RECs 10,000,000
 - o Wind 4,500,000 (all utility scale)
 - o Solar 5,500,000
 - ABP 2,750,000/Utility Scale 2,585,000/Brownfield 165,000

Slide 17 - Indexed REC Price Procurements

Ameren Illinois recommends hourly settlement. The Company believes that 5 minute settlement would likely create administrative burden with no meaningful gain.

Slide 19 - Brownfield Site Procurement

Ameren Illinois believes the intent was that brownfield should be competitive. To the extent this is not successful, the proposal to reevaluate "other approaches" in a future LTRRPP seems reasonable (not in the pending LTRRPP).

Slide 22 – Customer Eligibility

It is Ameren Illinois' interpretation that the peak demand was to be based on non-coincident billing demand.

Slide 27 – Bill Crediting

Could the IPA make a compliance filing, but request the ICC formerly approve it, similar to what is done with REC awards? Also, please note we would need the bill credit value by ~May 20th of each year to ensure timely incorporation into billing.

Ameren Illinois appreciates the opportunity to provide these comments and is looking forward to working on the LTRRPP with the IPA and other stakeholders. The Company's comments represent its preliminary thoughts on certain issues and these may be subject to change as more information becomes available throughout the LTRRPP development and vetting process. By not responding to an issue at this time, the Company does not waive its right to comment at a later date. The Company reserves its right to object and comment as it deems necessary in the LTRRPP docket.