

June 27, 2017

VIA E-MAIL

Mr. Anthony M. Star
Illinois Power Agency
Michael A. Bilandic Building
160 North LaSalle Street, Suite C-504
Chicago, Illinois 60601

Re: Commonwealth Edison Company's Response to the IPA's Request for Comments Regarding Long-Term Renewable Resources Procurement Plan Workshop Issues

Commonwealth Edison Company ("ComEd"), by its counsel, respectfully submits this Response to the Illinois Power Agency's ("IPA" or "Agency") June 6, 2017 Request for Comments regarding issues raised in the Long-Term Renewable Resources Procurement Plan ("LTRRPP") workshops held on May 17, 18, and 24, 2017. As discussed below, ComEd does not take a position with respect to each of the questions identified in the Request, and instead offers general comments for the purpose of highlighting the important statutory goal of minimizing administrative expense in the design and implementation of the LTRRPP.

Public Act 99-0906, which created the new LTRRPP provisions and requirements, includes express directives regarding the goal of reducing costs. For example, with respect to the process of updating the LTRRPP, the Agency must review the LTRRPP every two years in conjunction with the development of procurement plans under Section 16-111.5 of the Public Utilities Act, which is meant to "*minimize administrative expense.*"¹ Similarly, Section 1-56 of the IPA Act provides that the "objectives of the Illinois Solar for All Program are to bring

¹ 20 ILCS 3855/1-75(c)(1)(A) (emphasis added).

photovoltaics to low-income communities in [Illinois] in a manner that maximizes the development of new photovoltaic generating facilities, to create a long-term, low-income solar marketplace throughout [Illinois] ... and to *minimize administrative costs*.”² Section 1-75(c) of the IPA Act, moreover, provides that the Agency “shall also *strive to minimize administrative expenses* in the implementation of the Adjustable Block program.”³

As such, ComEd encourages the IPA to carefully consider the overhead and administration costs associated with proposals that are not required under the law. For example, while a proposal designed to ensure that every type, size, facility location, and customer is allocated a portion of the available LTRRPP funding may have some appeal, these extra-statutory preferences would undoubtedly add complexity and administrative costs. These added costs, in turn, would ultimately decrease the amount of funds that can be used to procure clean energy. ComEd thus encourages the IPA to weigh the costs and benefits of proposals that are not required by statute, especially to the extent they result in increased administrative costs that will result in less clean energy procured.

Finally, ComEd recommends that the LTRRPP include an explanation of the ways in which it complies with the statutory directive to minimize administrative expense.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mark R. Johnson', written in a cursive style.

Mark R. Johnson

² 20 ILCS 3855/1-56(b)(2) (emphasis added).

³ 20 ILCS 3855/1-75(c)(1)(M) (emphasis added).