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**Subject:** [External] ComEd Comments - Draft Carbon Mitigation Credit Procurement Plan  
**Date:** Friday, September 24, 2021 1:42:17 PM  
**Attachments:** [Draft CMC Plan for Public Comment \(17 Sept 2021\)S ComEd Suggestions.docx](#)

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Good Afternoon –

Upon review of the Illinois Power Agency’s Draft Carbon Mitigation Credit Procurement Plan (Plan), ComEd offers the following comments and suggestions. Attached to this email is a word document with suggested changes in redline format.

1. Section 4.2 requires suppliers to make all “commercially reasonable” efforts to ensure that they apply for any known federal tax credits, direct payments, or similar subsidy programs. Failure to apply for those subsidies would be considered an event of default. The Plan should outline a process to evaluate and determine (if necessary) whether the supplier’s efforts were “commercially reasonable”. ComEd’s redline suggestions provide for a determination by the Illinois Power Agency (IPA) and an Illinois Commerce Commission (ICC) review process prior to the issuance of a default notice.
2. Section 4.2 requests feedback on whether monthly CMC price calculations may be appropriate and states the IPA’s understanding that tariffed prices will be published on an annual basis. The tariff addressing CMC charges is under development and may propose pricing updates within a given delivery year to better align collections with costs. Tariffed rates associated with the procurement of zero emissions credits (ZECs) go into effect in June and may be updated, if necessary, in September.
3. Technical Changes.
  - a. PG 19 – Clarifying suggestion.
  - b. PG 25 – Corrects a typographical error.
  - c. PG 31 – Corrects a typographical error.

Michael

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