

**COMMENTS OF THE RETAIL ENERGY SUPPLY ASSOCIATION ON THE
ILLINOIS POWER AGENCY’S DRAFT 2015-2020
POWER PROCUREMENT PLAN**

The Retail Energy Supply Association (“RESA”)¹ is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. RESA is devoted to working with all stakeholders to promote vibrant and sustainable competitive retail energy markets for residential, commercial and industrial consumers. RESA has been an active participant in all of the proceedings before the Illinois Commerce Commission (“Commission”) concerning approval of the annual procurement plans of the Illinois Power Agency (“IPA”), beginning with Ill. C. C. Docket 08-0519. RESA appreciates the opportunity to file comments on the IPA’s Draft 2015-2020 Power Procurement Plan, dated August 15, 2014 (the “2015 IPA Draft Plan”).

RESA’s Comments are limited to a single issue. For the reasons provided in the Comments of the Illinois Competitive Energy Association (“ICEA”), Full Requirements Products should be incorporated into the 2015-2020 IPA procurement plan. Specifically, the IPA should revise the 2015 Draft Plan and include in the 2015-2020 Plan that it files with the

¹ RESA’s members include AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energetix, Inc.; GDF SUEZ Energy Resources NA, Inc.; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Interstate Gas Supply, Inc. d/b/a IGS Energy; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd.; and TriEagle Energy, L.P.. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

Commission on September 29, 2014, a four-year pilot program to include Full Requirements Products in the energy procurements for Commonwealth Edison Company (“ComEd”). That plan is described in detail in the Comments of ICEA being filed today. RESA supports and joins in ICEA’s Comments.

In its Comments, ICEA demonstrates why the Commission should incorporate Full Requirements Products, on a four-year pilot basis, into the procurement plan for ComEd. RESA agrees with ICEA that the IPA’s analysis of Full Requirement Products supporting its decision to exclude such products from the 2015 Draft Plan is flawed. RESA also agrees with ICEA that the only valid means to compare Full Requirements Products against the IPA’s use of a three-year ladder of block-and-spot purchases is to use the four years of pilot program data to make such a comparison. Absent the pilot program and absent such a comparison, the IPA’s conclusions that led to its decision to exclude Full Requirements Products from its procurement plans is simply speculation.

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Respectfully submitted,

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