

STATE OF ILLINOIS
ILLINOIS POWER AGENCY
REQUEST FOR STAKEHOLDER FEEDBACK
OCTOBER 20, 2023

COMMENTS OF THE RETAIL ENERGY SUPPLY ASSOCIATION

On September 29, 2023, the Illinois Power Agency issued a Request for Stakeholder Feedback regarding a Policy Study required by House Bill 3445. That bill directs the IPA to conduct a Policy Study to evaluate the potential impacts of three proposals made during the Illinois General Assembly's spring 2023 Legislative Session and provide policy recommendations to the General Assembly. Those proposals are:

- Senate Bill 1587, a storage procurement plan pursuant to which electric utilities would contract for energy storage credits;
- House Bill 2132, a procurement process to provide renewable energy credits from a new utility-scale offshore wind project in Lake Michigan; and
- A policy project for the procurement of high-voltage direct current renewable energy credits.

These are the comments of the Retail Energy Supply Association in response to the IPA's request for stakeholder feedback. RESA is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail electric and natural gas 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 markets for

residential, commercial and industrial consumers. Many RESA members are certificated Alternative Retail Electric Suppliers and/or Alternative Gas Suppliers in Illinois.

While RESA will not be addressing the specific questions contained in the IPA's request for feedback, RESA has the following comments. In general, in addition to the policy considerations set forth on page 2 of the IPA's request, competitive neutrality should be a policy consideration. This means providing a level-playing field when considering the projects that are the subject of the IPA's Policy Study. Regarding the three specific projects, RESA has the following comments.

Regarding energy storage, some retail suppliers, including some RESA members, are contemplating energy storage solutions to complement their retail supply offerings. Therefore, there needs to be a level-playing field for retail suppliers to offer energy storage products to their end-use commercial and industrial customers. The procurement rules developed by the IPA should not discourage such customers from participating in energy storage related transactions with their retail suppliers.

Regarding off-shore wind, RESA has two points. First, customers of retail suppliers should not be discriminated against in the allocation of the costs of this project between such customers and the default service customers of the electric utilities. Second, commercial and industrial customers should have the ability to opt-out or receive comparable credits if they purchase similar renewable energy credits from retail suppliers.

Regarding procurements from a new HVDC line, RESA has the same two comments that it made with respect to the off-shore wind project.

In conclusion, RESA realizes that this is still early in the process of the IPA. RESA appreciates the opportunity to provide this feedback and looks forward to continuing to participate in the IPA's process.

Respectfully submitted,

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