

TO: Illinois Commerce Commission
Ameren Illinois Company
Commonwealth Edison Company
MidAmerican Energy Company
Interested Parties

FROM: Anthony Star, Director

RE: Draft Revised Long-Term Renewable Resources Procurement Plan

DATE: August 15, 2019

In accordance with Section 16-111.5(b)(5) of the Public Utilities Act (220 ILCS 5), the Illinois Power Agency (“IPA”) hereby presents its Draft Revised Long-Term Renewable Resources Procurement Plan (“draft Revised Plan”) for review and comments.

The Initial Long-Term Renewable Resources Procurement Plan (“Initial Plan”) was developed by the IPA pursuant to Public Act 99-0906 and was approved by the Illinois Commerce Commission on April 3, 2019 in Docket No 17-0838. Section 16-111.5(b)(5)(ii)(B) provides that “[the IPA] shall review, and may revise, the plan at least every 2 years thereafter,” with revisions proposed “in conjunction with the Agency’s other planning and approval processes” to the extent practicable. This draft Revised Plan has been developed under this authority and is being released for public comment concurrently with the IPA’s release of its draft 2020 Electricity Procurement Plan.

The IPA’s process of reviewing and revising the Initial Plan began in June 2019 with a series of workshops followed by a Request for Comments to provide additional opportunities for stakeholder feedback.¹ The IPA also requested updated data from Ameren Illinois, ComEd, and MidAmerican. This draft Revised Plan reflects the IPA’s consideration of feedback received from stakeholders, updated data from the utilities, as well as the IPA’s own lessons learned from Initial Plan implementation.

This draft Revised Plan sets out the potential procurements and programs that the Agency has proposed for 2020 and 2021 to meet the Renewable Portfolio Standard requirements of Ameren Illinois Company, Commonwealth Edison Company, and MidAmerican Energy Company contained in Section 1-75(c)(1) of the IPA Act. It also contains the Agency’s proposed approach to implementing the Illinois Solar for All Program contained in Section 1-56(b) of the IPA Act.

Key changes between the Initial Plan and this draft Revised Plan include:

- An updated analysis of RPS budgets, targets and goals, indicating significant funding constraints that will limit activities (see Chapter 3)
- A proposed revision to the use of Alternative Compliance Payments held by utilities (see Chapter 3)

¹ See: <https://www2.illinois.gov/sites/ipa/Pages/RenewableResourcesWorkshops.aspx>.

- An approach to potential competitively conducted utility-scale procurements to address contingency needs, and a structure for additional new utility-scale wind and solar procurements if funding is available (see Chapter 5)
- A proposed process for updating Adjustable Block Program contracts (see Chapter 6)
- A framework for how to manage the current wait list for community solar projects in the Adjustable Block Program (see Chapter 6)
- Codification of consumer protection requirements (see Chapters 6 and 7)
- An approach to prioritization for the selection of for low-income community solar projects, and clarified eligibility requirements for non-profit and public facility projects (see Chapter 8)

For public comment, the IPA will follow a similar schedule to that being employed for comments on the draft 2020 Electricity Procurement Plan:

Monday, September 16, 2019: Deadline for affected utilities and other interested parties to provide comments to the IPA on the draft Revised Plan.

Comments are required to be “specific, supported by data or other detailed analyses, and, if objecting to all or a portion of the procurement plan, accompanied by specific alternative wording or proposals.” (See 220 ILCS 5/16-111.5(b)(5)(ii)(B) [emphasis added])

Monday, September 30, 2019: The IPA plans revise the draft Revised Plan, as necessary, based on the comments received, and intends to file the Revised Plan with the Illinois Commerce Commission (“Commission”) for review and approval by this date. (See 220 ILCS 5/16-111.5(b)(5)(ii)(B))

Tuesday, October 15, 2019: The IPA recommends a briefing schedule whereby following filing of the Revised Plan with the Commission, within fifteen days, any person objecting to the Plan may file an objection with the Commission. While this is a longer period than for the 2020 Electricity Procurement Plan (5 days), it is generally consistent with the timeline applicable to the Initial Plan. The IPA believes that given the larger scope of potential issues contained in the Revised Plan, this timeline will provide interested parties more time to properly prepare their objections. (See 220 ILCS 5/16-111.5(b)(5)(ii)(C))

Monday, October 21, 2019: The IPA likewise proposes that the Commission, within twenty-one days of the filing of the Plan, determine whether a hearing is necessary. (See 220 ILCS 5/16-111.5(b)(5)(ii)(C))

Tuesday, January 28, 2020: The IPA recommends a 120 day deadline for the Commission to enter its order confirming or modifying the draft Revised Plan. 120 days is longer than the 90 days allowed for the 2020 Electricity Procurement Plan, but is again consistent with the time allowed for the approval of the Initial Plan. Given the breadth of the topics covered by the Revised Plan, the Agency believes this longer schedule is warranted. (See 220 ILCS 5/16-111.5(b)(5)(ii)(C))

The Commission may determine the need for an additional comment or briefing period in addition to, or in lieu of, hearings.

In addition to the dates above, the IPA will hold three public hearings to receive public comment on the draft Revised Plan; these hearings will be conducted jointly with hearings on the Agency’s 2020 Electricity Procurement Plan:

Tuesday, September 3, 2019, 2:00 pm – 4:00 pm: Illinois Commerce Commission Chicago Office, 160 North LaSalle Street, Chicago, Illinois. Room N808.

Wednesday, September 4, 2019, 10:00 am – 11:30 pm: MidAmerican Moline Customer Office, 716 17th Street, Moline, Illinois. Basement Room.

Wednesday, September 4, 2019, 2:30 pm – 4:30 pm: Illinois Commerce Commission Springfield Office, 527 East Capital Ave, Springfield, Illinois. Hearing Room C.

A call-in number to listen to the hearings will be available upon request. **Public comments will only be taken from participants present in person at the hearing.**

Please note that the public hearings may be adjourned early if there are no public comments remaining. Parties unable to attend the public hearings may submit written comments as described herein.

The IPA looks forward to parties' comments and suggestions. To expedite the review process, the IPA respectfully asks parties to make any suggested changes to the draft Revised Plan in redline format.

Comments on the draft Revised Plan should be submitted to ipa.contactus@illinois.gov by September 16, 2019.

Comments will then be formatted for posting to the IPA's website at: <http://www.illinois.gov/ipa>.