

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)
On Its Own Motion)
)
Notice of Inquiry regarding)
retail electric market issues)

14-NOI-01

WIND ON THE WIRES' INITIAL COMMENTS

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NOW COMES Wind on the Wires, filing its' Initial Comments in response to the Notice of Inquiry ("NOI") identified as 14-NOI-01 and initiated by the Illinois Commerce Commission on September 30, 2014. As stated in the Background section of the NOI, "as the residential retail electric market continues to evolve, the Illinois Commerce Commission ("Commission") is interested in exploring retail market issues that have been experienced thus far" and that "the Commission is interested in issues involving the disclosure of variable rate offers and the marketing of 'green' or 'renewable' offers."

Wind on the Wires will only be addressing the questions in the NOI related to the issue identified as "Renewable or 'Green' Energy Offers." Wind on the Wires' decision to not address other issues in the NOI does not constitute a waiver of those issues or a waiver of the ability to respond to comments on those topics filed by other parties.

Renewable or "Green" Energy Offers

Question 1: Should the Commission define residential marketing terms such as "green" and "renewable" offers? If so, what should form the basis of such definitions?

RESPONSE OF WIND ON THE WIRES: The Commission does not need to define residential marketing terms such as "green" and "renewable." In docket 12-0456, Wind on the Wires had recommended the addition of language that required Aggregate Suppliers provide Commission staff information about municipal products identified as 'green' or 'renewable.' This request arose from the fact that a significant number of Governmental Aggregator's were seeking retail energy products for its constituents that

had an intent of being environmentally friendly or 'green'. Informing the public of these products can be accomplished by having the Aggregate Supplier provide Staff a description of products in which the Governmental Aggregator intends for the product to be environmentally friendly, or sets a requirement for part or all of the electricity to be generated by renewable resources, or requires the procurement of renewable energy credits.

Moreover, Wind on the Wires believes its description above is also consistent with the scope of "renewable" and "green" that ICEA described in "ICEA Pre-Workshop Comments." We also agree with ICEA's statements in said document that the rule requires reporting of a wide range of options or products and that they should not be restricted by limiting reporting to a subset of products that meet a 'green' or 'renewable' definition.

Question 2: Should a "% renewable" column be added to the supplier offer matrix found on PlugInIllinois.org? If so, is the addition of such a column dependent on a Commission definition of "renewable energy"?

RESPONSE OF WIND ON THE WIRES: While such a column can be included on the webpage it cannot be the sole format for informing the public of the "green" or "renewable" products that Governmental Aggregators could require. Given the wide range of products that could qualify (based on our answer to question 1, describing what types of products would merit notice under 83 ILCS 470.200(a)(4)) a short written narrative or link to the product description would be a better way of informing the public. A "% Renewable" column fails to capture aspects of the product that can only be

reflected in a written description. For example, the product may not require a certain percentage of renewable energy or RECs and in those instances such a column would not adequately inform the public. Moreover, such a column would not clearly distinguish between the purchase of energy and RECs. Thus, while such a column can be included on the webpage, by itself it would not adequately inform the public of the product the Aggregate Supplier is to provide and needs a short written description or link to a written description.

WHEREFORE, Wind on the Wires recommends that the Commission adopt the recommendations contained herein.

Respectfully submitted,

____s/_____

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