

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

<b>Illinois Commerce Commission</b>	:	
<b>On Its Own Motion</b>	:	
	:	<b>11-NOI-01</b>
<b>Notice of Inquiry Into the Implementation</b>	:	
<b>Of Public Act 97-0222</b>	:	

**Comments of Champion Energy, LLC.**

Champion Energy, LLC (“Champion”) appreciates the opportunity to provide comments to the Illinois Commerce Commission (“Commission”) regarding the above-referenced Notice of Inquiry initiated by the Commission to implement Public Act 97-0222.

**Introduction**

In response to the questions presented in the NOI, Champion believes residential and small commercial customers can benefit from changes to the existing educational material provided by the Commission and has provided in the comments below specific recommendations to modify these materials and to enhance the Commission's overall consumer education effort. Additionally, in response to the request of the Office of Retail Market Development (ORMD), Champion has included in its comments recommendations regarding the display and format of residential complaints filed with the ICC against alternative retail electric suppliers (ARES) along with recommendations for the display of ARES offers posted on PluginIllinois.org. Champion commends the Commission and the ORMD on their advocacy in the advancement of residential and small commercial switching and believes this process will be beneficial to the continued growth in customer switching.

## **Presentation of ARES Complaints**

Based on the options presented by the ORMD, Champion recommends the star approach or Option #3. This approach provides the customer with a format that offers a notional view at a supplier's overall performance. Champion believes that only true complaints should be included on a scorecard and that the star "ranking" should be calculated based on a ratio of those complaints. Champion opposes the presentation of raw data or the pure number of complaints lodged against an ARES. The pure number of complaints does not always paint a clear picture relative to the number of customers an ARES serves and could skew the customer's perception of the ARES and the information provided. Champion supports the ORMD proposal to use a per 1,000 customer ratio to calculate the star ranking. Along with the star rankings, customers should have the option to view the detailed account of complaints based on the type of complaint filed. To support this view, Champion recommends using the percentage of complaints category chart from ORMD Option #2 with some modifications.

The detailed complaint information could list both inquiries and complaints, and the percentage of each category should be provided. Champion also believes it is useful to categorize the detailed complaint information as proposed in the ORMD's various options. However, Champion recommends including "switching or slamming" as a category.

## **Rate Display for PluginIllinois.org**

Champion believes the Compare Offers Now section of the PluginIllinois.org website is a valuable tool for customer choice. This type of tool has proven in many other states to be the primary source for residential customers to easily access supplier offers and make an informed choice in their selection process. Champion commends the Commission and the ORMD's efforts to improve this process with the inclusion of the proposed residential complaint statistics.

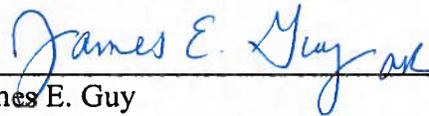
In an effort to provide a more comprehensive ARES offering, Champion recommends the following changes for consideration.

ARES rates could be divided into distinct pricing categories, such as Fixed, Variable, Indexed and Renewable. Customers could view a particular type of offer utilizing a filter that would display a specific type of offer or all offers posted by ARES based on the filter selected by the customer. Consideration should be given in disallowing ARES to post "custom offers" versus a specific offer as this display does not provide the customer with a true apples to apples comparison or meaningful offer relative to other ARES.

**Conclusion**

Champion appreciates the opportunity to participate in this process and looks forward to working with the Commission, ORMD, and other interested parties on the proposed changes.

Respectfully submitted,



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