

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER AGENCY

**Petition for Approval of Initial
Procurement Plan**

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Docket No. 08-0519

**VERIFIED RESPONSE OF THE ILLINOIS POWER AGENCY
TO OBJECTIONS TO ITS INITIAL POWER PROCUREMENT PLAN**

The Illinois Power Agency (“IPA”) files this response to the objections to its Initial Power Procurement Plan submitted by the Staff of the Illinois Commerce Commission (“Staff”), Commonwealth Edison Company (“ComEd”), and AmerenCILCO, AmerenCIPS, and AmerenIP (together referred to as “Ameren”).

On October 20, 2008, the IPA submitted to the Illinois Commerce Commission (“Commission”) its Petition seeking approval of the IPA’s Power Procurement Plan for the period June 2009 through May 2014 (“Procurement Plan” or “Plan”). This Plan was submitted in accordance with Section 16-111.5(d)(2) of the Illinois Public Utilities Act (“PUA”), 220 ILCS 5/16-111.5(d)(2). Staff, ComEd and Ameren filed Objections on October 27, 2008. Pursuant to the Administrative Law Judge’s November 5, 2008 Procedural Ruling, the IPA responds to each of the issues raised by these parties where the parties have made specific recommendations to modify the Plan. In some cases, the parties commented generally on the Plan, but did not recommend that the Commission modify the Plan. In those instances, the IPA may respond generally, but also does not recommend that the Commission modify the Plan. Notwithstanding, these comments will be useful for future discussions among interested participants in the development of future procurement plans, and the implementation of the proposed Plan.

I. Response to Commonwealth Edison

A. Single Procurement Event (Responding to ComEd Objections at 2.)

ComEd expressed concern about the apparent conflict between the Plan’s statement to hold a single procurement event and the language that highlights potential risks of holding a single, versus multiple, event. The IPA agrees this section could have been more clear; however, the IPA believes that the statements are important with any future transition to multiple procurement events. ComEd offered language to clarify this section.

The IPA recommends that the Plan be modified as follows:

- On page 2, in the paragraph numbered 2:
 - Before the second sentence, insert “The IPA intends to evaluate whether a” and delete “A”;
 - Before the third sentence, insert “The IPA also intends to evaluate whether under” and delete “Under”;
- On page 19, in the first paragraph of the subsection labeled “ii”:
 - Before the second sentence, insert “The IPA intends to evaluate whether a” and delete “A”;
 - In the third sentence, before the word “single” insert “The IPA also intends to evaluate whether”.

B. Clarification of Demand-Side Initiatives For Inclusion in Future Plans (Responding to ComEd Objections at 3.)

ComEd states that the Plan is unclear as to the types of programs or resources the IPA included within the term “demand-side initiatives”. ComEd seeks clarification for the term, stating that if the IPA intends for “demand-side initiatives” to mean the same as “demand-response measures”, then it has no objections, but does offer clarifying language.

To address this issue, the IPA agrees with ComEd’s proposed amendments, and recommends that the Plan be modified as follows:

- On page 3, in the paragraph numbered 3, make the following revisions:
 - In line 2, change “demand” to “demand-response”;

- In line 8, change “demand-side resources” to “demand-response measures”;
- In line 10, change “demand-side initiatives” to “demand-response measures”.

C. Long-Term RECs and Renewable Supply (Responding the ComEd Objections at 4.)

As ComEd correctly recognizes, the IPA’s Procurement Plan does not intend to procure physical renewable supply or any long-term Renewable Energy Credits (“RECs”). ComEd indicates that there are many issues associated with long term purchases of RECs and suggests that any future Plan amendments not only be in accordance with the PUA, but also include a full investigation of these issues. No specific amendments were offered by ComEd on this issue.

The Plan is consistent with the mandates of the PUA, and future plans for the procurement of electricity, including renewable energy and RECs, will be done in accordance with Section 16-111.5 of the PUA. ComEd does not propose any redline changes to the Plan. The IPA believes that Plan is clear in this respect, and recommends that no modifications be made to the Plan at this time.

D. Portfolio Rebalancing (Responding to ComEd Objections at 5.)

The Plan proposes that if there are revisions to ComEd’s demand forecast, the IPA will convene a meeting among interested parties to determine the appropriate actions necessary to rebalance the portfolio. ComEd states that it provides forecasts twice per year, once in the Spring and once in the Fall. ComEd further states that it has no objection to the IPA’s Plan in this regard, and provides no redline changes or recommended alternatives. The IPA recommends that no modifications be made to the Plan as they are not necessary in order to address ComEd’s comments.

E. Updated Forecast Data (Responding to ComEd Objections at 5.)

While ComEd appropriately filed its load forecasts in July, 2008, it offered revisions using a more current forecast. ComEd notes that it issues “load forecasts twice a year, ... once in the Spring and once in the Fall.” ComEd Objections at 5. The forecast provided to the IPA for use in its Plan was based on ComEd’s Spring 2008 load forecast. ComEd’s Fall aggregate forecast “shows lower expected loads” due, in part, to “unexpected changes in economic conditions.” ComEd Objections at 6. ComEd suggests the IPA allow for flexibility to use updated information in future plans to improve the procurement process, and suggests that the Commission use the updated information in this Plan, without rewriting the entire Plan. ComEd Objections at 6. ComEd provides revised forecasts for Tables Q-a and Q-b, as well as, Attachments I and J.

The IPA notes that the Plan currently contemplates that there may be changes to the load forecast during the procurement period, and permits the Procurement Administrator, Procurement Monitor, the IPA and the Commission to adjust the procurement activities as necessary given the changes to the load forecast.

The IPA agrees that using the most recent information would be useful for this and future Plans. To address this issue, the IPA agrees that ComEd’s revised forecast be incorporated into the Plan. The IPA recommends that ComEd’s revised Tables Q-a and Q-b, as well as Attachments I and J (attached as Exhibit A), be incorporated into the Plan, and that the Plan be modified accordingly.

II. Response to Ameren

A. Section IV.C.2.ii: Capacity (Responding to Ameren Objections at 1-3.)

Ameren suggests that Section IV. C.2.ii of the Plan contains “several discrepancies that relate to the current and pending Resource Adequacy rules required by the Midwest Independent Transmission System Organization, Inc. (“MISO”). Ameren Objections at 1. Ameren recommends that the IPA amend the Plan by deleting Section IV.C.2.ii in its entirety and replacing it with the following:

Module E of the Midwest ISO’s Open Access Transmission and Energy Markets Tariff addresses resource adequacy. The Midwest ISO’s current Module E requires Ameren to have capacity in an amount equal to its forecast of load plus a planning reserve margin. The planning reserve margin is that of the relevant regional reliability organization or relevant state regulatory authority, but, in no case less than 12%. There is currently no enforcement mechanism or penalty provision in the Midwest ISO’s tariff for not maintaining this level of capacity.

The Federal Energy Regulatory Commission (“FERC”) has approved modifications to Module E to be effective June 1, 2009 such that Ameren will be required to hold the higher of the reserve requirement as specified by an annual planning process undertaken by the Midwest ISO and the requirement of the relevant state regulatory authority. These modifications require each load serving entity to provide an annual forecast of monthly loads and subsequently confirm on a month-ahead basis that each load serving entity has enough capacity to meet or exceed its monthly peak load forecast plus its planning reserve margin. Although such approval did not contain any penalty provisions for non-compliance the Midwest ISO has subsequently filed additional modifications with FERC in order to seek penalty provisions.

For demonstration purposes, the tables included in this plan utilize the reserve margin of 14.3% that has been effective for the period June 2008 through May 2009 but the planning reserve margin beginning June 2009 has yet to be established. The IPA therefore recommends that the Commission authorize the IPA’s procurement administrator, in consultation with the IPA, the Commission Staff, the procurement monitor, and the Ameren Illinois Utilities, to adjust the quantities of capacity to acquire to comply with the applicable planning reserve requirements. Furthermore, to the extent to which it is impractical or impossible for the procurement administrator to modify its capacity RFP to fully account for all applicable capacity requirements the applicable planning reserve requirements, the IPA recommends that the Commission authorize the Ameren Illinois Utilities to make up the difference through a supplemental procurement process.

The IPA agrees with Ameren’s recommendation and recommends that the Plan be modified accordingly.

B Ancillary Services subsection of Transmission Section IV.C.3.iii (Responding to Ameren’s Objections at 4.)

Ameren suggests that language in Section IV.C.3.iii of the Plan was inadvertently placed in the wrong section. The IPA agrees that this was an inadvertent oversight. To make the appropriate correction, the IPA recommends that the Plan be modified by replacing the current section with the following:

The MISO tariff defines ancillary services as “(t)hose services that are necessary to support Capacity and the transmission of Energy from Resources to Loads while maintaining reliable operation of the Transmission System in accordance with Good Utility Practice.”

As detailed in Module A, Section II.3 of the MISO tariff each Transmission Service Customer is required to acquire the following ancillary services (i) Scheduling, System Control and Dispatch, (ii) Reactive Supply and Voltage Control from Generation Resources, (iii) Regulation and Frequency Response, (iv) Operating Reserve – Spinning and (v) Operating Reserve – Non-Spinning – whether from the Transmission Provider, from the Control Area, from the ITC, from a third party, or by self-supply. Within MISO, energy imbalance service, is provided by the operation of the real time market and is no longer required to be acquired as a separate ancillary service. Ameren shall acquire the necessary ancillary services in accordance with the MISO tariff. The cost for this service shall be that established in the applicable MISO schedule or as otherwise determined by the operation of the MISO ancillary services market.

C. Section IV.C.4 Contingency Procurement Plan (Responding to Ameren’s Objections at 4-6.)

Ameren contends that the Contingency Section contained in Section IV.C.4 is at odds with its Rider PER – Purchased Electricity Recovery. It states that if it remains in the Plan, it will continue to create confusion and set forth conflicting procedures going forward. Ameren suggests deleting this section in its entirety and replaced with a reference to the “Contingency Obligations” section in its Rider PER.

The IPA agrees with Ameren that its Rider PER (Purchased Energy Recovery) can appropriately serve as the basis of the Contingency Procurement Plan. The IPA recommends

that the Plan be amended by deleting language in Section IV.C.4 Contingency Procurement Plan and replacing it with the following reference to Ameren Rider PER:

Ameren Rider PER (Purchased Energy Recovery) (Electric Service Schedule III.CC. No. 18) will serve as the basis of the Contingency Procurement Plan.

III. Response to Staff

A. Demand Response Values (Responding to Staff Response and Objections at 10.)

The demand response requirement in the statute is “to reduce peak demand by 0.1% over the prior year” 220 ILCS 5/12-103(c). The Plan accepts both Ameren’s and ComEd’s demand response forecasts although it believes both companies interpret the requirement differently. Staff does not request hearing solely on the issue, but states that this issue be “cleared up at some point.” Staff Response and Objections at 11. No specific redline amendments were offered by Staff.

ComEd states that it and Ameren “calculate the demand-response requirement in the same manner.” ComEd Objections at 8. ComEd offered amendments to clarify this misconception of differences.

First, the IPA reiterates that this, and any other aspect of the Plan, can be modified in any future Plan. Second, to clarify the Plan, the IPA agrees with the revisions offered by ComEd and recommends that the Plan be modified as follows:

- On page 13, in the last paragraph, delete the second and third sentences;
- On page 14, in the eighth line from the top, insert “incremental” between “effective” and “reduction”.

B. REC Benchmarks (Responding to Staff Response and Objections at 12.)

The Plan sets forth guidelines to use benchmarks to measure whether to accept or reject Renewable Energy Credit (“REC”) bids. Staff states that it is “philosophically supportive of

utilizing benchmarks for rejecting REC bids”, but it has “several practical and legal concerns with the concept.” Staff Response and Objections at 12. First, Staff does not believe that benchmarks are required as a matter of law for RECs under the PUA. *Id.* Second, Staff states that “adding any benchmark into the selection process would potentially counteract the effect of the other special renewable/REC requirements.” *Id.* Third, Staff stated concerns with the potential use of benchmarks based on seemingly “limited and idiosyncratic price data”. *Id.* at 15. Fourth, Staff expressed concern about the Plan’s proposal to consider “the economic development benefits of in-state resources”. *Id.* at 15. Notwithstanding its discussion, Staff makes no specific recommendations to modify the Procurement Plan proposed by the IPA.

The IPA appreciates Staff’s concerns regarding the use of appropriate benchmarks, and the IPA believes that Staff’s concern regarding the availability of some benchmark data is well-taken. However, Section 16-111.5(e)(3) of the PUA states specifically that all contracts for the products procured through the procurement process, including renewable energy, shall be evaluated according to benchmarks established by the Procurement Administrator, in consult with the Commission, Agency Staff, and the Procurement Monitor. 220 ILCS 5/16-111.5(c); 5/16-111.5(e)(3). The creation of the benchmarks, and the evaluation of the REC bids with respect to the benchmarks, will be made in cooperation with these participants at the appropriate time. Because Staff makes no recommended modification to the Plan with respect to the reliance on benchmarks to evaluate bids, the IPA recommends no modifications be made to the Plan at this time.

C. Long-Term Contracting for RECs (Responding to Staff Response and Objections at 16.)

The Plan discusses the use of long-term contracting for RECs, in particular, for future procurement plans. Staff is not opposed to long-term contracting for RECs, but compares the potential value of long-term versus short-term contracts. Staff Response and Objections at 16 - 20. Because the plan allows “considerable opportunity for the Procurement Administrator, the IPA, the Commission, and the Utilities to exercise their combined judgment in determining whether or not to incorporate multi-year contracts into the upcoming REC bid solicitation,” Staff makes no recommendation to modify the Plan at this time. *Id.* at 20. Given that Staff makes no recommended modification to the Plan with respect to the term of the contracts for RECs, the IPA recommends no modifications be made to the Plan at this time.

D. Residual Demand for Ameren July and August 2009 On-Peak Energy (Responding to Staff Response and Objections at 21.)

Staff believes Table I-a contains errors for July and August 2009. The IPA agrees that this was an inadvertent oversight, and recommends that Plan be modified as follows:

Contract Month	Peak Contract Volumes to Secure (MW)				
	Adjusted Projected Volume	2006 Auction Volumes (MW)	Swap Volumes (MW)	Residual Volumes (MW)	2009 IPA Procurement (MW)
June-09	2678	901	800	977	1000
July-09	3397	1143	800	1454	1450
August-09	3330	1120	800	1410	1400
September-09	2504	842	800	861	850
October-09	2235	752	800	683	700
November-09	2178	733	800	645	650
December-09	2507	843	800	863	850
January-10	2597	874	800	923	900
February-10	2438	820	800	818	800
March-10	2164	728	800	636	650
April-10	1949	656	800	493	500
May-10	1944	654	800	490	500
June-10	2512	0	1000	1512	750
July-10	3242	0	1000	2242	1050
August-10	3135	0	1000	2135	1000
September-10	2330	0	1000	1330	650
October-10	2070	0	1000	1070	450
November-10	2053	0	1000	1053	450
December-10	2348	0	1000	1348	650
January-11	2492	0	1000	1492	750
February-11	2312	0	1000	1312	600
March-11	2061	0	1000	1061	450
April-11	1869	0	1000	869	300
May-11	1864	0	1000	864	300

E. Release of Information to the Public (Responding to Staff Response and Objections at 22.)

Section 16-111.5 of the PUA provides that certain information related to the development and implementation of the Procurement Plan be afforded confidential treatment. *See* Staff Response and Objections at 22-23. Staff notes that the Plan does not specify which information developed in developing and implementing the Procurement Plan is subject to disclosure, or which information is confidential in accordance with Section 16-111.5. That was intentional. Section 16-111.5 describes the information that is subject to confidential treatment, and it is not necessary at this time to speculate on the specific information that would or would not fall under the statute’s protective cloak.

Staff suggests that “the number of megawatts awarded for each contract type and for each contract term could generally be provided to the public following each procurement event.” Staff Response and Objections at 24. Staff opines that aggregate data on the number of megawatts for each contract type “does not disclose information about individual bidders or about their bids.” *Id.* Staff recommends that the Commission approve a Plan that “explicitly provide[s] that the number of megawatts awarded for each contract type and for each contract term will be publicly disclosed after a Commission vote accepting a procurement administrator recommendation to accept certain bids for future procurement events, provided there are at least three winning bidders in the entire procurement event.” Staff Response and Objections at 24.

The IPA opposes the Staff’s recommendations. Section 16-111.5(h) of the PUA makes clear that only two items of information need be disclosed to the public: 1) the names of the successful bidders, and 2) the load weighted average of the winning bid prices. 220 ILCS 5/16-111.5(h). Section 16-111.5(h) further states that the Commission and all participants in the procurement process “shall maintain the confidentiality *of all other supplier and bidding*

information . . . absent a compelling demonstration of need. . . .” Id. Section 16-111.5(h) makes clear that only names of the successful bidders and the load weighted average prices of the winning bids are to be publicly disclosed, and that all other information, including (as Staff suggests) “the number of megawatts awarded for each contract type and for each contract term,” be maintained as confidential. Staff speculates that the aggregate number of megawatts would not disclose confidential information, particularly if there are three or more successful bidders. However, that is not the standard set forth in Section 16.111.5(h). Section 16-111.5 requires that “all other supplier and bid information” is required to be maintained confidential unless there is a compelling demonstration that a party “needs” this information.

Staff’s proposal ignores the strict terms of Section 16-111.5(h), and would create a presumption of disclosing information that is required to be maintained as confidential under Section 16-111.5(h), without any party having to demonstrate the need to have this information disclosed. Even Staff, in its comments, does not demonstrate why the aggregate number of megawatts would need to be disclosed; Staff simply argues that the information would not be confidential if there are more than three successful bidders. Staff’s recommendation is barred by the plain language of Section 16-111.5.

The IPA notes that there might be an opportunity after the bids are awarded for a party or participant to petition the Commission or the IPA to disclose the aggregate number of megawatts. If so, then the Commission or the IPA can, at that time, determine whether a participant has demonstrated a compelling need to have the information disclosed. At that time, the Commission or the IPA can evaluate whether disclosure would be appropriate under the circumstances that exist at the time, rather than speculate now whether the aggregate data could inadvertently disclose confidential information. Given the foregoing, the IPA opposes Staff’s recommendation and recommends that no modifications be made to the Plan at this time.

General Typographical Corrections

ComEd offered several corrections to what it deems “inadvertent errors and inaccuracies.” ComEd Objections at 8. The IPA agrees with ComEd’s suggestions and recommends that the Plan be modified to incorporate the following corrections :

- On page 1, delete the reference to “draft” in line 1.
- On page 2, delete the first sentence, which begins “statistical modeling will be independently verified...”. The IPA agrees that it no longer applies at this stage of the process.
- On page 13, in the last paragraph, delete the second and third sentences. The IPA agrees that they are incorrect since ComEd and Ameren calculate the demand-response requirement in the same manner.
- On page 14, in the eighth line from the top, insert “incremental” between “effective” and “reduction”. This also clarifies the misconception that the ComEd and Ameren demand-response calculations were different.
- On page 46, Table P should be deleted and replaced with the Table P attached hereto as Exhibit B.
- On page 48, in the paragraph above Table Q-a, the reference to “Ameren” should be changed to “ComEd”.
- On pages 48-49, Tables Q-a and Q-b are misplaced and need to be switched.
- On page 49, in the first line of the paragraph after Table Q-b, “eligible” should be changed to “Included Retail Customers”.
- On page 52, in the section on “Portfolio Rebalancing,” the three references to “Ameren” should be changed to “ComEd”.
- On page 52, in the paragraph on Portfolio Rebalancing, in several places the paragraph refers to “Ameren” when it should be referring to “ComEd.”
- On page 55, in the first paragraph in the section on “Compliance Tracking” the second and third sentences should be deleted since the IPA used historical data as reflected in Table R on page 53.
- On page 55, in the section on “Evaluation Criteria,” in the paragraph on “Determination of REC requirement,” in the fourth line, the time period in the parenthetical should be “June 2007 – May 2008” to be consistent with Table R on page 53.
- On page 55, in the section on “Evaluation Criteria,” in the paragraph on “Determination of Cost Effectiveness” the language should be revised to be consistent with Table R (the column on “Maximum Cost”) on page 53.

- In Attachment J, delete the “Peak Contract Volumes to Secure (MW)” table, and insert the attached “Peak Contract Volumes to Secure (MW) table”.

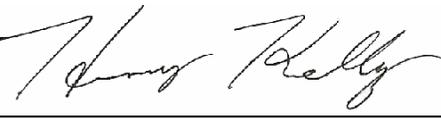
Conclusion

The Illinois Power Agency’s Procurement Plan is consistent with the requirements of the Act, meets the needs of customers, and should be confirmed by the Commission as specifically modified herein.

Dated: November 12, 2008

Respectfully submitted,

Illinois Power Agency

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EXHIBIT A:

COMMONWEALTH EDISON COMPANY REVISED FORECASTS

Attachment I

Commonwealth Edison Residual Supply Requirements Forecast for Five Year Planning Period, June 2009 through May 2014 using Fall 2008 Load Forecast

Contract Month	Off-Peak Contract Volumes to Secure (MW)				Peak Contract Volumes to Secure (MW)			
	Projected Volume (MW)	2006 Auction Volumes (MW)	Swap Volumes (MW)	Residual Volumes (MW)	Adjusted Projected Volume (MW)	2006 Auction Volumes (MW)	Swap Volumes (MW)	Residual Volumes (MW)
Jun-09	5,010	1,676	2,000	1,334	5,996	2,006	2,000	1,990
Jul-09	5,997	2,006	2,000	1,991	8,001	2,677	2,000	3,324
Aug-09	5,677	1,899	2,000	1,778	7,480	2,502	2,000	2,978
Sep-09	4,604	1,540	2,000	1,064	5,567	1,862	2,000	1,705
Oct-09	4,056	1,357	2,000	699	4,819	1,612	2,000	1,207
Nov-09	4,486	1,501	2,000	985	5,237	1,752	2,000	1,485
Dec-09	5,136	1,718	2,000	1,418	5,930	1,984	2,000	1,946
Jan-10	5,341	1,787	2,000	1,554	6,139	2,054	2,000	2,085
Feb-10	5,025	1,681	2,000	1,344	5,777	1,933	2,000	1,844
Mar-10	4,504	1,507	2,000	997	5,220	1,746	2,000	1,474
Apr-10	4,107	1,374	2,000	733	4,756	1,591	2,000	1,165
May-10	4,147	1,387	2,000	760	4,830	1,616	2,000	1,214
Jun-10	4,571	0	3,000	1,571	5,347	0	3,000	2,347
Jul-10	5,505	0	3,000	2,505	7,128	0	3,000	4,128
Aug-10	5,144	0	3,000	2,144	6,653	0	3,000	3,653
Sep-10	4,061	0	3,000	1,061	4,711	0	3,000	1,711
Oct-10	3,620	0	3,000	620	4,126	0	3,000	1,126
Nov-10	4,076	0	3,000	1,076	4,591	0	3,000	1,591
Dec-10	4,664	0	3,000	1,664	5,293	0	3,000	2,293
Jan-11	4,850	0	3,000	1,850	5,449	0	3,000	2,449
Feb-11	4,569	0	3,000	1,569	5,095	0	3,000	2,095
Mar-11	4,086	0	3,000	1,086	4,574	0	3,000	1,574
Apr-11	3,692	0	3,000	692	4,112	0	3,000	1,112
May-11	3,717	0	3,000	717	4,181	0	3,000	1,181
Jun-11	4,582	0	3,000	1,582	5,383	0	3,000	2,383
Jul-11	5,532	0	3,000	2,532	7,126	0	3,000	4,126
Aug-11	5,134	0	3,000	2,134	6,680	0	3,000	3,680
Sep-11	4,098	0	3,000	1,098	4,694	0	3,000	1,694
Oct-11	3,641	0	3,000	641	4,151	0	3,000	1,151
Nov-11	4,095	0	3,000	1,095	4,625	0	3,000	1,625
Dec-11	4,725	0	3,000	1,725	5,308	0	3,000	2,308
Jan-12	4,923	0	3,000	1,923	5,510	0	3,000	2,510
Feb-12	4,599	0	3,000	1,599	5,101	0	3,000	2,101
Mar-12	4,124	0	3,000	1,124	4,589	0	3,000	1,589
Apr-12	3,709	0	3,000	709	4,145	0	3,000	1,145
May-12	3,735	0	3,000	735	4,218	0	3,000	1,218
Jun-12	4,676	0	3,000	1,676	5,429	0	3,000	2,429
Jul-12	5,774	0	3,000	2,774	7,376	0	3,000	4,376
Aug-12	5,377	0	3,000	2,377	6,869	0	3,000	3,869
Sep-12	4,260	0	3,000	1,260	4,828	0	3,000	1,828
Oct-12	3,763	0	3,000	763	4,282	0	3,000	1,282
Nov-12	4,218	0	3,000	1,218	4,768	0	3,000	1,768
Dec-12	4,968	0	3,000	1,968	5,531	0	3,000	2,531
Jan-13	5,076	0	3,000	2,076	5,631	0	3,000	2,631
Feb-13	4,728	0	3,000	1,728	5,173	0	3,000	2,173
Mar-13	4,089	0	3,000	1,089	4,522	0	3,000	1,522
Apr-13	3,559	0	3,000	559	3,957	0	3,000	957
May-13	3,734	0	3,000	734	4,183	0	3,000	1,183
Jun-13	4,729	0	0	4,729	5,415	0	0	5,415
Jul-13	5,813	0	0	5,813	7,396	0	0	7,396
Aug-13	5,408	0	0	5,408	6,869	0	0	6,869
Sep-13	4,261	0	0	4,261	4,865	0	0	4,865
Oct-13	3,788	0	0	3,788	4,299	0	0	4,299
Nov-13	4,258	0	0	4,258	4,762	0	0	4,762
Dec-13	5,022	0	0	5,022	5,574	0	0	5,574
Jan-14	5,123	0	0	5,123	5,670	0	0	5,670
Feb-14	4,770	0	0	4,770	5,197	0	0	5,197
Mar-14	4,122	0	0	4,122	4,539	0	0	4,539
Apr-14	3,585	0	0	3,585	3,962	0	0	3,962
May-14	3,765	0	0	3,765	4,170	0	0	4,170

Attachment J
Commonwealth Edison Peak Contract Volumes to Secure in 2009-2011 Procurement Cycles using Fall
2008 Load Forecast

Contract Month	Peak Contract Volumes to Secure (MW)						
	Adjusted Projected Volume (MW)	2006 Auction Volumes (MW)	Swap Volumes (MW)	Residual Volumes (MW)	2009 IPA Procurement (MW)	2010 IPA Procurement (MW)	2011 IPA Procurement (MW)
Jun-09	5,996	2,006	2,000	1,990	2,000	0	0
Jul-09	8,001	2,677	2,000	3,324	3,300	0	0
Aug-09	7,480	2,502	2,000	2,978	3,000	0	0
Sep-09	5,567	1,862	2,000	1,705	1,700	0	0
Oct-09	4,819	1,612	2,000	1,207	1,200	0	0
Nov-09	5,237	1,752	2,000	1,485	1,500	0	0
Dec-09	5,930	1,984	2,000	1,946	1,950	0	0
Jan-10	6,139	2,054	2,000	2,085	2,100	0	0
Feb-10	5,777	1,933	2,000	1,844	1,850	0	0
Mar-10	5,220	1,746	2,000	1,474	1,450	0	0
Apr-10	4,756	1,591	2,000	1,165	1,150	0	0
May-10	4,830	1,616	2,000	1,214	1,200	0	0
Jun-10	5,347	0	3,000	2,347	750	1,600	0
Jul-10	7,128	0	3,000	4,128	2,000	2,150	0
Aug-10	6,653	0	3,000	3,653	1,650	2,000	0
Sep-10	4,711	0	3,000	1,711	300	1,400	0
Oct-10	4,126	0	3,000	1,126	0	1,150	0
Nov-10	4,591	0	3,000	1,591	200	1,400	0
Dec-10	5,293	0	3,000	2,293	700	1,600	0
Jan-11	5,449	0	3,000	2,449	800	1,650	0
Feb-11	5,095	0	3,000	2,095	550	1,550	0
Mar-11	4,574	0	3,000	1,574	200	1,350	0
Apr-11	4,112	0	3,000	1,112	0	1,100	0
May-11	4,181	0	3,000	1,181	0	1,200	0
Jun-11	5,383	0	3,000	2,383	0	750	1,650
Jul-11	7,126	0	3,000	4,126	0	2,000	2,150
Aug-11	6,680	0	3,000	3,680	0	1,700	2,000
Sep-11	4,694	0	3,000	1,694	0	300	1,400
Oct-11	4,151	0	3,000	1,151	0	0	1,150
Nov-11	4,625	0	3,000	1,625	0	250	1,400
Dec-11	5,308	0	3,000	2,308	0	700	1,600
Jan-12	5,510	0	3,000	2,510	0	850	1,650
Feb-12	5,101	0	3,000	2,101	0	550	1,550
Mar-12	4,589	0	3,000	1,589	0	200	1,400
Apr-12	4,145	0	3,000	1,145	0	0	1,150
May-12	4,218	0	3,000	1,218	0	0	1,200
Jun-12	5,429	0	3,000	2,429	0	0	800
Jul-12	7,376	0	3,000	4,376	0	0	2,150
Aug-12	6,869	0	3,000	3,869	0	0	1,800
Sep-12	4,828	0	3,000	1,828	0	0	400
Oct-12	4,282	0	3,000	1,282	0	0	0
Nov-12	4,768	0	3,000	1,768	0	0	350
Dec-12	5,531	0	3,000	2,531	0	0	850
Jan-13	5,631	0	3,000	2,631	0	0	950
Feb-13	5,173	0	3,000	2,173	0	0	600
Mar-13	4,522	0	3,000	1,522	0	0	150
Apr-13	3,957	0	3,000	957	0	0	0
May-13	4,183	0	3,000	1,183	0	0	0
Jun-13	5,415	0	0	5,415	0	0	1,900
Jul-13	7,396	0	0	7,396	0	0	2,600
Aug-13	6,869	0	0	6,869	0	0	2,400
Sep-13	4,865	0	0	4,865	0	0	1,700
Oct-13	4,299	0	0	4,299	0	0	1,500
Nov-13	4,762	0	0	4,762	0	0	1,650
Dec-13	5,574	0	0	5,574	0	0	1,950
Jan-14	5,670	0	0	5,670	0	0	2,000
Feb-14	5,197	0	0	5,197	0	0	1,800
Mar-14	4,539	0	0	4,539	0	0	1,600
Apr-14	3,962	0	0	3,962	0	0	1,400
May-14	4,170	0	0	4,170	0	0	1,450

Attachment J
Commonwealth Edison Off-Peak Contract Volumes to Secure in 2009-2011 Procurement Cycles using
Fall 2008 Load Forecast

Off-Peak Contract Volumes to Secure (MW)							
Contract Month	Projected Volume (MW)	2006 Auction Volumes (MW)	Swap Volumes (MW)	Residual Volumes (MW)	2009 IPA Procurement (MW)	2010 IPA Procurement (MW)	2011 IPA Procurement (MW)
Jun-09	5,010	1,676	2,000	1,334	1,350	0	0
Jul-09	5,997	2,006	2,000	1,991	2,000	0	0
Aug-09	5,677	1,899	2,000	1,778	1,800	0	0
Sep-09	4,604	1,540	2,000	1,064	1,050	0	0
Oct-09	4,056	1,357	2,000	699	700	0	0
Nov-09	4,486	1,501	2,000	985	1,000	0	0
Dec-09	5,136	1,718	2,000	1,418	1,400	0	0
Jan-10	5,341	1,787	2,000	1,554	1,550	0	0
Feb-10	5,025	1,681	2,000	1,344	1,350	0	0
Mar-10	4,504	1,507	2,000	997	1,000	0	0
Apr-10	4,107	1,374	2,000	733	750	0	0
May-10	4,147	1,387	2,000	760	750	0	0
Jun-10	4,571	0	3,000	1,571	200	1,350	0
Jul-10	5,505	0	3,000	2,505	850	1,650	0
Aug-10	5,144	0	3,000	2,144	600	1,550	0
Sep-10	4,061	0	3,000	1,061	0	1,050	0
Oct-10	3,620	0	3,000	620	0	600	0
Nov-10	4,076	0	3,000	1,076	0	1,100	0
Dec-10	4,664	0	3,000	1,664	250	1,400	0
Jan-11	4,850	0	3,000	1,850	400	1,450	0
Feb-11	4,569	0	3,000	1,569	200	1,350	0
Mar-11	4,086	0	3,000	1,086	0	1,100	0
Apr-11	3,692	0	3,000	692	0	700	0
May-11	3,717	0	3,000	717	0	700	0
Jun-11	4,582	0	3,000	1,582	0	200	1,400
Jul-11	5,532	0	3,000	2,532	0	850	1,700
Aug-11	5,134	0	3,000	2,134	0	600	1,550
Sep-11	4,098	0	3,000	1,098	0	0	1,100
Oct-11	3,641	0	3,000	641	0	0	650
Nov-11	4,095	0	3,000	1,095	0	0	1,100
Dec-11	4,725	0	3,000	1,725	0	300	1,400
Jan-12	4,923	0	3,000	1,923	0	450	1,450
Feb-12	4,599	0	3,000	1,599	0	200	1,400
Mar-12	4,124	0	3,000	1,124	0	0	1,100
Apr-12	3,709	0	3,000	709	0	0	700
May-12	3,735	0	3,000	735	0	0	750
Jun-12	4,676	0	3,000	1,676	0	0	250
Jul-12	5,774	0	3,000	2,774	0	0	1,050
Aug-12	5,377	0	3,000	2,377	0	0	750
Sep-12	4,260	0	3,000	1,260	0	0	0
Oct-12	3,763	0	3,000	763	0	0	0
Nov-12	4,218	0	3,000	1,218	0	0	0
Dec-12	4,968	0	3,000	1,968	0	0	500
Jan-13	5,076	0	3,000	2,076	0	0	550
Feb-13	4,728	0	3,000	1,728	0	0	300
Mar-13	4,089	0	3,000	1,089	0	0	0
Apr-13	3,559	0	3,000	559	0	0	0
May-13	3,734	0	3,000	734	0	0	0
Jun-13	4,729	0	0	4,729	0	0	1,650
Jul-13	5,813	0	0	5,813	0	0	2,050
Aug-13	5,408	0	0	5,408	0	0	1,900
Sep-13	4,261	0	0	4,261	0	0	1,500
Oct-13	3,788	0	0	3,788	0	0	1,350
Nov-13	4,258	0	0	4,258	0	0	1,500
Dec-13	5,022	0	0	5,022	0	0	1,750
Jan-14	5,123	0	0	5,123	0	0	1,800
Feb-14	4,770	0	0	4,770	0	0	1,650
Mar-14	4,122	0	0	4,122	0	0	1,450
Apr-14	3,585	0	0	3,585	0	0	1,250
May-14	3,765	0	0	3,765	0	0	1,300

**Table Qa: ComEd Peak Load Volumes to Secure in 2009 Procurement Cycle
(June 2009 through May 2011) using Fall 2008 Load Forecast**

Contract Month	Peak Contract Volumes to Secure (MW)				
	Adjusted Projected Volume (MW)	2006 Auction Volumes (MW)	Swap Volumes (MW)	Residual Volumes (MW)	2009 IPA Procurement (MW)
June-09	5,996	2,006	2,000	1,990	2,000
July-09	8,001	2,677	2,000	3,324	3,300
August-09	7,480	2,502	2,000	2,978	3,000
September-09	5,567	1,862	2,000	1,705	1,700
October-09	4,819	1,612	2,000	1,207	1,200
November-09	5,237	1,752	2,000	1,485	1,500
December-09	5,930	1,984	2,000	1,946	1,950
January-10	6,139	2,054	2,000	2,085	2,100
February-10	5,777	1,933	2,000	1,844	1,850
March-10	5,220	1,746	2,000	1,474	1,450
April-10	4,756	1,591	2,000	1,165	1,150
May-10	4,830	1,616	2,000	1,214	1,200
June-10	5,347	0	3,000	2,347	750
July-10	7,128	0	3,000	4,128	2,000
August-10	6,653	0	3,000	3,653	1,650
September-10	4,711	0	3,000	1,711	300
October-10	4,126	0	3,000	1,126	0
November-10	4,591	0	3,000	1,591	200
December-10	5,293	0	3,000	2,293	700
January-11	5,449	0	3,000	2,449	800
February-11	5,095	0	3,000	2,095	550
March-11	4,574	0	3,000	1,574	200
April-11	4,112	0	3,000	1,112	0
May-11	4,181	0	3,000	1,181	0

**Table Qb: ComEd Off-Peak Load Volumes to Secure in 2009 Procurement Cycle
(June 2009 through May 2011) using Fall 2008 Load Forecast**

Contract Month	Off-Peak Contract Volumes to Secure (MW)				
	Projected Volume (MW)	2006 Auction Volumes (MW)	Swap Volumes (MW)	Residual Volumes (MW)	2009 IPA Procurement (MW)
June-09	5,010	1,676	2,000	1,334	1,350
July-09	5,997	2,006	2,000	1,991	2,000
August-09	5,677	1,899	2,000	1,778	1,800
September-09	4,604	1,540	2,000	1,064	1,050
October-09	4,056	1,357	2,000	699	700
November-09	4,486	1,501	2,000	985	1,000
December-09	5,136	1,718	2,000	1,418	1,400
January-10	5,341	1,787	2,000	1,554	1,550
February-10	5,025	1,681	2,000	1,344	1,350
March-10	4,504	1,507	2,000	997	1,000
April-10	4,107	1,374	2,000	733	750
May-10	4,147	1,387	2,000	760	750
June-10	4,571	0	3,000	1,571	200
July-10	5,505	0	3,000	2,505	850
August-10	5,144	0	3,000	2,144	600
September-10	4,061	0	3,000	1,061	0
October-10	3,620	0	3,000	620	0
November-10	4,076	0	3,000	1,076	0
December-10	4,664	0	3,000	1,664	250
January-11	4,850	0	3,000	1,850	400
February-11	4,569	0	3,000	1,569	200
March-11	4,086	0	3,000	1,086	0
April-11	3,692	0	3,000	692	0
May-11	3,717	0	3,000	717	0

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER AGENCY	:	
	:	
	:	Docket No. 08-0519
Petition for Approval of Initial Procurement Plan	:	
	:	

EXHIBIT B:

COMMONWEALTH EDISON COMPANY REVISED TABLE P

Corrected Table P

Contract Month	Peak				Off Peak			
	Projected Volume (MWh)	2006 Auction Volumes (MWh)	Swap Volumes (MWh)	Residual Volumes (MWh)	Projected Volume (MWh)	2006 Auction Volumes (MWh)	Swap Volumes (MWh)	Residual Volumes (MWh)
June-09	2,141,623	716,442	704,000	721,181	1,873,337	626,692	736,000	510,645
July-09	2,734,169	914,668	736,000	1,267,501	2,309,153	772,486	752,000	784,667
August-09	2,346,163	784,867	672,000	1,040,496	2,382,159	796,909	816,000	769,250
September-09	1,881,759	629,509	672,000	580,250	1,785,096	597,172	768,000	419,924
October-09	1,721,639	575,944	704,000	441,695	1,621,614	542,482	784,000	295,132
November-09	1,711,303	572,486	640,000	498,817	1,840,111	615,577	800,000	424,534
December-09	2,167,273	725,023	704,000	738,250	2,098,047	701,865	784,000	612,182
January-10	1,990,348	665,836	640,000	684,512	2,307,359	771,886	848,000	687,473
February-10	1,868,295	625,005	640,000	603,290	1,795,009	600,489	704,000	490,520
March-10	1,902,638	636,494	736,000	530,144	1,681,239	562,429	752,000	366,810
April-10	1,606,834	537,538	704,000	365,296	1,453,921	486,384	736,000	231,537
May-10	1,540,370	515,304	640,000	385,066	1,755,747	587,354	848,000	320,393