

OCT 06 2014

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION  
CHIEF CLERK'S OFFICE

PSAA

ILLINOIS POWER AGENCY )  
 )  
Petition for approval of the 2015 IPA )  
Procurement Plan Pursuant to Section 16- )  
111.5(d)(4) of the Public Utilities Act )

ICC Docket No. 14-0588

**OBJECTION OF THE ILLINOIS COAL ASSOCIATION TO THE ILLINOIS POWER AGENCY'S PROCUREMENT PLAN**

The Illinois Coal Association ("ICA") hereby objects to the 2015 Procurement Plan as filed with the Illinois Commerce Commission ("ICC") by the Illinois Power Agency ("IPA"). For the reasons stated below the ICA objects to the exclusion of new clean coal power procurement in the proposed plan and encourages the ICC to include the opportunity for new clean coal technology projects in the Final 2015 Power Procurement Plan.

**I. Job Creation and Retention** – The Illinois coal industry and its employment economics will be negatively affected by the announced retirements of existing coal-fired generating facilities, and recently promulgated (and expected) federal emissions guidelines are expected to have a significant negative effect on any new coal projects that lack clean coal features.

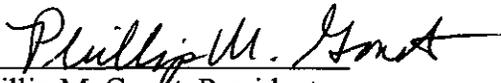
The importance of clean coal was clearly recognized and acted upon by the Illinois legislature in its creation of the clean coal features and procurement procedures via the Illinois Power Agency Act and related legislation. The IPA's recently proposed 2015 Procurement Plan ignores clean coal entirely, relying on a statutory interpretation that makes impossible the achievement of the legislative purpose of having 25% clean coal power in Illinois by 2025. By the interpretation

submitted, no new projects will ever be defined as clean coal in order to participate in competitive procurement to be conducted by the IPA.

**II. Market Growth.** Permitting clean coal into the Illinois IPA procurement portfolio will make Illinois a leader and case example of the existence and benefits of genuine clean coal technology. This fact will stimulate market growth for Illinois coal in the near future, as nearby states undertake to install new clean coal facilities – with corresponding retention and creation of jobs in the coal industry.

The ICA respectfully requests that the ICC modify the proposed Power Procurement Plan to include the opportunity for development of clean coal technology.

Respectfully Submitted.  
Illinois Coal Association

  
Phillip M. Gonet, President

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STATE OF ILLINOIS                    )  
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COUNTY OF SANGAMON            )        SS

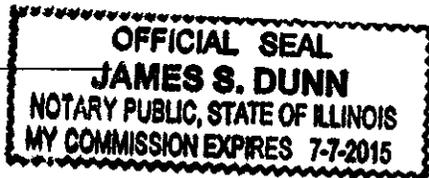
**VERIFICATION**

Phillip M. Gonet, being first duly sworn, on oath deposes and states that he is the President of the Illinois Coal Association that he has read the foregoing Objection of the Illinois Coal Association to the Illinois Power Agency’s Procurement Plan, that he knows of the contents thereof, and that the same is true to the best of his knowledge, information and belief.

Phillip M. Gonet  
Phillip M. Gonet

Subscribed and sworn to me  
this the 6<sup>th</sup> day of October, 2014.

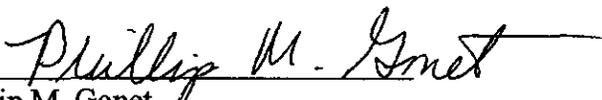
James S. Dunn  
Notary Public



My Commission Expires: 7-7-2015

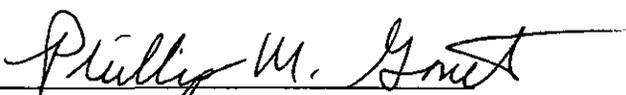
**NOTICE OF FILING**

On October 6<sup>th</sup>, 2014, I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Objection of the Illinois Coal Association to the Illinois Power Agency's Procurement Plan in this proceeding.

  
Phillip M. Gonet

**CERTIFICATE OF SERVICE**

I, Phillip M. Gonet, certify that I caused to be served copies of the foregoing Objection of the Illinois Coal Association to the Illinois Power Agency's Procurement Plan upon the parties on the service list maintained on the Illinois Commerce Commission's e-docket system for the instant docket via electronic delivery on October 6, 2014.

  
Phillip M. Gonet