

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

**The Illinois Power Agency** )  
 )  
**Petition for Approval of the 2015 IPA** ) **Docket No. 14-0588**  
**Procurement Plan Pursuant to Section** )  
**16-111.5(d)(4) of the Public Utilities Act** )

**THE RENEWABLES SUPPLIERS’ BRIEF IN REPLY TO EXCEPTIONS  
TO THE ADMINISTRATIVE LAW JUDGE’S PROPOSED ORDER**

The Renewables Suppliers submit this Brief in Reply to Exceptions to the Administrative Law Judge’s Proposed Order (“ALJPO”).<sup>1</sup> The Renewables Suppliers are responding to the second proposed revision in Commonwealth Edison’s (“ComEd”) Exception No. 3. ComEd Brief on Exceptions (“ComEd BOE”) at 6-8.<sup>2</sup>

Addressing an issue raised by the Renewables Suppliers,<sup>3</sup> the ALJPO directed as follows:

As the Commission understands it, the RS do not seek to have an existing contract modified; instead, it wants the Commission to intervene with respect to future contracts regarding curtailed RECs. *The Commission also finds it troubling that ComEd, apparently, does not communicate with the RS to obtain its input on contract terms and conditions before having the contract approved by the IPA and Staff. The Commission notes this is not the first time this type of complaint has been raised by the RS. In the future, the Commission directs ComEd to obtain the input of the counterparty, in this case the RS, before having contracts concerning curtailed RECs approved by the IPA and Staff.* (ALJPO at 278; emphasis added.)

ComEd asks the Commission to delete the italicized text above and replace it with the following:

The Commission also appreciates, however, that there are numerous suppliers and, therefore, efficiencies to be gained in maintaining a standard contract. To balance these interests, in the future, each supplier that seeks changes to the standard contract shall direct its comments to the utility, IPA and Staff, rather than just the utility, and the utility, IPA and Staff shall consider the comments and, if appropriate, work out changes to the standard contract (on behalf of all suppliers). (ComEd BOE at 8.)

ComEd offers nothing to refute the accuracy of the ALJPO’s statements that “ComEd,

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<sup>1</sup> The Renewables Suppliers are listed at page 1 of the Renewables Suppliers Brief on Exceptions.

<sup>2</sup> The Renewables Suppliers do not object to ComEd’s proposed correction to page 229 of the ALJPO (ComEd BOE at 7), which is intended to correct the ALJPO’s summary of ComEd’s position.

<sup>3</sup> Objections of the Renewables Suppliers Regarding the Illinois Power Agency’s 2015 Procurement Plan at 4-7; Renewables Suppliers’ Reply to Responses to Objections to the Illinois Power Agency’s 2015 Procurement Plan at 7-11.

apparently, does not communicate with the RS to obtain its input on contract terms and conditions before having the contract approved by the IPA and Staff” and that “this is not the first time this type of complaint has been raised by the RS,” but ComEd nonetheless proposes to delete these statements. ComEd also states that “[t]he standard hourly ACP contracts are the result of a process that culminates in approval of the contracts by the IPA and Staff” (ComEd BOE at 6), which incorrectly suggests that LTPAA Suppliers have had input to the process of developing the contract form prior to approval by the IPA and Staff. They have not. ComEd cites that in Docket 13-0546, the Commission did not adopt the Renewables Suppliers’ proposal to revise the settlements process for purchases of curtailed RECs (ComEd BOE at 6-7), but in that instance the decision was made by the Commission after the parties had the opportunity to present their reasoning – not unilaterally by ComEd.

The above noted, the Renewables Suppliers do not object to ComEd’s revision to the process proposed by the ALJPO for giving suppliers input into the development of contracts in the future, if the Commission concludes that ComEd’s approach is better. Either the approach set forth in the ALJPO or the approach proposed by ComEd will provide suppliers with input into the development of the contract forms and terms – rather than having the contracts presented to them as a unilateral *diktat* by ComEd, accompanied by the assertion that the contracts have already been pre-approved by the IPA and the Commission Staff.

In either process, however, the existing contract forms should not be given any necessary presumption of correctness or precedential weight. The existing contracts have not been developed with input from the LTPPA Suppliers. They should not continue to be used, without revision, simply because they are the “existing contracts.”<sup>4</sup> In the future, in each succeeding year, the contract terms and the experience implementing the contracts should be reviewed by

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<sup>4</sup> The Renewables Suppliers agree that in any given year, a standard contract should be used for all suppliers; however, this does not mean that, once adopted, a contract should continue to be used from year to year with consideration of revisions based on experience.

the contract parties, the IPA and Staff, and revisions should be considered for adoption based on the experience of prior periods.

Finally, the Renewables Suppliers reiterate that the Commission's order should address and rule on the specific issue raised by the Renewables Suppliers with respect to the current form of contract for ComEd's purchase of curtailed LTPPA RECs using its accumulated hourly ACP funds. Renewables Suppliers' BOE at 10-11. To accomplish this, the Renewables Suppliers proposed that the following text be added to the end of the second full paragraph on page 278 of the ALJPO (*see* Renewables Suppliers' BOE at 11):

In addition, the Commission directs that future years' contracts for the purchase of curtailed RECs using hourly ACP funds should provide that, if the supplier is in a short-fall make-up situation pursuant to the terms of the LTPPA going into following Plan year, the purchaser will accept and pay for curtailed RECs of the same month's vintages as the associated non-curtailed RECs that are being produced and delivered to make up the shortfall.

## **CONCLUSION**

The Renewables Suppliers respectfully request that the Commission, in arriving at its final order in this docket, modify the ALJPO as set forth in the Renewables Suppliers' Brief on Exceptions and in this Brief in Reply to Exceptions.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he caused the Renewables Suppliers' Brief in Reply to Exceptions to the Administrative Law Judge's Proposed Order in ICC Docket 14-0588 to be served on each of the persons on the Service List by e-mail on December 1, 2014.

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