

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

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<b>ILLINOIS POWER AGENCY</b>	:	
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<b>Petition for Approval of the 2015 IPA Procurement Plan pursuant to Section 16-111.5(d)(4) of the Public Utilities Act</b>	:	<b>Docket No. 15-0541</b>
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**STAFF OF THE ILLINOIS COMMERCE COMMISSION  
OBJECTIONS TO THE ILLINOIS POWER AGENCY'S  
2016 PROCUREMENT PLAN**

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October 5, 2015

*Counsel for the Staff of the  
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Staff of the Illinois Commerce Commission (“Staff”), by and through its counsel, respectfully submits these objections to the Illinois Power Agency’s (“IPA”) 2016 Procurement Plan (“Plan” or “Proposed Plan”) and the IPA’s Petition for Approval of the 2016 Procurement Plan (“Petition”) filed on September 28, 2015 pursuant to Section 16-111.5 of the Illinois Public Utilities Act (“PUA”), 220 ILCS 5/16-111.5. Staff also submits the affidavit of Jennifer Hinman Morris in support of facts and non-legal matters contained herein.

**I. PROCESS AND PROCEDURE FOR REVIEW OF THE IPA’S PLAN UNDER PUBLIC ACT 095-0481**

Section 16-111.5 of the PUA, adopted as part of Public Act 095-0481, sets forth various provisions relating to procurement of power and energy. 220 ILCS 5/16-111.5. Subsection (d) of Section 16-111.5 sets forth the process and procedure for the review and approval of IPA procurement plans, beginning in 2008. The statute states, among

other things, that: (1) “[w]ithin 5 days after the filing of a procurement plan, any person objecting to the plan shall file an objection with the Commission”; (2) “[w]ithin 10 days after the filing, the Commission shall determine whether a hearing is necessary”; and (3) the Commission must “enter its order confirming or modifying the procurement plan within 90 days after the filing of the procurement plan by the [IPA].” 220 ILCS 5/16-111.5(d)(3). Pursuant to these statutory guidelines, objections must be filed by October 5, 2015<sup>1</sup>, the Commission must determine whether a hearing is necessary on or before October 15, 2015<sup>2</sup>. A final Commission order must be entered on or before December 28, 2015.

Section 16-111.5 of the PUA further provides the standard by which the Commission must assess a Plan. The statute provides that “[t]he Commission shall approve a procurement plan, including the forecast used in the procurement plan, if the Commission determines that it will ensure adequate, reliable, affordable, efficient, and environmentally sustainable electric service at the lowest total cost over time, taking into account the benefits of price stability.” 220 ILCS 5/16-111.5(d)(4).

Staff recommends that the Commission not hold hearings, but allow Staff and the other parties to address objections to the Plan by the filing of responses and replies. The statute contemplates hearings only if they are necessary. Parties have had the

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<sup>1</sup> Five days from September 28, 2015 is Saturday, October 5, 2015. Under the Commission’s Rules of Practice and by statute, the Saturday October 3<sup>rd</sup> would be excluded in computing five days as would Sunday October 4<sup>th</sup>. The next business day is Monday October 5, 2015. (83 Ill. Admin. Code 200.80; 5 ILCS 70/1.11)

<sup>2</sup> With respect to the Commission making a determination of whether a hearing is necessary, it is Staff’s position that the determination being made “within 10 days after the filing”, is in reference to the filing of objections, not the Plan. The IPA has the same opinion. (IPA August 14, 2015 letter). The Commission from 2009 to 2014, has made its determination as to whether there will be a hearing within ten days from the filing of the Plan, with the exception for 2012. In 2012, the Commission by ALJ ruling made the determination within eleven days from the filing of the Plan. Staff would further note, that since 2012 the Commission determination of whether there will be a hearing has been made through a Chief Administrative Law Judge Ruling.

opportunity to comment on the IPA’s draft plan and have the opportunity to file objections to the Plan filed September 28, 2015. Any issues that exist can be efficiently and adequately addressed, as they have in the past, by the Staff and the parties filing verified objections, responses to objections and replies without the need for hearings. Assuming the Commission determines that no hearing is necessary, consistent with recent procurement docket schedules, Staff proposes the following schedule for 2015 indicated in bold<sup>3</sup> for the filing of verified responses, verified replies, an Administrative Law Judge’s Proposed Order (“ALJPO”), exceptions, reply exceptions and final order:

	2015 Docket	2014 Docket	2013 Docket
IPA Plan Filed	9/28	9/29	9/30
Objections	10/5	10/6	10/7
<b>Responses</b>	<b>10/21</b>	10/21	10/21
<b>Replies</b>	<b>10/30</b>	10/31	10/31
<b>ALJPO</b>	<b>11/13</b>	11/13	11/13
<b>BOE</b>	<b>11/20</b>	11/21	11/21
<b>RBOE</b>	<b>12/1</b>	12/1	12/2
<b>FINAL ORDER</b>	<b>12/16</b>	12/17	12/18
Drop Dead	12/28	12/28	12/30

<sup>3</sup> Historical schedule dates for the 2014 and 2013 dockets (Docket Nos. 14-0588 and 13-0546, respectively) are provided. Also provided, are the filing dates of the Plan, Objections and last date for Commission action (drop dead) in 2015, 2014 and 2013.

## II. COMMENTS AND OBJECTIONS TO THE PROCUREMENT PLAN

### A. 7.1.5.3 The Commission should exclude the Programs for which Ameren Illinois asserts the cost exceeds the cost of supply.

The IPA rejects Ameren Illinois Company's d/b/a Ameren Illinois ("Ameren") recommendation to exclude two energy efficiency programs from the Plan based upon Ameren's argument that the cost of the programs exceed the cost of supply. (Plan, 97.) Staff agrees with the IPA that Ameren's analysis of whether particular programs' costs exceed the "cost of the supply" does not comport with the consensus, reached in prior years, that Section 111.5B(a)(3)(E) of the PUA can be interpreted as the total resource cost ("TRC") test. Staff does not, however, agree with other statements made by the IPA in Section 7.1.5.3. In particular, while all the programs or measures included in the procurement plan must be cost-effective using the Illinois TRC test,<sup>4</sup> the fact that the statute sets forth a number of additional analyses to include with the utilities' energy efficiency assessments means that information other than the results from the TRC test should be considered by the IPA and the Commission when determining which programs or measures should be approved as part of the Plan. The Commission should consider the TRC test to be a minimum requirement in deciding whether programs or measures should be approved as part of the Plan.

In assessing whether energy efficiency programs should be included in the Plan, the Commission should be mindful of the analysis provided by Ameren concerning the significant burden imposed upon small business and residential ratepayers with the

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<sup>4</sup> Section 5/16-111.5B(b) of the PUA defines the term cost effective to have the meaning set forth in subsection (a) of Section 8-103. Section 8-103(a) of the PUA defines cost effective to mean measures that satisfy the total resource cost test.

approval of each additional energy efficiency program. Specifically, Ameren notes that the Commission has previously approved \$38 million in spending on energy efficiency programs for program year 9 (“PY9”)<sup>5</sup> (2016) (as part of the PY8 (2015) IPA Procurement Plan’s two-year energy efficiency programs) and that approval of all of the programs Ameren recommends for inclusion with respect to this year’s PY9 (2016) IPA Procurement Plan, which excludes the two programs that Ameren contends exceed the cost of supply, would increase approved spending for PY9 to \$49 million. (Plan, Appendix B (Section 16-111.5B submittal) -- 2016 IPA Procurement Plan, 2-3.) Ameren explains that unlike the Section 5/8-103 energy efficiency portfolio, for which costs are recovered from all rate classes including the medium and large businesses (DS-3 and DS-4), the costs related to the Plan are borne only by the DS-1 and DS-2 rates classes and states:

The impact on Ameren Illinois DS-1 (residential) and DS-2 (small business) customer bills attributable to energy efficiency spending is significant. Prior to June 1, 2013, when the IPA began accepting energy efficiency programs as an alternative to supply, the average annual electric energy efficiency rider charges (via Rider EDR) totaled approximately \$20 for DS-1 customers and \$61 for DS-2 customers for energy efficiency programs procured as part of the Section 5/8-103 portfolio. For PY9, the annual cost of electric energy efficiency procurement (under both Section 5/8-103 and Section 5/16-111.5B) will rise to approximately \$55 for DS-1 customers and \$175 for DS-2 customers, over half of which will be attributable to energy efficiency procured as part of the IPA Procurement Plan.<sup>[6]</sup> This represents about a 175% and 187% increase, respectively, in annual Rider EDR costs for DS-1 and DS-2 customers since the IPA started procuring energy efficiency.

(Plan, Appendix B (Section 16-111.5B submittal) -- 2016 IPA Procurement Plan, 2-3.)

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<sup>5</sup> Program Year 9 runs from June 1, 2016 through May 31, 2017.

<sup>6</sup>These estimates assume the IPA includes and the Commission approves only those programs recommended to be included as part of the 2016 IPA Procurement Plan as identified in this submission.

Given the impact of these significant increases in energy efficiency costs on small business and residential ratepayers, information other than the results from the TRC test should be considered by the Commission when determining which energy efficiency programs or measures should be approved as part of the Plan. Ameren has identified two programs that it believes exceed the cost of supply. Ameren estimates that removal of these two programs would result in a decrease in costs to ratepayers of \$754,535. (Plan, Appendix B (Section 16-111.5B submittal) -- 2016 IPA Procurement Plan, 23.) While Staff does not agree that Ameren's cost of supply analysis is consistent with Section 111.5B(a)(3)(E) of the PUA, Staff believes it does provide another data point for the Commission's consideration in making the determination of which additional energy efficiency programs should be approved in this proceeding, if any. For these reasons, Staff supports Ameren's recommendation that the Commission should not approve the two less competitively priced energy efficiency programs as part of the Plan. (Plan, Appendix B (Section 16-111.5B submittal) -- 2016 IPA Procurement Plan, 23.) Staff also believes that if the Commission rejects the two costlier programs it will send a clear signal to bidders that they should put forth competitive pricing in next year's RFP process, which is beneficial to ratepayers.

**B. 7.1.6.4 The Commission should exclude the Commonwealth Edison Company ("ComEd") Performance Risk Programs from the Plan.**

The Plan states:

ComEd does not, however, recommend that such programs not be included in the IPA's Plan or not approved by the Commission. The IPA agrees. Section 16-111.5B requires the IPA to include incremental "energy efficiency programs and measures it determines

are cost-effective.”<sup>[7]</sup> Under Section 16-111.5B, “the term ‘cost-effective’ shall have the meaning set forth in subsection (a) of Section 8-103 of this Act,”<sup>[8]</sup> meaning “that the measures satisfy the total resource cost test.”<sup>[9]</sup> As each of these measures passes the total resource cost test, it is the obligation of the IPA to include them in this procurement plan.

(Plan, 103.) Pursuant to Section 16-111.5B(a)(4) of the PUA, the IPA is not required to recommend approval of “all” cost-effective programs in its annual procurement plans. Statutory language must be given its plain and ordinary meaning. People v. Fink, 91 Ill. 2d 237, 239 (1982). Where statutory language is clear it must be given effect. Hadley v. Illinois Department of Corrections, 224 Ill. 2d 365, 371 (2007); GMC v. State Motor Vehicle Review Board, 224 Ill. 2d 1, 13 (2007). The requirement under the law is that the programs or measures included in the Plan must be cost-effective (220 ILCS 5/16-111.5B(a)(4)), not that “all” cost-effective programs or measures must be recommended for approval in procurement plans. A program projected to be cost-effective but which is duplicative with the utilities’ existing Section 8-103 energy efficiency programs may be excluded for sound reasons, as indicated by the Commission in the 2014 Procurement Plan docket. Illinois Power Agency, ICC Order Docket No. 13-0546, 148-149 (December 18, 2013). For the programs and measures included in the procurement plans, among other things, they have to fully capture the potential for “all achievable cost-effective savings, to the extent practicable.” 220 ILCS 5/16-111.5B(a)(5). The legislature has given the IPA discretion in determining what to include in a plan. The IPA is to assess opportunities to expand the energy efficiency programs that have been offered under

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<sup>7</sup> 220 ILCS 5/16-111.5B(a)(4).

<sup>8</sup> 220 ILCS 5/16-111.5B(b).

<sup>9</sup> 220 ILCS 5/8-103(a).

energy efficiency plans approved under Section 8-103 of the PUA or to implement additional cost-effective energy efficiency programs or measures. 220 ILCS 5/16-

111.5B(a)(2). Section 16-111.5B(a)(5) of the PUA provides that:

Pursuant to paragraph (4) of subsection (d) of Section 16-111.5 of this Act, the Commission shall also approve the energy efficiency programs and measures included in the procurement plan, including the annual energy savings goal, if the Commission determines they fully capture the potential for all achievable cost-effective savings, to the extent practicable, and otherwise satisfy the requirements of Section 8-103 of this Act.

220 ILCS 5/16-111.5B(a)(5) (emphasis added). Section 16-111.5B(a)(5) references Section 16-111.5(d)(4) of the PUA which provides that:

The Commission shall approve the procurement plan, including expressly the forecast used in the procurement plan, if the Commission determines that it will ensure adequate, reliable, affordable, efficient, and environmentally sustainable electric service at the lowest total cost over time, taking into account any benefits of price stability.

220 ILCS 5/16-111.5(d)(4) (emphasis added). The reference in Section 16-111.5B(a)(5) of the PUA to “all achievable cost-effective savings, to the extent practicable” requires the Plan to provide electric service at the “lowest total cost over time.” In addition, Section 16-111.5B(a)(3) sets forth a number of other metrics that the utilities must include with the energy efficiency assessments they submit to the IPA. 220 ILCS 5/16-111.5B(a)(3)(D)-(E). In particular, Section 16-111.5B(a)(3) requires the utilities to provide the following:

(D) Analysis showing that the new or expanded cost-effective energy efficiency programs or measures would lead to a reduction in the overall cost of electric service.

(E) Analysis of how the cost of procuring additional cost-effective energy efficiency measures compares over the life of the measures to the prevailing cost of comparable supply.

Id. While all the programs or measures included in the Plan must be cost-effective using the Illinois TRC test,<sup>10</sup> the fact that the statute sets forth a number of additional analyses to include with the utilities' energy efficiency assessments means that information other than the results from the TRC test must be considered by the IPA and the Commission when determining which programs or measures should be approved as part of the Plan. Again, the Commission should consider passing the TRC test to be a minimum requirement in deciding whether the programs or measures should be approved as part of the Plan. Further, Section 16-111.5B(a)(3)(D) requires each energy efficiency program to pass the Utility Cost Test ("UCT").

The Plan states that "[i]f risk of non-performance rested with ratepayers or the administering utility, then qualitative program factors would need to be considered to protect those parties' interests." (Plan, 103.) Staff believes that it serves the public interest to use qualitative program factors in the analysis of third party bids in order to protect parties' interests. Staff notes that use of qualitative program factors in analyzing bids is reasonable and consistent with the approach currently used by the utilities in conducting the RFP process for the Section 8-103 energy efficiency programs. There is no logical reason for performing a less comprehensive review for the bids submitted pursuant to Section 16-111.5B in comparison to those submitted pursuant to Section 8-

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<sup>10</sup> Section 5/16-111.5B(b) of the PUA defines the term cost effective to have the meaning set forth in subsection (a) of Section 8-103. Section 8-103(a) of the PUA defines cost effective to mean measures that satisfy the total resource cost test.

103, especially given the fact that there is no explicit spending cap to protect ratepayers under Section 16-111.5B of the PUA as there is for Section 8-103 energy efficiency programs.

The Plan states that “under a pay for performance arrangement, the IPA understands risk of underperformance to rest with the winning bidders, and flawed program design will simply manifest itself in less payment for less performance.” (Plan, 103.) However, the pay-for-performance model that has been relied upon in the past has proven to be insufficient at insulating ratepayers and utilities from financial risk, due in part to large upfront payments being made to vendors without any demonstration of performance and relying primarily on truing up performance shortfalls after the end of the program year. As evidenced by testimony in the currently pending ComEd energy efficiency reconciliation docket, ICC Docket No. 14-0567, one of the Section 16-111.5B third party vendors became insolvent (Docket No. 14-0567, ComEd Ex. 3.0, 3:41-42) in late 2014 and did not perform under the pay-for-performance contracts, forcing ratepayers and/or the utility to cover the loss of approximately \$390,000. Therefore, the IPA and the Commission should consider qualitative program factors when analyzing and evaluating whether to accept bids for Section 16-111.5B programs.

The Plan states:

Additionally, the IPA understands that the utilities plan to make adjustments in RFP development to help ensure that any winning bidders may not be significantly compensated prior to demonstrating achieved savings.

(Plan, 103.) In order to ensure such adjustments are made through the RFP process next year to protect ratepayers, Staff recommends the Commission explicitly direct Ameren

and ComEd to make adjustments in RFP development to help ensure that any winning bidders may not be significantly compensated prior to demonstrating achieved savings in order to protect ratepayers, while still providing the utilities a significant amount of flexibility in determining the best way to accomplish that through the development of the RFPs. While qualitative factors should be analyzed and considered when analyzing the bids for Section 16-111.5B, it is possible to reduce the financial risk to ratepayers and utilities through more effective pay-for-performance contracting. For example, utilities could minimize the risk of unrecoverable start-up cost expenditures through performance bonding.

Nevertheless, for the sake of the current Plan and programs at issue in this proceeding, Staff notes that a utility's decision whether or not to make adjustments in RFP development for next year's Section 16-111.5B process does not necessarily provide sufficient protection for ratepayers for the programs that the IPA proposed for inclusion in this Plan. Thus, Staff recommends that the Commission direct the utilities to incorporate safeguards to protect ratepayers when finalizing contract terms for the programs approved in this proceeding such that vendors may not be significantly compensated prior to demonstrating achieved savings, while still providing the utilities a significant amount of flexibility in determining the best way to accomplish that through contract provisions. Staff also recommends that the Commission consider qualitative program factors when analyzing and evaluating whether to approve the Section 16-111.5B programs contained in the Plan. Specifically, Staff recommends the Commission reject the four energy efficiency programs that the IPA included in the Plan that were identified by ComEd and stakeholders as "performance risk."

Additionally, some of what is characterized as qualitative program factors may be better accounted for within TRC analyses. For example, if a program design is infeasible or impossible to carry out, then the expected benefits from the program should be reduced or eliminated for purposes of the TRC analysis. With respect to the current programs identified as a performance risk, Staff believes the “performance risk” programs should not have been included in the IPA’s Plan because they are not cost-effective once reasonable TRC input assumptions are used.

ComEd and stakeholders failed to adjust the TRC inputs to reflect reasonable input assumptions based on the identified performance risk of such programs. Likewise the IPA made no adjustments to ComEd’s TRC analysis of these programs – one reason noted in the Plan is that the IPA does not have access to ComEd’s TRC software and thus could not perform any revised cost-effectiveness analysis of the programs. (Plan, 101.) This makes it even more critical for ComEd to do its due diligence when performing the cost-effectiveness analysis of the programs. ComEd has been running energy efficiency programs in its service territory for 7-8 years now, meaning ComEd has extensive expertise concerning what realistic planning assumptions are. ComEd should not rely solely on the information provided by vendors in performing the TRC analysis of the bids when it is aware of adjustments that would better reflect reality and reasonable inputs. As evidenced by testimony in the currently pending ComEd energy efficiency reconciliation docket, ICC Docket No. 14-0567, there has already been several cases where an approved Section 16-111.5B program has fell significantly short of its estimated participation targets and savings proposed in their bid. These shortfalls highlight the need for ComEd to make reasonable adjustments when performing the TRC analysis of the

Section 16-111.5B bids in order to provide for more realistic TRC results of the programs for the Commission's consideration. The Commission should direct ComEd to make adjustments to its TRC analysis of bids to reflect reasonable assumptions, consistent with the approach used by Ameren.

Staff notes some of ComEd's TRC assumptions that do not pertain to the amount of first year savings are also unreasonable. For example, the measure life values for one of the "performance risk" programs appeared to Staff to be incorrect. Staff requested evidence to support those values, but ComEd provided no support and failed to follow-up with the vendor to obtain support in response to Staff's request. (ComEd's Resp. to Staff DR JHM 1.02.) Alternatively, when Ameren performed the TRC analysis of the same program, it followed up with the vendor and learned that the original measure life length specified in the bid was incorrect. (Ameren's Resp. to Staff DR JHM 1.) Ameren made adjustments to the TRC analysis accordingly. Thus, Staff believes the TRC analysis ComEd performed for this "performance risk" program is incorrect and overstates the likely benefits of the program.

For the above reasons, Staff recommends the Commission reject the performance risk programs. Staff further recommends the Commission direct ComEd and Ameren to take all reasonable steps to reduce the financial risk to ratepayers and utilities through more effective pay-for-performance contracting. Finally, Staff recommends that the Commission direct ComEd and Ameren to take all reasonable steps to make adjustments to their TRC analysis of bids to reflect reasonable assumptions (consistent with the approach used by Ameren).

**C. 7.1.7 The Commission should find that Section 16-111.5B does not apply to MidAmerican Energy Company (“MEC”).**

Section 7.1.7 of the Plan states that utilities participating in the IPA’s procurement process are required, under Section 16-111.5B of the PUA, to provide additional information regarding their energy efficiency programs and measures to the IPA. (Plan, 104.) MEC’s energy efficiency submittal is attached as Appendix D to the Plan. Id. In its submittal, MEC states that the following subsections to Section 16-111.5B(a) do not apply to MEC: (3)(B) (recent Section 8-103A study), (3)(C) (identification of new or expanded measures), (3)(D) (cost analysis), (3)(E) (comparison analysis), (3)(F) (energy savings goals), and (3)(G) (reduced need to procure supply). According to MEC, it is not subject to these subsections because the subsections rely upon Section 8-103 applying to the utility. However, subsection (h) of Section 8-103 exempts electric utilities, like MEC, that on December 31, 2005 provided electric service to fewer than 100,000 customers in Illinois. (Plan, Appendix D (Election to Procure Power and Energy – 2016 IPA Procurement Plan), 6-8.) The Plan concludes that MEC’s energy efficiency submission meets the requirements of Section 16-111.5B, but, also, invites further feedback on the issue. (Plan, 104-105.)

Staff agrees with the IPA that subsections 16-111.5B(a)(3)(B) through (G) do not apply to MEC. Section 16-111.5B only applies to a utility if the utility is subject to Section 8-103. And, Section 8-103 does not apply to MEC since MEC provided electric service to fewer than 100,000 customers in Illinois on December 31, 2005 (220 ILCS 5/8-103(h)). (Plan, 19, footnote 102.) Moreover, cost recovery of Section 16-111.5B energy efficiency programs and measures is permitted under Section 16-111.5B(a)(6) only through a tariff established pursuant to Section 8-103. Because Section 8-103 does not apply to MEC,

it does not have a Section 8-103 tariff. Consequently, MEC does not have a funding mechanism for additional energy efficiency programs and measures. Accordingly, MEC cannot be required to implement additional energy efficiency programs and measures.

Because Section 16-111.5B does not apply to MEC, it is not necessary to seek comments from interested parties on the applicability of Section 16-111.5B to MEC for this Plan or any future plan. Accordingly Staff recommends the following revisions to the Plan.

Based on the foregoing, the IPA believes that MidAmerican's July 15, 2015 submittal meets the requirements of Section 16-111.5B as it applies to that utility. ~~However, in comments this draft Plan, the IPA invites further feedback from interested parties on the applicability of Section 16-111.5B to MidAmerican for this Plan, and in the future.~~

(Plan, 104-105.)

### III. CONCLUSION

Staff respectfully requests that the Illinois Commerce Commission make note of Staff's objections to the Plan and approve Staff's recommendations in this docket. If the Commission ultimately accepts Staff's objections or any other changes to the Plan, the Commission should also direct the IPA to file a revised procurement Plan as a compliance filing in accordance with 20 ILCS 3855/1-75(f).

Respectfully submitted,

/s/

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*Counsel for the Staff of the  
Illinois Commerce Commission*

October 5, 2015

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ILLINOIS COMMERCE COMMISSION**

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**ILLINOIS POWER AGENCY**

**Petition for Approval of the 2016 IPA  
Procurement Plan pursuant to  
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**Docket No. 15-0541**

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**AFFIDAVIT OF JENNIFER HINMAN MORRIS**

State of Illinois            )  
  )  
County of Sangamon        )

The undersigned, under oath, deposes and states as follows:

1. My name is Jennifer Hinman Morris. I am employed by the Illinois Commerce Commission as an Economist in the Commission's Policy Division.
2. I have read the Staff of the Illinois Commerce Commission's Objections to the Illinois Power Agency's 2016 Procurement Plan ("Objections").
3. I have personal knowledge of the facts and matters discussed in the Objections and, to the best of my knowledge, information and belief, the facts and non-legal opinions expressed in the Objections are true and accurate and, if sworn as a witness, I could testify concerning them.

Further affiant sayeth not.

Jennifer Hinman Morris  
Jennifer Hinman Morris

Subscribed and sworn to before me

This 5<sup>th</sup> day of October 2015.

Lisa Bowman  
Notary Public

