

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

The Illinois Power Agency)
)
Petition for Approval of the 2016 IPA) **Docket No. 15-0541**
Procurement Plan Pursuant to Section)
16-111.5(d)(4) of the Public Utilities Act)

**THE RENEWABLES SUPPLIERS’ REPLY TO RESPONSES TO OBJECTIONS
TO THE ILLINOIS POWER AGENCY’S 2016 PROCUREMENT PLAN**

The Renewables Suppliers (sometimes referred to herein as the “RS”) submit this Reply to the Responses of certain parties to the Renewables Suppliers’ Objections to the Illinois Power Agency’s (“IPA”) 2016 Procurement Plan.¹ The Renewables Suppliers are replying to the Responses of the IPA, Commission Staff (“Staff”), Commonwealth Edison Company (“ComEd”) and Ameren Illinois Company (“AIC”). The issues addressed in this Reply relate to Section 8, Renewable Resources Availability and Procurement, of the IPA Plan and the related Action Plan items at pages 6-7 of the IPA Plan.

I. March 2016 Load Forecast Updates

In their Objections, the Renewables Suppliers proposed three alternatives regarding the IPA’s proposal that the Commission “pre-approve” curtailments of the existing long-term bundled renewable resources power purchase agreements (“LTPPAs”) if the updated load forecasts to be submitted by the electric utilities in March 2016 show a need for curtailments and those load forecast updates are concurred in by the utility, the IPA, Staff, and the Procurement Monitor.² The three alternatives proposed by the Renewables Suppliers were:

- (1) Based on the large margins between the electric utilities’ load forecasts for the 2016-2017 Delivery Year and the load levels that would result in a need for curtailments, the Commission can determine in its Order in this proceeding that no LTPPA curtailments will be needed for the 2016-2017 Delivery Year.

¹ The Renewables Suppliers are comprised of: (1) Invenergy LLC and its affiliated project companies Grand Ridge Energy IV LLC and Invenergy Illinois Solar I LLC, and (2) NextEra Energy Resources, LLC and its subsidiary project company FPL Energy Illinois Wind, LLC.

² Objections of the Renewables Suppliers Regarding the Illinois Power Agency’s 2016 Procurement Plan (“RS Objections”) at 1-4.

- (2) Alternatively, the Commission should require the utilities to file their March 2016 load forecasts in this docket, allow interested parties 14 days to file comments, and then the Commission should determine what load forecast should be used for the 2016-2017 Delivery Year: the utility's July 2015 forecast, the updated March 2016 forecast, or a modified forecast adopted by the Commission based on consideration of all the information provided.
- (3) Alternatively, if the Commission wishes to continue with the "consensus" process for considering and adopting Spring load forecast updates, the consensus of the utility, the IPA, Staff, the Procurement Monitor, and the impacted LTPPA supplier(s) should be required to adopt an updated forecast that results in a curtailment.³

In reply to other parties' Responses to these proposals, and to clarify, although the Renewables Suppliers presented these proposals as alternatives, they believe that proposal (2) above is the superior alternative. The Renewables Suppliers agree that, all other things equal, using a load forecast that is prepared closer to the start of the Plan/Delivery Year, and therefore is based on more current information than the load forecast submitted in the previous July, is better than using the load forecast that was prepared in the previous July, eleven months (or longer) prior to the start of the Plan/Delivery Year.⁴ Thus, to be clear, the Renewables Suppliers are not trying to do away with Spring load forecast updates. However, as stated in their Objections and Response, the Renewables Suppliers believe that the load forecast used as the basis for Procurement Plan activities for a utility (whether the original July forecast or an updated Spring forecast) should be adopted by the Commission after interested parties have had an opportunity to comment on the proposed load forecast or load forecast update.

ComEd contends that the Renewables Suppliers' first proposed alternative is an "unlawful" attempt to prevent curtailments in compliance with the Renewable Portfolio Standard ("RPS") rate caps. ComEd Response at 1-3. The Renewables Suppliers' first proposal is no more "unlawful" in this regard than is the adoption of Spring load forecast updates prepared

³ The Renewables Suppliers stated in their Response that they do not object to ComEd's and Ameren's position that consensus should be required to adopt any load forecast update, even if it does not result in a curtailment of LTPPAs. Renewables Suppliers' Responses to Certain Objections to the Illinois Power Agency's 2016 Procurement Plan ("RS Response"), at 7.

⁴ A Plan Year or Delivery Year begins on June 1 and runs to May 31 of the following year.

several months before the start of the Plan Year. At some point, the final load forecast that will be the basis for activities under the IPA Plan during the Plan Year has to be adopted, even though events may (and probably will) occur subsequently that will cause actual results to deviate from the adopted forecast. For example, customer switching after a Spring load forecast update is adopted could result in a utility's load dropping to a level that would have required a curtailment of the LTPPAs had there been perfect foresight as to actual load. The Renewables Suppliers' first alternative proposal simply reflects the facts that (1) at some point, a final load forecast to use as the basis for activities under the IPA Plan in the 2016-2017 Plan Year must be adopted, and (2) ComEd's current load forecast shows sufficient margin between its forecasted eligible retail customer load and the load levels that would necessitate a curtailment, that the Commission can determine in this proceeding (by adopting ComEd's current load forecast as the final load forecast) that no curtailment of LTPPAs will be necessary in 2016-2017.⁵

Further, the Renewables Suppliers acknowledge, and do not dispute, that if the approved load forecast shows that RPS rate caps would be violated, curtailments of renewable resources contracts may be necessary to bring the renewables purchases for the Delivery Year within the rate cap limits. Renewables Suppliers' objection is to the possibility – which Action Plan item no. 7 in the IPA Plan (IPA Plan at 7) would authorize – that curtailments could be based on a revised load forecast that is neither reviewed nor approved by the Commission and which the directly-impacted parties are given no opportunity to comment on.

The Renewables Suppliers acknowledge (as they did in their Response, at 8) that the current “consensus” process for adopting Spring load forecast updates has been used in previous years. (*See, e.g.*, Staff Response at 4-5; IPA Response at 23; ComEd Response at 4.) However, this process does not result in *the Commission* adopting the load forecast to be used for the Procurement Plan, as required by 220 ILC 5/16-111.5(d)(4). RS Response at 8. The Renewables

⁵ The Renewables Suppliers only have LTPPAs with ComEd, not with AIC.

Suppliers also acknowledge that this proceeding provides the opportunity to review and comment on the basic methodologies and formulas used in the electric utilities' load forecasts, and that the Spring update typically (although not necessarily) involves only adjusting the values of inputs and assumptions used in the established methodologies and formulas. (*See Staff Response at 5-6.*) In fact, the Renewable Suppliers have reviewed the utilities' load forecasts in the IPA Plan, and have not found it necessary to propose any changes to the methodologies and formulas or to the inputs and assumptions currently used.⁶ Indeed, in recommending that the Commission declare in its December 2015 Order in this case that no curtailments will be needed in the 2016-2017 Delivery Year, the Renewables Suppliers are relying on the reasonableness of the current load forecasts submitted by the utilities. However, changes to inputs and assumptions in the Spring 2016 updates, even with no changes to the underlying methodologies and formula, could be significant, material, and controversial, and therefore potentially-impacted parties should have an opportunity to comment before an updated load forecast is adopted as the basis for 2016-2017 activities under the IPA Procurement Plan.

Contrary to the discussion in the IPA Response (at 24), the Renewables Suppliers have not contended that the Spring load forecast updates could be "manipulated" to produce curtailments. However, the Renewables Suppliers are concerned that if there were significant changes to the inputs and assumptions used in the Spring load forecast updates, then, under the process supported by the utilities, IPA and Staff, these changes could result in curtailments of the LTPPAs based on a significantly revised load forecast that the Renewables Suppliers have had no opportunity to comment on and the Commission has neither reviewed nor approved.

Regarding the Renewables Suppliers' alternative proposal that they be allowed to participate (along with the utilities, the IPA, Staff and the Procurement Monitor) in the process of determining whether the March 2016 updated load forecasts should be adopted, ComEd and

⁶ In previous IPA Procurement Plan proceedings, the Renewables Suppliers have submitted comments on the utilities' load forecasts. *See* Order in Docket 13-0546 (Dec. 18, 2013) at 181-182.

AIC argue that the utilities have no financial interest in the final load forecasts that are adopted, whereas LTPPA suppliers do have a financial interest. ComEd Response at 4; AIC Response at 5. This, however, is precisely the Renewables Suppliers' point: the entities that will be directly, and potentially adversely, impacted by a change in the load forecast should have input in the process. Further, the participation of parties that have a specific interest in the outcome can bring to the process a sharper perspective and identification of points and issues that the "neutral" parties who have no interest in the outcome might overlook. In any event, as noted above, the Renewables Suppliers' preferred alternative is to require the load forecast updates to be filed in this docket, allow a short period for interested parties to file comments, and then the Commission determines whether a revised load forecast should be adopted.

AIC states, with respect to the Renewables Suppliers' second alternative proposal, that there is insufficient time to allow comments to be submitted by interested parties on the Spring load forecast updates and for the Commission to issue a ruling. AIC Response at 5. This concern should not preclude adoption of the Renewables Suppliers' proposal. The Plan Year to which the Spring load forecast pertains does not begin until June 1. For the current Plan Year (June 1, 2015 – May 31, 2016), AIC's Spring load forecast update was filed with the Commission on March 25, 2015, and ComEd's update was filed with the Commission on April 6, 2015 (*see* these filings on e-docket for Docket 14-0588, the 2015 IPA Plan case). The Renewables Suppliers have proposed a 14 day period after the load forecast updates are filed in the applicable docket for interested parties to file any comments, after which the Commission would issue an order on whether a revised load forecast should be adopted. It would require only a modest advancement of the date on which the load forecast updates are filed to alleviate AIC's timing concern with the Renewable Suppliers' proposal.

Staff contends that the existing "consensus" process for adopting the Spring load forecast updates has "worked well" in the past. Staff Response at 5. However, this process has never

been stressed by the introduction of revised inputs and assumptions that resulted in a significant change from the July load forecast included in the filed IPA Plan, resulting in curtailments of the LTPPAs. Given the electric utilities' current load forecasts included in the filed IPA Plan, input and assumption changes large enough to drop the forecasts to a point at which LTPPA curtailments are required would be significant and controversial. Such a materially-changed load forecast should not be adopted by the consensus of the utility, the IPA, Staff, and the Procurement Monitor, but rather should be adopted by the Commission after potentially-impacted parties have had an opportunity to comment on the updated load forecast.

The Renewables Suppliers reiterate that, regardless of whether the "consensus" process for adopting Spring load forecast updates has been used in previous years or has "worked well" in past years, this process results in adoption of a load forecast, as the basis for the approved Procurement Plan, that has not been "expressly" approved by the Commission, as required by 220 ILCS 5/16-111.5(d)(4). If the Commission is going to approve the use of post-final Order load forecast updates to replace the forecasts submitted with and approved as part of the IPA Plan, the Commission should do so through a process that allows potentially-impacted parties a due process opportunity to comment on the updated forecast and requires the Commission to actually review and approve the updated forecast. Accordingly, the Renewables Suppliers reiterate their recommendation that the Commission's Order should direct that the IPA Plan be modified to adopt the procedure for filing, review, and approval of the electric utilities' March 2016 load forecast updates set forth in the first full paragraph on page 4 of the Renewables Suppliers' Objections (modified, if the Commission deems it appropriate, to encompass all March load forecast updates, not just updates that would trigger curtailments of existing renewable energy resources procurement contracts).

II. Additional REC Procurements in the 2016-2017 Plan Year

The Renewables Suppliers proposed that the IPA Plan should include an additional utility

procurement event or events in 2016-2017 to procure REC under short-term (one to five year contracts) for delivery in the 2017-2018 through 2020-2021 Delivery Years. RS Objections at 4-8. These procurement(s) would contract for RECs to fill in some of the difference between renewable energy resources currently contracted for these Delivery Years and the electric utilities' currently projected RPS obligations for those years (based on their 5-year load forecasts included in the IPA Plan). However, because of the volatility of the electric utilities' eligible retail customer load in recent years, the Renewables Suppliers proposed that the REC procurement event(s) use no more than the following percentages of each utility's currently forecasted available Renewable Resources Budget (Available RPS Funds) for the 2017-2018 through 2020-2021 Delivery Years:

Delivery Year 2017-2018:	30%
Delivery Year 2018-2019:	25%
Delivery Year 2019-2020:	20%
Delivery Year 2020-2021:	10%

ComEd, AIC, and the IPA argue, with varying degrees of vigor, that the Renewables Suppliers' proposal ignores the risks presented by customer switching. ComEd Response at 6; AIC Response at 2-3; IPA Response at 20-21. These Responses fail to address the specifics of the Renewables Suppliers' proposal. The Renewables Suppliers explicitly recognized the recent volatility of the electric utilities' eligible retail customer loads, and proposed that a REC procurement event or events for the electric utilities be included in the IPA's 2016 Plan (1) in which RECs would be procured under contracts of 1 year to no more than 5 years duration, (2) to procure only a portion of the difference between each electric utility's currently forecast RPS obligation for each of the 2017-2018 through 2020-2021 Delivery Years and its currently contracted renewable energy resources supply for those years, and (3) using only a small portion (as listed immediately above) of each electric utility's currently forecasted Available RPS Funds for these years, with a lower percentage of Available RPS Funds being applied to the REC

procurements in each of years 2 through 5 in the 5-year forecast period. RS Objections at 5-8.

The Renewables Suppliers certainly did not propose that the IPA conduct procurement events in the 2016-2017 Plan Year to secure all, or anywhere close to all, of the difference in years 2 through 5 between each electric utility's currently projected RPS requirement and its currently contracted renewable energy resources supply.⁷ Rather, the Renewables Suppliers have proposed a conservative approach to provide for some additional electric utility REC procurements for wind and solar RECs during the 2016-2017 Plan Year while respecting the recent volatility of the utility's eligible retail customer loads as well as the increasing uncertainty associated with load forecasting the farther into the future one goes in the five-year forecast period. Instead of erroneously criticizing the Renewables Suppliers for presenting a proposal that fails to take into account the risks of customer switching, it would have been useful for ComEd to provide some specific analysis of the risks associated with the modest level of REC procurements that the Renewables Suppliers are proposing. ComEd, however, failed to do so.⁸

Additionally, the Renewables Suppliers did not ignore the possibility of load reductions compared to forecasts over the 5-year forecast period and the resulting potential for curtailments. (See AIC Response at 3.) In addition to proposing that the 2016-2017 REC procurement event(s) procure only a portion of the currently forecasted uncontracted RPS requirement for the 2017-2018 through 2020-2021 Delivery Years, using only short-term contracts, the Renewables

⁷ Contrary to the description of the Renewables Suppliers' proposal in the IPA Response (at 22), the Renewables Suppliers recognized that what is shown by Tables 8-1 and 8-2 on pages 129-130 of the IPA Plan is the difference between each utility's currently-contracted renewable energy resources and its total RPS requirement based on its current load forecast, for the 2016-2017 through 2020-2021 Delivery Years. RS Objections at 5-7.

⁸ In contrast, AIC pointed out that under its "low" load forecast for 2016-2017, LTPPA curtailments would be needed in that year. AIC Response at 2; see also IPA Response at 24. The IPA Plan does not provide a conclusion as to the relative likelihood of AIC's "low" load forecast (or "high" load forecast) coming to fruition in the current 5-year forecast period. Nonetheless, the Renewables Suppliers recognize that there is a smaller difference (in percentage terms) between the Available RPS Funds for AIC and its Contracted REC Cost over the 5-year forecast period than there is for ComEd (Tables 8-4 and 8-5 on page 132 of the IPA Plan); therefore, greater conservatism may be appropriate in sizing a REC procurement in 2016-2017 for AIC than for ComEd.

Suppliers proposed (1) that the short term REC contracts provide that they will be subject to availability of Renewables Resources Budget funds for each Delivery Year based on the approved load forecast for that year, and (2) the short-term REC contracts would be subordinate to the LTPPAs in the event of curtailment. RS Objections at 7. AIC notes that the Renewables Suppliers did not propose any specific contract terms to implement these latter two provisions. AIC Response at 3. The Renewables Suppliers submit, however, that specific contract terms are better developed as part of the actual procurement process, taking into consideration input of all interested entities, rather than attempting to do so in this proceeding, which is time-constrained and provides little or no opportunity for discussion of possible alternative contractual terms⁹.

Finally, in objecting to the Renewables Suppliers' proposal, the other parties have ignored the importance of generating some activity, however modest, in the REC markets in Illinois during the 2016-2017 Plan Year. Perhaps more importantly, given (1) the substantial unspent balance in the IPA's Renewable Energy Resources Fund (\$116,573,040 at September 28, 2015, *see* IPA Plan at 137) and (2) the IPA's construction of §1-56 of the IPA Act that the IPA can only use the Renewable Energy Resources Fund to procure RECs "in conjunction with" a procurement for the electric utilities (*see* RS Response at 6; 20 ILCS 3855/1-56(c)), it is critical that utility procurement events for RECs be conducted during the 2016-2017 Plan Year so that REC procurements using the Renewable Energy Resources Fund can also occur. This will enable the IPA to begin to utilize some of the substantial accumulated balance in the Renewable Energy Resources Fund for its intended purpose.

III. IPA's Use of the Renewable Energy Resources Fund

In their Objections, the Renewables Suppliers did not make a specific proposal for the IPA's use of its substantial accumulated balance of monies in the Renewable Energy Resources

⁹ Section 16-111.5(e)(2) of the Public Utilities Act (220 ILCS 5/16-111.5(e)(2)) specifies the procedure for development of the contractual terms for procurements, with the Commission having ultimate authority if the procurement administrator and the utility cannot reach agreement.

Fund. However, in their Response, the Renewables Suppliers supported the Environmental Law and Policy Center's ("ELPC") recommendation that the IPA should use the Renewable Energy Resources Fund to procure RECs during the 2016-2017 Plan Year. The Renewables Suppliers did emphasize that any procurements by the IPA using the Renewable Energy Resources Fund should purchase RECs in approximately the percentages prescribed in §1-56(b) of the IPA Act, *i.e.*, 75% RECs from wind resources, 6% RECs from photovoltaic resources, and 1% RECs from distributed generation resources. RS Response at 6. Wind on the Wires ("WOW") made a similar point concerning the distribution among renewable resource types of REC purchases by the IPA using the Renewable Energy Resources Fund. WOW Response at 2.

The IPA points out that the Commission does not have authority to direct how the IPA will spend the funds in the Renewable Energy Resources Fund. IPA Response at 30-31; IPA Plan at 137. For present purposes, the Renewables Suppliers do not dispute this, but note two points. First, the Commission certainly can, and should, make recommendations to the IPA as to how the monies in the Renewable Energy Resources Fund can best be spent. The Renewables Suppliers strongly disagree with the IPA's statement that the Commission's Order approving the IPA Plan "should concern only those matters over which the Commission has jurisdiction, and that it would be inappropriate for the Commission to offer recommendations on planned disbursements from that fund" (IPA Response at 31). Second, it is important, in order to present an effective overall Procurement Plan for Illinois, that the IPA articulate with specificity how it intends to use the Renewable Energy Resources Fund. The final approved IPA Plan for the upcoming year should comprehensively set forth both the procurement activities that the Commission has approved and the procurement activities that the IPA plans to take that do not require Commission approval.

The inability, to date, of the IPA to fully and regularly spend funds accumulated in the Renewable Energy Resources Fund has been the biggest impediment to the development of a

vibrant renewable energy resources market in Illinois and to the utilization of renewable energy resources in this State to the extent envisioned by the General Assembly in enacting the IPA Act and the related Public Utilities Act amendments in 2007 (P.A. 95-481).¹⁰ Under the applicable statutory provisions, if a utility's eligible retail customers shift to alternative retail electric suppliers ("ARES"), through municipal aggregation programs or for other reasons, the ARES are subject to the same overall RPS requirements as the electric utilities, with the exception that an ARES must meet at least 50% of its RPS obligation by making Alternative Compliance Payments into the Renewable Energy Resources Fund. 220 ILCS 5/16-115D(a)-(b). The IPA is then expected to use the funds accumulated in the Renewable Energy Resources Fund to purchase RECs (IPA Act §1-56(b)-(c)), with the result that the overall procurement and use of renewable energy resources should not be materially impacted by the distribution of eligible retail customer load between the electric utilities and ARES. But if the IPA is unable, or fails, to use the Renewable Energy Resources Fund fully and regularly to purchase RECs, the process established by the General Assembly breaks down.

Further, a clear and definitive articulation by the IPA of its plans to use the Renewable Energy Resources Fund in the upcoming Plan Year helps to inform and shape the remainder of the Procurement Plan for the year. For example, if the IPA were to state definitively that it will use the Renewable Energy Resources Fund to make substantial purchases of RECs during the 2016-2017 Plan Year, this would somewhat reduce the need for and extent to which the IPA should be required to conduct utility procurement events for RECs during the 2016-2017 Plan Year as proposed by the Renewables Suppliers and ELPC.

Accordingly, the Renewables Suppliers continue to recommend that the Commission's Order in this proceeding should recommend to the IPA that (1) during the 2016-2017 Plan Year,

¹⁰ The Renewables Suppliers recognize that the non-use of the Renewable Energy Resources Fund has been due largely to circumstances and events beyond the IPA's control, such as the borrowing of monies in the Renewable Energy Resources Fund to be used to meet General Revenue Fund obligations.

the IPA should conduct procurements for RECs, using funds in the Renewable Energy Resources Fund, in conjunction with procurement events for the electric utilities; and (2) any such procurements using the Renewable Energy Resources Fund should, in the aggregate, procure RECs from wind, solar, and distributed generation resources in approximately the percentages stated in Section 1-56(b), specifically, 75% from wind resources, 6% from photovoltaic resources, and 1% from distributed generation resources.

III. Conclusion

The Renewables Suppliers respectfully request that the Commission adopt the Renewables Suppliers' recommendations as set forth in their Objections, Response, and this Reply, and that the Commission issue an order in this docket making determinations and issuing directives, including revisions to the IPA Plan, in accordance with the Renewables Suppliers' recommendations as set forth in their Objections, Response, and this Reply.

Respectfully submitted,

RENEWABLES SUPPLIERS

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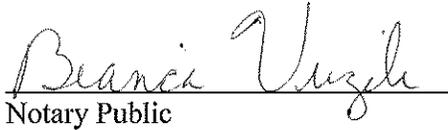
VERIFICATION

Craig Gordon, on oath, states that he is Vice President of Sales and Marketing for Invenergy LLC, one of the Renewables Suppliers; that he is authorized to make this verification on behalf of the Renewables Suppliers; that he has read the foregoing "Renewables Suppliers' Reply to Responses to Objections to the Illinois Power Agency's 2016 Procurement Plan" ("Renewables Suppliers' Reply") and is familiar with the matters set forth therein; and that the matters set forth in the Renewables Suppliers' Reply are true and correct to the best of his knowledge, information and belief.



Craig Gordon

Subscribed and sworn to before me
this 21st day of October, 2015.



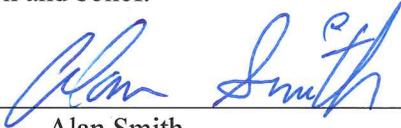
Notary Public



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VERIFICATION

Alan Smith, C.F.A, P.E., on oath, states that he is Regional Director, Business Management, for NextEra Energy Resources, LLC, one of the Renewables Suppliers; that he is authorized to make this Verification on behalf of the Renewables Suppliers; that he has read the foregoing "Renewables Suppliers' Reply to Responses to Objections to the Illinois Power Agency's 2016 Procurement Plan" ("Renewables Suppliers' Reply") and is familiar with the matters set forth therein; and that the matters set forth in the Renewables Suppliers' Reply are true and correct to the best of his knowledge, information and belief.

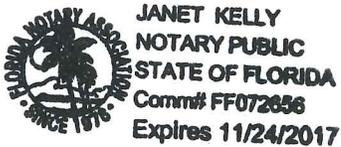


Alan Smith

Subscribed and sworn to before me
this 30 day of October, 2015.



Notary Public



CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused the Renewables Suppliers' Reply to Responses to Objections to the Illinois Power Agency's 2016 Procurement Plan in ICC Docket 15-0541 to be served on each of the persons on the Service List by e-mail on October 30, 2015.

/s/ Owen E. MacBride

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