

## Comments for Illinois Power Agency

Wanxiang New Energy appreciates the opportunity provided to the Illinois Power Agency to comment on the IPA's 2015 Draft Procurement Plan, released on August 15, 2014. Below are our comments:

1. Wanxiang New Energy has concerns about the total amount of solar RECs the Illinois Power Agency proposes that ComEd and Ameren procure for the 2015 energy year. We are hoping for clarification about how the IPA has decided on the figures it sets as targets for procurement in the 2015 energy year.

According to Illinois Commerce Commission data on retail electricity sales in Illinois, total sales to the ultimate consumer in Illinois as regulated by the Illinois Commerce Commission were 128,238.215 GWH in 2013. Assuming a similar figure for 2015, and bearing in mind that for 2015, the Illinois Power Agency Act and the Public Utility Act require both utilities and alternative retail energy suppliers (ARES) to have 10% of their total electricity be from renewable energy to meet the Renewable Portfolio Standard, *and* that 6% of the RPS must be from solar PV sources, that implies around 769 GWH of solar PV need to be procured for 2015.

However, in the IPA's 2015 Draft Procurement Plan, it sets a target for ComEd and Ameren to procure a combined 118 GWH of solar. That leaves around 651 GWH of solar missing.

Furthermore, from the ICC's data of electricity retail sales for 2013, Ameren and ComEd had a combined retail energy sales figure of 28,253.972 GWH. This figure was reached by combining the total megawatt hours of fixed price services and hourly priced services of both utilities. Assuming a similar figure for 2015, and considering the Illinois Power Agency Act for this year requires 10% of the utilities' electricity to come from renewable energy to meet the Renewable Portfolio Standard, and that 6% of the RPS must be from solar PV sources, this suggests Ameren and ComEd's combined solar procurement for 2015 should be around 169 GWH.

However, in the IPA's 2015 Draft Procurement Plan, it sets a target for ComEd and Ameren to procure a combined 118 GWH. That leaves the combined total to be around 51 GWH short of meeting the requirement set forth by the Illinois Power Agency Act.

Wanxiang New Energy is simply curious about what accounts for the two gaps in figures listed in the preceding paragraphs.

Wanxiang New Energy urges the Illinois Power Agency and Illinois Commerce Commission to approve a plan that ensures the Renewable Portfolio Standards, as required by the Illinois Power Agency Act and the Public Utility Act, are met for the 2015 energy year. According to those rules, at least 10% of Illinois retail electricity sales as regulated by the ICC should be from renewables, and at least 6% of those renewables should be from solar PV. Therefore, at least .6% of retail electricity sales as regulated by the ICC for the 2015 energy year should be from solar PV.

2. Wanxiang New Energy seeks clarification on the geographic location requirements of the facilities from which the energy/REC sources are to be procured, in particular the Solar Renewable Energy Credits. We believe the IPA and ICC should give first preference to SRECs produced in Illinois. The money to be spent on the procurement comes from Illinois companies to create jobs and promote Illinois commerce. It is not fair to Illinois businesses and utilities if that money then goes out of state. The procurement money should remain in Illinois to support Illinois businesses and to create high paying jobs for Illinois workers. Otherwise the procurement may not promote development or produce new jobs in Illinois.

Thank you very much for considering Wanxiang New Energy's comments.