



September 13, 2018

Mr. Mario Bohorquez - Planning and Procurement Bureau Chief  
Illinois Power Agency (IPA)  
Via Email – mario.bohorquez@illinois.gov

**Ameren Illinois' Comments to the IPA's Draft Plan  
For Period June 2019 – May 2024**

Dear Mr. Bohorquez:

Pursuant to Section 16-111.5(d)(2) of the Public Utilities Act, Ameren Illinois respectfully submits informal comments to the Draft Plan, which the Illinois Power Agency (IPA) released for public review and comment on August 15, 2018. More formal comments may be provided in the docketed proceeding before the Illinois Commerce Commission (ICC).

Ameren Illinois compliments the IPA regarding its past success and the thoughtful manner in which the Draft Plan was developed.

**ENERGY PROCUREMENTS**

**Ameren Illinois supports the IPA's recommendations, which are summarized in Table 1-1 of the Draft Plan and include:**

**Prompt Year (2019/2020)**

- Spring 2019 event, which procures the summer period at 100% hedge (except July/August peak at 106%) and the non-summer period at 75% hedge.
- Fall 2019 event, which procures the remaining non-summer to achieve 100% hedging.

**Prompt Year + 1 (2020/2021)**

- Spring 2019 event, which procures half of the quantity necessary to achieve 50% hedging by the end of the Fall 2019 procurement.
- Fall 2019 event, which procures the remaining quantity to achieve 50% hedging.

**Prompt Year + 2 (2021/2022)**

- Spring 2019 event, which procures half of the quantity necessary to achieve 25% hedging by the end of the Fall 2019 procurement.
- Fall 2019 event, which procures the remaining quantity to achieve 25% hedging.

Final quantities for the Spring 2019 procurement would be based on an updated forecast in March 2019 subject to consensus by the IPA, ICC Staff, Procurement Monitor and Ameren Illinois. Final

quantities for the Fall 2019 procurement would be based on an updated forecast in July 2019, also subject to consensus by the IPA, ICC Staff, Procurement Monitor and Ameren Illinois.

### **CAPACITY PROCUREMENTS**

**Ameren Illinois supports the IPA's recommendations, which are summarized in Table 1-2 of the Draft Plan and include:**

#### **Prompt Year (2019/2020)**

- Not applicable for this plan, but bilateral procurement quantities from the prior plan are now complete totaling a 50% hedge.

#### **Prompt Year + 1 (2020/2021)**

- Spring 2019 event, which seeks to bilaterally procure a quantity equal to a 25% hedge.
- Fall 2019 event, which seeks to bilaterally procure the remaining quantity to achieve a 50% hedge.

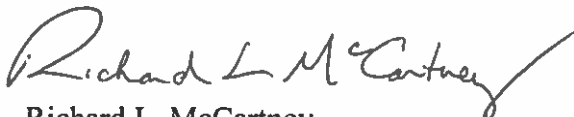
#### **Prompt Year + 2 (2021/2022)**

- Spring 2019 event, which seeks to bilateral procure a quantity equal to a 12.5% hedge.
- Fall 2019 event, which seeks to bilateral procure the remaining quantity to achieve a 25% hedge.
- Any remaining bilateral procurement quantity to be determined in the 2020 IPA plan.

In the event of regulatory or legislative changes that render the capacity procurements unnecessary, the procurements would be cancelled upon consensus of the IPA, ICC Staff, Procurement Monitor and Ameren Illinois.

We appreciate the opportunity to provide the foregoing comments.

Sincerely,



Richard L. McCartney  
Director, Power Supply Acquisition  
Ameren Illinois Company

Copy:

Anthony Star, Brian Granahan, Sameer Doshi – Illinois Power Agency  
Jim Blessing, Justin Range, Greg Weiss, Carol Garth, Jermaine Grubbs – Ameren Illinois