

**TO:** Illinois Commerce Commission  
Ameren Illinois Company  
Commonwealth Edison Company  
MidAmerican Energy Company  
Interested Parties

**FROM:** Anthony Star, Director

**RE:** **\*REVISED SCHEDULE\* FOR LONG-TERM RENEWABLE RESOURCES PROCUREMENT PLAN COMMENT, FILING, & APPROVAL**

**DATE:** September 3, 2019

In its Cover Letter dated August 15, 2019, the Illinois Power Agency (“IPA”) established a due date of September 16, 2019 (30 days after posting) for the receipt of written public comments on its Revised Long-Term Renewable Resources Procurement Plan (“Revised Plan”). This deadline would allow the Agency to conduct its public comment process “in conjunction with” the plan development and public comment process applicable to its annual electricity procurement plan.<sup>1</sup>

After discussions with the Staff of the Illinois Commerce Commission, the IPA believes there is, at minimum, a colorable argument that the 45-day public comment applicable to the publishing of the Agency’s Initial Long-Term Renewable Resources Procurement Plan should also apply to the development of its Revised Long-Term Renewable Resources Procurement Plan.<sup>2</sup> This reading of Section 16-111.5(b)(5)(ii) of the Public Utilities Act also extends to allowing the Agency 21 days to revise its Plan, allowing parties 14 days for Objections, and allowing the Commission 120 days for its review and approval.

The IPA strongly values the public comment process and wishes to ensure that no party receives any less opportunity to offer public comment than what that party could arguably be entitled to under Illinois law. Additionally, given the multitude of issues addressed in its Long-Term Renewable Resources Procurement Plan and the complexity of many of those issues, it understands that interested parties may benefit from additional time to prepare and submit written public comments.

Consistent with these principles, **the Agency will now be utilizing the following schedule for receiving written public comment on, revising, and filing its Revised Long-Term Renewable Resources Procurement Plan.**

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<sup>1</sup> See 20 ILCS 3855/1-75(c)(1)(A) (“The Agency shall review, and may revise on an expedited basis, the long-term renewable resources procurement plan at least every 2 years, which shall be conducted in conjunction with the procurement plan under Section 16-111.5 of the Public Utilities Act to the extent practicable to minimize administrative expense.”); 220 ILCS 5/16-111.5(b)(5)(ii)(B) (“To the extent practicable, the Agency shall review and propose any revisions to the long-term renewable energy resources procurement plan in conjunction with the Agency’s other planning and approval processes conducted under this Section.”).

<sup>2</sup> See 220 ILCS 5/16-111.5(b)(5)(ii)(B) (“An affected utility and other interested parties shall have 45 days following the date of posting to provide comment to the Agency on the initial long-term renewable resources procurement plan and all subsequent revisions.”).

**REVISED SCHEDULE**

**Monday, September 30, 2019:** New deadline for affected utilities and other interested parties to provide comments to the IPA on the draft Revised Plan.

Comments are required to be “specific, supported by data or other detailed analyses, and, if objecting to all or a portion of the procurement plan, accompanied by specific alternative wording or proposals.” (See 220 ILCS 5/16-111.5(b)(5)(ii)(B) [emphasis added])

**Monday, October 21, 2019:** The IPA plans to revise the draft Revised Plan, as necessary, based on the comments received, and intends to file the Revised Plan with the Illinois Commerce Commission (“Commission”) for review and approval by this date. (See 220 ILCS 5/16-111.5(b)(5)(ii)(B))

**Monday, November 4, 2019:** Within fourteen days, any person objecting to the Revised Plan may file an objection with the Commission, consistent with the timeline applicable to the Initial Plan. (See 220 ILCS 5/16-111.5(b)(5)(ii)(C))

**Tuesday, November 12, 2019:** The Commission, within twenty-one days of the filing of the Revised Plan,<sup>3</sup> will determine whether a hearing is necessary. (See 220 ILCS 5/16-111.5(b)(5)(ii)(C))

**Tuesday, February 18, 2020:** The IPA assumes a 120-day deadline for the Commission to enter its order confirming or modifying the Revised Plan, consistent with the time allowed for the approval of the Initial Plan. (See 220 ILCS 5/16-111.5(b)(5)(ii)(C))

The schedule for public hearings remains unchanged:

**Tuesday, September 3, 2019, 2:00 pm – 4:00 pm:** Illinois Commerce Commission Chicago Office, 160 North LaSalle Street, Chicago, Illinois. Room N808.

**Wednesday, September 4, 2019, 10:00 am – 11:30 pm:** MidAmerican Energy Company Moline Customer Office, 716 17th Street, Moline, Illinois. Basement Room.

**Wednesday, September 4, 2019, 2:30 pm – 4:30 pm:** Illinois Commerce Commission Springfield Office, 527 East Capital Ave, Springfield, Illinois. Hearing Room C.

These hearings will continue to be conducted jointly with hearings on the Agency’s 2020 Electricity Procurement Plan, although comments on the 2020 Electricity Procurement Plan remain due by September 16<sup>th</sup>, and the previously announced schedule<sup>4</sup> for Commission review and approval of the 2020 Electricity Procurement Plan remains unchanged.

**Written comments on the draft Revised Plan should now be submitted to [ipa.contactus@illinois.gov](mailto:ipa.contactus@illinois.gov) by no later than September 30, 2019.** Comments will then be formatted for posting to the IPA’s website at: <http://www.illinois.gov/ipa>.

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<sup>3</sup> As Monday November 11, 2019 is a state holiday, the Commission would instead make this determination by Tuesday November 12.

<sup>4</sup> See <https://www2.illinois.gov/sites/ipa/Documents/2020%20Draft%20Electricity%20Procurement%20Plan/Draft%202020%20Procurement%20Plan%20cover%20letter%20%288-15-19%29.pdf>.