

May 17, 2017

Submission to Illinois Power Agency from NextEra Energy Resources, LLC

Feedback On the Initial Forward Procurement Workshop Held May 10, 2017

NextEra Energy Resources, LLC (“NEER”) appreciates the opportunity to offer comment on the Illinois Power Agency’s (“IPA”) proposals for initial forward procurements to be held under Public Act 99-0906. NEER is the competitive generating subsidiary of NextEra Energy, Inc., the largest generator of wind and solar energy in North America. NEER’s subsidiaries own and operate approximately 19,000 megawatts (“MW”) of generation in 25 states and Canada, including approximately 13,000 MW of wind and solar generation.

These comments are in response to request for feedback from the IPA from the May 10, 2017 workshop.

1. Site Control

NEER recommends the IPA adopt site control requirements similar to that required by the Midcontinent Independent System Operator (“MISO”). In addition, lease/purchase agreements should satisfy the requirements laid out below.

MISO requires proof of minimum site control of seventy-five percent (75%) ownership or \$100,000 deposit in lieu of Site Control (Refer to the BPM-015 Section 4.2.1.1 for more details). Proof required is as follows:

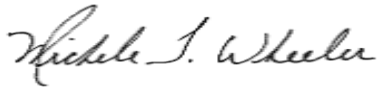
- Project site map indicating lease/ownership boundaries.
- Copies of each agreement or agreement signature pages with a complete sample agreement.
- Document signed by a company executive that states all the listed agreements are on file in their entirety, all referenced land is within the proposed project boundaries, and those agreements constitute 75% or greater ownership of the project’s total site. This document should also include a statement (as necessary) regarding land for which Site Control cannot be obtained due to federal, state, or local regulatory permitting requirements or obligations.

2. Renewable Energy Credit (“REC”) Flexibility

REC flexibility is important to an efficient and cost effective market. Flexibility allows for compliance while at the same time keeping costs lower than would otherwise be the case. NEER suggests the IPA adopt the following:

- Performance guarantee – no comment on the proposal as suggested.
- REC Delivery /Flexibility – provide reasonable flexibility for delivery by suppliers in the form of:
 1. Allowing a permitted bandwidth of a certain percentage below the scheduled REC delivery (*e.g.*, allowing 99 RECs delivered to not be in breach of 100 REC requirement) paired with a 12-18 month REC banking ability for the supplier or,
 2. The ability of a supplier to adjust its performance schedule 10-15% with six months' notice.

NEXTERA ENERGY RESOURCES

A handwritten signature in black ink that reads "Michele J. Wheeler". The signature is written in a cursive, flowing style.

Michele Wheeler
VP Regulatory & Political Affairs