

Ameren Illinois ("Ameren") – Stakeholder Feedback on CP Proposals

On September 16, 2024, the Illinois Power Agency ("IPA") issued a request for stakeholder feedback regarding the following: (i) Escrow Process for Approved Vendors that Do Not Pass Through Promised Incentive Payments; (ii) REC Price Adder for Stranded Customer Solar Projects; and (iii) Solar Restitution Program. Ameren Illinois Company ("Ameren") has reviewed each of these and offers feedback as set forth below. Ameren's silence on a particular issue should not be construed as acceptance of, or disagreement with, the IPA's position or specific proposal.

I. Comments on the Escrow Process

Ameren is supportive of the IPA's use of a third-party professional escrow service as the escrow agent to make payments to customers in situations where the Approved Vendors have not passed through promised incentive payments. As the IPA suggests in its questions for stakeholders, there could be many factors that warrant the use of an escrow agent to ensure that incentive payments made by utilities are ultimately passed through to customers. Ameren agrees that all of those factors should be considered and evaluated. However, Ameren recommends that the contracting utility not be part of the evaluation process in determining whether to implement the escrow process for a specific Approved Vendor. Ameren would prefer that the IPA independently undertake this evaluation after an appropriate inquiry has been performed.

II. Comments on the Stranded Customer REC Adder

Ameren is supportive of a REC adder to incentivize Approved Vendors to assist stranded customers. Further, given the limited effect the implementation of this program will have on Ameren, it believes it is more appropriate for other stakeholders to opine on the specific questions posed by the IPA. That said, when implementing the program, Ameren does recommend that there be sufficient transparency in the invoicing process and the Quarterly Netting Statement such that any REC adder

payment to be paid to an Approved Vendor by a utility can be readily identified and distinguished from REC payments to the same Approved Vendor for RECs not entitled to the adder.

III. Comments on the Solar Restitution Program

Ameren is supportive of a solar restitution program for customers harmed through their participation in the Illinois Shines or Illinois Solar for All programs. Ameren Illinois also agrees that forfeited collateral is an appropriate funding source for this program. However, Ameren does not think utilities should be required to administer the program. Ameren believes the IPA is best positioned to manage and administer the program.

More specifically, when collateral is forfeited, the utility would transfer the forfeited collateral as directed by the IPA to a third-party administrator. The third-party administrator would then be responsible for utilizing these funds to make payments to individual customers qualified to receive restitution by the IPA. Ameren believes the third-party administrator should be accountable for the funds it administers through the program by submitting quarterly reports to the utilities. The quarterly reports should contain sufficient detail so that the utilities know the amount of claims paid and the remaining funds available for paying future claims.

IV. Conclusion

Ameren appreciates the opportunity to provide the feedback set forth above and looks forward to reviewing the responses of the other stakeholders.