

FISCAL YEAR 2020



**ANNUAL
REPORT**

FEBRUARY 16, 2021

Illinois Power Agency
Annual Report
Fiscal Year 2020

(July 2019 - June 2020)

Prepared in Accordance with 20 ILCS 3855/1-125 and 220 ILCS 5/16-115D(d)(4)

February 16, 2021

INTRODUCTION

The Illinois Power Agency (“IPA”) was established to serve the people of Illinois by administering electricity and renewable resources planning and procurement processes for Ameren Illinois Company (“Ameren Illinois”), Commonwealth Edison Company (“ComEd”), and MidAmerican Energy Company (“MidAmerican”).

The IPA’s processes and mandates are described in the Illinois Power Agency Act (20 ILCS 3855) and the Illinois Public Utilities Act (220 ILCS 5). The Agency strives to employ best practices to meet the goals set out for it in those statutes. Chief among these is to develop electricity and renewable resources procurement plans and processes to ensure adequate, reliable, affordable, efficient, and environmentally sustainable electric service at the lowest total cost over time, taking into account any benefits of price stability. The Agency prepares electricity procurement plans on an annual basis. For renewable energy resources, the Agency develops Long-Term Renewable Resources Procurement Plans on a biennial basis.

As an independent agency subject to the oversight of the Executive Ethics Commission, the Illinois Power Agency is committed to:

- Conducting competitive procurement processes to procure the supply resources identified in procurement plans.
- Ensuring that the process of power procurement is conducted in an ethical and transparent fashion, immune from improper influence.
- Operating in a structurally insulated, independent and transparent fashion so that nothing impedes its mission to secure power at the best prices the market will bear, provided that it meets all applicable legal requirements.
- Continuing to review its policies and practices to determine how best to meet its mission of providing the lowest cost power to the greatest number of people, at any given point in time, in accordance with applicable law.

Fiscal Year 2020 featured the following accomplishments for the Agency:

- The Agency developed its 2020 Annual Electricity Procurement Plan and had that Plan approved by the Illinois Commerce Commission (“Commission”) for implementation in calendar year 2020.
 - The Agency successfully conducted electricity and capacity procurement events as approved in the 2019 and 2020 Annual Procurement Plans.
- The Agency developed a Revised Long-Term Renewable Resources Procurement Plan in calendar year 2019 which was approved by the Commission in early 2020. The Revised Plan contained updated analyses of the goals, targets, and budgets of the Renewable Portfolio Standard, proposed one utility scale-wind procurement (to be conducted in 2021), and revisions to the Adjustable Block Program and the Illinois Solar for All Program.
- Renewable Resources Procurement and Program activities:
 - Pursuant to the Initial Long-Term Renewable Resources Procurement Plan that was approved in 2018, the Agency held a procurement for RECs from the brownfield site photovoltaic projects in July 2019 (with two projects selected), and a procurement for Low-Income Community Solar Pilot Projects in December 2019 (also with two projects selected).
 - The Adjustable Block Program – a solar incentive program administered by the IPA to incent the development of new photovoltaic distributed generation and community solar projects pursuant to Section 1-75(c)(1)(K)-(M) of the IPA Act – which began accepting project applications in Fiscal Year 2019 continued accepting project applications during Fiscal Year 2020.

As of the end of Fiscal Year 2020, 15,110 projects had been approved by the Commission totaling 592 MW of capacity. At the time of the publishing of this Annual Report, including Fiscal Year 2020 activities, 21,123 projects had been approved by the Commission totaling 649 MW of capacity. Assuming all projects are successfully developed, and the program continues to be fully subscribed, the Adjustable Block Program will result in the development of over 679 MW of additional photovoltaic distributed generation and community solar projects in Illinois. This is a significant increase given that, prior to the implementation of Public Act 99-0906, Illinois was estimated to have less than 80 MW of total solar photovoltaic installed capacity statewide.

However, as of the publishing of this Annual Report, the capacity of the Adjustable Block Program has been filled and project applications are being put on waitlists pending the availability of funding, with any new funding availability likely requiring legislative action. Additional information on the Adjustable Block Program can be found at: www.illinoisabp.com.

- The Illinois Solar for All Program – a low-income solar incentive program developed pursuant to Section 1-56(b) of the IPA Act – began taking project applications for its second program year on September 4, 2019. Project applications exceeded available funding for Low-income Community Solar projects and four projects (totaling over 4 MW) were selected and approved by the Commission. 24 Non-Profit/Public Facilities projects (totaling 2.8 MW in capacity) and 10 Low-Income Distributed Generation projects (totaling 2.1 MW) were approved during the program year. Additional information on the Illinois Solar for All Program can be found at: www.illinoisfa.com.

The IPA welcomes your questions and hopes you will take advantage of the information offered herein, on the IPA's program websites linked above, and on the Agency's website: www.illinois.gov/IPA.

REPORT ORGANIZATION

20 ILCS 3855/1-125 requires that, by February 15 of each year, the Agency shall report annually to the Governor and the General Assembly on the operations and transactions of the Agency. The annual report shall include, but not be limited to, each of the following:

- (1) The average quantity, price, and term of all contracts for electricity procured under the procurement plans for electric utilities.
- (2) (Blank)¹
- (3) The quantity, price, and rate impact of all energy efficiency and demand response measures purchased for electric utilities, and any measures included in the procurement plan pursuant to Section 16-111.5B of the Public Utilities Act.
- (4) The amount of power and energy produced by each Agency facility.
- (5) The quantity of electricity supplied by each Agency facility to municipal electric systems, governmental aggregators, or rural electric cooperatives in Illinois.
- (6) The revenues as allocated by the Agency to each facility.
- (7) The costs as allocated by the Agency to each facility.
- (8) The accumulated depreciation for each facility.
- (9) The status of any projects under development.
- (10) Basic financial and operating information specifically detailed for the reporting year and including, but not limited to, income and expense statements, balance sheets, and changes in financial position, all in accordance with generally accepted accounting principles, debt structure, and a summary of funds on a cash basis.
- (11) The average quantity, price, contract type and term and rate impact of all renewable resources purchased under the electricity procurement plans for electric utilities.
- (12) A comparison of the costs associated with the Agency's procurement of renewable energy resources to (A) the Agency's costs associated with electricity generated by other types of generation facilities and (B) the benefits associated with the Agency's procurement of renewable energy resources.
- (13) An analysis of the rate impacts associated with the Illinois Power Agency's procurement of renewable resources, including, but not limited to, any long-term contracts, on the

¹ Previous Illinois Power Agency Annual Reports included a Section (2) that provided information on, "The quantity, price, and rate impact of all renewable resources purchased under the electricity procurement plans for electric utilities." That provision was repealed pursuant to Public Act 099-0536 through consolidating the Agency's Annual Report and its previously-required separate report on the Cost and Benefits of Renewable Resource Procurement. Information comparable to what was previously reported in Section (2) can be found in Section (11) of this Report.

eligible retail customers of electric utilities. The analysis shall include the Agency's estimate of the total dollar impact that the Agency's procurement of renewable resources has had on the annual electricity bills of the customer classes that comprise each eligible retail customer class taking service from an electric utility.

- (14) An analysis of how the operation of the alternative compliance payment mechanism, any long-term contracts, or other aspects of the applicable renewable portfolio standards impacts the rates of customers of alternative retail electric suppliers.

In addition to these requirements, Section 16-115D(d)(4) of the Public Utilities Act requires that, beginning April 1, 2012 and by April 1 of each year thereafter, the Agency shall submit the following information to the General Assembly, the Commission, and alternative retail electric suppliers:

A report of the alternative compliance payment mechanism fund that shall include ...

- (A) the total amount of alternative compliance payments received in aggregate from alternative retail electric suppliers by planning year for all previous planning years in which the alternative compliance payment was in effect;
- (B) the total amount of those payments utilized to purchased [sic] renewable energy credits itemized by the date of each procurement in which the payments were utilized; and
- (C) the unused and remaining balance in the Agency Renewable Energy Resources Fund attributable to those payments.

This Annual Report for Fiscal Year 2020 addresses each of the above requirements, including reporting alternative compliance payment and expenditure information.

(1) The average quantity, price, and term of all contracts for electricity procured under the procurement plans for electric utilities.

The IPA’s 2020 Annual Procurement Plan, approved by the Illinois Commerce Commission in Docket No. 19-0951, contains a hedging strategy for the procurement of electricity under which 100% of projected eligible retail customer load is to be under contract for the upcoming (or “prompt”) delivery year (starting June 1, 2020),^{2,3} 50% for the following year (starting June 1, 2021), and 25% for the next year (starting June 1, 2022). This approach constitutes a continuation of the approach adopted in the 2015 through 2019 Procurement Plans, under which the Agency holds two energy procurement events per year. Each procurement uses an updated load forecast provided by the utilities to match procured volumes with actual demand more accurately. The Procurement Plan covers a calendar year of Agency activities, while energy deliveries are based on an industry-standard energy delivery year that starts June 1 (and thus is one month different from the State Fiscal Year). In Fiscal Year 2020, the IPA held two energy procurements: the first occurred in September, 2019 pursuant to the 2019 Plan; the second took place in April, 2020 pursuant to the 2020 Plan.

The following tables report on the names of winning suppliers, quantity, price, and term for electricity contracts procured through the two procurement events.⁴ The specific months and quantities procured reflect the load forecasts provided by Ameren Illinois, ComEd and MidAmerican.

² Delivery year is synonymous with planning year and used interchangeably in this Report.

³ This percentage total is 106% for July and August 2020, on-peak.

⁴ Under Section 16-111.5(h) of the Public Utilities Act, “the names of the successful bidders and the load weighted average of the winning bid prices for each contract type and for each contract term shall be made available to the public.” This information is included in the tables that follow. However, as the IPA “shall maintain the confidentiality of all other supplier and bidding information,” individual supplier contract quantities, prices, and terms may not be disclosed and have not been included in this report or in prior annual reports.

September 2019 Procurement⁵

Ameren Illinois

Winning Suppliers

AEP Energy Partners, Inc.
Dynegy Marketing and Trade, LLC
Exelon Generation Company, LLC
Macquarie Energy LLC
Morgan Stanley Capital Group Inc.
NextEra Energy Power Marketing, LLC
Shell Energy North America (US), L.P.
The Energy Authority, Inc.
Union electric Company d/b/a Ameren Missouri
Vitol Inc.

Average Prices (\$/MWh) and MWs of Electricity Contracts

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
October 2019	29.10	125	22.70	125
November 2019	29.61	175	22.62	150
December 2019	32.32	175	23.62	175
January 2020	37.04	175	29.57	200
February 2020	36.30	200	28.33	150
March 2021	31.25	150	23.76	125
April 2020	30.14	125	23.08	100
May 2020	29.51	125	21.57	125
June 2020	30.08	100	22.23	75
July 2020	34.40	125	23.69	75
August 2020	32.65	125	22.08	100
September 2020	30.67	75	22.17	75
October 2020	28.03	50	22.23	50
November 2020	29.04	75	22.54	75
December 2020	30.70	100	23.56	100
January 2021	35.13	100	26.88	100
February 2021	33.68	75	25.20	50
March 2021	29.63	75	23.15	75
April 2021	28.26	50	23.15	75

⁵ Source: <https://www.icc.illinois.gov/workshops/Electricity-Procurement-Process-for-Plan-Years-Beginning-June-2019>

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
May 2021	28.06	75	20.85	75
June 2021	28.46	100	21.87	50
July 2021	33.50	125	23.23	75
August 2021	31.71	100	22.89	75
September 2021	30.00	50	21.59	50
October 2021	26.98	25	21.17	25
November 2021	27.83	50	19.17	50
December 2021	29.19	75	24.20	75
January 2022	32.00	50	27.47	75
February 2022	32.00	50	27.04	50
March 2022	27.86	25	23.48	25
April 2022	27.86	25	-	-
May 2022	27.58	50	19.46	50

In the September 2019 procurements, the IPA also procured capacity for a portion of the eligible retail customer load of Ameren Illinois as specified in the 2019 Procurement Plan. Although the capacity procured did not include an electricity component, this information is provided below for the benefit of completeness. The following tables report on the name of winning supplier, quantity of capacity procured in Zonal Resource Credits (ZRCs), the average contracted price, and term.

Winning Suppliers

Hoosier Energy Rural Electric Cooperative, Inc.
Prairie Power, Inc.
Union Electric Company d/b/a Ameren Missouri
Voltus, Inc.
Wabash Valley Power Association, Inc.

Term, Average Price (\$/MW-Day) and Quantities (in ZRCs) of Capacity Contracts

Term	# ZRCs Awarded	Zonal Resource Credits
Delivery Year		Average Price (\$/MW-Day)
June 2020 – May 2021	357	\$23.74
June 2021 – May 2022	153	\$27.75

ComEd

Winning Suppliers

AEP Energy Partners, Inc.
American Electric Power Service Corporation as agent for Appalachian Power Company, Indiana Michigan
Axpo U.S. LLC
Dynegy Marketing and Trade, LLC
Exelon Generation Company, LLC
Macquarie Energy LLC
Midwest Generation, LLC
Morgan Stanley Capital Group Inc.
NextEra Energy Marketing, LLC
Shell Energy North America (US), L.P.
TransAlta Energy Marketing (U.S.) Inc.

Average Prices (\$/MWh) and MWs of Electricity Contracts

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
October 2019	28.69	625	19.55	550
November 2019	28.77	675	20.32	600
December 2019	30.42	800	22.07	725
January 2020	37.71	800	28.58	725
February 2020	36.54	725	28.25	675
March 2020	29.70	650	21.92	600
April 2020	28.37	575	20.99	500
May 2020	27.73	625	18.08	525
June 2020	27.48	425	18.31	350
July 2020	31.35	500	21.36	400
August 2020	30.37	450	18.91	375
September 2020	28.54	375	18.21	300
October 2020	27.41	2750	19.82	250
November 2020	27.33	325	19.72	300
December 2020	28.09	400	20.24	325
January 2021	34.61	400	26.64	350
February 2021	33.34	350	25.68	350
March 2021	27.90	325	21.12	300
April 2021	27.58	275	20.26	225
May 2021	26.93	275	17.03	250
June 2021	26.17	350	18.36	275
July 2021	30.96	450	20.14	350
August 2021	29.39	425	19.98	325

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
September 2021	26.70	300	18.19	250
October 2021	25.96	200	18.03	175
November 2021	25.90	225	17.77	200
December 2021	26.33	300	20.84	250
January 2022	33.04	300	25.89	250
February 2022	31.69	275	25.89	250
March 2022	26.21	225	20.50	175
April 2022	26.00	175	19.69	150
May 2022	25.27	225	16.35	150

MidAmerican

No Procurement

April 2020 Procurement⁶

Ameren Illinois

Winning Suppliers

Dynasty Power, Inc.
Dynegy Marketing and Trade, LLC
Exelon Generation Company, LLC
Macquarie Energy, LLC
Morgan Stanley Capital Group, Inc.
NextEra Energy Marketing, LLC
Shell Energy North America (US), L.P.
The Energy Authority, Inc.
TransAlta Energy Marketing (U.S.), Inc.

Average Prices (\$/MWh) and Quantities (MW) of Electricity Contracts

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
June 2020	25.37	500	19.40	350
July 2020	29.69	625	21.13	425
August 2020	29.53	575	20.69	400
September 2020	28.50	350	20.80	275
October 2020	28.63	150	20.68	150
November 2020	28.79	175	21.66	175
December 2020	29.43	225	22.61	175
January 2021	33.38	200	25.87	200
February 2021	33.11	200	25.52	200
March 2021	29.46	150	22.34	150
April 2021	28.99	150	22.08	100
May 2021	28.82	175	21.39	125
June 2021	27.65	125	21.06	100
July 2021	33.27	150	22.91	100
August 2021	32.13	125	22.17	100
September 2021	29.85	100	21.24	75
October 2021	26.80	75	20.79	75
November 2021	27.55	75	20.69	75
December 2021	27.72	100	22.20	100

⁶ Source: <https://www.icc.illinois.gov/workshops/Electricity-Procurement-Process-for-Plan-Years-Beginning-June-2020>

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
January 2022	33.48	100	27.02	100
February 2022	32.30	100	25.80	100
March 2022	28.60	75	22.62	75
April 2022	28.35	50	22.28	50
May 2022	27.75	75	20.36	75
June 2022	27.32	100	21.16	75
July 2022	32.09	125	22.95	100
August 2022	31.61	125	22.04	75
September 2022	28.75	75	21.15	50
October 2022	26.90	25	21.06	25
November 2022	26.54	50	21.06	25
December 2022	27.26	75	21.7754	50
January 2023	33.61	75	26.61	50
February 2023	32.21	50	25.38	50
March 2023	29.39	50	23.35	25
April 2023	27.63	25	21.62	25
May 2023	27.91	50	20.64	25

In the April 2020 procurement, the IPA also procured capacity for a portion of the eligible retail customer load of Ameren Illinois as specified in the 2020 Procurement Plan. Although the capacity procured did not include an electricity component, this information is provided below for the benefit of completeness. The following tables report on the names of winning suppliers, quantity of capacity procured - in Zonal Resource Credits (ZRCs), the average contracted price, and term.

Winning Suppliers

Hoosier Energy Rural Electric Cooperative, Inc.
Prairie Power, Inc.
Union Electric Company d/b/a Ameren Missouri
Voltus, Inc.
Wabash Valley Power Association, Inc.

Term, Average Price (\$/MW-Day) and Quantities (in ZRCs) of Capacity Contracts

Term	Zonal Resource Credits	
	Average Price	Quantity
June 2021 – May 2022	\$17.23 per MW-day	414
June 2022 – May 2023	\$25.26 per MW-day	203

ComEd

Winning Suppliers

AEP Energy Partners, Inc.
Axpo U.S. LLC
Dynasty Power, Inc.
Dynegy Marketing and Trade, LLC
Exelon Generation Company, LLC
Macquarie Energy LLC
Midwest Generation, LLC
Morgan Stanley Capital Group Inc.
NextEra Energy Marketing, LLC
Shell Energy North America (US), L.P.
TransAlta Energy Marketing (US), Inc.
Vitol, Inc.

Average Prices (\$/MWh) and Quantities (MW) of Electricity Contracts

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
June 2020	23.38	1,600	16.73	1,325
July 2020	28.18	2,175	19.22	1,550
August 2020	28.00	2,025	19.05	1,475
September 2020	25.94	1,350	17.47	1,150
October 2020	26.53	575	19.52	500
November 2020	27.10	650	19.57	575
December 2020	27.79	725	20.47	675
January 2021	32.37	750	24.43	675
February 2021	31.30	725	23.10	625
March 2021	28.50	625	20.48	575
April 2021	27.48	550	19.67	500
May 2021	27.04	550	18.63	500
June 2021	26.77	400	18.72	325
July 2021	30.15	475	20.22	400
August 2021	29.37	450	20.01	375
September 2021	27.58	325	19.01	275
October 2021	27.20	275	19.48	250
November 2021	26.98	325	19.47	275
December 2021	27.30	375	19.89	325

Month(s)	On-Peak		Off-Peak	
	Average Price	Quantity	Average Price	Quantity
January 2022	30.30	375	22.91	350
February 2022	29.58	350	22.28	325
March 2022	27.71	325	20.37	300
April 2022	27.20	275	19.39	250
May 2022	26.89	275	18.87	250
June 2022	25.92	350	17.44	275
July 2022	28.90	450	20.03	350
August 2022	28.05	425	19.28	300
September 2022	26.40	275	17.42	225
October 2022	26.62	200	18.50	175
November 2022	26.35	225	18.66	175
December 2022	26.29	300	19.54	250
January 2023	29.14	300	24.15	250
February 2023	28.25	275	23.66	250
March 2023	26.98	225	16.98	175
April 2023	26.88	175	17.58	150
May 2023	26.65	200	17.56	150

MidAmerican

Winning Suppliers

TransAlta Energy Marketing (U.S.)

Average Prices (\$/MWh) and Quantities (MW) of Electricity Contracts

Month(s)	On-Peak⁷ Average Price	Off-Peak Average Price
July 2020	27.86	Not procured
August 2020	27.73	Not procured

⁷ In accordance with the RFP rules and previous Commission orders, quantity information is provided where the number of successful bidders is greater than two.

(2) (Blank)

(3) The quantity, price, and rate impact of all energy efficiency and demand response measures purchased for electric utilities, and any measures included in the procurement plan pursuant to Section 16-111.5B of the Public Utilities Act.

Consistent with prior years, the IPA did not directly purchase energy efficiency or demand response measures for ComEd or Ameren Illinois in Fiscal Year 2020.

Procurement Plans developed by the Agency for the years 2013 through 2017 included the approval of incremental energy efficiency programs pursuant to Section 16-111.5B of the Public Utilities Act. Those provisions were terminated as part of Public Act 99-0906, which took effect on June 1, 2017 and thus the IPA has not included energy efficiency in its procurement plans since that time.

Under current market and regulatory conditions, the IPA believes that a demand response procurement by the IPA could not meet the standards set forth in Section 16-111.5(b)(3) of the Public Utilities Act. Reasons for this include, for example, the statutory requirement that demand response under this provision must come from “eligible retail customers,” and as the IPA is not aware of any simple, straightforward way of definitively determining whether a non-competitive class customers take supply from the utility or an alternative retail electric supplier for purposes of any demand response aggregation, there may simply be no feasible way to ensure that only eligible retail customers participate. As a result, the IPA has not included demand response procurements in its annual electricity procurement plan and the ICC has approved that determination.

(4) The amount of power and energy produced by each Agency facility.

Consistent with prior years, the IPA had no Agency facilities during Fiscal Year 2020.

(5) The quantity of electricity supplied by each Agency facility to municipal electric systems, governmental aggregators, or rural electric cooperatives in Illinois.

Consistent with prior years, the IPA had no Agency facilities during Fiscal Year 2020.

(6) The revenues as allocated by the Agency to each facility.

Consistent with prior years, the IPA had no Agency facilities during Fiscal Year 2020.

(7) The costs as allocated by the Agency to each facility.

Consistent with prior years, the IPA had no Agency facilities during Fiscal Year 2020.

(8) The accumulated depreciation for each facility.

Consistent with prior years, the IPA had no Agency facilities during Fiscal Year 2020.

(9) The status of any projects under development.

Consistent with prior years, the IPA had no Agency facilities under development during Fiscal Year 2020.

Among the Agency's goals and objectives enumerated in the Illinois Power Agency Act are the following:

- *Develop electric generation and co-generation facilities that use indigenous coal or renewable resources, or both, financed with bonds issued by the Illinois Finance Authority.*
- *Supply electricity from the Agency's facilities at cost to one or more of the following: municipal electric systems, governmental aggregators, or rural electric cooperatives in Illinois.*⁸

⁸ 20 ILCS 3855/1-5(C) and (D).

The Act puts a number of restrictions on the Agency that severely limit its ability to develop the allowed facilities in the current marketplace. See, for example:

At the Agency's discretion, it may conduct feasibility studies on the construction of any facility. Funding for a study shall be assessed to municipal electric systems, governmental aggregators, units of local government, or rural electric cooperatives requesting the feasibility study; or through an appropriation from the General Assembly.

No entities have requested such a study.

The Agency may enter into contractual arrangements with private and public entities, including but not limited to municipal electric systems, governmental aggregators, and rural electric cooperatives, to plan, site, construct, improve, rehabilitate, and operate those electric generation and co-generation facilities.

No entities have requested such arrangements.

The first facility that the Agency develops, finances, or constructs shall be a facility that uses coal produced in Illinois. The Agency may, however, also develop, finance, or construct renewable energy facilities after work on the first facility has commenced.

Any such facility that uses coal must be a clean coal facility and must be constructed in a location where the geology is suitable for carbon sequestration.

The Agency may supply electricity produced by the Agency's facilities to municipal electric systems, governmental aggregators, or rural electric cooperatives in Illinois. The electricity shall be supplied at cost. Electric utilities shall not be required to purchase electricity directly or indirectly from facilities developed or sponsored by the Agency.

Financing of new generation generally requires that there be certainty regarding the contractual obligation to purchase the output of the facility. Even priced at cost, electricity produced by such a facility is likely to be priced significantly above the market price of electricity for the foreseeable future. Without a mandate to purchase such electricity, buyers would not elect to purchase the significantly more expensive electricity from a clean coal facility, let alone enter into a contract featuring the length and terms necessary to finance such a facility's construction. Due to a severely restricted pool of potential buyers and the apparent absence of need among those potential buyers, the development of a new IPA facility is unlikely to be feasible for the foreseeable future.

The Agency may sell excess capacity and excess energy into the wholesale electric market at prevailing market rates; provided, however, the Agency may not sell excess capacity or

excess energy through the procurement process described in Section 16-111.5 of the Public Utilities Act.

The Agency shall not directly sell electric power and energy to retail customers. Nothing in this paragraph shall be construed to prohibit sales to municipal electric systems, governmental aggregators, or rural electric cooperatives.

(Source: P.A. 95-481, eff. 8-28-07; 95-1027, eff. 6-1-09.)

These provisions mean that the Agency may not serve as a seller to retail load in Illinois from any facilities it develops, which serves as a protection for both customers and the market. However, a reduced pool of potential buyers helps ensure that there is not sufficient demand at this time (or in the near future) for the IPA to develop a new facility.

- (10) Basic financial and operating information specifically detailed for the reporting year and including, but not limited to, income and expense statements, balance sheets, and changes in financial position, all in accordance with generally accepted accounting principles, debt structure, and a summary of funds on a cash basis.**

The Agency's Fiscal Year 2020 unaudited Financial Statements and Notes are contained in the attached Appendix A. Appendix B contains a summary of funds on a cash basis.

(11) The average quantity, price, contract type and term and rate impact of all renewable resources purchased under the electricity procurement plans for electric utilities.

This section of the report, in addition to providing the average quantity, price, contract type and term of all renewable resources purchased, provides a comparison of the costs associated with the procurement of the renewable resources to the costs associated with electricity generated by other types of generation facilities. In this Report, “cost” is used to refer to a quantity procured multiplied by that quantity’s average unit price.

Information on the resources procured and the results of the competitive procurements are presented in Tables, 2, 3, and 4 below for the 2019-20 delivery year for ComEd, Ameren Illinois, and MidAmerican, respectively.⁹ To place the costs of renewable resources and conventional generation on a level footing, procurement costs are compared for RECs and electricity contracted or delivered to the utility’s bundled rate customers during the 2019-20 delivery year. The following costs are tabulated:

- The weighted average price and cost of RECs procured by the Agency;
- The weighted average price per MWh and cost of the blocks of electricity procured by the Agency;
- For Ameren Illinois and ComEd, the 2010 Long-Term Power Purchase Agreements (“LTPPAs”) purchase costs broken down to show the imputed REC and electricity prices,¹⁰ beginning with the 2012-13 delivery year, which is the first year of delivery under those agreements;
- For Ameren Illinois, ComEd, and MidAmerican, the average price and cost of RECs procured in the 2015 Fall Distributed Generation Procurement (Ameren Illinois and ComEd only), the 2016 Spring Distributed Generation Procurement, the 2017 Spring Distributed Generation Procurement, and the 2017 Fall Distributed Generation Procurement (Ameren Illinois and ComEd only);

⁹ Historical information is available in the Agency’s Report on Costs and Benefits of Renewable Resource Procurement published on April 1, 2016, and in the Fiscal Year 2016, Fiscal Year 2017, Fiscal Year 2018, and Fiscal Year 2019 Annual Reports.

¹⁰ In its December 19, 2012 Order, the ICC allowed for the release of the previously confidential “Appendix K” imputed REC prices. The conformed plan (ICC Docket No. 12-0544, 2013 Electricity Procurement Plan Conforming to the Commission’s December 19, 2012 Order at 84) included imputed prices for the five subsequent delivery years 2013-17.

- For Ameren Illinois, ComEd, and MidAmerican, the average price and cost of RECs procured in the Competitive Procurements for new Utility-Scale Wind, new Utility-Scale Solar, and Brownfield Site Solar from 2017 through 2019; and
- For Ameren Illinois, and ComEd, the average imputed price and cost of RECs delivered under the Adjustable Block Program.

With regard to the 2010 LTPPAs, those contracts contain bundled pricing for electricity and RECs. REC prices are “imputed” by subtracting an electricity price from the bundled price. The electricity prices used in those contracts are determined through a forward energy curve calculated at the time of the procurement event. The process of imputing these REC prices is described in Appendix K to the Agency’s 2010 Procurement Plan.¹¹

Although the tables below compare the costs of procured RECs to the costs of procured electricity, it should be noted that these costs are not for equivalent products. RECs represent only the value of the environmental attributes of electricity produced from renewable energy facilities, and not the value of the underlying electricity. Alternatively, the costs shown for electricity procured represent prices of actual electricity procured for delivery and use by the end customer. In general, the REC costs are additive to the conventional supply costs when calculating individual customer rate and bill impacts. The Agency also notes that the costs reported herein are only for the supply of electricity and do not include distribution, transmission or other costs related to the provision of electric service.

The Competitive Procurements include the Initial Forward Procurements, Subsequent Forward Procurements, and additional Forward Procurements conducted by the Agency, from 2017 through 2019, for the utilities, as required by Section 1-75(c)(1)(G) of the IPA Act. These procurements are for 15-year contracts for RECs to be delivered annually from new utility-scale wind projects, new utility-scale solar projects and brownfield site photovoltaic projects. The REC deliveries may not start before June 1, 2019 and must start by June 1, 2022¹². Table 1 shows the results of the specific procurement that was conducted in Fiscal Year 2020.

Table 1: FY 2020 Forward Procurement Results

Procurement Date	Product	Average Price (\$/REC)
July 2019 ¹³	Brownfield Site - Solar	58.10

¹¹ Illinois Power Agency, ICC Docket No. 09-373, Supplemental Filing (Nov. 9, 2009).

¹² This deadline was initially set at June 1, 2021 in Public Act 99-0906 and was subsequently extended to June 1, 2022 through Public Act 101-0113 in the event of certain development delays like the establishment of an operating interconnection.

¹³ <https://www.icc.illinois.gov/downloads/public/PublicNoticeOfJuly2019BrownfieldRECProcurementResults2019-08-01.pdf>

The average price and cost in tables 2, 3, and 4 are for all the Competitive Procurements from 2017 through 2019.¹⁴ The average price and cost are based on actual deliveries.

Sections 1-75(c)(1)(K) and (L) of the IPA Act, as amended by Public Act 99-0906, required the Agency to establish an Adjustable Block Program (“ABP”) for the procurement of RECs from new photovoltaic distributed generation systems and from new photovoltaic community renewable generation projects. The procurements under the ABP are for 15-year contracts with RECs priced according to a transparent schedule of administratively-set prices. The average price and cost of ABP RECs in tables 2, 3 and 4 are based on actual deliveries.

¹⁴ ComEd, Ameren Illinois, and MidAmerican provided the information in these tables in response to the IPA’s data requests issued January 4, 2021.

ComEd

Table 2 shows the average quantity, price and contract type of all renewable energy resources purchased and a comparison of the cost of RECs relative to the cost of electricity under contract for delivery to ComEd during the 2019-20 delivery year.

Table 2: ComEd - Comparison of the Cost of RECs Relative to the Cost of Electricity

Procurements of REC from Renewable Energy Resources	RECs and Electricity Delivered in the 2019-20 Delivery Year		
	Quantity [RECs]	Average Unit Price	Cost ¹⁵
Competitive Procurements	109,462	\$4.00	\$437,848
Adjustable Block Program	32,300	\$60.58	\$1,956,659
2017 Fall Five-Year Distributed Generation REC Procurement ¹⁶	3,364	\$71.75	\$241,372
2017 Spring Five-Year Distributed Generation REC Procurement ¹⁷	11,119	\$130.07	\$1,446,256
2016 Spring Five-Year Distributed Generation REC Procurement ¹⁸		\$129.50	
2015 Fall Five-Year Distributed Generation REC Procurement ¹⁹		\$113.30	
<u>2010 Long-Term Purchase Agreements - REC Procurement²⁰</u>	<u>1,261,725</u>	<u>\$18.61</u>	<u>\$23,484,620</u>
Total RECs ²¹	1,420,344	\$19.61	\$27,849,160
2010 Long-Term Purchase Agreements - Electricity Procurement ²²	1,261,725	\$44.77	56,489,226

¹⁵ Cost = Quantity times Average Unit Price.

¹⁶ RECs purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on ComEd's fixed-price rate customers.

¹⁷ RECs purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on ComEd's fixed-price rate customers.

¹⁸ In accordance with the procurement RFP rules and previous Illinois Commerce Commission orders, quantity information is only released when the number of successful bidders in a procurement is greater than two. The results of the 2016 Distributed Generation Procurement did not meet that threshold, therefore quantity (and cost) is not provided. The IPA also notes that these RECs were purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on ComEd's fixed-price rate customers.

¹⁹ In accordance with the procurement RFP rules and previous Illinois Commerce Commission orders, quantity information is only released when the number of successful bidders in a procurement is greater than two. The results of the 2015 Distributed Generation Procurement did not meet that threshold, therefore quantity (and cost) is not provided. The IPA also notes that these RECs were purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on ComEd's fixed-price rate customers.

²⁰ This represents the Annual Contract Quantity Commitment of RECs specified in the contract and the imputed REC price.

²¹ Total REC quantities and contracted cost includes the results of the 2015 and 2016 Fall and Spring procurements that are not individually disclosed.

²² This represents the energy associated with the Annual Contract Quantity Commitment of RECs specified in the contract and the difference between the Contract Price and the Imputed REC Price.

Procurements of Electricity from Conventional Resources	Quantity [MWh]	Average Unit Price	Cost [8]
2020 Fall Block Energy Procurement ²³			
2020 Spring Block Energy Procurement ²⁴			
2019 Fall Block Energy Procurement	3,782,000	\$26.96	101,947,991
2019 Spring Block Energy Procurement	7,917,200	\$28.31	224,174,549
2018 Fall Block Energy Procurement	2,585,400	\$26.79	69,254,384
2018 Spring Block Energy Procurement	2,815,400	\$27.17	76,502,240
2017 Fall Block Energy Procurement	2,267,425	\$27.74	62,888,669
<u>2017 Spring Block Energy Procurement</u>	<u>2,699,200</u>	<u>\$27.73</u>	<u>74,847,619</u>
Total Electricity from Conventional Resources	22,066,625	\$27.63	609,615,452

²³ Energy for the 2019 Fall Block Energy Procurement is expected to start being delivered in the 2020-21 Delivery Year.

²⁴ Energy for the 2020 Spring Block Energy Procurement is expected to start being delivered in the 2020-21 Delivery Year.

Ameren Illinois

Table 3 shows the average quantity, price and contract type of all renewable resources purchased and a comparison of the cost of RECs relative to the cost of electricity under contract for delivery to Ameren Illinois during the 2019-20 delivery year.

Table 3: Ameren Illinois - Comparison of the Cost of RECs Relative to the Cost of Electricity

Procurements of REC from Renewable Energy Resources	RECs and Electricity Delivered in the 2019-20 Delivery Year		
	Quantity [RECs]	Average Unit Price	Cost ²⁵
Competitive Procurements	169,475	\$3.88	\$657,563
Adjustable Block Program	20,863	\$66.47	\$1,386,818
2017 Fall Five-Year Distributed Generation REC Procurement ²⁶	257	\$127.54	\$32,778
2017 Spring Five-Year Distributed Generation REC Procurement ²⁷	2,475	\$194.85	\$482,254
2016 Spring Five-Year Distributed Generation REC Procurement ²⁸		\$154.51	
2015 Fall Five-Year Distributed Generation REC Procurement ²⁹		\$123.78	
<u>2010 Long-Term Purchase Agreements - REC Procurement³⁰</u>	<u>571,982</u>	<u>\$13.33</u>	<u>\$7,624,520</u>
Total RECs ³¹	766,264	\$13.50	\$10,346,799
2010 Long-Term Purchase Agreements - Electricity Procurement ³²	571,982	\$44.61	\$25,516,117

²⁵ Cost = Quantity times Average Unit Price

²⁶ RECs were purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on Ameren Illinois' fixed-price rate customers.

²⁷ RECs were purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on Ameren Illinois' fixed-price rate customers.

²⁸ In accordance with the procurement RFP rules and previous Illinois Commerce Commission orders, quantity information is only released when the number of successful bidders in a procurement is greater than two. The results of the 2016 Distributed Generation Procurement did not meet that threshold, therefore quantity (and cost) is not provided. The IPA also notes that these RECs were purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on Ameren Illinois' fixed-price rate customers.

²⁹ In accordance with the procurement RFP rules and previous Illinois Commerce Commission orders, quantity information is only released when the number of successful bidders in a procurement is greater than two. The results of the 2015 Distributed Generation Procurement did not meet that threshold, therefore quantity (and cost) is not provided. The IPA also notes that these RECs were purchased using collected ACP from hourly rate customers; thus, this purchase has no rate effect on Ameren's fixed-price rate customers.

³⁰ This represents the Annual Contract Quantity Commitment of RECs specified in the contract and the imputed REC price.

³¹ Total REC quantities and contracted cost includes the results of the 2015 and 2016 Fall and Spring procurements that are not individually disclosed.

³² This represents the energy associated with the Annual Contract Quantity Commitment of RECs specified in the contract and the difference between the Contract Price and the Imputed REC Price.

Procurements of Electricity from Conventional Resources	Quantity [MWh]	Average Unit Price	Cost
2020 Fall Block Energy Procurement ³³			
2020 Spring Block Energy Procurement ³⁴			
2019 Fall Block Energy Procurement	875,200	\$28.38	\$24,841,854
2019 Spring Block Energy Procurement	2,363,200	\$29.68	\$70,130,210
2018 Fall Block Energy Procurement	856,200	\$28.13	\$24,082,162
2018 Spring Block Energy Procurement	863,000	\$27.49	\$23,726,350
2017 Fall Block Energy Procurement	462,000	\$28.65	\$13,236,212
<u>2017 Spring Block Energy Procurement</u>	<u>600,200</u>	<u>\$29.11</u>	<u>\$17,473,634</u>
Total Electricity from Conventional Resources	6,019,800	\$28.82	\$173,490,422

³³ Energy for the 2019 Fall Block Energy Procurement is expected to start being delivered in the 2020-21 Delivery Year.

³⁴ Energy for the 2020 Spring Block Energy Procurement is expected to start being delivered in the 2020-21 Delivery Year.

MidAmerican

Table 4 shows the price and contract type of all renewable resources purchased and a comparison of the cost of RECs relative to the cost of electricity under contract for delivery to MidAmerican during the 2019-20 delivery year.

Table 4: MidAmerican - Comparison of the Cost of RECs Relative to the Cost of Electricity

Procurements of REC from Renewable Energy Resources	RECs and Electricity Delivered in the 2019-20 Delivery Year		
	Quantity [RECs]	Average Unit Price	Cost ³⁵
Competitive Procurements Adjustable Block Program ³⁶	1,406	\$3.84	\$5,399
2017 Spring Five-Year Distributed Generation REC Procurement <u>2016 Spring Five-Year Distributed Generation REC Procurement³⁷</u>	434	\$163.49 <u>\$189.90</u>	\$70,953
Total RECs ³⁸	1,934	\$48.71	\$94,203
Procurements of Electricity from Conventional Resources	Quantity [MWh]	Average Unit Price	Cost
2020 Spring Block Energy Procurement ³⁹ <u>2019 Spring Block Energy Procurement</u>	<u>35,200</u>	<u>\$35.90</u>	<u>\$1,263,592</u>
Total Electricity from Conventional Resources	35,200	\$35.90	\$1,263,592

³⁵ Cost = Quantity times Average Unit Price

³⁶ No RECs from the Adjustable Block Program were delivered in the 2019-20 Delivery Year.

³⁷ In accordance with the procurement RFP rules and previous Illinois Commerce Commission orders, quantity information is only released when the number of successful bidders in a procurement is greater than two. The results of the 2016 Distributed Generation Procurement did not meet that threshold, therefore quantity (and cost) is not provided.

³⁸ Total REC quantities and contracted cost includes the results of the 2016 Spring procurements that are not individually disclosed.

³⁹ Energy for the 2020 Spring Block Energy Procurement is expected to start being delivered in the 2020-21 Delivery Year.

Term of REC Contracts for all Utilities

The IPA’s procurement of renewable energy resources includes REC procurements of various terms (i.e., length of contract). Table 5 shows the term⁴⁰ associated with each procurement of renewable resources for delivery to Ameren Illinois, ComEd and MidAmerican during the 2019-20 delivery year.

Table 5: Term of RECs Contracts for Delivery during the 2019-20 Delivery Year

Procurements from Renewable Energy Resources	Ameren Illinois & ComEd Delivery Terms	MidAmerican Delivery Terms
Competitive Procurement RECs under Contract	15 years starting June 2019	15 years starting June 2019
Adjustable Block Program RECs under Contract	15 years starting June 2019	-
2017 Fall Five-Year Distributed Generation REC Procurement	5 years starting June 2017	-
2017 Spring Five-Year Distributed Generation REC Procurement	5 years starting June 2017	5 years starting June 2017
2016 Spring Five-Year Distributed Generation REC Procurement	5 years starting June 2016	5 years starting June 2016
2015 Fall Five-Year Distributed Generation REC Procurement	5 years starting June 2015	-
2010 Long-Term Purchase Agreements REC Procurement	20 years starting June 2012	-

⁴⁰ The term indicated in this section is merely the nominal term for REC deliveries upon a system becoming energized or beginning with its first REC deliveries; the full term applicable to obligations under REC delivery contracts may vary depending on the contracted system’s specific development schedule (i.e., contractual obligations may still need to be fulfilled before deliveries commence, and achieving those milestones may occur months or even years later than the month/year specified in Table 5).

(12) A comparison of the costs associated with the Agency's procurement of renewable energy resources to (A) the Agency's costs associated with electricity generated by other types of generation facilities and (B) the benefits associated with the Agency's procurement of renewable energy resources.⁴¹

The costs associated with the Agency's procurement of renewable energy resources and the Agency's costs of electricity generated by other types of generation facilities are presented above under (11). The environmental and economic benefits that result from the generation of renewable energy are considered in both quantitative and qualitative terms in this section. The primary benefits associated with renewable energy resources are attributable to the reduction of the pollutants emitted by fossil fuel electricity generation that is displaced by electricity generation from renewable resources, and from the economic benefits provided by the construction and operation of these facilities. The monetary estimates of the environmental benefits are focused on the reduced costs that result from the avoidance of emissions-related adverse health effects and crop damages. The economic benefits include increased employment that results from the construction and operation of renewable resource facilities, increased taxes or payments in lieu of taxes, and the local revenue and supply chain impacts that benefit local businesses which supply products and services to these facilities and their workers.

1. Environmental Benefits

The environmental benefits associated with renewable energy generation primarily involve the benefits of avoiding the pollutants emitted by electricity generated by the combustion of fossil fuels. Emissions from the combustion of fossil fuels—specifically, particulate matter (PM)⁴², sulfur dioxide (SO₂) and nitrogen oxides (NO_x)—have been linked to a wide range of adverse health effects. The adverse health impacts that can result from PM emissions are related, to a large extent, to the size of the particles such that the smaller the particle, the greater the potential for damaging health effects. Fine particles referred to as PM_{2.5} are the most damaging and are associated with respiratory diseases such as asthma, bronchitis and emphysema as well as cardiovascular disease and cancer.⁴³ PM emissions can also damage the surfaces of agricultural crops adversely affecting growth rates and yields. The health effects associated with SO₂ emissions include irritation and inflammation of tissue exposed to the pollutant, which can exacerbate respiratory diseases. NO_x emissions can have adverse impacts such as respiratory and eye irritation and reduced crop yield. SO₂ and NO_x emissions also add to PM emissions in the form of secondary

⁴¹ 20 ILCS 3855/1-125(12).

⁴² PM emissions are generally reported as either PM₁₀, particulates that have diameters of 10 micrometers or less, or PM_{2.5}, particulates of 2.5 micrometers or less.

⁴³ State of Illinois, Illinois Environmental Protection Agency, Illinois Air Quality Report AQI Air Quality Index, 2018.

sources as some of these emissions turn into nitrate and sulfate particles in the atmosphere after being emitted. NO_x emissions are also a precursor to the photochemical formation of ozone (O₃). Elevated levels of O₃ in the atmosphere can result in significant damage to vegetation as well as lung damage and exacerbation of respiratory diseases. In addition to the pollutants that have direct impacts on public health, carbon dioxide (CO₂), emitted by the combustion of fossil fuels, contributes to climate change and indirectly to increased public health concerns such as reduced agricultural production, increased waterborne and pest-related diseases, increased storm severity, and ocean acidification.⁴⁴

In Illinois, almost all of the emissions associated with electricity generation are sourced from coal and natural gas fired power plants. In 2019, these two generation sources accounted for more than 99% of the CO₂, SO₂ and PM_{2.5} as well as 90% of the NO_x emissions for electricity generation. The U.S. Energy Information Administration reported SO₂, NO_x and CO₂ emissions from power generation in the state for 2019.⁴⁵ The emissions of PM_{2.5} were based on the U.S. eGRID emissions for Illinois reported for 2018.⁴⁶ These emissions are shown in the following table.

Illinois Power Generation Emissions 2019 (Tons)

SO ₂	86,312
NO _x	29,401
PM _{2.5}	2,808
CO ₂	62,987,535

To estimate a range of benefits from renewable generation, the Agency determined the composite emission factors for the coal and natural gas generation in the state and applied the estimated environmental impacts (also known as “damages”) for each pollutant and multiplied by the renewable resource generation related to the Agency’s procurements. This approach assumes that renewable generation will replace coal and gas-fired generation in proportion to the relative generation shares of these resources. For 2019, the generation emission factors, using U.S. EIA and eGRID data are: 2.71 lbs./MWh for SO₂, 0.92 lbs./MWh for NO_x, 0.08 lbs./MWh for PM_{2.5}

⁴⁴ U.S. Environmental Protection Agency, Air Pollution: Current and Future Challenges, www.epa.gov/clean-air-act-overview/air-pollution-current-and-future-challenges, updated September 17, 2019, accessed January 26, 2021.

⁴⁵ U.S. Energy Information Administration, Electricity, Detailed State Data-Final Annual Data for 2019, accessed January 26, 2021, www.eia.gov/electricity/data/state.

⁴⁶ www.epa.gov/eGRID/eGRID-related-materials. Draft eGRID 2018 PM_{2.5} Data.

and 1,980 lbs./MWh for CO₂.⁴⁷ While the emissions that are displaced by renewable generation can be determined with reasonable specificity, assigning monetary values to these emissions benefits is subject to significant uncertainty. In light of this uncertainty, in this report emissions quantities and emissions factors are reported as specific data points and the monetary benefits of the reduced emissions that result from wind and solar generation are reported as ranges.

Several recent studies^{48,49,50} developed estimates of the marginal damages that result from emissions from electricity generation. The following ranges of damages in dollars per ton emitted are based on the monetary values reported in these studies converted to 2019 dollars: \$7,040 to \$27,980 for SO₂, \$1,940 to \$14,860 for NO_x, and \$11,520 to \$107,480 for PM_{2.5}. The differences in damage estimates between studies highlight the considerable uncertainties associated with these estimates which are dependent on a range of assumptions and inputs that vary between studies. As a result, the estimates provided below should be understood to be extrapolations and estimates rather than definitive calculations of benefits by the Agency.

To estimate the benefits of avoided damages from CO₂ emissions displaced, the Agency used a social cost of carbon measured in terms of dollars per ton of CO₂. The social cost of carbon is an estimate of the economic damages that would result from the emissions of an additional ton of carbon. The social cost of carbon converts the future damages estimated from the emitted carbon into present values based on a discount rate. Also considered in this estimate is the geographic area assumed to be impacted by the emissions, either in terms of global damages or domestic damages specific to the United States. The range of CO₂ emissions benefits were calculated based on the domestic social cost of carbon (in 2019 dollars) of \$7.11/ton and the global social cost of carbon of \$50.81/ton determined using a 3% discount rate.^{51, 52}

Based on RECs procured by the Agency and delivered to the utilities in the 2019-2020 delivery year, it was estimated that the associated renewable resources generated 2,188,542 MWh (see Tables 2-4 in Section 11 above). These MWh represent about 15% of the renewable resources

⁴⁷ The emission rate for PM_{2.5} is based on 2018 reported emissions allocated to 2019 coal and natural gas generation in the state.

⁴⁸ Jaramillo, P. and Muller, N., "Air pollution emissions and damages from energy production in the U.S.: 2002-2011, Energy Policy 90 (2016) pp.202-211.

⁴⁹ Goodkind, A.L. et al, "Fine-scale damage estimates of particulate matter air pollution reveal opportunities for location-specific mitigation of emissions," PNAS, April 30, 2019, vol. 116, no. 18, 8775-8780, www.pnas.org/cgi/doi/10.1073/pnas.1816102116.

⁵⁰ National Research Council, "Hidden Costs of Energy Unpriced Consequences of Energy Production and Use," The National Academies Press, 2010.

⁵¹ Rennert, K. and Kingdon, C., Resources for the Future, "Social Cost of Carbon 101" August 1, 2019.

⁵² For context the \$16.50/MWh Social Cost of Carbon used for the development of the Zero Emission Standard Procurement Plan translates to \$31.37/ton based on a CO₂ emissions factor of 1,052 lbs./MWh.

generation in Illinois, which was 14,521,559 MWh in 2019.⁵³ Using the emissions factors, the amount of renewable generation that is equivalent to the quantity of RECs procured by the Agency and delivered to the utilities in the 2019-20 delivery year, and the dollar per ton estimated emissions damages, the value of the environmental benefits from these renewable resources were estimated as shown in the following table.

Estimated Benefits of Renewable Resource Procured by the Agency and Delivered to the Utilities in the 2019-20 Delivery Year

SO ₂	\$20.9 - \$83.1 million
NO _x	\$2.0 - \$15.0 million
PM _{2.5}	\$1.0 - \$9.4 million
CO ₂	\$15.4 - \$110.1 million
Total	\$39.2 - \$217.7 million

By way of comparison, the U.S. EPA’s assessment of the 2017 public health benefits associated with the reduction of emissions by wind and solar generation in the Upper Midwest ranged from \$28.90/MWh to \$65.30/MWh for solar generation and from \$32.00/MWh to \$72.30/MWh for wind generation.⁵⁴ The EPA’s public health benefits were based on reduced PM_{2.5}, SO₂ and NO_x emissions from generation displaced by the renewable generation but did not include the benefits associated with reduced CO₂ emissions. The total estimated environmental benefits of the IPA’s renewable resource procurements for the 2019-20 delivery year range from \$17.94/MWh to \$99.46/MWh.

A study by Lawrence Berkley National Laboratory (LBNL) and National Renewable Energy Laboratory (NREL) focused on the prospective impacts of renewable portfolio standards (“RPS”) over the period of 2015 to 2050. The study assumed that state RPS policies which were in effect as of July 2016 remained the same through the end of the 35-year forecast period. The study predicts that compliance with the existing RPS goals through 2050 would reduce cumulative SO₂ emissions by 2.1 million metric tons, cumulative NO_x emissions by 2.5 million metric tons, and

⁵³ U.S. EIA, Electric Power Monthly, February 2020.

⁵⁴ U.S. Environmental Protection Agency, “Public Health Benefits per kWh of Energy Efficiency and Renewable Energy in the United States: A Technical Report,” July 2019.

cumulative PM_{2.5} emissions by 0.3 million metric tons.⁵⁵ If these reductions were to come to fruition, the report analysis estimates that there would be 12,000 to 28,000 fewer premature deaths due to respiratory issues over this period.⁵⁶ Based on the emissions reductions under the existing RPS, the study estimated total health and environmental benefits to be on the order of \$97 billion for the U.S. over the forecast period.⁵⁷

Based on the range of emissions benefits utilized above and the actual delivery quantity of 53,163 ABP RECs for 2019-20, the ABP emissions benefits for 2019-20 would range from a low of \$954,000 to a high of \$5.3 million.

2. Economic Benefits

The increasing integration of renewable energy into the electric grid is being driven in large part by state RPS requirements with the primary goal of reducing the adverse health and environmental impacts associated with electricity generation. Along with these environmental benefits, renewable generation also offers a range of economic benefits. The economic benefits that can be attributed to renewable energy include potential electricity price reductions, increased electric system reliability through portfolio diversity, as well as state and regional economic development, including employment and tax revenue benefits. Additional benefits that can be obtained from solar PV distributed generation programs, such as the Solar for All Program, include: providing incentives for the development of renewable resources in under-served, low income neighborhoods; addressing some of the environmental justice issues affecting these neighborhoods; increased job training and employment in high unemployment areas; and improving local distribution system reliability.⁵⁸

a) Electricity Price Benefits

Price Moderation and Portfolio Diversity

Wind and solar power offer opportunities for lower wholesale electricity costs, generation supply portfolio diversity and, because these sources do not involve fuel costs, the costs of wind and solar generation are not affected by fuel price volatility. In addition to moderating fuel induced price volatility, wind and solar can provide diversity benefits to a generation portfolio that contains significant amounts of fossil fuel and nuclear generation. These renewable resources offer

⁵⁵ Mai, T., Wiser, R., Barbose, G., Bird, L., Heeter, J., Keyser, D., Krishnan, V., Macknick, J., and Millstein, D., “A Prospective Analysis of the Costs, Benefits, and Impacts of U.S. Renewable Portfolio Standards,” National Renewable Energy Laboratory, Lawrence Berkeley National Laboratory, December 2016, NREL/TP-6A20-67455.

⁵⁶ Id.

⁵⁷ Id. at 45.

⁵⁸ U.S. Department of Energy, ICF, Inc. “Review of Recent Cost-Benefit Studies Related to Net Metering and Distributed Solar,” May 2018.

improved reliability by potentially substituting for other resources that may be adversely impacted by fuel supply and transportation issues, supply disruptions, and the potential delay or avoidance of conventional generation capital expenditures.⁵⁹ Wind and solar in a diversified portfolio can provide a hedge against the cost impacts associated with potential changes in environmental regulations that could adversely affect the costs of, and ultimately the price of electricity, from fossil fuel and nuclear generation.⁶⁰ Wind, solar, and certain other forms of renewable energy are not subject to the uncertainty surrounding potential future carbon taxes, unlike fossil fuel-fired power plants.⁶¹

Since most of the costs associated with wind and solar generation involve upfront investments, these resources have low operating costs. The resulting low marginal costs do not involve fuel costs and as a result can reduce the wholesale price of electricity by shifting more expensive (on a marginal cost basis) resources out on the supply curve. However, the net pricing benefits attributable to renewable energy resources are difficult to monetize and involve determinations that will be impacted by the trade-off between the system costs⁶² incurred by higher market penetration and the downward pressure exerted on wholesale electricity prices by higher levels of renewable resource generation.

Impacts on Locational Marginal Prices

Wholesale electric energy prices are set for hourly periods based on bidding by available generators into the regional markets. Most analyses of the impact of renewable generation on electricity prices address these Locational Marginal Prices (“LMPs”) and assume generator bids reflect variable costs. LMPs consist of three components – Energy, Congestion, and Marginal Losses. The energy component prices energy purchases and sales, the congestion component prices transmission congestion costs to move energy from one point to another, and the marginal losses component prices losses on the bulk power system as a result of moving power from one point to another. An impact on any one of these components will have a corresponding impact on

⁵⁹ U.S. Environmental Protection Agency, “Quantifying the Multiple Benefits of Energy Efficiency and Renewable Energy: A Guide for State and Local Governments. Part One: The Multiple Benefits of Energy Efficiency and Renewable Energy.” 2018 edition.

⁶⁰ *Guide to Purchasing Green Power*, United States Department of Energy Office of Renewable Energy and Energy Efficiency, at 5. (March 2010; Update: September 2018). www.epa.gov/greenpower/guide-purchasing-green-power.

⁶¹ Loomis, D., Stroup, I., Center for Renewable Energy, Illinois State University, “Economic Impact: Illinois Wind Energy Development,” June 2016, at 10.

⁶² System costs generally refer to the costs incurred by increasing variable renewable energy penetration involving grid extension and reinforcement, transmission, and balancing.

the overall LMP. Renewable generation resources tend to lower the price of electricity in the real-time markets (LMPs) and indirectly lower forward wholesale market prices.⁶³

The Lawrence Berkley National Laboratory conducted a recent study to assess the impact on wholesale electricity prices that resulted from growing variable renewable energy generation (wind and solar) over the period of 2008 through 2017.⁶⁴ This study also evaluated the relative impacts that other market drivers, notably lower natural gas prices and increasing gas-fired generation, had on wholesale prices during this period. While increasing variable renewable generation was found to result in reduced wholesale electricity prices, lower natural gas prices over this period was the dominant driver of declining average wholesale prices. In MISO, solar and wind generation were found to account for \$0.60/MWh of the drop in average wholesale prices (at the Cinergy/Indiana Hub) from \$50.71/MWh in 2008 to \$29.38/MWh in 2017, the drop in natural gas prices accounted for \$10.90/MWh of the wholesale electricity price decline during this period. In PJM, based on an analysis of wholesale prices at the PJM Western Hub, wind and solar generation accounted for \$0.40/MWh of the drop in the average annual electricity price from \$69.81/MWh in 2008 to \$29.73/MWh in 2017 while lower natural gas prices contributed \$26.30/MWh to the price decline.⁶⁵ A range of other factors including flat electricity demand growth, declines in other fuel prices, thermal plant heat rate improvements, retirements of high cost generating plants, and in many markets, lower priced imports, accounted for the rest of the wholesale price declines. The relatively modest wholesale price impacts of variable renewable generation in MISO and PJM are due in part to the low penetration of renewable generation in these markets during this time period. However, going forward, increasing penetration of renewable electricity can be expected to exert a larger influence on wholesale prices.

To quantify the relative benefits of wholesale price reductions that could be related to the IPA's procurement of renewable resources, these price reductions were applied to the renewable energy associated with the RECs under contract for Ameren (MISO \$0.60/MWh) and ComEd (PJM \$0.40/MWh). The estimated wholesale price benefits for the 2019-20 delivery year are \$459,758 for Ameren, \$1,160 for MidAmerican, and \$568,138 for ComEd.

While there haven't been any substantive studies done to show the impact of renewables on capacity prices, PJM testimony at FERC has highlighted the price suppression concerns of renewables on capacity prices in PJM in the docket dealing with (i) Calpine's complaint that PJM's Minimum Offer Price Rule ("MOPR") is unjust and unreasonable because it does not address the

⁶³ Electricity acquired through the Agency's procurement events is purchased competitively in regional forward wholesale markets.

⁶⁴ Mills, A.D., et al, "Impact of Wind, Solar, and Other Factors on Wholesale Power Prices, An Historical Analysis – 2008 through 2017," Lawrence Berkeley National Laboratory, November 2019.

⁶⁵ It should be noted here that this analysis of price impacts resulting from increasing wind and solar generation only considers the wholesale market price and does not include consideration of the other environmental and economic benefits associated with renewable electricity generation.

impact of subsidized existing resources on the capacity market, and (ii) PJM’s filing consisting of two alternate proposals designed to address the price suppressing effects of state out-of-market support for certain resources.⁶⁶ FERC, in their order noted as follows:

“PJM, however, recognizes that in today’s market, even if a load-serving entity’s or a state’s primary goal may not be to suppress price, the growing use of out-of-market support of renewable resources can have a significant effect on prices. PJM presents evidence showing that the MW-level of renewable resources receiving out-of-market support has increased significantly and raises price suppression concerns, similar to other resources receiving out-of-market support. Intervenors echo this same concern.”⁶⁷ (Underlining added for emphasis)

Following up on their June 29, 2018 Order, FERC issued another order directing PJM to submit a replacement rate that extended the MOPR to resources receiving out-of-market payments. FERC, in that order noted as follows:

“The evidence in this proceeding shows that RPS programs are growing at a rapid pace, and resources participating in these programs will increasingly have the ability to suppress capacity market prices.”⁶⁸ (Underlining added for emphasis)

A previous simulation modeling study conducted by the LBNL assessed the impact of variable renewable resources on wholesale electricity prices in four market areas including; the California Independent System Operator (CAISO), the Electric Reliability Council of Texas (ERCOT), the Southwest Power Pool (SPP), and the New York Independent System Operator (NYISO). This assessment compared the change in prices from 2016 to 2030 of a low variable renewable energy scenario that froze renewable penetration in each market area at 2016 levels with a 40% penetration of a mix of wind and solar generation in 2030. The 2016 renewable generation penetration levels were 21% in CAISO, 13.25% in ERCOT, 19% in SPP, and 3.8% in NYISO, renewable generation in the latter markets areas was predominantly wind. Although specific to the market areas analyzed, the findings support the contention that increasing variable renewable energy generation in competitive wholesale electricity markets would result in a general decrease in average annual hourly wholesale electricity prices.⁶⁹ In these market areas, the reduction in hourly average annual

⁶⁶ Order Rejecting Proposed Tariff Revisions, Granting in Part and Denying in Part Complaint, and Instituting Proceeding under Section 206 of the Federal Power Act, 163 FERC ¶ 61,236, FERC Docket No. EL16-49-000 et al, June 29, 2018 (“The June 29, 2018 Order”).

⁶⁷ Id. at p.102.

⁶⁸ Order Establishing Just and Reasonable Rate, 169 FERC ¶ 61,239, FERC Docket No. EL18-178-000 (Consolidated), December 19, 2019.

⁶⁹ J. Seel; A. Mills; R. Wiser; “Impacts of High Variable Renewable Energy Futures on Wholesale Electricity Prices and on Electric-Sector Decision Making.” Energy Analysis and Environmental Impacts Division, Lawrence Berkeley National Laboratory, May 2018.

electricity prices ranged from 4% to 21% at the simulated 40% penetration levels as compared to the 2016 renewable penetration levels.

MISO's 2011 launch of the Dispatchable Intermittent Resources ("DIRs") program allows registered intermittent (variable) generation (mostly wind generators) to participate in the Real-Time Energy Market and set the Real-Time price. Wind generation resources in MISO receive production tax credits, which allow these resources to submit negative energy offers in the energy market. Negative price hours are usually correlated with higher variable renewable energy generation, especially during low system loads. The low marginal-cost generation including negative price bidding shifts the supply curve out to the right reducing near-term wholesale prices.⁷⁰

In the 2019 PJM State of the Market Report, the PJM Market Monitor reported that "In 2019, 93.1 percent of the wind marginal units had negative offer prices, 6.1 percent had zero offer prices and 0.8 percent had positive offer prices."⁷¹ The implications from the PJM Market Monitor report suggests that wind units in PJM also exert downward pressure on LMPs.

These analyses of the downward impacts on LMPs are focused on reductions at the wholesale level and are not necessarily directly or immediately reflected in the retail rates customers pay.

b) Economic Development Opportunities

In 2016, the Illinois State University's Center for Renewable Energy issued "Economic Impact: Illinois Wind Energy Development," a report that modeled the economic impact of wind energy on Illinois' economy by entering wind project-specific information into the NREL's Jobs and Economic Development Impact ("JEDI") model. The model was used to estimate the income, economic activity, and number of job opportunities accruing to the state from the wind projects that have generating capacities of larger than 50 MW. The report estimated that the development of the 25 largest Illinois wind farms installed at the time of the analysis, accounting for 3,610 MW of nameplate capacity out of a total nameplate capacity for all wind projects in the state of 3,842 MW, was responsible for 20,173 full-time equivalent jobs in Illinois during construction and 869 permanent jobs, and would generate a total economic benefit of \$6.4 billion⁷² during the construction and typical 25-year operational lives of the projects of about \$250 million on an

⁷⁰ Wisser, R.; A. Mills; J. Seel; T. Levin; A. Botterud; "Impacts of Variable Renewable Energy on Bulk Power System, Assets, Pricing and Costs." Lawrence Berkeley National Laboratory and Argonne National Laboratory. November 2017.

⁷¹ Monitoring Analytics, LLC, 2019 State of the Market Report for PJM, March 12, 2020. Volume 2 at 167.

⁷² Economic Impact: Illinois Wind Energy Development at 6.

annualized basis. The U.S. Department of Energy lists the 2019 installed wind capacity in Illinois to be 5,659 MW which reflects a 16% increase in installed wind capacity since 2018.⁷³

The U.S. Energy Information Administration reported that as of August 2020 installed solar PV capacity in Illinois was 396.1 MW up from 185.1 MW in August 2019.⁷⁴ Small-scale solar installations (facilities of less than 1 MW) accounted for 343.1 MW of the solar capacity. During this period utility-scale PV capacity increased to 53 MW. The Solar Energy Industries Association (“SEIA”) data on the solar industry in Illinois indicated that solar employment in Illinois in 2019 totaled 5,513.⁷⁵ The Solar Foundation breaks down this total into jobs by category of employment including: 3,593 involved in installation; 573 in manufacturing; 721 in wholesale trade and distribution; 332 in operations and maintenance; and 292 in other categories.⁷⁶

The wind reports by Illinois State University found that renewable power development leads to the creation of temporary and permanent jobs requiring highly skilled workers in the fields of construction, management, and engineering.⁷⁷ Construction phase jobs typically last anywhere from 6 months to over a year, while operational jobs, including operations and maintenance positions, last the life of the generating facility, typically 20-30 years.⁷⁸

The jobs and economic benefits estimated in the wind report included “turbine and supply chain impacts,” which can also be referred to as “indirect impacts.”⁷⁹ Indirect impacts occurred both in the construction and the operation of wind turbines, and included construction spending on materials and wind farm equipment and other purchases of goods and offsite services. The supply chain of inputs required to produce these goods and services; and project revenues that flow to the local economy in the form of land lease revenue, property tax revenue, and revenue to equity investors are also indirect impacts.⁸⁰ The estimated benefits also included local spending by employees working directly or indirectly on the wind farm project who receive their paychecks and then spend money in the community.⁸¹ Additional economic impacts referred to in the study as “induced impacts” were also considered, these impacts result from changes in household spending in the

⁷³ U.S. Department of Energy, WINDEXchange, Installed Wind Capacity, accessed November 29, 2020. The DOE installed capacity data is based on the American Wind Energy Association Quarterly Market Report.

⁷⁴ U.S. Energy Information Administration, Electric Power Monthly, October 2020, https://www.eia.gov/electricity/monthly/current_month/epm.

⁷⁵ SEIA, Solar Spotlight Illinois, September 10, 2020.

⁷⁶ Solar Foundation Solar Jobs Census 2019. www.solarstates.org/#state/illinois/counties/solar-jobs/2019.

⁷⁷ Economic Impact: Wind Energy Development in Illinois at 23.

⁷⁸ Id.

⁷⁹ Id. at 19.

⁸⁰ Id. at 20.

⁸¹ Id. at 20.

areas surrounding the wind project development due to increased income brought about by the direct and indirect impacts.⁸² The solar report showed similar types of economic benefits would be associated with the development of photovoltaic generating facilities.

The analysis in the wind report also determined the 25 largest wind projects in Illinois are estimated to generate more than \$30.4 million in annual property taxes.⁸³ Local governments can also receive significant amounts of revenue from permitting fees.⁸⁴ Benefits to landowners identified included revenue from leasing their land, which the report found amounted to almost \$14 million annually.⁸⁵ There may be some local concerns such as wear and tear on roads during construction, unfunded decommissioning cost liability, and possibly lowered land values that should be considered when evaluating any specific project's impacts.

Other entities have published employment estimates regarding the impact of wind and solar development in Illinois. According to the American Wind Energy Association, wind power supported 8,001-9,000 direct and indirect jobs in Illinois during 2019.⁸⁶ This apparently includes manufacturing jobs, which may be supported by wind generation located outside Illinois. The American Wind Energy Association also reported that in 2019 the wind industry in Illinois made annual state and local tax payments of \$49 million and \$37 million in land lease payments. The Clean Jobs Midwest Illinois Fact Sheet reported that in 2019 there were an estimated 17,707 jobs in renewable energy generation in Illinois including 5,917 jobs in solar generation and 8,763 jobs in wind generation.⁸⁷ An Illinois Science & Technology Institute report conducted with Strategic Economic Research estimated that increasing Illinois' RPS target to 35% would result in average annual additional jobs of 8,571 by 2030.⁸⁸

Implementation of Public Act 99-0906's renewable resources provisions will have significant, continuing economic and environmental impacts on the state. The development and installation of new renewable generation is expected to expand significantly, with RECs from approximately 1,000 MW of new utility-scale wind generating capacity and 1,500 MW of new utility scale solar already under contract (with development ongoing) and approximately 300 MW of new utility-

⁸² Id. At 20.

⁸³ Id. at 23.

⁸⁴ Id. at 18.

⁸⁵ The study noted that these payments to landowners usually extend over the 25-year life of the project and can involve adjustments for inflation which would result in higher payments over time.

⁸⁶ American Wind Energy Association, Wind Energy in Illinois, accessed November 20, 2020.

⁸⁷ Clean Jobs Midwest Illinois Fact Sheet. <http://www.cleanjobsmidwest.com/state/illinois>, accessed November 20, 2020.

⁸⁸ Illinois Science & Technology Institute, "Illinois Employment Impacts Due to Energy Policy Changes," Executive Summary, March 2015.

scale wind generating capacity to be procured in 2021, and approximately 679 MW of photovoltaic distributed generation and community solar developed or under development.

The Agency's renewable energy procurement plans include support for the development of utility-scale solar as well as community solar and photovoltaic distributed generation (DG). DG includes residential rooftop solar and commercial and industrial solar with a capacity of less than 2 MW. The Agency procures DG and community solar RECs through the Adjustable Block and Illinois Solar for All programs. Based on the range of emissions benefits utilized above and the actual delivery quantity of 53,163 ABP RECs for 2019-20, the ABP emissions benefits for 2019-20 would range from a low of \$954,000 to a high of \$5.3 million. As additional projects under contract reach energization and begin delivery RECs, that range will climb significantly in 2020-21 and across future delivery years.

DG, community solar, and utility-scale solar PV offer economic and environmental benefits, but to a differing degree. On a levelized cost of energy basis (exclusive of federal tax benefits from the Investment Tax Credit and the Production Tax Credit) utility-scale PV is substantially less expensive with costs in the range of \$29 to \$42/MWh as compared with \$150 to \$227/MWh for residential rooftop solar, \$74 to \$179/MWh for commercial and industrial rooftop solar, and \$63 to \$94/MWh for community solar.⁸⁹ The lower cost utility-scale PV generation means that more solar generation can be procured maximizing the environmental and price impact benefits at the lowest overall system cost.⁹⁰ In this case, the Agency can procure more RECs from utility-scale projects at a lower total cost than a similar amount of RECs from DG or community solar. The comparative economics of DG versus utility-scale PV are heavily impacted by net metering policies. Net metering improves the economics of DG by allowing the DG systems to sell unused electricity back to the grid at retail prices. While utility-scale systems result in more renewable generation and more emissions benefits for the same cost, DG systems offer additional benefits in terms of greater local employment impacts, the potential to avoid some transmission and distribution system investments and distributing the benefits of renewable resource electricity to a more diverse range of participants in terms of income strata and geographic location.

The IPA's incentives for the development of photovoltaic distributed generation projects and community solar projects will have a wide range of local impacts as those projects are expected to be spread throughout the state. Some employment impacts are already being observed: since more than 86 percent of the solar capacity added in 2019 involved projects of 1 MW or less, most of the 2019 jobs in the solar industry are focused on small scale distributed PV generation which is the focus of the ABP.

⁸⁹ Lazard's Levelized Cost of Energy Analysis, Version 14.0, October 2020, lazard.com/perspective/lcoe2020.

⁹⁰ Tsuchida, B. et. al., "Comparative Generation Costs of Utility-Scale and Residential-Scale PV in Xcel Energy Colorado's Service Area," The Brattle Group, July 2015, brattle.com/news-and-knowledge/publications/comparative-generation-costs-of-utility-scale-and-residential-scale-pv-in-xcel-energy-colorados-service-area.

c) Workforce Diversity and Use of Graduates of Job Training Programs

The Revised Long-Term Renewable Resources Procurement Plan contained a new requirement applicable to ABP Approved Vendor⁹¹ Annual Reports, requiring reporting on “[o]ther information related to ongoing program participation, including use of graduates of job training programs and other information related to increasing the diversity of the solar workforce.”⁹²

The Agency conducted a stakeholder feedback process on how to collect this information in June of 2020 and finalized the reporting requirements in July of 2020, with Approved Vendors required to submit information responsive to this requirement by October 13, 2020.⁹³ Those finalized reporting requirements included a provision that “[t]he Agency will publicly report aggregated data and other information from the Annual Reports that does not identify the specific Approved Vendor.” This report constitutes the Agency’s reporting of that aggregated data.

Information provided by Approved Vendors in response to this new job training and diversity requirement was submitted at the Approved Vendor level (rather than reporting for each ABP project separately) and covered the period from the program opening on January 31, 2019 through May 31, 2020. Employment information was reported for two categories: direct (“hiring and employment by the Approved Vendor, e.g., staff on the Approved Vendor’s payroll”) and indirect (“hiring and employment conducted by the Approved Vendor’s Designees, installers, marketing/sales sub-contractors, and other entities with which it works as it relates to the marketing, sale, development, and operation of projects participating in the Adjustable Block Program”. “Approved Vendors were instructed to only report only on their Illinois-based workforce.

While the Agency believes that the data reported herein provides a reasonable snapshot of the solar industry in Illinois, the Agency notes several limitations of this data. First, this data is self-reported and has not been independently verified. Second, due to the varied nature of the business models within the solar industry, what may be a direct job function for one entity might be an indirect job function for another entity (e.g., if sales and marketing are conducted in-house or outsourced, or if an Approved Vendor conducts installations itself or subcontracts that work). Third, some Approved Vendors, notably those serving as aggregators who manage REC contracts and delivery obligations for smaller solar firms, reported that it was difficult to collect data from all of the entities with which they worked. In such cases, indirect hiring may be underreported. And fourth, some Approved Vendors may have REC delivery contracts for projects which had not yet

⁹¹ Approved Vendors are the entities that receive contracts for the delivery of RECs to the utilities in the ABP, Approved Vendors range from vertically integrated marketing, engineering, and installation companies, to aggregators who manage RECs for smaller installers, to special purpose entities created for the development and financing of individual solar projects.

⁹² See page 164 of the Revised Plan.

⁹³ See: <https://illinoisabp.com/wp-content/uploads/2020/07/Job-Training-Report-Requirements-7-30-20.pdf>.

commenced construction during the reporting period. Alternatively, for many projects (particularly community solar projects), some project development activities would have also occurred before the reporting period.

The following tables contain the aggregated information collected from Approved Vendors.

Workforce Diversity

	Direct (FTE ⁹⁴)	Indirect (FTE)	Total (FTE)	Direct (%)	Indirect (%)	Total (%)
Race						
Black or African-American	191	345	536	10.5%	12.5%	11.6%
Hispanic or Latinix	230	693	923	12.6%	25.1%	19.9%
Asian	47	31	78	2.6%	1.1%	1.7%
American Indian or Alaska Native	4	6	10	0.2%	0.2%	0.2%
Native Hawaiian or Other Pacific Islander	9	11	20	0.5%	0.4%	0.4%
Total ⁹⁵	481	1,086	1,568	26.4%	39.3%	33.8%
Two or more races	28	134	162	1.5%	4.8%	3.5%
Gender						
Female	270	351	621	14.8%	12.7%	13.4%
Non Binary	2	3	5	0.1%	0.1%	0.1%
Disabled	6	8	14	0.3%	0.3%	0.3%

Job Training Graduate Hiring

Program	Direct	Direct	Direct	Indirect	Indirect	Indirect
	Full Time	Part Time	Temp.	Full Time	Part Time	Temp.
Solar Training Pipeline Program	31	3	9	150	16	123
Craft Apprenticeship Program	3	1	0	91	6	85
Multi-Cultural Jobs Programs	11	0	10	31	11	0
Other ⁹⁶	0	0	0	42	3	0
Total	46	2	19	315	34	208

⁹⁴ FTE: Full-Time Equivalent.

⁹⁵ Some respondents may have identified more than one race and therefore some numbers may overlap.

⁹⁶ Includes internal training programs and IBEW apprenticeships.

(13) Rate Impacts on Eligible Retail Customers

“An analysis of the rate impacts associated with the Illinois Power Agency’s procurement of renewable resources, including, but not limited to, any long term contracts, on the eligible retail customers of electric utilities. The analysis shall include the Agency’s estimate of the total dollar impact that the Agency’s procurement of renewable resources has had on the annual electricity bills of the customer classes that comprise each eligible retail customer class taking service from an electric utility.”⁹⁷

This section of the report also includes estimates of bill impacts determined by analysis of the load of each eligible customer class, numbers of customers, and bill estimates contained in publicly available utility tariff and rate case filings. For the purposes of determining the total bill impact, this section of the report includes the same costs included in the statutory RPS spending cap: “the total amount paid for electric service [which] includes without limitation amounts paid for supply, transmission, distribution, surcharges, and add-on taxes.” The bill impacts are presented both as a percentage of an average customer bill for that class and as cents per kilowatt-hour.

These breakouts provide the rate impact associated with the Agency’s procurement of renewable resources. When multiplied by the overall billing determinants, the values also provide the total dollar impact on the annual electricity bills of each customer class. Results for each electric utility and corresponding customer class are presented for ComEd in Table 6 and Table 7, for Ameren Illinois in Table 8 and Table 9, and for MidAmerican in Table 10 and Table 11.⁹⁸

⁹⁷ 20 ILCS 3855/1-125(13).

⁹⁸ ComEd, Ameren Illinois, and MidAmerican provided the information in these tables in response to the IPA’s data requests issued January 4, 2021.

ComEd

Table 6: Rate Impact for Customers Taking Supply from ComEd⁹⁹

Customer Class	Description	2019-20 Delivery Year
Single Family No Electric Space Heat	Revenue/kWh	\$0.1447
	REC/kWh	\$0.00189
	Ratio (REC/Revenue) ¹⁰⁰	1.31%
Multi Family No Electric Space Heat	Revenue/kWh	\$0.1562
	REC/kWh	\$0.00189
	Ratio (REC/Revenue)	1.21%
Single Family With Electric Space Heat	Revenue/kWh	\$0.1109
	REC/kWh	\$0.00189
	Ratio (REC/Revenue)	1.70%
Multi Family With Electric Space Heat	Revenue/kWh	\$0.1212
	REC/kWh	\$0.00189
	Ratio (REC/Revenue)	1.56%
Watt-hour	Revenue/kWh	\$0.1605
	REC/kWh	\$0.00189
	Ratio (REC/Revenue)	1.18%
Small Load (< 100 kW)	Revenue/kWh	\$0.1158
	REC/kWh	\$0.00189
	Ratio (REC/Revenue)	1.63%

⁹⁹ Overall bill (e.g. Revenue/kWh) includes fixed supply charges, RTO services charges, delivery services charges (customer charge, standard metering service charges, distribution facilities charges, and Illinois Electricity Distribution Tax charge), other environmental cost recovery and energy efficiency & demand adjustments, franchise cost additions, and municipal and state taxes. The REC/kWh value is equal to the cost of renewable resources in the delivery year, divided by the sum of the actual load of eligible retail customers.

¹⁰⁰ This value represents the amount that RECs cost each customer of that delivery year class as a percentage of the amount paid for total “annual electricity bills,” including taxes. Thus, a Rate Impact of 1.31% (Single Family No Electric Space Heat) means that 1.31% of the total electricity bill of a customer of that class in the 2019-20 delivery year was spent on contracts for renewable energy resources.

Table 7: Dollar Impact for Customers Taking Supply from ComEd¹⁰¹

Customer Class	Description	2019-2020 Delivery Year
Single Family No Electric Space Heat	Usage (kWh)	12,642,880,425
	Dollar Impact	\$23,895,044
Multi Family No Electric Space Heat	Usage (kWh)	3,454,736,170
	Dollar Impact	\$6,529,451
Single Family With Electric Space Heat	Usage (kWh)	380,348,715
	Dollar Impact	\$718,859
Multi Family With Electric Space Heat	Usage (kWh)	1,060,032,486
	Dollar Impact	\$2,003,461
Watt-hour	Usage (kWh)	174,254,116
	Dollar Impact	\$329,340
Small Load (< 100 kW)	Usage (kWh)	4,205,536,681
	Dollar Impact	\$7,948,464

¹⁰¹ Usage values were reported by ComEd. Dollar Impact values were calculated by multiplying the Usage by the REC/kWh reported in Table 6.

Ameren Illinois

Table 8: Rate Impact for Customers Taking Supply from Ameren Illinois¹⁰²

Customer Class	Description	2019-20 Delivery Year
Residential Service (DS-1)	Revenue/kWh	\$0.107
	REC/kWh	\$0.001805
	Ratio (REC/Revenue) ¹⁰³	1.69%
Small General Service (DS-2)	Revenue/kWh	\$0.106
	REC/kWh	\$0.001805
	Ratio (REC/Revenue)	1.70%
General Service & Large General Service (DS-3 and DS-4) ¹⁰⁴	Revenue/kWh	\$0.058
	REC/kWh	\$0.001805
	Ratio (REC/Revenue)	3.12%

Table 9: Dollar Impact for Customers Taking Supply from Ameren Illinois¹⁰⁵

Customer Class	Description	2019-20 Delivery Year
Residential Service (DS-1)	Usage (kWh)	4,976,578,805
	Dollar Impact	8,984,715
Small General Service (DS-2)	Usage (kWh)	1,638,974,293
	Dollar Impact	2,959,004
General Service & Large General Service (DS-3 and DS-4) ¹⁰⁶	Usage (kWh)	1,371,316,483
	Dollar Impact	2,475,775

¹⁰² Overall bill (i.e. Revenue/kWh) includes fixed supply charges, RTO services charges, delivery services charges (customer charge, standard metering service charges, distribution facilities charges, and Illinois Electricity Distribution Tax charge), other environmental cost recovery and energy efficiency & demand adjustments, franchise cost additions, and municipal and state taxes. The REC/kWh value is equal to the cost of renewable resources in the delivery year, divided by the sum of the actual load of eligible retail customers.

¹⁰³ This value represents the amount that RECs cost each customer of that delivery year class as a percentage of the amount paid for total “annual electricity bills,” including taxes. Thus, a Rate Impact of 1.69% (Residential Service) means that 1.69% of the total electricity bill of a customer of that class in the 2019-20 delivery year was spent on contracts for renewable energy resources.

¹⁰⁴ General Service & Large General Service (DS-3 and DS-4) have been declared fully competitive and therefore these classes can no longer take supply from Ameren Illinois fixed price (Rider BGS). Therefore, calculations represent only the load of customers taking supply from Ameren Illinois real time price supply applicable to larger customers (Rider HSS). The REC/kWh value is as described in the footnote above except it only applies to customers and load on Rider HSS.

¹⁰⁵ Usage values were reported by Ameren Illinois. Dollar Impact values were calculated by multiplying the Usage by the REC/kWh reported in Table 8.

¹⁰⁶ General Service & Large General Service (DS-3 and DS-4) have been declared fully competitive and therefore these classes can no longer take supply from Ameren Illinois fixed price (Rider BGS). Therefore, calculations represent only the load of customers taking supply from Ameren Illinois real time price supply applicable to larger customers (Rider HSS).

MidAmerican

Table 10: Rate Impact for Customers Taking Supply from MidAmerican¹⁰⁷

Customer Class	Description	2019-20 Delivery Year
Residential	Revenue/kWh	\$0.09738
	REC/kWh	\$0.00124
	Ratio (REC/Revenue) ¹⁰⁸	1.27%
Commercial	Revenue/kWh	\$0.07615
	REC/kWh	\$0.00124
	Ratio (REC/Revenue)	1.63%
Industrial	Revenue/kWh	\$0.04950
	REC/kWh	\$0.00124
	Ratio (REC/Revenue)	2.51%
Public Authority	Revenue/kWh	\$0.06210
	REC/kWh	\$0.00124
	Ratio (REC/Revenue)	2.00%
Street Lighting	Revenue/kWh	\$0.13108
	REC/kWh	\$0.00124
	Ratio (REC/Revenue)	0.95%

Table 11: Dollar Impact for Customers Taking Supply from MidAmerican¹⁰⁹

Customer Class	Description	2019-20 Delivery Year
Residential	Usage (kWh)	629,825,376
	Dollar Impact	\$781,928
Commercial	Usage (kWh)	439,874,201
	Dollar Impact	\$546,104
Industrial	Usage (kWh)	623,180,380
	Dollar Impact	\$773,678
Public Authority	Usage (kWh)	162,275,166
	Dollar Impact	\$201,465
Street Lighting	Usage (kWh)	7,224,079
	Dollar Impact	\$8,969

¹⁰⁷ Overall bill (e.g. Revenue/kWh) includes fixed supply charges, RTO services charges, delivery services charges (customer charge, standard metering service charges, distribution facilities charges, and Illinois Electricity Distribution Tax charge), other environmental cost recovery and energy efficiency & demand adjustments, franchise cost additions, and municipal and state taxes. The REC/kWh value is equal to the cost of renewable resources in the delivery year, divided by the sum of the actual load of eligible retail customers.

¹⁰⁸ This value represents the amount that RECs cost each customer of that delivery year class as a percentage of the amount paid for total “annual electricity bills,” including taxes. Thus, a Rate Impact of 1.27% (Residential) means that 1.27% of the total electricity bill of a customer of that class in the 2019-20 delivery year was spent on contracts for renewable energy resources.

¹⁰⁹ Usage values were reported by MidAmerican. Dollar Impact values were calculated by multiplying the Usage by the REC/kWh reported in Table 10.

(14) Rate Impacts on Customers of Alternative Retail Electric Suppliers

“An analysis of how the operation of the alternative compliance payment mechanism, any long-term contracts, or other aspects of the applicable renewable portfolio standards impacts the rates of customers of alternative retail electric suppliers.”¹¹⁰

Due to changes to Section 16-115D of the Public Utilities Act contained in Public Act 99-0906, for the 2017-18 delivery year through the 2018-19 delivery year, Section 16-115D’s ARES RPS requirements were gradually phased out, with Section 16-115D’s requirements applicable to only 50% of load in the first of those years and 25% of load in the second. Furthermore, ARES were no longer required to make alternative compliance payments (“ACPs”) for a portion of their obligations.¹¹¹ After the 2018-19 delivery year (which ended on May 31, 2019), RPS obligations became fully consolidated under the processes identified in Section 1-75(c) of the IPA Act funded through a charge applicable to all retail customers and ARES now no longer make ACP payments.¹¹²

As a result, there were no ACP rates applicable to the 2019-2020 delivery year (which overlaps the state Fiscal Year 2020), and thus there were no impacts on customers of alternative retail electric suppliers related from alternative compliance payments. Any rate impacts on these customers would be the same as those described for eligible retail customers in Section 13.

The following analysis is retained from previous annual reports for reference purposes.

¹¹⁰ 20 ILCS 3855/1-125(14).

¹¹¹ Additional new requirements include a change from 60% of resources coming from wind, and 6% from photovoltaics, to a combined 32% coming from wind or photovoltaics. Resources also may not come from facilities that have their costs recovered through rates regulated by a state.

¹¹² See <https://www.icc.illinois.gov/industry-reports/renewable-portfolio-standards-requirements> for a chart of year to year obligations for ARES.

Table 12: Historical ACP Rates¹¹³

Delivery Year	ComEd ACP Rate (¢/kWh)	Ameren Illinois ACP Rate (¢/kWh)	MidAmerican ACP Rate (¢/kWh)
June 2009 - May 2010	0.0764	0.0645	
June 2010 - May 2011	0.0256	0.0211	
June 2011 - May 2012	0.00568	0.00584	
June 2012 - May 2013	0.09724	0.06687	
June 2013 - May 2014	0.15923	0.14661	
June 2014 - May 2015	0.18917	0.16811	
June 2015 - May 2016	0.16641	0.14806	
June 2016 - May 2017	0.12815	0.17351	0.01507
June 2017 - May 2018	0.04317	0.04252	0.00586
June 2018 - May 2019	0.03548	0.03073	0.00515

Assuming an ARES used the ACP to meet half its RPS requirement and passed through the costs of the ACP to all its volume sold, the estimated rate impact on ARES customers would have been half the values shown in Table 12 above. That is, for example, for an ARES customer in Ameren Illinois territory, the ARES rate impact in delivery year June 2018 to May 2019 would have been 0.01537 cents per kilowatt-hour for the ACP portion of that ARES’s compliance. The ARES would have incurred additional costs to self-procure the additional renewable resources to meet the balance of its obligations. However, ARES are not required to disclose those costs.

Because ACPs were based on the utilities’ average cost of REC procurement, if ARES were to have paid approximately the same amount for renewable resources they directly procured as the utilities, the bill impact of renewable procurement on ARES and utility customers would have been similar in dollar amount. As an illustrative example, the percentage impact on an ARES customer during the 2018-2019 delivery year is shown in Table 13. However, if ARES had procured different or less expensive products (for instance, only purchasing short-term REC supply contracts rather than entering into long-term PPAs), overall ARES costs to comply with the RPS would likely have been lower than the costs paid by utility default service customers.

¹¹³ The data is sourced from <https://www.icc.illinois.gov/electricity/RPSCompliancePaymentNotices.aspx>.

Table 13: RPS Compliance - Comparative Rate Impact on ARES Customers (2018-2019 delivery year)

Utility Territory	Maximum ACP Rate (¢/kWh)	Representative ARES Price (¢/kWh) ¹¹⁴	Maximum Rate Impact on ARES Customers Assuming 100% ACP (estimated)
ComEd	0.18917	8.25	2.29%
Ameren Illinois	0.18054	6.37	2.83%

However, it appears that most ARES procured RECs rather than making ACP payments, so the actual rate impacts were likely to have been significantly lower. Because price information on ARES direct purchases of RECs is not publicly available, an exact calculation of typical or average rate impacts on ARES customers was not possible. It is also important to note that the comparison here is only looking at the supply component of a customer’s bill, not the entire bill, so it is not directly comparable to the rate impacts presented in Tables 6, 8, and 10.

¹¹⁴ Representative ARES prices are for the 2018-19 delivery year, based on offers found on the Plug In Illinois website (<https://www.pluginillinois.org/OffersBegin.aspx>) for 12-month fixed prices energy contracts as of 1/4/2019. Any monthly fees included with the offers were converted to ¢/kWh based on a usage rate of 1,000 kWh/month. ARES data for the MidAmerican service area had only one offer with a variable price over a 24 month period. Due to the lack of offers with 12-month fixed prices, the rate impact on ARES customers in the MidAmerican service area is not included in Table 13. Note that some plans may contain early termination fees that are not included in the calculation of the representative prices. Clarification of the specifications, marketing, and disclosure requirements associated with these plans was the subject of a rulemaking proceeding before the ICC (see Docket No. 15-0512). A Final Order in the Docket was issued on October 19, 2017.

Alternative Compliance Payment Mechanism Fund Report

“[T]he Illinois Power Agency shall submit an annual report to the General Assembly, the Commission, and alternative retail electric suppliers that shall include ...”

- (A) the total amount of alternative compliance payments received in aggregate from alternative retail electric suppliers by planning year for all previous planning years in which the alternative compliance payment was in effect;*
- (B) the total amount of those payments utilized to purchased [sic] renewable energy credits itemized by the date of each procurement in which the payments were utilized; and*
- (C) the unused and remaining balance in the Agency Renewable Energy Resources Fund attributable to those payments.”¹¹⁵*

For the delivery year ending May 31, 2017, to the extent an ARES complied with its RPS obligations by procuring renewable energy resources, at least 60% of the renewable energy resources procured by that ARES was required to come from wind generation, while at least 6% of the renewable energy resources procured was required to come from solar PV.¹¹⁶ If an ARES did not purchase at least the technology-specific sub- target levels of wind or photovoltaic renewable energy resources, then it was required to make additional ACPs at the same rate to meet those obligations. For the delivery years beginning on June 1, 2017 and June 1, 2018, 32% of the renewable energy resources procured by an ARES had to come from either wind or photovoltaics and cannot come from facilities that had their costs recovered through rates regulated by a state. For deliveries years starting June 1, 2019 ARES no longer had RPS obligations.

Up until June 1, 2017, all ACPs were deposited into the Renewable Energy Resources Fund (“RERF”), a state fund administered by the Agency to procure renewable energy resources through the purchase and retirement of RECs.¹¹⁷ As of June 1, 2017, changes to Section 16-115D(d)(4.5) of the Public Utilities Act contained in Public Act 99-0906 required ACPs to be remitted to the utilities and used to support the procurement of renewable resources for the utilities by the IPA under Section 1-75(c) of the IPA Act.

¹¹⁵ 220 ILCS 5/16-115D(d)(4).

¹¹⁶ 220 ILCS 5/16-115D(a)(3) (the 60% statutory wind energy minimum for ARES is lower than the 75% wind standard for utilities).

¹¹⁷ 20 ILCS 3855/1-56.

A. Total Amount of ACPs Received

This report must provide the total amount of ACPs received in aggregate from ARES for each delivery year in which the ACP was in effect.¹¹⁸ Under the PUA, a delivery year begins on June 1st of each calendar year.¹¹⁹ The ACP mechanism was “in effect” by September 1, 2010 to require payments by ARES for the period of June 1, 2009 to May 1, 2010.¹²⁰ Therefore, this report provides the aggregate total amount of ACPs for the delivery years 2009-10 through 2017-18. Table 14 shows the total ACPs for each year through 2015-2016 which were collected by the ICC and deposited into the Renewable Energy Resources Fund. Starting with the 2016-2017 delivery year, ACP payments are made to the applicable utility and are reported separately.

Table 14: Total ACPs Received by the RERF¹²¹

Delivery Year	Total ACPs Received
June 2009 – May 2010	\$7,148,261.61
June 2010 – May 2011	\$5,632,587.18
June 2011 – May 2012	\$2,156,777.61
June 2012 – May 2013	\$38,382,345.57
June 2013 – May 2014	\$77,145,921.09
June 2014 – May 2015	\$86,278,411.02
June 2015 – May 2016	\$71,649,805.76
Aggregate Total	\$288,394,109.84

ARES ACP payments were due by September 1st following the end of the delivery year. For example, for the delivery year that ended in May, 2017, payments were due September 1, 2017.¹²² Payments are made in conjunction with a Compliance Report submitted to the ICC.

Table 15 shows total the ACPs collected by the utilities from ARES from for the delivery years 2016-2017, 2017-2018 and 2018-2019, the final delivery year. ComEd reported interests earned from their ACP balance in the 2019-2020 delivery year.

¹¹⁸ 220 ILCS 5/16-115D(d)(4)(A).

¹¹⁹ See e.g. 220 ILCS 5/16-111.5(b).

¹²⁰ Pub. Act 96-0033 (eff. 7/10/2009); 220 ILCS 5/16-115D(d)(2).

¹²¹ Total ACPs Received does not account for expenditures (or other diversions) from the RERF and, therefore, the Aggregate Total reported in this figure will differ from the RERF balance reported in Table 16. Source: internal IPA records reconciled with the ARES reports submitted to the ICC.

¹²² 220 ILCS 5/16-115D(d)(2).

Table 15: Total ACPs Collected by the Utilities¹²³

Delivery Year	ComEd^{124 125}	Ameren Illinois	MidAmerican	Total ACPs
June 2016 – May 2017	\$40,575,311.19	\$23,375,512.09	\$10,532	\$63,961,355.28
June 2017 – May 2018	\$74,147.65	\$76,169.24	\$1,951	\$152,267.89
June 2018 – May 2019	\$228,292.00	\$67,725.00	\$1,073.00	\$ 297,090.00
Aggregate Total	\$42,731,063.07	\$23,519,406.33	\$13,556.00	\$64,410,713.17

The dramatic decrease in the amount of ACP payments collected by the utilities between the first two Delivery Years appears to be the result of the removal of the requirement that an ARES was required to make ACP payments for 50% of its RPS obligations as well as a very low ACP rate for the 2017-2018 delivery year (see Table 12 above). ARES appear to have complied with their RPS obligations primarily through the purchase and retirement of Renewable Energy Credits rather than making ACP payments.

The combined total of ACPs received by the Renewable Energy Resources Fund and by the utilities since the ACP compliance mechanisms was first instituted is \$354,658,135.24.

B. Amount of ACPs used to purchase RECs

1. Purchases Made

Prior to May 2013, the only disbursements made from the RERF were temporary transfers of funds to the State’s General Revenue Fund pursuant to 30 ILCS 105/5h(a). Of the \$7,148,261.61 in total ACPs received for the 2009-10 delivery year, the State of Illinois transferred \$2,000,000 on September 20, 2010 and \$4,710,000 on October 15, 2010.¹²⁶ The remaining \$438,261.61 was not used to purchase RECs and remained in the RERF. The State was required to repay the funds within 18 months of borrowing, and it repaid \$2,000,000 to the RERF in March 2012 and the remaining \$4,710,000 was repaid in April 2012. Because the funds were transferred from a non-interest earning account, no interest was paid.

¹²³ Source: ACP balances provided to the IPA by the respective utility.

¹²⁴ ACP payments are received in the subsequent delivery year. For purposes of this schedule, the payments are reflected in the procurement year it relates to.

¹²⁵ Interest is earned monthly. For purposes of this schedule, the amounts include the interest earned during the delivery year.

¹²⁶ 30 ILCS 105/5h(a).

In 2013, REC deliveries under the 2010 LTPPAs were curtailed due to application of the RPS budget cap.¹²⁷ Pursuant to the 2013 Procurement Plan, holders of those LTPPAs were given the option to sell curtailed RECs to ComEd with the purchases supported by the ACPs collected from customers on hourly pricing, which are distinct from ACPs collected from ARES. Those funds were insufficient to purchase all of the curtailed RECs and the IPA offered to voluntarily use the RERF to purchase remaining curtailed RECs. In May 2013, the IPA entered into contracts to purchase RECs associated with ComEd’s curtailed long-term contracts that were not otherwise purchased by ComEd.¹²⁸ These purchase contracts were for the delivery year June 1, 2013 through May 31, 2014, and were for up to 121,620 RECs with no minimum delivery levels with a total value of \$2.24 million. Due to improved market prices for RECs elsewhere, not all contract holders exercised their rights to deliver RECs to the IPA. A total of 74,402 RECs were delivered in the June 1, 2013 through May 31, 2014 delivery year under these contracts at a total cost of \$1,719,141.52. There was no direct rate impact resulting from these purchases because they used ACP funds previously collected from ARES. As approved in ICC Docket No. 12-0544, ComEd also used ACP funds to purchase 79,674 RECs curtailed under the operation of LTPPAs in the June 1, 2013 through May 31, 2014 delivery year at a total cost of \$1,647,596.

Effective June 28, 2014, Public Act 98-0672 created new subsection 1-56(i) of the Illinois Power Agency Act requiring the Agency to develop a one-time supplemental procurement plan for the procurement of renewable energy credits from new or existing photovoltaics using up to \$30,000,000 from the RERF. The Supplemental Plan was developed by the IPA in 2014 and approved by the ICC on January 21, 2015. Three procurement events were conducted pursuant to the Supplemental Plan (June 2015; November 2015; and March 2016). Table 16 shows the number of RECs contracted for purchase using alternative compliance payments held in the RERF as the result of each procurement event.¹²⁹

Table 16: Supplemental Photovoltaic Procurement RECs and RERF Funds Committed

Procurement Event	RECs Contracted For Purchase	RERF Funds Committed
June 2015	37,082	\$4,999,963
November 2015	70,096	\$9,999,961
March 2016	91,770	\$14,999,894
Total	198,948	\$29,999,818

Table 17 below documents the expenditures for RECs from those procurements as the photovoltaic projects developed pursuant to it are completed and begin operation. As of February 16, 2021,

¹²⁷ Illinois Power Agency, *2013 Annual Report*, December 1, 2013, at 5. This document, which is available at http://www2.illinois.gov/ipa/Pages/IPA_Reports.aspx#AnnualReports, should not be confused with the *2013 Annual Report on the Costs and Benefits of Renewable Resource Procurement in Illinois*.

¹²⁸ Of the eight LTPPA-holders, seven elected to enter into contracts.

¹²⁹ Source: SPV procurement results, internal IPA records

1,062 new photovoltaic projects have begun operation as a result of this procurement process and have delivered 100,005 RECs under five-year delivery contracts.¹³⁰

Public Act 99-0002, effective March 26, 2015, authorized the transfer of \$98,000,000 from the RERF to the State's General Revenue Fund. That transfer occurred on April 1, 2015 and did not include a repayment provision, further increasing the differential between ACPs received and the current RERF balance.

Public Act 99-0524, effective June 30, 2016, included an appropriation of \$12 million from the Renewable Energy Resources Fund for deposit into the Illinois Commerce Commission Public Utility Fund. The transfer occurred on June 23, 2017.

Public Act 100-0023, effective July 6, 2017, authorized transfers from special funds (such as the Renewable Energy Resources Fund) to the State's General Revenue Fund with a two-year deadline for repayment provision. On August 10, 2017, \$150 million was transferred from the Renewable Energy Resources Fund to the General Revenue Fund. In April 2018, \$37.5 million was repaid back to the Renewable Energy Resources Fund from the General Revenue Fund. However, on January 22, 2020, an additional \$10 million was transferred from the Renewable Energy Resources Fund to the General Revenue Fund, and on March 23, 2020 another \$20 million was transferred to the Health Insurance Reserve Fund.

2. Changes in Spending the RERF

Public Act 99-0906, effective June 1, 2017, substantially revamped Section 1-56 of the Illinois Power Agency Act (which governs how the Agency uses the RERF). Other than expenditures previously committed via the Supplemental Photovoltaic Procurement process as described above, the remaining balance of the RERF was shifted to supporting the Illinois Solar for All Program, which is designed to create incentives for and support to the development of photovoltaic resources benefitting low-income households and communities. (Solar for All is also supported by contracts with the utilities in addition to the RERF funds.)

Details of the Illinois Solar for All Program were included in the original Long-Term Renewable Resources Procurement Plan developed by the Agency and approved by the Illinois Commerce Commission in 2018, and subsequently updated in the Revised Long-Term Renewable Resources Procurement Plan approved in 2020. See www.illinoisfsfa.com for more information and details on the program. As of February 16, 2021, REC contracts totaling \$50,297,326.03 have been awarded

¹³⁰ Unlike future REC purchases as part of the Illinois Solar for All Program which will feature upfront payments, the Supplemental Photovoltaic Procurement only pays for RECs as they are delivered.

to Illinois Solar for All projects using funds from the RERF (and an additional \$23,675,571.57 in contracts funded by the utilities).

Some of the challenges in spending the RERF that have been previously documented are resolved by this change in State law. However, the RERF remains a special State Fund and expenditures from it are only authorized pursuant to the annual appropriations process, and the RERF could be subject to future reallocations of funds to other State purposes if authorized by the General Assembly and Governor.

C. Balance in RERF

As of February 16, 2021, the RERF balance equals \$16,200,375.50. Table 17 shows the current RERF balance.¹³¹ As discussed above, ACP payments from ARES were submitted to the utilities in recent years and were not deposited into the RERF.

Table 17: IPA RERF Balance Sheet

Date	Transaction	Amount	Cumulative Balance
Fall 2010	ACPs received	\$7,148,261.61	\$7,148,261.61
September 2010	Transfer to General Revenue Fund pursuant to 30 ILCS 105/5h(a)	(\$2,000,000.00)	\$5,148,261.61
October 2010	Transfer General Revenue Fund pursuant to 30 ILCS 105/5h(a)	(\$4,710,000.00)	\$438,261.61
Fall 2011	ACPs received	\$5,606,245.18	\$6,044,506.79
March 2012	Transfer in pursuant to 30 ILCS 105/5h(a)	\$2,000,000.00	\$8,044,506.79
April 2012	Transfer in pursuant to 30 ILCS 105/5h(a)	\$4,710,000.00	\$12,754,506.79
Fall 2012	ACPs received	\$2,156,777.61	\$14,911,284.40
Fall 2013	ACPs received	\$38,382,345.57	\$53,293,629.97
Winter/Spring 2014	RECs purchased per May 2013 Contracts	(\$1,719,141.52)	\$51,574,488.45
Fall 2014	ACPs received	\$77,145,921.09	\$128,720,409.54
Fall 2014	Supplemental PV Procurement Expenses	(\$170,068.33)	\$128,550,341.21
Spring 2015	Transfer to General Revenue Fund pursuant to Public Act 99-0002	(\$98,000,000.00)	\$30,550,341.21
Spring 2015	ACPs Received	\$26,342.00	\$30,576,683.21
Summer 2015	Supplemental PV Procurement Expenses	(\$653,549.18)	\$29,923,134.03
Summer 2015	SPV Deposits	\$427,836.00	\$30,350,970.03
Fall 2015	ACPs Received	\$86,278,411.02	\$116,629,381.05
Fall 2015	SPV Deposits	\$492,785.00	\$117,122,166.05
Spring 2016	SPV Deposits	\$561,734.04	\$117,683,900.09
Summer 2016	REC Payments/SPV Deposit Returns/Supplemental PV Procurement Expenses	(\$738,377.81)	\$116,945,522.28
Fall 2016	ACPs Received	\$71,649,805.76	\$188,595,328.04
Fall 2016	REC Payments/SPV Deposit Returns	(\$728,153.71)	\$187,867,174.33
Winter 2016-17	REC Payments/SPV Deposit Returns	(\$734,612.31)	\$187,132,562.02
Spring 2017	REC Payments/SPV Deposit Returns	(\$660,180.37)	\$186,472,381.65
Spring 2017	Transfer to Public Utility Fund pursuant to Public Act 99-0524	(\$12,000,000)	\$174,472,381.65
Summer 2017	REC Payments/SPV Deposit Returns	(\$871,070.33)	\$173,601,311.32

¹³¹ Source: internal IPA records

Summer 2017	Transfer to General Revenue Fund pursuant to Public Act 100-0023	(\$150,000,000.00)	\$23,601,311.32
Fall 2017	REC Payments/SPV Deposit Returns	(\$1,169,996.58)	\$22,431,314.74
Winter 2017-18	REC Payments/SPV Deposit Returns	(\$1,235,079)	\$21,196,235.74
Spring 2018	REC Payments/SPV Deposit Returns	(\$792,668.65)	\$20,403,567.09
Spring 2018	Repayment pursuant to Public Act 100-0023	\$37,500,000.00	\$57,903,567.09
Summer 2018	REC Payments/SPV Deposit Returns	(\$1,397,724.65)	\$56,505,842.44
Fall 2018	REC Payments/SPV Deposit Returns	(\$1,553,532.50)	\$54,952,309.94
Winter 2018-19	REC Payments/SPV Deposit Returns	(\$1,024,176.35)	\$53,928,133.59
Winter 2018-19	ILSFA Collateral Deposits	\$115,384.00	\$54,043,517.59
Spring 2019	REC Payments/SPV Deposits Returns	(\$1,689,295.05)	\$52,354,222.54
Spring 2019	ILSFA Expenses	(\$2,036,953.03)	\$50,317,269.51
Summer 2019	ILSFA Expenses	(\$290,061.22)	\$50,027,208.29
Fall 2019	REC Payments/SPV Deposits Returns	(\$1,467,086.90)	\$48,560,121.39
Fall 2019	ILSFA Expenses	(\$897,031.39)	\$47,663,089.91
Fall 2019	ILSFA Collateral Deposits	\$432,583.05	\$48,095,672.96
Winter 2019-2020	REC Payments/SPV Deposits Returns	(\$935,608.35)	\$47,160,064.61
Winter 2019-2020	ILSFA Expenses	(\$735,477.48)	\$46,424,587.13
Winter 2019-2020	ILSFA Collateral Deposits	\$1,798,031.16	\$48,222,618.29
Winter 2019-2020	Transfer to General Revenue Fund Pursuant to Public Act 100-0023	(\$10,000,000.00)	\$38,222,618.29
Spring 2020	Transfer to General Revenue Fund Pursuant to Public Act 100-0023	(\$10,000,000.00)	\$28,222,618.29
Spring 2020	REC Payments/SPV Deposits Returns	(\$2,360,208.66)	\$25,862,409.63
Spring 2020	ILSFA Expenses	(\$1,435,761.48)	\$24,426,648.15
Spring 2020	ILSFA Collateral Deposits	\$67,084.70	\$24,493,732.85
Summer 2020	REC Payments/SPV Deposits Returns	(\$4,561,049.86)	\$19,932,682.99
Summer 2020	ILSFA Expenses	(\$40,447.75)	\$19,892,235.24
Fall 2020	REC Payments/SPV Deposits Returns	(\$1,456,509.60)	\$18,435,725.64
Fall 2020	ILSFA Expenses	(\$1,037,583.88)	\$17,398,141.76
Fall 2020	ILSFA Collateral Deposits	\$135,537.48	\$17,533,679.24
Winter 2020-2021	REC Payments/SPV Deposits Returns	(\$930,699.52)	\$16,602,979.72
Winter 2020-2021	ILSFA Expenses	(\$402,604.22)	\$16,200,375.50

Appendix A
Illinois Power Agency
Fiscal Year 2020
Financial Statement and Notes (Unaudited)

State of Illinois
 Illinois Power Agency
 Individual Nonshared Governmental Funds
 Balance Sheet
 June 30, 2020
 (Expressed in Thousands)

UNAUDITED

	<u>Special Revenue</u>		<u>Permanent Trust</u>
	<u>Illinois Power Agency Operations 0425</u>	<u>Illinois Power Agency Renewable Energy Resources 0836</u>	<u>Illinois Power Agency Trust 0424</u>
Assets			
Cash equity in State Treasury	\$ 4,466	\$ 25,697	\$ -
Investments - held in the Illinois State Board of Investment Commingled Fund at fair value	-	-	39,428
Other receivables, net	900	-	-
Due from other State funds	-	132,500	-
Total assets	<u>\$ 5,366</u>	<u>\$ 158,197</u>	<u>\$ 39,428</u>
Deferred Outflows of Resources (DOR)	-	-	-
Total DOR	-	-	-
Total assets and DOR	<u>\$ 5,366</u>	<u>\$ 158,197</u>	<u>\$ 39,428</u>
Liabilities			
Accounts payable and accrued liabilities	\$ 736	\$ 1,645	\$ -
Bid deposits	-	1,642	-
Due to other State funds	8	-	-
Total liabilities	<u>744</u>	<u>3,287</u>	<u>-</u>
Deferred Inflows of Resources (DIR)	-	-	-
Total DIR	-	-	-
Fund Balances			
Nonspendable - endowments and similar funds	-	-	37,828
Committed			
Employment and economic development	4,622	154,910	1,600
Total fund balance	<u>4,622</u>	<u>154,910</u>	<u>39,428</u>
Total liabilities, DIR, and fund balances	<u>\$ 5,366</u>	<u>\$ 158,197</u>	<u>\$ 39,428</u>

The accompanying notes to the financial statements are an integral part of this statement.

State of Illinois
Illinois Power Agency
Individual Nonshared Governmental Funds
Statements of Revenues, Expenditures, and Changes in Fund Balances
For the Year Ended June 30, 2020
(Expressed in Thousands)

UNAUDITED

	<u>Special Revenue</u>		<u>Permanent Trust</u>
	<u>Illinois Power Agency Operations 0425</u>	<u>Illinois Power Agency Renewable Energy Resources 0836</u>	<u>Illinois Power Agency Trust 0424</u>
Revenues			
Licenses and fees	\$ 2,050	\$ 400	\$ -
Interest and other investment income	-	-	1,788
Other revenues	3	3	-
Total revenues	<u>2,053</u>	<u>403</u>	<u>1,788</u>
Expenditures			
Employment and economic development	4,294	8,031	-
Interest	-	-	-
Total expenditures	<u>4,294</u>	<u>8,031</u>	<u>-</u>
Excess (deficiency) of revenues over (under) expenditures	<u>(2,241)</u>	<u>(7,628)</u>	<u>1,788</u>
Other financing sources (uses)			
Transfers in	1,848	-	-
Transfers out	-	-	(1,848)
Net other financing sources (uses) resources	<u>1,848</u>	<u>-</u>	<u>(1,848)</u>
Net change in fund balances	<u>(393)</u>	<u>(7,628)</u>	<u>(60)</u>
Fund balances, July 1, 2019	<u>5,015</u>	<u>162,538</u>	<u>39,488</u>
Fund Balances, June 30, 2020	<u>\$ 4,622</u>	<u>\$ 154,910</u>	<u>\$ 39,428</u>

The accompanying notes to the financial statements are an integral part of this statement.

UNAUDITED

**STATE OF ILLINOIS
ILLINOIS POWER AGENCY**

Individual Nonshared Governmental Funds
Notes to the Financial Statements

June 30, 2020

(1) Organization

The Illinois Power Agency (Agency) is a part of the executive branch of government of the State of Illinois (State) and operates under the authority of and review by the Illinois General Assembly. The Agency actively administers four individual nonshared governmental funds - the Illinois Power Agency Operations Fund, the Illinois Power Agency Trust Fund, the Illinois Power Agency Investment Fund, and the Illinois Power Agency Renewable Energy Resources Fund (collectively, "Funds") - described within these Notes to the Financial Statements. A nonshared fund is a fund in which a single agency of the State is responsible for administering substantially all of the financial transactions of the fund. Each of the Funds operate under a budget approved by the Illinois General Assembly in which resources are appropriated for the use of the Agency to meet each one of the Funds' specific mission and functions as described within the Illinois Compiled Statutes and the Illinois Administrative Code. All funds appropriated to the Agency from each one of the Funds and all cash received for each one of the Funds are under the custody and control of the State Treasurer.

The Agency, created in Fiscal Year 2008, is dedicated to capturing the benefits of competitive energy markets and facilitating the development of alternative energy technologies for the benefit of Illinois consumers. The Agency meets these objectives by planning and managing competitive procurements and participating in the development of new power generation assets and approaches in Illinois. The Agency is an independent agency subject to the oversight of the Executive Ethics Commission and its activities are subject to the authority of certain departments of the executive and legislative branches of government (such as the Department of Central Management Services (CMS), the Governor's Office of Management and Budget, the State Treasurer's Office, and the State Comptroller's Office) as defined by the Illinois General Assembly.

(2) Summary of Significant Accounting Policies

The financial statements of the Funds have been prepared in accordance with accounting principles generally accepted in the United States of America (GAAP) for governmental funds, as prescribed by the Governmental Accounting Standards Board (GASB). To facilitate user understanding of the Funds' financial statements, significant accounting policies are summarized below.

(a) Financial Reporting Entity

As defined by GAAP, the financial reporting entity consists of a primary government, as well as its component units, which are legally separate organizations for which the elected officials of the primary government are financially accountable.

The financial statements only present the Funds administered by the Agency and do not purport to, and do not, present fairly the financial position of the Agency or the State as of June 30, 2020, nor changes in the Agency or State's financial position for the year ended in conformity with GAAP.

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(2) Summary of Significant Accounting Policies – Continued

(a) Financial Reporting Entity - Continued

The Funds are not legally separate from the State; therefore, the financial information of the Funds are included in the financial statements of the State. The State's Comprehensive Annual Financial Report (CAFR) may be obtained by writing to the State Comptroller's Office, Division of Financial Reporting, 325 West Adams Street, Springfield, Illinois, 62704-1871, or accessing its website at www.illinoiscomptroller.gov.

(b) Basis of Presentation

In government, the basic reporting entity is a fund. A fund is defined as an independent fiscal and accounting entity with a self-balancing set of accounts recording cash and/or other resources together with all related liabilities, obligations, inflows, outflows, and equities, which are segregated for the purpose of carrying on specific activities or attaining certain objectives in accordance with special regulations, restrictions, or limitations. A balance sheet and statement of revenues, expenditures, and changes in fund balance have been presented for the Funds administered by the Agency.

The Agency administers the following fund types:

Governmental Fund Type:

Special Revenue:

These funds account for resources obtained from specific revenue sources that are legally restricted or committed to expenditures for specified purposes. Special revenue funds account for, among other things, federal grant programs, taxes levied with statutorily defined distributions, and other resources restricted as to purpose.

Illinois Power Agency Operations Fund – 425

This fund was created as a special fund in the State Treasury. The fund is administered by the Agency for Agency operations as specified in the Illinois Power Agency Act. Funding sources include charges for services through fee reimbursements as provided by the Illinois Power Agency Act and transfers of interest and investment income from the Illinois Power Agency Trust Fund.

Illinois Power Agency Debt Service Fund – 427

This fund was created as a special fund in the State Treasury. The fund shall be administered by the Agency for retirement of revenue bonds issued for any Agency

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facility. There were no account balances or activities in this fund during Fiscal Year 2020.

(2) Summary of Significant Accounting Policies – Continued

(b) Basis of Presentation - Continued

Illinois Power Agency Facilities Fund – 426

This fund was created as a special fund in the State Treasury. The fund shall be administered by the Agency for costs incurred in connection with the development and construction of a power facility by the Agency as well as costs incurred in connection with the operation and maintenance of an Agency facility. There were no account balances or activities in this fund during Fiscal Year 2020.

Illinois Power Agency Renewable Energy Resources Fund – 836

This fund was created as a special fund in the State Treasury. This fund is administered by the Agency for the procurement of renewable energy resources. This fund's funding source was Alternative Compliance Payments remitted by Alternative Retail Electric Suppliers to comply with the State's Renewable Portfolio Standard established by the Public Utilities Act.

Permanent:

These funds account for resources that are legally restricted to the extent that only earnings, and not principal, may be used for purposes that benefit the government or its citizens.

Illinois Power Agency Trust Fund – 424

This fund was created as a special fund in the State Treasury. This fund has two distinct purposes:

- 1) This fund may accept, receive, and administer any grants, loans, or other funds made available to it by any source. Any funds received except for interest and investment income shall not be considered income, but shall be added to the principal of the Illinois Power Agency Trust Fund. These amounts shall be interfund cash transferred to the Illinois Power Agency Investment Fund to be held for investment by the Illinois State Board of Investment for the purpose of obtaining a total return on investments for the long term as described in the State Finance Act (30 ILCS 105/6z-75).

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- 2) This fund may accept cash transfers of investment income from the Illinois Power Agency Investment Fund for interfund cash transfer, subject to appropriations from the Illinois General Assembly, to the Illinois Power Agency Operations Fund as described in the State Finance Act (30 ILCS 105/6z-75).

(2) Summary of Significant Accounting Policies – Continued

(b) Basis of Presentation - Continued

Illinois Power Agency Investment Fund – 1408

This fund was created as a locally held fund held by the Illinois State Board of Investment outside of the State Treasury. Any funds received by the Illinois Power Agency Investment Fund from the Illinois Power Agency Trust Fund shall not be considered income, but shall be added to the principal of the Fund. In addition, the Agency may interfund cash transfer, subject to the maximum appropriation for the Illinois Power Agency Trust Fund from the Illinois General Assembly, up to 90% of the annual investment income to the Illinois Power Agency Trust Fund for interfund cash transfer to the Illinois Power Agency Operations Fund. Any investment income not interfund cash transferred to the Illinois Power Agency Trust Fund for interfund cash transfer to the Illinois Power Agency Operations Fund shall not be considered income, but shall be added to the principal of the Illinois Power Agency Investment Fund.

The Illinois Power Agency Investment Fund has been collapsed into the Illinois Power Agency Trust Fund for financial reporting purposes.

Funding sources for both permanent funds include interest accumulations deposited by the State Treasurer, investment income received through the Illinois State Board of Investment, and any grants, loans, or other funds made available to it by any source.

(c) Measurement Focus and Basis of Accounting

The Funds are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Revenues are recognized as soon as they are both measurable and available. Revenues are considered to be available when they are collectible within the current period or soon enough thereafter to pay liabilities of the current period. For this purpose, the State considers revenues to be available if they are collected within 60 days of the end of the current fiscal year. Expenditures generally are recorded when the liability is incurred, as under accrual accounting. However, principal and interest on formal debt issues, claims and judgments, and compensated absences are recorded only when payment is due. Capital asset acquisitions are reported as expenditures in governmental funds. Proceeds of formal debt issues and acquisitions under capital leases and installment purchases are reported as other financing sources. Significant revenue sources which are susceptible to

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accrual include charges for services and interest and investment income. All other revenue sources including fines, licenses, and other miscellaneous revenues are considered to be measurable and available if they are collected within 60 days of the end of the current fiscal year.

(2) Summary of Significant Accounting Policies – Continued

(d) Cash Equity in State Treasury

Cash equity in the State Treasury includes deposits held in the State Treasury. It also includes cash received and deposited in the Agency's clearing account and in process to the State Treasurer.

(e) Investments

Investments are reported at fair value. The Illinois State Board of Investment holds investments for the Illinois Power Agency Trust Fund within the Illinois Power Agency Investment Fund pursuant to the State Finance Act (30 ILCS 105/6z-75).

(f) Interfund Transactions

The following types of interfund transactions between the Funds and funds of other State agencies may occur:

Interfund Loans are amounts provided with a requirement for repayment made in accordance with State law, which are reported as interfund receivables in lender funds and interfund payables in borrower funds. When interfund loan repayments are not expected within a reasonable time, the interfund balances are reduced and the amount that is not expected to be repaid is reported as a transfer from the fund that made the loan to the fund that received the loan.

Services provided and used are sales and purchases of goods and services between funds for a price approximating their external exchange value. Interfund services provided and used are reported as revenues in seller funds and expenditures or expenses in purchaser funds. Unpaid amounts are reported as interfund receivables and payables in the governmental fund's balance sheet.

Reimbursements are repayments from the funds responsible for particular expenditures or expenses to the funds that initially paid for them. Reimbursements are reported as expenditures in the reimbursing fund and as a reduction of expenditures in the reimbursed fund.

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Transfers are flows of assets (such as cash or goods) between funds without equivalent flows of assets in return and without a requirement for repayment. In governmental funds, transfers are reported as other financing uses in the governmental funds making transfers and as other financing sources in the governmental funds receiving transfers.

(2) Summary of Significant Accounting Policies – Continued

(g) Fund Balances

Fund balances are classified in the following categories:

Non-spendable – This consists of amounts that cannot be spent because they are either not in spendable form or are legally or contractually required to be maintained intact. The Illinois Power Agency Trust Fund had a non-spendable fund balance as of June 30, 2020.

Restricted – This consists of amounts that are restricted to specific purposes, which is when constraints placed on the use of resources are either externally imposed by creditors, grantors, contributors, or laws or regulations of other governments, or imposed by law through constitutional provisions or enabling legislation. There were no restricted fund balances as of June 30, 2020.

Committed – This consists of amounts that can only be used for specific purposes pursuant to constraints imposed by formal action of the Agency's highest level of decision-making authority. Committed amounts cannot be used for any other purpose unless the Agency removes or changes the specified use by taking the same type of action it employed to previously commit those amounts. The Agency's highest level of decision-making authority rests with the Illinois General Assembly and the Governor. The State passes "Public Acts" to commit its fund balances. The Illinois Power Agency Trust Fund, the Illinois Power Agency Operations Fund, and the Illinois Power Agency Renewable Energy Resources Fund had committed fund balances as of June 30, 2020.

Assigned – This consists of net amounts that are constrained by the Agency's intent to be used for specific purposes, but that are neither restricted nor committed. Fund balance assignments can only be removed or changed by action of the General Assembly. There were no assigned fund balances as of June 30, 2020.

Unassigned – This consists of residual fund balance (deficit) that has not been designated for specific purposes within the Funds. There were no unassigned fund balances as of June 30, 2020.

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The Agency has a general policy to first use restricted resources for expenditures incurred for which both restricted and unrestricted (committed, assigned, or unassigned) resources are available. When expenditures are incurred for which only unrestricted resources are available, the policy is to use committed resources first, then assigned. Unassigned amounts are only used after the other resources have been used.

(2) Summary of Significant Accounting Policies – Continued

(h) Use of Estimates

The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, and deferred inflows of resources and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenditures during the reporting period. Actual results could differ from those estimates.

(i) Future Adoption of GASB Statements

Effective May 8, 2020, The Agency will adopt GASB Statement No. 95 which provides temporary relief to governments and other stakeholders in light of the COVID-19 pandemic. That objective is accomplished by postponing the effective dates of certain provisions in Statements and Implementation Guides that first became effective or scheduled to become effective for periods beginning after June 15, 2018, and later. By providing governments with sufficient time to apply the authoritative guidance addressed in this Statement will help to safeguard the reliability of their financial statements, which in turn will benefit the users of those financial statements. The Agency does not expect this statement to have an impact on the Agency's Funds.

Effective for the year ending June 30, 2021, the Agency will adopt GASB Statement No. 84, *Fiduciary Activities*, which is to improve guidance regarding the identification of fiduciary activities for accounting and financial reporting purposes and how those activities should be reported. The Agency does not expect this statement to have an impact on the Agency's Funds.

Effective for the year ending June 30, 2022, the Agency will adopt GASB Statement No. 87, *Leases*, which is to better meet the information needs of financial statement users by improving accounting and financial reporting for leases by governments. The Agency has not yet determined the impact on the Funds' financial statements as a result of adopting this statement.

Effective for the year ending June 30, 2021, the State will adopt GASB Statement No. 90, *Majority Equity Interests - an amendment of GASB Statements No. 14 and No. 61*, the objective of which is to improve the consistency and comparability of reporting a government's majority

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equity interest in a legally separate organization and to improve the relevance of financial statement information for certain component units. The statement defines a majority equity interest and provides information on how the holding of a majority equity interest in a legally separate organization should be accounted for based on the ownership percentage, whether the holding meets the definition of an investment or whether the legally separate organization should be reported as a component unit. The Agency does not expect this statement to have an impact on the Agency's Funds.

Effective for the year ending June 30, 2021, the Agency will adopt GASB Statement No. 91, *Conduit Debt Obligations*, which establishes a single method of reporting conduit debt obligations by issuers and eliminates diversity in practice associated with (1) commitments extended by issuers, (2) arrangements associated with conduit debt obligations, and (3) related note disclosures. This Statement achieves those objectives by clarifying the existing definition of a conduit debt obligation; establishing that a conduit debt obligation is not a liability of the issuer; establishing standards for accounting and financial reporting of additional commitments and voluntary commitments extended by issuers and arrangements associated with conduit debt obligations and improving required note disclosures. The Agency does not expect this statement to have an impact on the Agency's Funds.

(3) Deposits and Investments

(a) Deposits

The State Treasurer is the custodian of the Fund's deposits and investments for funds maintained in the State Treasury. Deposits in the custody of the State Treasurer at June 30, 2020, including cash on hand and cash in transit, totaled \$4.466 million for the Illinois Power Agency Operations Fund and \$25.697 million for the Illinois Power Agency Renewable Energy Resources Fund. These deposits are pooled and invested with other State funds in accordance with the Deposit of State Moneys Act of the Illinois Compiled Statutes (15 ILCS 520/11). Funds held by the State Treasurer have not been categorized as to credit risk because the Funds do not own individual securities. Details on the nature of these deposits are available within the State's CAFR.

(b) Investments

The Illinois State Board of Investment, an internal investment pool of the State, holds the investments within the Illinois Power Agency Investment Fund pursuant to the State Finance Act (30 ILCS 105/6z-75). At June 30, 2020, total investments were \$39.428 million.

The Illinois State Board of Investment manages all assets held by it within a single commingled fund. Disclosures pertaining to these investments are included in the financial statements of the Illinois State Board of Investment. A copy of the financial statements of the Illinois State Board of Investment may be obtained by writing to the Illinois State Board of Investment, 180 North LaSalle Street, Suite 2015; Chicago, Illinois, 60601.

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(4) Other Receivables

The balance of Other Receivables for the Illinois Power Agency Operations Fund includes reimbursements owed to the Agency, totaling \$900 thousand.

(5) Interfund Balances and Activity

Interfund transfer activity during the year ended June 30, 2020, consisted of the following:

The following balances (in thousands) represents amounts transferred among funds:

<u>Transfers In</u>	<u>Transfers Out</u> <u>Illinois Power Agency</u> <u>Trust Fund</u>	<u>Description/Purpose</u>
Illinois Power Agency Operations Fund	\$ 1,848	Transfer Pursuant to the State Finance Act (30 ILCS 105/6z-75)
Total:	<u>\$ 1,848</u>	

In addition, the General Assembly ordered a \$150 million interfund loan between the Illinois Power Agency Renewable Energy Resources Fund and the General Fund. On August 9, 2017, the State Comptroller and the State Treasurer, in consultation with the Governor's Office of Management and Budget, processed the transaction. Under the State Finance Act (30 ILCS 105/5h.5), the State Comptroller and the State Treasurer must repay the loan by August 8, 2021. On April 27, 2018, the first repayment of \$37.5 million was processed from the General Fund to the Illinois Power Agency Renewable Energy Resources Fund by the State Comptroller and the State Treasurer. On January 22, 2020 the State Comptroller transferred \$10 million to the Health Insurance Reserve, this transfer is made pursuant to statutory authorization set forth in 30 ILCS 150/5h.5 as amended in P.A. 101-0010 which provides for transfers to the general funds (as defined in 15 ILCS 20/50-40) or the Health Insurance Reserve Fund to meet cash flow deficits and to maintain liquidity between July 1, 2017 and March 1, 2021. Additionally, all monies transferred shall be repaid to the fund of origin within 48 months along with any interest that the fund would have accrued had the transfer not occurred. On March 27, 2020 the State Comptroller transferred \$10 million to the Health Insurance Reserve, this transfer is made pursuant to statutory authorization set forth in 30 ILCS 150/5h.5 as amended in P.A. 101-0010 which provides for transfers to the general funds (as defined in 15 ILCS 20/50-40) or the Health Insurance Reserve Fund to meet cash flow deficits and to maintain liquidity between July 1, 2017 and March 1, 2021. Additionally, all monies transferred shall be repaid to the fund of origin within 48 months along with any interest that the fund would have accrued had the transfer not occurred.

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The following presents the Funds' interfund balances and activities at June 30, 2020:

The following balances (in thousands) represents amounts due to other funds:

Due From	Due To	
	Other State Funds	Description/Purpose
Illinois Power Agency Operations Fund	\$ 8	Payment for Services
Total:	\$ 8	

The following balances (in thousands) represents amounts due from other funds:

(5) Interfund Balances and Activity - Continued

Due To	Due From	
	Other State Funds	Description/Purpose
Illinois Power Agency Renewable Energy Resources Fund	132,500	Interfund Loan Pursuant to the State Finance Act (30 ILCS 105/5h.5)
Total	\$ 132,500	

(6) Pension Plan

Substantially all of the Agency's full-time employees participate in the State Employees' Retirement System (SERS), which is a pension trust fund in the State of Illinois' reporting entity. The SERS is a single-employer defined benefit public employee retirement system in which State employees participate, except those covered by the State Universities, Teachers', General Assembly, and Judges' Retirement Systems. The financial position and results of operations of the SERS for Fiscal Year 2019 are included in the State of Illinois' CAFR for the year ended June 30, 2020. The SERS also issues a separate CAFR that may be obtained by writing to the SERS, 2101 South Veterans Parkway, Springfield, Illinois, 62794-9255.

A summary of benefit provisions, changes in benefit provisions, employee eligibility requirements including eligibility for vesting, and the authority under which benefit provisions are established are included as an integral part of the SERS' CAFR. Also included is a discussion of employer and employee obligations to contribute and the authority under which those obligations are established.

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June 30, 2020

The Agency pays employer retirement contributions based upon an actuarially determined percentage of its payrolls. For Fiscal Year 2020, the employer contribution rate was 54.33% and the Illinois Power Agency Operations Fund made contributions of \$510 thousand.

(7) Post-employment Benefits

The State provides health, dental, vision, and life insurance benefits for retirees and their dependents in a program administered by the CMS. Substantially all State employees become eligible for post-employment benefits if they eventually become annuitants of one of the State sponsored pension plans. Health, dental, and vision benefits include basic benefits for annuitants and dependents under the State's self-insurance plan and insurance contracts currently in force. Annuitants may be required to contribute towards health, dental, and vision benefits with the amount based on factors such as date of retirement, years of credited service with the State, whether the annuitant is covered by Medicare, and whether the annuitant has chosen a managed health care plan. Annuitants who retired prior to January 1, 1998, and who are vested in the State Employees' Retirement System do not contribute towards health, dental, and vision benefits. For annuitants who retired on or after January 1, 1998, the annuitant's contribution amount is reduced five percent for each year of credited service with the State allowing those annuitants with twenty or more years of credited service to not have to contribute towards health, dental, and vision benefits. Annuitants also receive life insurance coverage equal to the annual salary of the last day of employment until age 60, at which time the benefit becomes \$5,000.

The total cost of the State's portion of health, dental, vision, and life insurance benefits of all members, including post-employment health, dental, vision, and life insurance benefits, is recognized as an expenditure by the State in the State's CAFR.

The State finances the costs on a pay-as-you-go basis. The total costs incurred for health, dental, vision, and life insurance benefits are not separated by department or component unit for annuitants and their dependents nor active employees and their dependents.

A summary of post-employment benefit provisions, changes in benefit provisions, employee eligibility requirements including eligibility for vesting, and the authority under which benefit provisions are established is included as an integral part of the financial statements of CMS. A copy of the financial statements of CMS may be obtained by writing to CMS, 715 Stratton Building, 401 South Spring Street, Springfield, Illinois, 62706.

(8) Risk Management

The Funds are exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; workers compensation; and, natural disasters. The State retains the risk of loss (i.e., self-insured) for these risks.

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The Funds' risk management activities for self-insurance, unemployment insurance, and workers' compensation are financed through appropriations to the Department of Central Management Services and are accounted for in the General Fund of the State. The claims are not considered to be a liability of the Funds; and accordingly, have not been reported in the Funds' financial statements for the year ended June 30, 2020.

(9) Commitments and Contingencies

(a) Operating Leases

The Illinois Power Agency leases various real property and equipment under terms of non-cancellable operating lease agreements through November 30, 2023 that required the Illinois Power Agency Operations Fund to make minimum lease payments plus pay a pro rata share of certain operating costs. Rent expense under operating leases was \$105 thousand for the year ended June 30, 2020.

(b) Renewable Energy Credits

During Fiscal Years 2015 and 2016, under the Supplemental Photovoltaic Procurement Plan developed pursuant to Public Act 98-0672, the Agency held procurements to purchase up to \$30 million in Renewable Energy Credits (RECs) from new photovoltaic distributed energy generation devices.

A total of 14 companies have contracts to sell RECs to the Agency with contracts that started on or after, July 1, 2016, and with terms that allowed for up to nine months to identify individual projects, one year to develop projects, and then five years for the delivery of RECs as they are created. As of June 30, 2020, the outstanding commitment for those contracts totaled \$9.8 million.

Starting in Fiscal Year 2019 the Agency implemented the Illinois Solar For All Program which has a total of 13 companies with contracts that include incentives for low-income distributed generation and community solar projects and other associated approved expenditures as stated in the (20 ILCS 3855/1-56(B)(2)). As of June 30, 2020, the total outstanding commitment for the contracts listed above is \$41.1 million.

(10) Subsequent Events

An analysis conducted by the Agency that was released on December 28, 2020 concluded that absent legislative action utilities will have insufficient funds in the 2021 to 2022 energy delivery year to meet certain contractual obligations related to the Renewable Portfolio Standard administered by the Agency. The ongoing COVID-19 pandemic has resulted in significant delays in the completions of many solar projects participating in the Agency's Adjustable Block Program. These delays will shift the associated payment obligations of utilities for the Renewable Energy Credits from those projects to after May 31, 2021, which is the end of a four-year period when the

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utilities can roll over from year to year funds collected from ratepayers to support the purchase of Renewable Energy Credits. As these are funds collected and managed by utilities, this will not have a direct impact on Agency's financial position.

Appendix B
Illinois Power Agency
Fiscal Year 2020
Summary of Funds on a Cash Basis

State of Illinois
Illinois Power Agency
Summary of Funds on a Cash Basis
June 30, 2020
(Expressed in Thousands)

	<u>Special Revenue</u>		<u>Permanent Trust</u>
	<u>Illinois Power Agency Operations 0425</u>	<u>Illinois Power Agency Renewable Energy Resources 0836</u>	<u>Illinois Power Agency Trust 0424</u>
Assets			
Cash equity in State Treasury	\$ 5,366	\$ 25,697	\$ -
Investments	-	-	39,428
Total assets	<u>\$ 5,366</u>	<u>\$ 25,697</u>	<u>\$ 39,428</u>
Liabilities			
Accounts payable and accrued liabilities	\$ 744	\$ 3,287	\$ -
Total liabilities	<u>744</u>	<u>3,287</u>	<u>-</u>
Fund Balances			
Nonspendable - endowments and similar funds	-	-	39,428
Committed			
Employment and economic development	4,622	22,410	-
Total fund balances	<u>4,622</u>	<u>22,410</u>	<u>39,428</u>
Total liabilities, DIR, and fund balances	<u>\$ 5,366</u>	<u>\$ 25,697</u>	<u>\$ 39,428</u>

The accompanying notes to the financial statements are an integral part of this statement.