

**Comments of Ameren Illinois Company in Response to
the Illinois Power Agency's REC Adjustable Block Program REC Contract
Request for Stakeholder Comments
May 12, 2020**

On April 9, 2020, the Illinois Power Agency (IPA or Agency) issued a request for comments regarding the Adjustable Block Program (ABP) Renewable Energy Credits (REC) delivery contract with the goal of modifying the contract as necessary for future use. Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois or Company) is offering comments to Section 3 of the REC delivery contract request for comment:

3. Verification of Community Solar Subscription levels. For community solar projects, the January 2019 REC Contract requires the Approved Vendor to maintain its subscription level each year. Failure to maintain the subscription levels each year from a baseline set forth in the contract will result in a draw on the Approved Vendor's Performance Assurance. In order for the Agency to verify subscription information, the Approved Vendor is required to provide written authorization in the form of Exhibit I to the contract (Subscription Information Access Authorization) from the owner of each community solar project, authorizing the interconnecting utility to disclose subscription information to the Agency (with any personally identifying information to be afforded confidential treatment by the Parties and the Agency). **The Agency proposes for Exhibit I to the contract (Subscription Information Access Authorization) to specify certain verification information that it requires from the interconnecting utility including: utility account number, utility account name, subscription size (kWac), subscription start date, subscription end date (if any, after the subscription has ended), and any changes to the subscription size over time.** The Agency seeks input from stakeholders regarding the information requested and best practices related to obtaining such subscription verification information from the interconnecting utility (which may not be a counterparty to the REC contract) observed in other jurisdictions. (emphasis added)

When Exhibit I was initially developed, the Company understood that the account number was an identifying figure applied by the developer to each subscriber and not the billing account number assigned by the Company to specific customers through its billing system. During subsequent conversations with the IPA and its vendor, Incline, it has been indicated that the Company's understanding was incorrect. Customer data privacy and security has been issue of ever-increasing importance, as evidenced by the multiple dockets initiated by the Illinois Commerce Commission, docket nos. 13-0506, 14-0507, 14-0701, 15-0073, and 17-0123. In recent conversations preceding the Agency's current request, the Company conveyed its inability to provide the customer-identifiable data. Additionally, the Company has serious concerns in regards to the ability of a third party (in this case, the ABP funding recipient) to commit the Company to a release of sensitive customer information to another third party (in this instance, the IPA and its vendor, Incline) without proper protections in place for customer's account information.

In consideration of these concerns, and the need for the IPA to independently verify subscription information, the Company has identified a solution that addresses each parties' needs. To implement that solution, the Company recommends the following edits to the bolded wording in the information required in Exhibit I:

The Agency proposes for Exhibit I to the contract (Subscription Information Access Authorization) to specify certain verification information that it requires from the interconnecting utility including: ~~utility account number, utility account name~~ an anonymized means of identifying individual subscribers to individual generation units, subscription size (kWac), subscription start date, subscription end date (if any, after the subscription has ended), and any changes to the subscription size over time.

The Company proposes to provide the Agency and its vendor with the data it needs to conduct its independent verification of subscription levels by issuing, on request, the following report in an Excel format:

	A	B	C	D	E	F
1	Generation Unit Subscriber Contract Report					
2						
3	Ameren					
4	Community Solar Portal					
5	Generation Owner Name: Fred Flintstone					
6	Generation Unit Account Number: 1110101004					
7	Generation ID: 1116356					
8	Generation Unit Nickname: Wilma					
9	Service From: 4/9/2018					
10	Service To: 4/10/2018					
11	Date Unit Energized: 3/7/2018					
12	Date Unit Removed:					
13	Unit Capacity KW: 2000					
14	Total Allocation as of Service To Date KW: 25					
15	Export Date: 4/11/2018 12:26:28 PM					
16						
		Subscriber				
		Account	Subscribed	Active	Termination	DS Rate
17	Subscriber Name	Number	KW	Date	Date	Class
18			25	03/27/2018		DS-3A

The Agency and its Vendor will be able to identify specific subscribers by the row number on the report (with the row numbers serving as the anonymized individual customer identifier), and the requested subscription information start/end date will also be included in this report.

Additionally, while the Company is not able to provide information regarding a subscriber's status as a "Qualifying Small Subscriber", the "DS Rate Class" data will indicate whether the customer is receiving service under the Company's residential delivery service tariffs, or under one of the Company's non-residential delivery service tariffs.

Ameren Illinois appreciates the opportunity to submit these Comments on the IPA's ABP REC delivery contract. Ameren Illinois requests that the IPA adopt the revisions proposed in its final version of the REC delivery contract.

Respectfully submitted,
Ameren Illinois Company
d/b/a Ameren Illinois

A handwritten signature in black ink, appearing to read "G. Grammer". The signature is written in a cursive style with a large initial "G" and a long, sweeping tail.

Geoffrey F. Grammer
1901 Chouteau Avenue
St. Louis, Missouri 63166

