STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER AGENCY	)	
Petition for Approval of the	)	**Docket No. 13-0546**
220 ILCS 5/16-111/5(d) Procurement Plan	)	

THE RETAIL ENERGY SUPPLY ASSOCIATION
VERIFIED REPLY TO RESPONSES TO OBJECTIONS TO
ILLINOIS POWER AGENCY'S 2014 PROCUREMENT PLAN

The Retail Energy Supply Association ("RESA")[1] submits, pursuant to Section 16-111.5 of the Public Utilities Act and the Administrative Law Judge's Ruling dated October 9, 2013, this Verified Reply to Responses to Objections of the Illinois Power Agency's ("IPA") 2014 procurement plan (the "2014 Procurement Plan"). RESA is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. RESA is devoted to working with all stakeholders to promote vibrant and sustainable competitive retail energy markets for residential, commercial and industrial consumers. RESA has been an active participant in all of the proceedings before the Illinois Commerce Commission ("Commission")

[1] RESA's members include AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energetix, Inc.; GDF SUEZ Energy Resources NA, Inc.; Hess Corporation; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd.; and TriEagle Energy, L.P.. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

concerning approval of the annual procurement plans of the IPA, beginning with Ill. C. C. Docket 08-0519.

On October 7, 2013, RESA filed Objections to the 2014 Procurement Plan filed by the IPA with the Commission on September 30, 2013, and docketed as Ill. C. C. Docket 13-0546. On October 21, 2013, RESA filed its Verified Response to the Objections of other parties to the 2014 Procurement Plan. RESA's Verified Response supported the proposal of the Illinois Competitive Energy Association ("ICEA") to incorporate fixed-priced, full requirements ("FPFR") products into the 2014 Procurement Plan. RESA also supported and endorsed ICEA's Verified Response to Objections in this proceeding which rebutted the concerns of Ameren Illinois Company ("Ameren"), the only party filing Objections which, among other things, opposed ICEA's FPFR proposal.

A number of other parties also submitted Responses to Objections. In addition to ICEA and RESA, Exelon Generation supported ICEA's proposal to incorporate FPFR products into the 2014 Procurement Plan. The Commission Staff and Commonwealth Edison Company took no position on ICEA's proposal. ICEA's proposal was opposed by Ameren, the Illinois Attorney General, the Citizens Utility Board ("CUB"), and the IPA. However, Ameren basically repeated arguments made in its Objections that were completely rebutted by ICEA in its Verified Response. The IPA, the Attorney General, and CUB relied on the IPA's analysis, contained in the 2014 Procurement Plan, of full requirements products. However, that analysis was demonstrated to be flawed by ICEA in its Objections, including the NorthBridge Report, attached to those Objections.

RESA supports and endorses ICEA's Verified Reply to Responses to Objections to the 2014 Procurement Plan, which fully rebuts the arguments of the parties who opposed the FPFR proposal in their Responses to Objections. RESA continues to recommend that the Commission accept ICEA's specific full requirements proposal (set forth in detail in its Objections) and incorporate that proposal in the 2014 Procurement Plan.

In their Objections, both RESA and ICEA raised concerns regarding the calculation of the Alternative Compliance Payment ("ACP"). In their Responses to Objections, both the IPA and Commission Staff assert that this matter should not be litigated in this proceeding. (IPA Response, p. 8; Staff Response, p. 10) RESA would be more understanding of this approach if either the IPA or the Commission Staff would point to another forum in which to address the problem caused by last minute changes to the ACP estimate. In the absence of another forum, and given the fact that the ACP is based on the renewable procurements that the IPA manages on behalf of the utilities, this proceeding is an appropriate forum to address concerns regarding the ACP.

Respectfully submitted,

/S/ GERARD T. FOX
Gerard T. Fox
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October 31, 2013

NOTICE OF FILING

Please take note that on October 31, 2013 I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Retail Energy Supply Association's Verified Reply to Responses to Objections in this proceeding.

Dated: October 31, 2013

/s/Gerard T. Fox
Gerard T. Fox

CERTIFICATE OF SERVICE

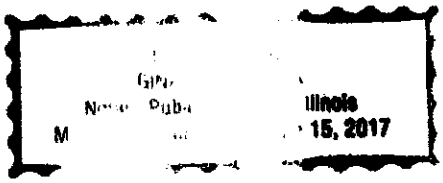
I, Gerard T. Fox, certify that I caused to be served copies of the foregoing Retail Energy Supply Association's Verified Reply to Responses to Objections upon the parties on the service list maintained on the Illinois Commerce Commission's eDocket system for the instant docket via electronic delivery on October 31, 2013.

/s/ Gerard T. Fox
Gerard T. Fox

STATE OF ILLINOIS)
) **SS**
COUNTY OF DUPAGE)

VERIFICATION

RoyBoston, being first duly sworn, on oath deposes and says that he is Strategic Planning and Policy Manager-East for Noble Americas Energy Solutions, LLC, that he has read the foregoing Reply to Responses to Objections in Ill. C. C. Docket 13-0546, that he knows of the contents thereof, and that the same is true to the best of his knowledge, information, and belief.



/s/ROY BOSTON
Roy Boston

Subscribed and sworn to me

This 29th day of October, 2013

