

From: Jack Darin
To: Bohorquez, Mario
Subject: [External] Comments on 2017 Procurement Plan

Mr. Bohorquez:

Please accept these comments on the Draft 2017 Electricity Procurement Plan on behalf of the Sierra Club, Illinois Chapter.

Sierra Club applauds the Agency for its efforts to implement Illinois' Renewable Portfolio Standard and Energy Efficiency Portfolio Standard in ways that seek to secure the many health, environmental, and consumer savings benefits associated with meeting these goals.

We are pleased that IPA is proposing a distributed generation (DG) procurement, and proposing several features of this procurement with the goal of encouraging robust competition and participation. This component of the procurement plan is well timed, and the proposal seems well-informed by, the recent successful Supplemental Photovoltaic Procurement.

We agree with IPA's intent to encourage participation in this procurement. Greater participation not only facilitates meeting statutory targets and competition to secure best pricing for consumers, but also hopefully can engage new market entrants. In particular, the proposal to allow speculative procurements makes a great deal of sense, given both the limited participation in past DG regular procurements, and the full participation in the Supplemental Photovoltaic Procurement allowing speculative procurements.

We encourage the IPA to consider allowing speculative procurement for systems over 25 kw/h as well. As the IPA notes, the 1MW minimum bid size may be a barrier to participation. Allowing speculative procurement for systems over 25 kw/h may prove to be an important solution to this issue.

Allowing for the procurement of "like resources", as proposed for the RERF procurement, is also a welcome proposal to encourage robust participation.

In the wake of the successful Supplemental Photovoltaic Procurement, we strongly agree with IPA's preference for legislative action to allow for the ongoing utilization of the Renewable Energy Resources Fund (RERF) for similar procurements. We would recommend legislation such as HB2607/SB1485, the Illinois Clean Jobs Bill, as an approach to authorize the expenditure of RERF dollars.

Again, thank you for the opportunity to comment, and for the Agency's efforts to meet Illinois' clean energy goals while maximizing benefits to our environment, economy, and electricity consumers.

Sincerely,
Jack Darin
Director
Sierra Club, Illinois Chapter