

## APX Inc. Comments RE: IPA Long-Term Renewable Resources Procurement Plan - September 29, 2017

### **Inclusion of North American Renewables Registry**

We believe that the inclusion of NAR as valid renewable energy tracking systems in the “Plan” will greatly increase the number of renewable projects that could be utilized to meet the proposed Illinois RPS (including Zero Emission) which requires that the power come from the state or a state directly adjacent. The inclusion of NAR would help keep the cost of compliance with the RPS borne by rate-payers low. Currently, there are approximately 100 renewable projects in NAR that are located in a state that borders Illinois. There are close to 50 projects in NAR that currently carry the Illinois RPS eligibility.

Here is a table showing the count of NAR certificates retired for IL compliance:

| Year       | Retired in NAR for IL Compliance | Imports from NAR retired in M-RETS for IL Compliance |
|------------|----------------------------------|--|
| 2014       | 1,500                            |  |
| 2015       | 40,067                           |  |
| 2016       | 55,727                           | 2,721  |
| 2017 (YTD) | 12,390                           | 38,202   |

NAR has been designated as the compliance system for the Missouri Renewable Energy Standard (RES). The State of North Carolina has also designated NAR as an eligible registry for facilities located outside of North Carolina that seek to qualify for the North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard. The Kansas Corporation Commission also uses NAR to verify RECs purchased by Kansas utilities and cooperatives for compliance with the Kansas Renewable Portfolio Standard. Most recently, the Northern Maine Independent System Administrator (NMISA) has chosen NAR as its tracking system. With this addition, renewable energy facilities registered in NAR can now be tagged as eligible for Kansas, Illinois, Missouri, Maine and Puerto Rico if they have met the applicable requirements as a renewable facility. Furthermore, NAR is currently able to export certificates to NYGATs, NC RETS and NEPOOL-GIS and accept imports of certificates from ERCOT, WREGIS, MIRECS, M-RETS and NC-RETS.

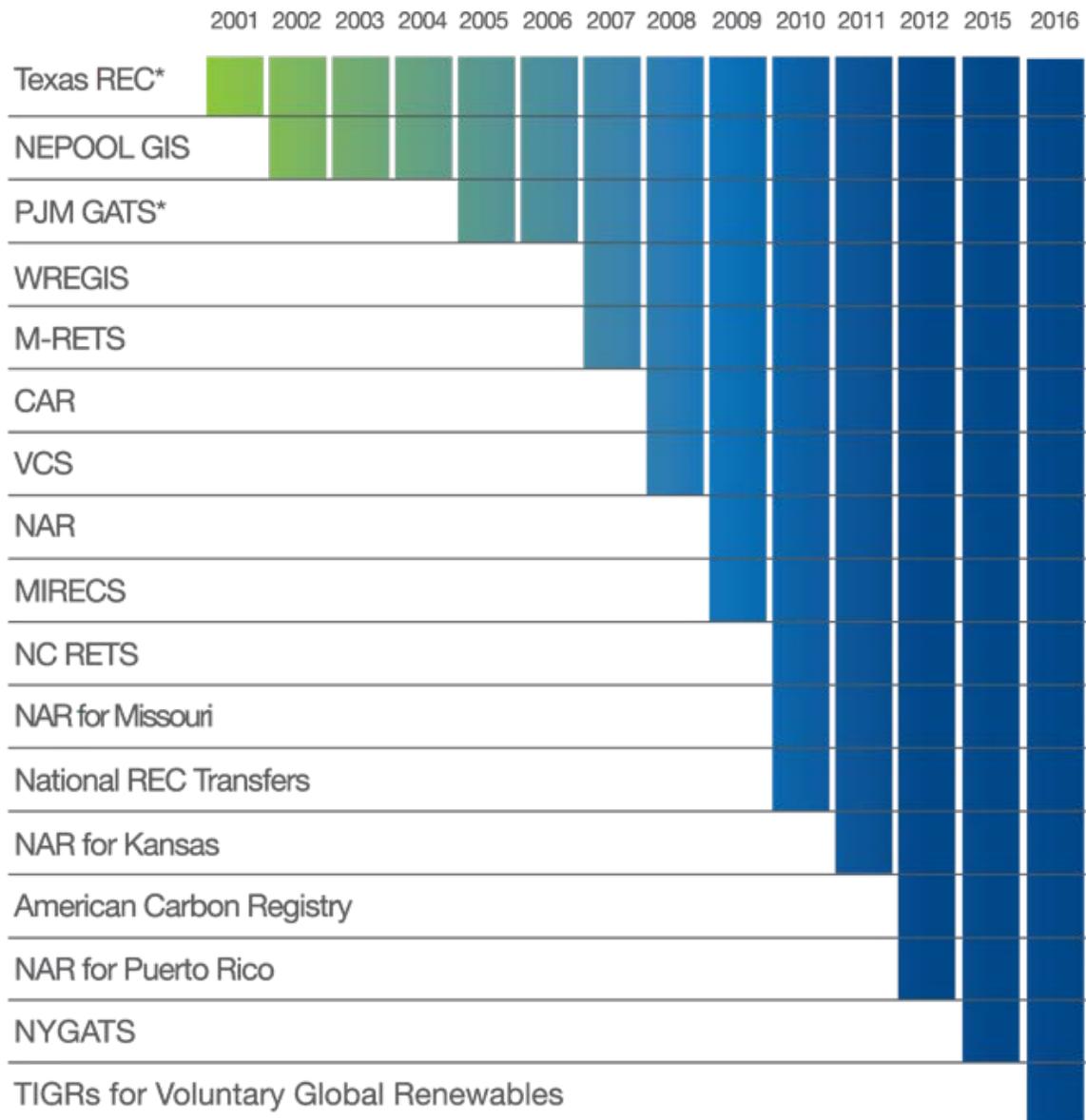
The North American Renewables Registry™ (NAR) provides an easy-to-use, Web-based platform trusted to create, track, and manage renewable energy certificate (REC) origination for clean generation facilities and states not covered by one of the existing APX-powered, regional systems. All market participants are able to take advantage of a trusted infrastructure to help manage their role in the market. With the ability to create unique, serialized records for every REC, the Registry provides the greatest product transparency, accountability and protection against double counting.

### **Disambiguation of Independent System Operator and Renewable Energy Tracking System**

APX Inc (“APX”) would like clarify the difference between the MISO and PJM independent system operators and regional renewable energy tracking systems. Throughout the “Plan” M-RETS and GATS are used to describe the geographic areas covered by the MISO and PJM control areas respectively, but the relationships are not so straight-forward. For example, renewable energy generators located in the MISO footprint are natively registered in MIRECS (Michigan RECS), GATS, and NAR (North American Renewables Registry) tracking systems, in addition to MRETS.

**About APX Inc.**

APX has unparalleled experience in hosting and servicing secure web-based applications that are custom built for the energy and environmental attribute markets. We currently support eight different energy tracking systems and three different carbon offset tracking systems and have been providing these services for over 16 years.



\* The APX Platform is still utilized but our role ended after launch

Globally, we support over 4,000 account holders, have registered over 36,000 projects and have issued over 2 billion instruments.