



#1) Comments concerning Section 6.14 through 6.14.4 addressing the application process, Batches, Batch Size and Batch Review.

We're located in downstate Illinois in a rural community and have been installing solar for many years in Illinois. Given our location and wide service area, we develop and install solar and wind projects over a wide geographical area and have worked with many electric utility territories.

Over the past 2 years alone, we've completed solar installations in 15 different utility districts. Of those about 50% have been in Ameren's territory and the majority of the others in rural electric coop territories and municipal territories.

The draft plan seems reasonable from what I can tell. However, I want to emphasize to the IPA to keep it simple and easy for small quantities of solar projects in rural electric coops and small municipalities to efficiently apply for SRECs without.

#2) Concerning batch size:

We propose lower batch size requirements OR offering REC price ADDERS for **companies that have been in business / located in Illinois for more than 5-years** or similar criteria? We've been helping create and grow an early-stage market which has often been challenging. We've been serving a rural, low population density market. Similar to Women/Minority owned contractors having a lower bar of 50 kW batches, long-term in-state solar employers should be **rewarded for investing many years of educating the Illinois consumer about solar.**

#3) Concerns Regarding Section 6.16.1 through 6.17

Requiring 10% collateral is high and should be reduced. **This IS NOT SMALL BUSINESS friendly language.** Our collateral requirements could grow considerably and become a major liability on our balance sheet. **The language appears to be written by a large company with deep pockets such as a utility company or national solar company.** It appears all the risk of performance is heavily shouldered by the "Approved Vendor" yet details about owner responsibilities are not addressed with much detail (unless in another section I missed). 15-yr is a long time. New owners will monetize the tax credit and SREC value in the first 5-years. Many owners within 15 years and often in under 10 yrs will move, die, divorce, confront health issues, or other major life challenges. As property changes ownership, new owners during years 6 through 10 and beyond will have much lower financial incentive to keep their systems in top operation compared to the original owner (at this point they will receive energy savings which for smaller systems may not be a big motivator). As an installer, I see we effectively have long-term performance responsibility whereas original owners may not. Why would owners received full SREC value in 5-years or less yet the "Approved Vendors" have a 10 to 15 year operation responsibility for systems we don't own and may be forced to deal future new owners that may have completely different motivation concerning their solar system. I can see that being problematic and creating instances putting our collateral at risk. This is unworkable and needs a new approach.

For small systems **under 10 kW and at least up to 200 kW** I recommend reducing the SREC value by 10% and eliminating the collateral requirement altogether. OR alternatively, 10% of the contract value should be held in an account by the state and that can serve as the collateral. We work with many small

businesses and farm installations where under 200 kW is a feasible size range. The collateral requirement should be re-vamped for this size range.

I appreciate your consideration of the above. Should have questions please let me know.

Thank you.

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