

[Commenter 4 logo]

February 19<sup>th</sup>, 2019

**Response to:  
IPA Brownfield Site Photovoltaic Procurement  
Questions & Request for Comments**

*On behalf of:* [Commenter 4]

*Submitted by:* [Commenter 4's representative]

Dear Director Star,

[Commenter 4] submits these comments to the Illinois Power Agency (“IPA”) in response the February 5<sup>th</sup>, 2019, request for comments regarding the IPA Brownfield Site Photovoltaic Procurement program.

**Specific IPA Questions**

1. There are prospective brownfield project sites that, while they do not meet the definition in Section 1-10 of the IPA Act, appear to meet the intent of the brownfield program. [REDACTED].
2. No comment.
3. No comment.
4. For a 2019 competitive procurement event, commenter recommends extending first delivery until December 31, 2022. The additional 6 months ensures that construction can be completed during spring and summer of 2022 if there are delays in securing environmental regulatory approvals in 2020 or 2021.
5. Brownfield sites present additional development actions, costs, and risks relative non-brownfield sites. Examples include securing authorizations from the U.S. EPA or IEPA to build on a site, additional cost to characterize subsurface to determine appropriate construction techniques (e.g., piles vs. ballasted sleds), and liability assumption negotiations. To encourage developers to undertake these additional risks, [Commenter 4] recommends reducing all pre-first REC delivery REC collateral requirements by 50%.
6. [Commenter 4] feels the 2018 competitive procurement event was sufficiently marketed.

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7. [REDACTED].

8. [REDACTED].

Thank you for the opportunity to provide comments. Please contact us with any questions.

Regards,

/s/

[Commenter 4's representative and contact information]