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Illinois Power Agency

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105 West Madison Street, Suite 1401

Chicago, Illinois 60602

Bella Power Services, LLC (Bella) appreciates the opportunity to submit comments on the draft 2022 Long-Term Renewable Resources Procurement Plan.

Specifically Bella would like to add our support to the workforce requirements in 10.1.1 Minimum Equity Standards. We believe that requiring work to be performed directly by equity eligible contractors is essential to achieving the overall goal of creating jobs for the people of Illinois with this program.

Much of the money that is awarded to projects with this program will be used to purchase equipment (modules, inverters, racking systems, etc) that is produced overseas. This is primarily because there is a lack of cost competitive domestic options and therefore much of the funding of this program will leave Illinois borders.

The primary area where funding can be focused within Illinois is to fund our labor. Bella has self performed over 25,000 hours of work over the past two years utilizing union labor in Illinois. It is our plan to continue self performing our work for the long term. We feel that requiring 10% of a project to be performed by equity eligible persons or contractors and growing that to 30% over the course of the program is essential. If these requirements are not in place it opens the possibility of aggregators utilizing non-Illinois labor for this work and diminishes the impact of the program in our opinion.

The primary objection to this requirement is the current lack of equity eligible contractors and persons who can self perform the work. We see that as the basis for why these requirements are essential. We need to incentivize more people to get involved as equity eligible contractors and people. Backing off these requirements would be short sighted in our opinion. We need to put the people of Illinois to work in high quality union jobs. Let's not back away from the challenge.

Thank you for the chance to share our comments and for the hard work you put into these programs. We look forward to being engaged partners in helping Illinois achieve our climate goals and building a secure future for our families and the people of Illinois.

Regards,

A handwritten signature in black ink, appearing to read "Karen Luedtke", with a long horizontal flourish extending to the right.

Karen Luedtke  
President  
Bella Power Services, LLC  
Illinois DG P2021-0773