

Good afternoon,

Once again, I am dismayed to see how Group A REC pricing is being handled. As noted below from the table copy/pasted from the recent correspondence regarding draft pricing, I see that every category in Group A has been reduced significantly in categories under 200kW, while Group B has been increased in all but three sizing categories that have a proposed slight reduction in relationship to the reduction being proposed for Group A:

Illinois Shines (Adjustable Block Program)

Distributed Generation

	2022-2023 Prices		Proposed 2023-2024 Prices		Proposed Change (\$)		Proposed Change (%)	
	Group A	Group B	Group A	Group B	Group A	Group B	Group A	Group B
0 - 10 kW	\$78.51	\$82.28	\$73.42	\$84.07	(\$5.09)	\$1.79	-6.49%	2.18%
10 - 25 kW	\$66.39	\$71.89	\$59.41	\$70.72	(\$6.98)	(\$1.17)	-10.51%	-1.63%
25 - 100 kW	\$57.94	\$62.23	\$50.22	\$58.35	(\$7.72)	(\$3.88)	-13.33%	-6.24%
100 - 200 kW	\$58.85	\$59.02	\$53.64	\$57.67	(\$5.21)	(\$1.35)	-8.85%	-2.29%
200 - 500 kW	\$52.35	\$53.11	\$50.55	\$54.00	(\$1.80)	\$0.89	-3.43%	1.68%
500 - 2000 kW	\$50.42	\$47.63	\$49.15	\$49.68	(\$1.27)	\$2.05	-2.51%	4.30%
2000- 5000 kW	\$40.90	\$33.31	\$38.72	\$36.59	(\$2.18)	\$3.28	-5.33%	9.85%

The two categories that best serve larger residential applications, small businesses and/or ag producers, the 10-25kW category and the 25-100kW category have proposed reductions of 10.51% and 13.33% respectively, while Group B is only being reduced 1.63% and 6.24%...less than half of the reduced pricing amounts proposed for Group A. With prevailing wage being required on all commercial jobs at this time, the difference in the cost of labor has been leveled so I do not understand how decreases of this significance are warranted.

Additionally, as in previous years since the passage of CEJA, capacity in Large DG was reached by Group A because the limits set were less than half of what Group B was allocated (in all categories except Large DG in which Group A was allocated 58% of what Group B was allocated, and there is now still significant capacity in Small and Large DG in Group B while Group A is once again waitlisted for Large DG (42.2% capacity left in Group A Small DG/54.5% in Group B Small DG; **0 capacity left in Group A Large DG/85.5% capacity left in Group B:**

The Final Block Sizes for the 2022-2023 Program Year, including the Addition of Uncontracted Capacity Allocation from the 2021-22 Program Year, in MW, are:

Block Group	Small DG	Large DG	Traditional Community Solar	Community-Driven Community Solar	Equity Eligible Contractor Projects	Public Schools
Group A (Ameren Illinois, MidAmerican, Mt. Carmel, Rural Electric Cooperatives and Municipal Utilities located in MISO)	42.18	57.58	51.27	10.55	43.59	154.85
Group B (ComEd and Rural Electric Cooperatives and Municipal Utilities located in PJM)	99.09	99.09	119.63	24.27	101.04	
Total	141.27	156.67	170.9	34.82	144.63	154.85

Please note that applications for Traditional Community Solar Category open November 1, 2022.

		2022-2023 Program Year Block Size (MW)	Allocated Capacity ^[1] (in MW)	Batched Capacity ^[2] (in MW)	Submitted Capacity ^[3] (in MW)	Available Capacity ^[4] (in MW)
Group A	Small DG	42.18	1.87	19.03	3.45	17.82
	Large DG	57.58	17.67	42.83	0.36	0.00
Group B	Small DG	99.09	3.87	36.64	4.60	53.98
	Large DG	99.09	0.40	9.04	4.89	84.76

I do not understand the discrepancies/methodology in pricing and/or the allocation of capacity, and after five years of the program being operational, respectfully request that the proposed REC values and capacity of Group A be reevaluated to something that is more fair and equitable based on historical data. Population should not be the only consideration for pricing and allocation. Roof and land space, along with reasonable permitting and utility application processes and processing times, are the main differences as to why Group A application submissions are higher. Attempting a "chilling effect" to the most utilized categories in Group A Large DG by such significant price reductions in REC pricing are counterproductive to reaching legislatively mandated state goals and should be reconsidered. Thank you for your consideration of my thoughts!

Best Regards,

Michelle

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