



The Wrigley Building
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To: Illinois Power Agency
From: Brad Tietz, Vice President of Government Relations & Strategy – Chicagoland Chamber
Date: September 28th, 2023
Re: 2024 Long-Term Renewable Resources Procurement Plan, Renewable Self-Direct Provisions

The Chicagoland Chamber respectfully submits the following comments on the Illinois Power Agency's ("IPA" or the "Agency") 2024 Long-Term Renewable Resources Procurement Plan ("Plan"). Chicagoland Chamber's comments below focus on the renewable self-direct program.

The Chicagoland Chamber of Commerce is a nonprofit organization that represents more than 1,000 member companies, which collectively employ 400,000 employees and generate \$24 billion in revenue in the greater Chicago area. The Chamber's members have ambitious climate and clean energy goals that outpace state targets which have driven significant renewable energy deployment in the region. A robust renewable self-direct program will encourage large voluntary renewable buyers, including Chamber members, to continue investing here in Illinois, advancing the state's economic goals as participants will continue to look for additional renewable energy opportunities as their operations grow in the state.

Section 6.5: Self-Direct Crediting and Accounting

The renewable self-direct program is an important tool to enable voluntary buyers of renewable energy to help accelerate the state's progress toward the state's climate and clean energy goals. As noted in section 6.5 of the Long Term Renewable Resource Procurement Plan, "Meanwhile, the benefit to the State of Illinois in providing the self-direct program is a reduction in the quantity of RECs required to be procured through IPA-administered utility-scale procurements." It is clear that purchasers of voluntary renewable energy participating in the self-direct program reduce not only the number of RECs procured by the IPA but also the expenditures of the IPA in procuring those REC. These expenditure reductions should be passed on directly to self-direct customers through a credit amount that reflects how each REC contributed through the program reduces the cost incurred by the IPA. By ensuring a fair credit value, the Agency maximizes the benefit of the program.

Section 6.9: Participant Data Confidentiality Comments - Compliance Reporting

Many elements of the information provided by self-direct participants are confidential and commercially sensitive. The Chamber recommends that participant data involving renewable energy production, annual renewable energy credits (RECs) quantities, and electric consumption, including annual electric usage and electric peak demand, remain confidential and not be disclosed publicly. The Chamber understands some of this information - namely, annual REC quantities - has been released publicly in an aggregated fashion as part of the initial program year. The Chamber believes that if annual REC quantities supplied by participating customers must be disclosed, the IPA should present this information in an aggregated fashion and within a wide range to protect commercially sensitive information.



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The Chamber appreciates the opportunity to provide these comments to the 2024 Draft Long-Term Renewable Resources Procurement Plan. We look forward to working with the IPA and other stakeholders to help shape a vibrant program that supports economic development through business attraction and renewable energy development.