



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

To: Illinois Power Agency
From: Tyler Diers, Executive Director – Midwest, TechNet
Date: September 26, 2023
**Re: 2024 Long-Term Renewable Resources Procurement Plan,
Renewable Self-Direct Provisions**

TechNet respectfully submits the following comments to the Illinois Power Agency (“IPA” or the “Agency”) on their draft 2024 Long-Term Renewable Resources Procurement Plan (“Plan”). TechNet’s comments below focus on the renewable self-direct program.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet’s diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over 4.5 million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

Our members have contracted for hundreds of megawatts of new renewable energy projects in Illinois, and they continue to look for additional renewable energy opportunities as their operations grow in the state. Our members are committed to meeting their own ambitious climate goals and want to contribute to Illinois’s clean energy future as well, through the renewable self-direct program.

Section 6.9; Pg 141: Participant Data Confidentiality Comments - Compliance Reporting

Information regarding self-direct participant electric consumption and renewable energy production is oftentimes confidential and commercially sensitive. Specifically, we continue to recommend that information regarding renewable energy production and annual renewable energy credit (REC) quantities supplied to the program remain confidential and not be disclosed publicly. Similarly, information regarding a self-direct program participant’s electric consumption - including annual electric usage and electric peak demand - should remain confidential and should not be disclosed to the public in any format.

If there is information about renewable energy projects (like annual REC quantities) that must be released publicly, we recommend that it be released in aggregate and within a very wide range to protect sensitive information about participant renewable energy production and electric consumption. TechNet acknowledges the IPA for following such practices when announcing initial 2023-2024 program participation details and encourages the IPA to continue this practice for all future public disclosures about the program.

Section 6.5; Pgs 130-136: Self-Direct Crediting and Accounting

The intent of the renewable self-direct program is to harness the power of the voluntary renewable energy procurement market to drive progress towards Illinois's climate and renewable goals. To fulfill this intent, the renewable self-direct program must fairly compensate all RECs self-direct participants retire in the program. As noted in section 6.5 of the Long-Term Renewable Resource Procurement Plan, "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, as "[e]ach renewable energy credit procured . . . by a self-direct customer shall reduce the total volume of renewable energy credits the Agency is otherwise required to procure from new utility scale projects." As noted in the Draft LTRRP section above, each REC provided by a self-direct customer reduces the number of utility-scale RECs the IPA is required to provide, and hence reduces IPA utility-scale REC expenditures. These avoided costs should be passed along to self-direct customers in a like-for-like manner through the self-direct credit. The current self-direct crediting mechanism provides all participants with a prorated credit amount that does not reflect how the utility-scale RECs provided by self-direct participants reduce Agency REC expenditures. The IPA should update the credit methodology so self-direct participants receive the actual value of the utility-scale REC (i.e., an average of actual utility-scale REC costs from the two preceding delivery years and anticipated utility-scale REC costs for the upcoming delivery year) for each REC provided to the program, regardless of whether participants provide the minimum REC threshold (40%) or more. It is important to note that under this approach, self-direct participants still pay for the programs that advance environmental justice and small-scale renewable energy development in the state through their monthly utility bill.

Thank you for the opportunity to submit comments on this important program. Our goal with these comments is to ensure a robust renewable self-direct program with strong customer participation.

Thank you,



Tyler Diers
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TechNet