

From: Craig Pals <craig@ticktockenergy.com>
Sent: Friday, September 29, 2023 6:33 PM
To: IPA.ContactUs <IPA.ContactUs@Illinois.gov>
Subject: [External] Long-Term Plan Comments / SREC Program

Hello IPA,
Please see comments below:

- Eliminate the group A and B separation in total capacity. Then either unify the SREC values or keep SREC values separate by Group.
- Shorten the life of the SREC program. Instead of 10 years – make it 5, or 8. Essentially borrow against the final years of the program. Then seek renewal of the program at that time.
- Program simplification:
 - Besides the administrative overhead for the SREC program, our company’s overhead related to the SREC program is quite high. Explaining a somewhat complicated incentive program to consumers takes time. Our internal admin support to process and administrate applications is high. Extra metering & reporting. The Approved Vendor fees and their overhead pulls from consumer funds. Throughout the entire SREC “supply chain” it appears the programmatic costs could benefit the consumer greater if things were simplified.
- Consider lowering SREC values by at least 25% and possibly more. That may slow the pace a bit.
- Analyze the under-performing groups in 2023-2024 program year, i.e. Public Schools segment and others. Other categories appear to move capacity at much slower rate. Eliminate these categories and redistribute those funds elsewhere and have public schools participate in the Large DG category.
- Increase consumer protections with respect to electrical knowledge, electrical licensing & quality.
 - Example: many aggressive sales organizations exist (local / virtual, etc) but “boots on the ground” electrical experience is often lacking. The fact that uniform electrical licensing is not required in the state contributes to this. The high SREC values entice all type of players with short-term revenue generation focus at the expense of quality and customer satisfaction. It’s shocking how many customers sign contracts under high pressure sales situations yet have various regrets after. The aggressive players that rush into the State, over-promise, under delivery and then go bankrupt and leave systems stranded with unhappy consumer is unfortunate. Many of these organizations don’t have a strong commitment to Illinois and are focused on a quick buck.

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