

Vistra Corp's Initial Submission on Plans for Workshops on Post-Award Contract Changes

Vistra Corp. (Vistra) has reviewed the information posted by the Illinois Power Agency (IPA) concerning plans and schedule for workshops on the topic of allowing post-award contract changes for renewable energy projects that have been selected in IPA-conducted renewable energy credit (REC) procurement events to contract with electric utilities to sell RECs from the projects. The IPA's proposal to conduct workshops on this topic was approved by the Illinois Commerce Commission in its order in ICC Docket 23-0714 concerning the IPA's 2024 Long-Term Renewable Resources Procurement Plan.

As a developer of renewable energy projects, some of which have already been selected in IPA-conducted procurement events to contract with electric utilities to sell RECs from Vistra projects, Vistra has a strong interest in this subject matter. Accordingly, Vistra wishes to participate in the workshop and (if conducted) proposal-drafting processes outlined in the IPA's request for comments. Vistra does not have any comments or concerns at this time regarding the schedule for workshops and other events and activities that the IPA has proposed. Vistra does not have any substantive comments to provide at this time, but recognizes, from a high-level perspective, the pros and cons of, on the one hand, allowing for post-award contract changes under carefully-designed criteria; or, on the other hand, continuing under the status quo approach with limited or no provision for post-award contract changes. Vistra believes that if post-award contract changes are to be allowed, the criteria under which such changes are allowed must be strictly defined to avoid negative consequences, and that determining such criteria (assuming post-award contract changes are determined to be appropriate at all) will be a critical focus area of the workshop process.

Vistra requests that its representatives listed below be included on the distribution list or notification list compiled by the IPA for the workshops and related events, and that Vistra's representatives receive notice of all events in the workshop and proposal drafting processes as well as copies of all comments, submissions, workshop summaries, and other documents pertaining to these processes.

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