

From: [Craig Pals](#)
To: [IPA-Solar](#)
Subject: [External] Tick Tock Energy – Feedback on REC Price Cost Collection
Date: Friday, November 22, 2024 8:45:52 PM
Attachments: [image004.png](#)

Dear IPA,
I'm providing feedback on this matter.

Regarding the granularity of accounting in Feedback Request #3, we would like to raise the following concerns:

- 1. Administrative Feasibility:** The level of detail required under this proposal introduces ANOTHER administrative burden and continues to drive up the cost of installing solar in IL. The overall Adjustable Block Program is already heavy on administrative requirements and consumer fees and we spend significant staff time on program related activities (i.e. sales people explain the SREC incentive, installing metering hardware and supporting monitoring and reporting, the administration of SREC applications and coordinate w/ approved vendors, the fees consumers pay, etc). Adding a cost reporting structure is will increase these costs and create disparities within the industry. Costs can vary considerably based on roof-mount vs ground mount, city vs rural, and related comparisons. Ground mount systems are often hundreds of feet away from point of interconnection and may have higher electrical distribution costs compared to a rooftop system nearby interconnection point. The ABP program already collects project cost, kW and installation type detail that should shed light on Illinois-specific costs. I'm skeptical that increased data granularity will yield value greater than the collective cost burden across the state. If the IPA continues to push this matter, then the CREST model is more appropriate.
- 2. Data Privacy and Competitive Concerns:** Sharing sensitive cost data—even under assurances of confidentiality—poses risks, particularly under the Freedom of Information Act (FOIA). Similar data is not collected or disclosed in other State programs that we are aware of, and doing so could expose proprietary information, providing a competitive advantage to larger players who can leverage this data. We strongly recommend reevaluating this aspect to ensure safeguards are adequate.

We urge the Agency to consider simplifying the data collection requirements and focus on statewide markers or average numbers wherever possible.

Respectfully,

Craig

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