

To: ipa.energyequity@illinois.gov

Subject: 22c - Stakeholder Feedback on EEC Criteria - Confidential

Date: May 3rd, 2023

Version: Confidential, partially redacted

22c Development, LLC and its primary AV Designee 22c Holdings, LLC ("22c") are based in Uptown at the corner of Broadway and Leland. 22c was formed in May 2022, is a start-up company, [REDACTED] and is focused each day on executing its twofold corporate mission.

1. Transition the IL power grid's energy supply to renewably generated &
2. Help enable Uptown individuals to become aware, educated, skilled, and empowered to join and then have an impact on #1, themselves, their families, and their community through the proper effectuation of CEJA.

At 22c's inception it conducted research across the state and found there *could* be 4 primary future root causes that would lead to CEJA not coming to fruition on time each year and effectively. These 4 potential causes are all focused on the effect of *people entering* the Illinois clean energy economy that CEJA has greatly helped cultivate. This effect at its core means people need to *choose* to join - so, the questions to ask are: 'why will people join' and 'why won't people join'. Obtaining answers to those two questions can help solve for future, potential results of if the law will have its desired effect on people, the grid and of course Illinois' global carbon footprint, or not.

22c focused on these questions and ended with 4 potential root causes that could inhibit CEJA's on time effectuation throughout the 2020s.

1. People being unaware of the law itself existing (*Awareness*),
2. People today lacking the trade skills that are required for the various job functions CEJA-participating-firms need to hire for work (*Skills*),
3. People lacking professional guidance and inspiration (*Mentorship*), &
4. People lacking capital and or process to obtain the necessary skills to be an employee, start a company or enter the market as an independent contractor so that they may have successful careers (*Means*).

22c then began to try to form and execute on solutions to these potential problems. This work was and is all in addition to 22c's other side of the business which is as a start-up renewable energy development and investment firm. It has been 11 months since 22c's inception in 2022.

22c at its core firmly believes that over the next decade Illinois can and likely will be the largest clean energy economy in the country (largest by

average yearly new operating MWS and jobs created), so, it is obvious that preemptively trying to solve any potential future root causes were actions that 22c wanted to take alongside other market leaders and participants.

And from this point, the second part of 22c's corporate mission took form: trying to solve these 4 locally with the subsequent vision to replicate in other parts of Illinois as 22c's workforce, capabilities, experience, and network of external partners who possess a shared vision grows.

[REDACTED]

[REDACTED]

[REDACTED]

22c believes a partnership with these fundamentals can be a great and productive countermeasure to not enough people knowing or being able to join the market. [REDACTED]

[REDACTED]

22c in addition to the above comments has opted to respond to the points the IPA raised in its April 11th Stakeholder Feedback Request.

22c would like to thank the IPA for its thoughtfulness in commencing this process and feels that many of the IPA's questions can be further answered through direct inquiry such as methods similar to this stakeholder process and also audits of Approved Vendor corporate partnership structures.

Through the ABP's set up and organization to date, 22c has worked hard and found a way to weave both of its missions together in a fast, executable, and probable manner after making many high risk investments as a start-up, [REDACTED] in Uptown. The finalization of the 2022 Long Term Plan and Program Guidebook was a clear signal to the market on rules and 22c fully supports updates to those rules for any future Long Term Plan Updates for the applicable ABP Program Years affected by the Long Term Plan Update.

Prior to direct responses to the questions posed by the IPA, 22c has 2 requests that it feels are important to make clear, respectfully, as today we are over 180 days since the original 11-1-2022 Program Opening date.

22c believes this 6-or-so month period to have been warranted for the entire market to pragmatically assess the situation and now feels that direction to the Program Administrator and market participants on what to expect for all applications submitted to date would be very helpful. These applications across Groups A & B carry millions of dollars of investments contingent on i. already finalized Long Term Plan rules, ii. recently released 22-0231 Final Order, iii. various Program Administrator office hour discussions and written memorializations by the IPA on REC contract holding rules during the moratorium period (See Confidential Exhibit A).

[REDACTED]

22c therefore respectfully requests 2 items for the IPA to consider:

1. Prioritize and expedite the Program Administrator's review of all 11-1-2022 applications since Docket 22-0231's Final Order is released.
2. Signal to the market that the scope of this stakeholder process is specific to the Long Term Plan Update's future ABP Program Years.

[REDACTED]

3. IPA Inquiry: To increase the transparency regarding companies that qualify as an Equity Eligible Contractor and submit projects to the Equity Eligible Contractor Category, what information might the Agency require be published on the ABP website?

22c Response: [REDACTED]

4. IPA Inquiry: What forms of documentation could IPA require all companies applying for certification as an Equity Eligible Contractor to submit that would verify the claimed ownership structure?

22c Response: All of the IPA's suggestions are reasonable.

5. IPA Inquiry: Are there variations on the above that strike a better balance? For example, the Agency could implement a prioritization system within the Equity Eligible Contractor category based on the above factors, providing bonus points for EECs that meet one or more of those criteria and selecting projects based on points received. Alternatively, the Agency could reserve a portion of that capacity for entities that meet some of the above factors - what might be a reasonable reserve portion to ensure state incentives benefit the intended actors?

22c Response: The ordering of any application awards that occur on Day 1 of any Program Year Opening should be prioritized based on an EECs quantity of qualification criteria. Any tiebreakers should be awarded to the company who has been awarded less MWs to date across all years.

22c appreciates the opportunity to have participated in this stakeholder process and thanks the IPA for commencing it at this time.

Very sincerely,

Alex Farkes
22c, Founder

EXHIBIT A [CONFIDENTIAL]

