



June 9, 2023

To: Illinois Power Agency

Via Email: IPA.ContactUs@Illinois.gov

Re: Stakeholder Feedback Request for the 2024 IPA Long-Term Plan Chapter 3: REC Portfolio, RPS Goals, Targets, and Budgets

Dear IPA,

We write to you regarding Chapter 3 of the draft 2024 IPA Long-Term Plan.

Specifically, we are responding the following clauses in your consultation paper:

Background

*Chapter 3 of the 2022 Long-Term Plan contains a detailed description of the Renewable Portfolio Standard (RPS) goals, targets, budget, and estimates of future expenditures through 2031. In April 2023, the Agency released updates of tables and figures from Chapter 3.1 That update extended the charts and tables from Chapter 3 out to the year 2042.*

Questions

- 1. How can the Agency improve the presentation of information addressed Chapter 3? This can be through refinements or clarifications to the narration, additional analyses, added charts, or visuals not currently included in the Chapter.*
- 2. Can the Agency better elaborate or explain on the information or analysis presented in Chapter 3 that could be added to aid stakeholders in understanding current and future progress towards RPS goals and targets?*

The above questions allow stakeholders to both provide views on “clarification to the narration” and suggest “information....that could be added to aid stakeholders in understanding current and future progress towards RPS goals and targets”.

Comment

We seek clarification on whether RECs generated by Illinois-sited solar resources registered in PJM GATS or MRETS, but procured outside of the programs enshrined in the IPA’s Procurement initiatives (eg. competitive procurement, Illinois Shines, Solar for All, etc) could be used to meet RPS goals and targets?

If the answer to this question is yes, we seek further clarification on how such RECs would be procured? The information available on the IPA’s website (see below) is inconsistent in this regard. It contains reference to the Part 455 Admin Rules which place a REC procurement obligation on RES and utilities, however, contains a reference in the chapeau of the webpage that RES do not have an obligation for compliance years on or after May 31, 2020.

<https://www.icc.illinois.gov/industry-reports/renewable-portfolio-standards-requirements>

Does this mean only utilities have an obligation after May 31, 2020? If so, does procurement of RECs by utilities need to occur exclusively through the IPA's procurement initiatives mentioned above or can utilities enter into their own bi-lateral contracts with suppliers of RECs generated by Illinois-sited solar resources and use those RECs to meet their RPS obligations?

Furthermore, for how many years can a facility generation RECs that could be used for compliance under the Illinois RPS?

We believe our comments are relevant to this section of 2024 IPA Long-Term Plan as any clarity on permissibility for Illinois-sited solar resources to generate and monetize RECs valid under the RPS - but doing so outside of the programs enshrined in the IPA's Procurement initiatives - would contribute to the achievement of RPS goals and targets.

Regards,

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Policy and Markets