

To: Illinois Power Agency

From: Members of the Renewables Subcommittee, IL Clean Jobs Coalition

Re: Illinois Power Agency Requests Stakeholder Feedback for 2024 Long-Term Plan
Development - Chapter 6

Date: June 16, 2023

The Renewables Subcommittee was convened to help implement CEJA as envisioned by the Illinois Clean Jobs Coalition ([ICJC](#)). Our focus includes renewable programs and procurements, with a particular interest in ensuring the IPA helps facilitate the attainment of the state's renewable portfolio standards while also meeting its equity goals. The ICJC is made up of environmental advocacy organizations, businesses, community leaders, consumer advocates, environmental justice groups, and faith-based and student organizations working together to improve public health and the environment, protect consumers, and create equitable, clean jobs across the state.

The below-signed members of the Renewables Subcommittee thank the IPA for an opportunity to provide input on the Long-Term Renewable Resources Procurement Plan (LTRRPP). Please do not hesitate to contact us with questions or comments.

Signatories include:

Central Road Energy LLC

Faith in Place

Illinois Environmental Council

Sierra Club Illinois

Vote Solar

Union of Concerned Scientists

Chapter 6: Self-Direct Program

TOPIC 4: Self-Direct Program Size and Selection

Background - Section 1-75(c)(1)(R)(3) requires that the Agency shall “annually determine the amount of utility-scale renewable energy credits it will include each year from the self-direct renewable portfolio standard compliance program[.]” The Agency’s procurement planning consultant studied the issue as outlined in the 2022 Long-Term Plan. The Agency released the study in January 2023 and received comments from only one stakeholder on the proposed program size.

Questions

2. Are there other changes to the process for the establishment of the Self-direct Program size that the Agency should consider?

The agency could consider expanding its market analysis to include a wider range of data sources, which would allow for a more comprehensive understanding of market dynamics and trends.

Here are a few potential additional data sources:

1. The EIA's Form 860M: [EIA Form 860M] (<https://www.eia.gov/electricity/data/eia860m/>) provides monthly updates on existing and planned electric power plants in the United States. It offers valuable information about renewable energy generation and can help to understand the broader market context.
2. The RTO renewable energy attributes tracking systems, PJM GATS: [PJM GATS] (<https://gats.pjm-eis.com/gats2/PublicReports/RenewableGeneratorsRegisteredinGATS>) and MISO M-RETS: [MISO M-RETS] (<https://app.mrets.org/reports/public/generators>). These resources provide data on renewable energy generation facilities and their output, which can be integral in understanding projects developed outside of the Adjustable Block Program.

Also, the RTO interconnection queues could provide some valuable insight, especially with respect to late-stage projects, by offering detailed information on the size, type, and location of proposed energy projects.