



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

To: Illinois Power Agency
From: Tyler Diers, Executive Director – Midwest, TechNet
Date: June 9, 2023
**Re: 2024 Long-Term Renewable Resources Procurement Plan,
Renewable Self-Direct Provisions**

TechNet respectfully submits the following comments to the Illinois Power Agency's ("IPA" or the "Agency") as the Agency kicks off the 2024 Long-Term Renewable Resources Procurement Plan ("Plan") stakeholder process. TechNet's comments below focus on the IPA stakeholder questions for the self-direct program regarding the confidentiality of participant data and the program size ("Chapter 6: LTP Feedback").

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over five million employees and countless customers in the fields of information technology, e-commerce, the sharing and gig economies, advanced energy, cybersecurity, venture capital, and finance.

Our members have contracted for hundreds of megawatts of new renewable energy projects in Illinois, and they continue to look for additional renewable energy opportunities as their operations grow in the state. Our members are committed to meeting their own ambitious climate goals and want to contribute to Illinois's clean energy future as well, through the renewable self-direct program.

Topic 3: Participant Data Confidentiality Comments

Information regarding self-direct participant electric consumption and renewable energy production is oftentimes confidential and commercially sensitive. Specifically, we recommend that information regarding renewable energy production and annual renewable energy credits (RECs) quantities supplied to the program remain confidential and not be disclosed publicly. Similarly, information regarding a self-direct program participant's electric consumption - including annual electric usage and electric peak demand - should remain confidential and should not be disclosed to the public.

If there is information about renewable energy projects (like annual REC quantities) that must be released publicly, we recommend that it be released in aggregate and within a very wide range to protect sensitive information about participant renewable energy production and electric consumption.

Topic 4: Self-Direct Program Size Comments

The intent of the renewable self-direct program is to harness the power of the voluntary renewable energy market to drive progress towards Illinois's climate and renewable energy goals as voluntary buyers have ambitious climate commitments that are often

faster and farther than the state's renewable portfolio standard (RPS) targets. To help fulfill this intent, the renewable self-direct program must be sized appropriately to facilitate prospective customer planning and to allow existing participants in the program to grow their operations in the state. Otherwise, a small program - coupled with the low credit value set by the IPA - will not spur new, utility-scale renewable energy procurements by eligible customers.

We appreciate the challenge of estimating the potential market size of the fast-growing voluntary renewable energy procurement market. However, the IPA's program size of 3 million RECs for the first year of the program was extremely small and likely left significant excess voluntary renewable energy capacity out of the program, raising the RPS costs for all customers. To encourage robust participation and utility-scale renewable energy development, the 2024 Self-Direct Program should be sized much bigger to provide existing and potential participants with certainty that their renewable energy contracts will be approved for participation in the program if they meet the applicable program requirements. With that said, TechNet recommends - similar to our comments submitted during last year's Plan development process - that the IPA set a delivery year 2024 program size of 4 GW of renewable energy capacity. At an estimated blended solar/wind capacity factor of 40%, the 2024 program size would translate to approximately 14,000,000 RECs. The program size should continue to grow in subsequent delivery years, based on participant interest in the program.

A 4 GW program ensures a robust self-direct program that keeps RPS costs low for all customers in the state. This is because it further reduces the number of utility-scale RECs the IPA must procure on behalf of other customers, to meet the increasing RPS targets. This transfers cost risk to the self-direct customer participants from the remaining customers, which is one of the benefits of the program. And important to note that self-direct participants still pay for the programs that advance environmental justice and small-scale renewable energy development in the state through their monthly utility bill.

Thank you for the opportunity to submit comments on this important program. Our goal with these comments is to ensure a robust renewable self-direct program with strong customer participation.

Thank you,

A handwritten signature in black ink, appearing to read 'Tyler Diers', written in a cursive style.

Tyler Diers
Executive Director, Midwest
TechNet