

Arcadia

Written responses emailed to: IPA.Contactus@Illinois.gov

Subject: "Arcadia – Response to REC Pricing Model Comment Request"

December 3, 2021

Illinois Power Agency

REC Price Questions

Request for Stakeholder Feedback – November 12, 2021

Arcadia appreciates the opportunity to comment on topics in preparation of the IPA's publishing of its updated Long-Term Renewable Resource Procurement Plan (LTRRPP) in January 2022 for public comment, in compliance with Public Act 102-0662. Arcadia plans to be an active participant in the public comment period and approval proceeding before the Illinois Commerce Commission ("Commission"), but also appreciates the discussion of these questions in an informal collaborative process which can hopefully minimize contested issues.

Arcadia is also in support of the Joint Solar Parties ("JSP") comments from the Solar Energy Industries Association, The Coalition for Community Solar Access, and the Illinois Solar Energy Association. We view these comments as supplemental to the feedback included in the joint comments.

Background

Founded in 2014, Arcadia is the first nationwide digital energy services platform. We connect both residential and commercial utility customers with clean energy while helping them save money. Depending on the local market structure, we provide a number of services to our customers. Arcadia has software technology that connects with utilities in every state, manages 4.5 terawatt-hours of residential energy demand, and is the largest manager of residential community solar subscribers in the US.

Arcadia's role in community solar is to find subscribers and manage everything related to the subscribers' experience. We market community solar to potential customers, enroll subscribers in projects, determine the appropriate allocation size for each subscriber, communicate allocation sizes to the utility, check that the utility has accurately applied credits to subscribers bills, collect subscription fees from subscribers, and transmit those fees to the community solar project. We also operate a customer experience team to respond to any questions from subscribers to make sure they understand the impact their community solar subscription has on their energy bills and their community's power system.

Arcadia performs these functions for 500 megawatts of community solar, spread across projects in eight states. Ultimately these projects will serve about 100,000 subscribers. In

Illinois specifically, Arcadia is serving over 100 megawatts of community solar projects and 20,000 customers. These projects have saved customers money, made the grid greener, and created hundreds of local jobs.

Stakeholder Feedback Questions

11. Community Solar REC prices currently include an adder for small subscriber commitments with the highest adder for projects with over 50% small subscribers. With a 50% minimum commitment for small subscribers now a statutory provision, should the small subscriber adder be removed and instead subscriber management costs be factored into baseline community solar prices?

Arcadia response:

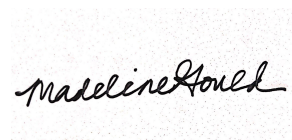
Arcadia supports rolling the small subscriber adder into the baseline community solar prices. This would create a simpler and more efficient pricing mechanism for the program.

13. How will the option for utility-billing for community solar subscription fees impact subscriber management costs?

Arcadia response:

Utility-billing will impact subscriber management costs, but it will introduce forces driving costs both lower and higher at the same time. For example, Approved Vendors will no longer have to accept payment from customers, which will obviously reduce their credit card payment fees. At the same time, customers who move may forget to give their new utility account number to their Approved Vendor if they don't have a billing relationship with the project, leading to increased customer churn. Arcadia encourages the Agency to study this issue closely and make any future decisions based on hard data from the Program and not assumptions.

Sincerely,



Madeline Gould
Policy Manager
Arcadia, Inc.