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To: [IPA.ContactUs](#)
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Subject: [External] Stakeholder Feedback to Long-Term Renewable Resources Procurement Plan
Date: Saturday, June 7, 2025 10:37:54 PM

From:

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To:

Illinois Power Agency
Director Granahan
105 W Madison St, Suite 1401
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RE: Public Comment on Proposed Rules - Long-Term Renewable Resources Procurement Plan

Published in Illinois Reister in April, 2024, Section 2.7.5.2

Dear Director Granahan,

I am writing to submit comments regarding the proposed rule identified above. My name is Jeff Haarmann and I am Managing Director for Priority Power Management LLC, dba AGE. Our firm represents 100 communities in Southern Illinois for municipal electric aggregation. For over 10 years, my team has been seeking ways to incorporate solar into our energy mix strategy for our aggregations. Besides the obvious green energy benefits, federal and potential state incentives could provide substantial financial benefit in the form of solar credits to our existing commodity rate procurement strategy.

Summary of Comment:

We are seeking the addition of OPT-OUT as an approved method of subscriber enrollment to community solar rules.

Detailed Feedback:

Current rule calls for subscribers to opt-in to community solar subscriptions by signing a Non-Disclosure form expressing the terms and conditions of their enrollment. In our conversations, concern has been expressed that without opt-in non-disclosure being individually acknowledged there would be greater potential for fraud.

For over 10 years, municipal aggregation supply enrollments on an opt-out basis have proven to be the safest form of enrollment for residents choosing to participate in retail supply choice. Communities across the State will affirm that residents who sign up through opt-in enrollments from door to door marketing, telemarketing, or even from shopping for rates direct to a supplier, experience far greater fraudulent enrollments than municipal opt-out aggregations which experience virtually no fraudulent enrollments.

Similar to each new aggregation commodity contract, our community solar farm enrollments can be properly managed through the same rate and term disclosures needed for community solar, via opt-out notifications. To simplify the community solar process and give subscribers and even better community solar experience, we can issue solar credits directly on resident's Ameren bills.

For our aggregation customers, we have previously demonstrated credits can be issued through our retail supplier directly to a resident via their Ameren bill.

Rationale:

Changing the rule to allow for OPT-OUT as well as opt-in enrollments for community solar will allow for broader, more efficient and customer friendly participation in residential community solar. Currently, roughly 15,000 residents have chosen to opt-in, using a difficult process. With our municipal aggregation solar strategy, allowing for OPT-OUT enrollments, we will add 75,000 residential households to community solar virtually overnight, with the approval of our community's leaders acting upon the directive voters gave them through aggregation referendums over 10 years ago.

Suggested Change:

Our suggested change is adding OPT-OUT to the existing opt-in community solar enrollment eligibility rules.

We have support from over 200 aggregation communities in both Northern and Southern Illinois. We have taken considerable input from CUB, Labor Unions, Legislative Leaders, Deputy Governor Scudder's office, community solar advocates, DG solar advocates and other industry experts under consideration. We would welcome discussion among stakeholders to consider any concerns we have not taken into account. Thus far, we have not encountered any

major concerns.

Thank you for considering my comments.

Jeff Haarmann

AGE

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