Comments of Advanced Energy United concerning the Illinois Power Agency's 2026 Long-Term Renewable Resource Procurement Plan Report – Chapter 4

Introduction:

Advanced Energy United ("United") respectfully submits these comments related to the Illinois Power Agency's ("IPA") request for stakeholder feedback as it prepares to develop its 2026 Long-Term Renewable Resources Procurement Plan ("LTRRPP").

United is a national trade association that educates, engages, and advocates for policies that allow its member companies to compete to power the economy with 100% clean energy. United is the only national trade association that represents a broad spectrum of clean energy providers and facilitators. Members include front-of-meter and behind-the-meter renewable energy and battery storage manufacturers and developers, electric vehicle ("EV") and EV charging equipment suppliers, providers of energy efficiency, demand response, and virtual power plants, as well as larger users of energy wanting to ensure that clean energy is available on the grid to facilitate corporate sustainability goals. United works with decision-makers at the federal and state levels of government as well as regulators of energy markets to achieve this goal. The businesses United represents, which include several businesses operating in Illinois, are lowering consumer costs, creating thousands of new jobs every year, and providing the full range of clean, efficient, and reliable energy and transportation solutions.

On May 19, 2025, the IPA issued a request for stakeholder feedback pertaining to the development of the 2026 LTRRPP and specifically focused on six chapters. United's responses to specific questions relating to Chapter 4: REC Eligibility are set forth below. The lack of a response to a specific question should not be construed as support for or acquiescence to a particular aspect or proposal for the LTRRPP. United may develop further positions as the process leading to the 2026 LTRRPP continues. Please send any questions regarding these comments to Brett Sproul at bsproul@advancedenergyunited.org.

Chapter 4: Renewable Energy Credit (REC) Eligibility

Topic: Adjacent State Project Eligibility

2. The current standard for determining the location of the project is geographic center of the project.
   a. Given the large geographic size of utility-scale projects, particularly utility-scale wind projects, what is an appropriate standard for determining the location of the project?
   b. For simplification, should the geographic point of reference for the project be changed in future procurements to the interconnection point of the project?

As referenced in subpart (b) of the question, United generally believes that a more reasonable geographic point of reference for adjacent states' renewable energy projects should be the interconnection point of the project rather than an arbitrarily chosen geographic center of a project. The point of interconnection generally acts as the node of transportation for the electrons that are being produced by the renewable energy project. Without the interconnection point, electrons produced by the renewable energy project would be unable to travel elsewhere on the electricity grid (and theoretically would be unavailable for use in an adjacent state such as Illinois). The interconnection point represents the reason why an adjacent state's renewable projects are considered eligible for renewable energy credits in the first place. As an example of this, energy from a wind turbine that is 500 yards away from the interconnection point and energy from a wind turbine that is 1 mile away from the interconnection point will both need to pass through the same interconnection point to be distributed elsewhere on the grid.

By changing the standard for determining the location of a project to the appropriate interconnection point of the project, there will be impacts on the public interest criteria calculations that the IPA uses when determining whether or not an adjacent states' renewable energy project is in the public interest of Illinois.[1] A potential change in the geographic standard applied to adjacent states renewable energy projects will impact the calculations for the Fuel and Resource Diversity Score, as well as the Reliability and Resiliency Score (as both incorporate a renewable energy projects' distance to Morris, IL).

[1] See Illinois Power Agency's 2024 Long-Term Renewable Resources Procurement Plan Chapter 4 Section 3 P. 84