



June 29, 2023

Illinois Power Agency  
105 W. Madison St.  
Suite 1401  
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Via email: [IPA.ContactUs@Illinois.gov](mailto:IPA.ContactUs@Illinois.gov)

Re: Comments by The Energy Professionals Association (TEPA) Regarding Chapter 7 and Chapter 10 of the Illinois Power Agency's 2024 Long-Term Plan on Behalf of ABC Industry

Established in 2005, The Energy Professionals Association (TEPA) is a not-for-profit organization of professionals dedicated to advancing competitive energy markets across the country. TEPA is a membership-based association that provides professional development, advocacy, certification program, and access to a network of respected industry leaders.

Our association operates as a self-governing organization to ensure that market participants conduct themselves in a professional manner, have access to accurate information and opportunities to collaborate with other industry professionals. We strive to provide our members with suggested best practices for transacting in the marketplace all while working with the best interest of the end user in mind.

TEPA wishes to submit select comments for consideration by the Illinois Power Agency regarding its 2024 Long-Term Plan.

I. *Comments Concerning Chapter 7 – Illinois Shines (Adjustable Block Program)*

Regarding Topic 2 (“CS Small Subscriber Limit at 25kW Across All Projects in the Program”), TEPA feels that implementing a 25kW limit for the aggregate sum of all subscriptions for a given utility account number would pose a number of challenges.

First, the investor-owned distribution utilities, Ameren Illinois and Commonwealth Edison, have not provided the means for AVs and Designees to determine whether or at what level a given utility account number is subscribed to one or more Community Solar projects.

When an AV or Designee enrolls a new subscriber, they will typically collect a recent invoice from the prospective subscriber. For cases where a subscription has already proceeded to active status (meaning the subscriber's Community Solar project is energized and generating credits), AVs and Designees can see credits on the utility bill. However, most Community Solar projects are subscribed fully or in majority part prior to the project being energized, and there is no indication on the utility bill that the utility account holder has entered into a future Community Solar subscription agreement.

Even in cases where credits are appearing on the invoice, there is no way to determine the size of the customer's subscription in kW from the utility invoice.

There is also no database accessible to AVs and Designees to verify this information. Such a database would be a welcome addition but would need to be implemented by the distribution utilities. Helpful information would include the size of the subscription in kW AC, the anticipated start date of that subscription, the name of the Community Solar project or projects that sum to that subscription level, and the account's total charges from the previous 12 months. This information would inform whether that subscriber has the potential to subscribe for an additional Community Solar project.

Second, TEPA feels that the overall objective of limiting individual utility accounts to a maximum 25kW subscription would be difficult to implement. Many utility accounts are already subscribed to multiple Community Solar projects summing to greater than 25kW. How will the IPA determine which project subscriptions to reduce or remove? How will the IPA message the reduction in subscription size to the utility account holders, who have become accustomed to a certain level of savings in order to continue operating their businesses?

Third, TEPA feels that this proposed change contradicts the State of Illinois' overall goals to provide clean, affordable, and reliable energy to residents and businesses. Placing a cap on the amount of money a subscriber can save, and the amount of clean energy that subscriber can subscribe for, will limit renewable energy development, interest in Community Solar subscriptions by residents and businesses.

Finally, it is not stated in the IPA Act that all subscriptions for a given utility account number sum to no greater than 25kW. We feel that this requirement is not required for any legislative purpose and does not serve any meaningful benefit to the residents, businesses, and environment within the State of Illinois.

## II. *Comments Concerning Chapter 10 – Diversity, Equity, and Inclusion*

Regarding Topic 5 (“Other Minimum Equity Standard Issues”), TEPA supports the overall implementation of Minimum Equity Standard (MES) but feels that the criteria of organizations impacted by the MES is overly broad.

We believe that the primary focus for the MES is the developer and construction employment functions. The job training programs that qualify someone as an Equity Eligible Person (EEP) teach skills required to perform these functions.

One category of Designees is “Marketing or Sales Organization.” Compliance with MES for these types of organizations can be a challenge. The skills taught by the job training programs that qualify someone as an EEP are not compatible with the skills desired by an organization that provides marketing and sales support to AVs. Furthermore, much of the work conducted by marketing and sales organizations is done at arm’s length, not in direct physical contact with the subscriber or the project to which the subscriber is enrolling. These activities may be performed via a website, through email, or over the phone. Many AVs and Designees performing these types of functions have no physical presence in the State of Illinois.

Many marketing and sales organizations are small, with fewer than 10 employees, many of whom are not actively growing. As such, hiring an EEP solely for the sake of satisfying MES may require them to lay off a non-EEP.

Thank you for the opportunity to comment on this important topic.

Sincerely,

A handwritten signature in black ink that reads "Shannon McGriff". The signature is written in a cursive, slightly slanted style.

Shannon McGriff  
Executive Director

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