

COMMENTS OF COMMONWEALTH EDISON COMPANY

Commonwealth Edison Company (“ComEd”) respectfully submits comments and recommendations regarding the questions posed during the Illinois Power Agency (“IPA”) Feedback Request on November 12, 2021 and subsequent workshops conducted by the IPA on November 18, 2021. ComEd appreciates the IPA’s commitment to solicit stakeholder feedback as part of the development of the 2022 Revised Long-Term Renewable Resources Procurement Plan.

Adjustable-Block Program Questions

OPEN QUESTIONS FROM THE WITHDRAWN DRAFT SECOND REVISED LONG-TERM PLAN

10) Batches (Section 6.14.1, pg. 178)

- a. While the Agency believes an initial batch of 100 kW is not a significant barrier to new market entrants, the Agency welcomes stakeholder feedback on whether the initial batch size and/or 75% verification level for new minority or woman-owned Approved Vendors should be set at a lower level.?*

ComEd Response: ComEd recommends keeping the 100 kW threshold to ease potential additional administrative burden.

11) Batch Contract Approval (Section 6.14.6, pg. 180)

- a. In stakeholder comment processes conducted by the Agency, parties have repeatedly requested allowing the rollover of collateral from projects withdrawn from the program to newly applied projects. The argument offered has been that, especially in the residential sector, the collateral requirement has created risks and costs for Approved Vendors who cannot control for decisions homeowners might make to cancel an installation. The Agency continues to believe that the collateral requirement is an important component of ensuring that only projects with a high degree of likely completion are submitted to the program. However, the Agency recognizes the concerns that have been raised repeatedly and is open to considering a narrow set of circumstances for allowing collateral from cancelled projects to be reallocated, such as if a homeowner sells the property prior to installation. The Agency welcomes stakeholder comments on what might be an acceptable list of such circumstances, and on the mechanics of how those exceptions could be applied (such as what level of proof would be appropriate).*

ComEd Response: ComEd does not recommend any changes to the current collateral requirements.