

Large Customer Self-Direct RPS Compliance Program

Response to Illinois Power Agency Request for Stakeholder Feedback

December 3, 2021

Company:

Invenergy LLC (“Invenergy”) is a leading privately held developer and operator of sustainable energy solutions headquartered in Chicago. Invenergy has completed development on 17 sustainable energy projects in Illinois and is pursuing additional opportunities in the state. Proud of our Illinois roots, Invenergy has long looked to provide value to the state by siting some of our most innovative projects on Prairie State Soil. Our Grand Ridge Energy Center, three energy technologies co-located at a single site, received Power Engineering and Renewable Energy World Magazines’ 2015 Project of the Year Award for Best Renewable Project as well as Energy Storage North America’s Innovation Award.

Through our growth journey, the state of Illinois and the Illinois Power Agency (“Agency”) have been crucial partners. Invenergy commends the efforts of the state to expedite the decarbonization of our energy grid and the thoughtful expansion of renewable energy deployment.

Invenergy submits the following responses and respectfully request that the Agency consider the feedback provided below.

Stakeholder Feedback Questions:

4. *How should the IPA handle this requirement for establishing program size?*
 - a. *What such publicly available analyses and studies are available to the Agency in determining self-direct program size?*
 - b. *By when each year should the Agency make this determination, and using what process?*
 - c. *Should the Agency publish the initial delivery year self-direct program size as part of its upcoming Long-Term Plan?*
 - d. *Given that customer account size does not account for permitted account aggregation by corporate affiliates, how can the IPA best assess the size of the retail customer market eligible for self-direct RPS compliance?*

RESPONSE: To maintain some level of certainty for procurement sizes, it is critical that the self-direct program has some form of size constraint. Invenergy recognizes the challenge with establishing the program size, as we are not aware of any comparable program in another state. A few factors that the Agency may consider in determining program size are C&I market size,

anticipated C&I market growth, anticipated infrastructure investment, and hydrogen hub development.

5. If the IPA receives applications for the program which exceed the amount of RECs it will include each year, how should the Agency choose between competing applicants?

a. While the law indicates that the Agency “shall ensure participation is evenly split between commercial and industrial users,” how should the Agency choose between individual commercial or industrial users within that category should applications exceed program capacity?

b. Should the Agency maintain a program waitlist for qualified applicants, with preference for waitlisted applicants when the program next reopens for applications?

RESPONSE: Program waitlists are a valuable component of the ABP and the Agency should consider maintaining a waitlist for these RECs. Waitlists provide an additional level of execution certainty, which in turn can lower financing costs.