

To: Illinois Power Agency
From: The Joint Non-Governmental Organizations (ELPC, NRDC, Vote Solar)
Date: December 3, 2021
Subject: Joint NGOs - Response to Self-Direct Program Comment Request.

The Environmental Law and Policy Center, the Natural Resources Defense Council and Vote Solar (VS), commenting together as the Joint Non-Governmental Organizations or Joint NGOs (JNGOs), appreciate the opportunity to comment ahead of the Illinois Power Agency's (IPA or Agency) development of its 2022 revision to the Long-Term Renewable Resources Procurement Plan (Plan or LTRRPP).

The passage of the Climate and Equitable Jobs Act (Public Act 102-0662) this fall requires significant expansion and reimagination across the renewables programs and procurements outlined in the IPA's Plan. It is an exciting and busy time and the IPA has a lot on its plate. With this in mind, the Joint NGOs urge the Agency to anticipate the need for continued growth and evolution even after the final Plan has been approved by the Illinois Commerce Commission. This need for ongoing evolution will be particularly true for:

- The new community-driven community solar program, where the state still has much to learn about what a successful community-driven project looks like (and potentially for other new programs where there is still much to learn).
- REC prices, where Illinois needs to set prices to drive significantly expanded renewables goals, but does not want to repeat past mistakes of failing to adjust those prices if market response is out of line with statutory goals.
- And the low-income distributed generation subprogram of the Illinois Solar for All Program, which has seen far lower uptake than similar programs in other states and therefore requires ongoing and detailed attention to get it on track.

The Joint NGOs comments in response to the various requests for feedback published in early November touch on each of these topics and respond to multiple of the specific requests for comments the IPA makes. The Joint NGOs look forward to working constructively with the Agency and other stakeholders through the Plan's update process and beyond to make Illinois' renewables programs and procurements a success and achieve the goals of the Climate and Equitable Jobs Act.

PROJECT ELIGIBILITY

3. For geographic qualification, would facilities qualifying under Section 1-75(c)(1)(I)'s new provisions for electricity transmitted to Illinois-based HVDC converter stations also qualify (once such converter stations are built and qualified)?

This is an important question, but not one that should be answered right now, when the HVDC converter station(s) in question has not yet been built and qualified. The Joint NGOs urge the IPA to take no position on this point, at present, and to pose this question, again, at that time.

APPLICATION PROCESS

The Joint NGOs strongly support IPA's efforts to provide more public information about the utility-scale projects supported under law, as described in the November 18th virtual workshop. This commitment to reporting should be extended to the self-direct program, as well. Reporting project size, location, and resource type for self-direct projects should be minimum public reporting required to allow projects to qualify. The JNGOs also do not know of any reason why it would be inappropriate to report on which customers are making these commitments, and this information would have value as well. This data should be collected as part of the application process and self-direct customers should not be able to keep this information confidential.