



**VIA ELECTRONIC MAIL**

Illinois Power Agency  
Anthony Star, Director  
160 North LaSalle Street  
Suite C-504  
Chicago, IL 60601  
[IPA.contactus@illinois.gov](mailto:IPA.contactus@illinois.gov)

RE: 2020 Illinois Long Term Renewable Resources Procurement Plan:  
Comments of Clean Grid Alliance

Dear Director Star:

Clean Grid Alliance appreciates the opportunity to provide comments to the Illinois Power Agency in response to its posted questions regarding Illinois' Long-Term Renewable Resources Procurement Plan (LTRRPP) for 2020. See PA 99-0906, 20 ILCS 3855/ 1-75(c)(1)(I).

Clean Grid Alliance is a not-for-profit corporation providing outreach, education and advocacy to increase renewable energy resource's access to the electric transmission system and wholesale electric market throughout the Midwest. Our members include wind and solar developers, energy storage owners/operators, environmental organizations,

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tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry across the country. Members of Clean Grid Alliance operate wind and solar plants in Illinois and as a result of P.A. 99-0906 intend to add new facilities to meet Illinois' demand for renewable energy resources. Clean Grid Alliance's members typically focus on the development of utility-scale wind, solar and storage resources.

Clean Grid Alliance will only be addressing three of the questions posted by the IPA in its July 3 *Request for Comments*. The IPA questions to which Clean Grid Alliance will respond are provided below, followed by Clean Grid Alliance's comment.

#### 1. **BUDGET**

At the workshop, the Agency presented a high-level overview of the RPS budget, current obligations, and future year spending estimates (see slides 16-22). Please comment on the reasonableness or accuracy of the assumptions, data, and preliminary conclusions of the Agency's budgeting model as shown in the referenced slides. Please also comment on the usefulness of the mode of presentation of data on slides 21 and 22. Please provide any alternate modeling/presentation approach you feel the Agency should consider.

**RESPONSE:** The graphs on slides 21 and 22 look reasonable and are qualitatively useful, however, a data table listing the dollar amounts per category per Delivery Year should still be provided.

#### 4. **MEETING ANNUAL RPS PERCENTAGE GOALS**

As discussed at the June 20, 2019 morning workshop, the annual RPS percentage goals found in Section 1-75(c)(1)(B) of the IPA Act will not be met under current contractual commitments and currently approved future procurements. In approving the current Plan, the Illinois Commerce Commission did not approve the Agency's proposed "spot procurements" (i.e., annual competitive

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procurements of RECs from statutorily eligible facilities, whether existing or new, through one-year delivery contracts), to attempt to meet the annual RPS percentage goals. Instead, the Commission prioritized allocating available funds to the development of new renewable resources.

- a. Should the Agency revisit this prioritization and attempt to meet annual RPS percentage goals?

RESPONSE: No.

- b. If so, should the Agency consider multi-year spot procurements, should there be additional criteria for such RECs (e.g., vintage/age of project, technology type), or some other approach?

RESPONSE: NA.

## 5. CONTINGENCY PROCUREMENTS

If a competitive procurement conducted by the Agency fails to meet its targeted procurement quantity, or if the Agency learns that projects awarded contracts from previously conducted procurements are not going to be completed (and thus will not be delivering anticipated RECs) what process should the Agency use to conduct additional procurements prior to the next update of the Plan? Should there be minimum procurement quantity requirements? Should there be an expedited review/approval of the new procurement by the ICC, or instead should the latitude to conduct the second procurement at the Agency's discretion? Are there other criteria to consider before considering contingency procurements?

RESPONSE: Under the current bill language, a REC procurement should be made within the next year if the shortfall exceeds a floor. That floor should be the size of a relatively large project – such as a sufficient amount of RECs for a 50 MW wind or solar farm, or larger. If an energy bill is passed during this Fall's veto session and it puts the IPA in line for conducting annual REC procurements, then add the shortfall to the next procurement regardless of the shortfall amount.

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Clean Grid Alliance requests the Illinois Power Agency consider and adopt the recommendations provided herein.

Respectfully submitted,

/s/ Sean R. Brady

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East

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