



13277 N. Illinois St., Suite 110 Carmel, IN 46032

Date: July 19th, 2019

RE: 2019 Long-Term Renewable Resource Procurement Plan Comments

Dear IPA and other Stakeholders,

We have attended workshops and reviewed the questions the IPA has regarding the future of the LTRRPP. Below are our comments and suggestions for the proposed plan.

Section B - Page 4: Illinois Solar For All

1. **Funding Levels** – Funding levels for this sub-program should be increased to allow for multiple Large DG projects (With the limited funding available 1MW or 2MW projects consume the entire funding allocated for this program.
3. **Non-profit/Public Facility REC Pricing** – If the non for profit or public facility is self-financing the project than they should be awarded higher REC prices (Current ILSFA REC prices are acceptable). If a third-party ownership model is involved in the ILSFA program then the REC prices should be lowered some where in between the ILSFA REC pricing and where the Adjustable Block Program pricing is.

Section C – Page 6: ABP Structure and REC Pricing Model

1. **Geographic Diversity** - To encourage more Geographic Diversity we believe the more block capacity should be shifted to Group A – Large DG. Due to Ameren having a bigger territory than ComEd and generally a lot more greenspace it makes the sense to award more capacity to the Ameren Group A – Large DG group. This will help spread out the arrays geographically while also helping small rural Illinois towns. (Total capacity should be equal or more than what was allocated to ComEd – Group B Large DG Totaling 117MW) It is also cheaper to install, get permitting, and get approvals to build solar inside the Ameren Territory.
2. **Batch Structure** - We would just like to confirm that we are happy with the current way the batch system works and is created. From our experience with having multiple arrays inside one project we would need the entire batch to be awarded REC dollars to have a financially viable project. Separating the projects could create many problems if the project in full did not receive funding and only one or two of the arrays.
3. **REC Pricing** - We believe the REC prices to be fair for the Group A- Large DG block system. In order for third-party ownership in Illinois the price of REC's needs to be maintained or increase in value. Average price per kWh is about \$.055 cents. In order to buy down the PPA rate we need REC prices to stay the same or increase. Without the current REC prices Solar projects would not generate enough savings for C&I customers to explore this type of solution. (Minimum REC price for this group should be \$40 per REC or higher)

4. **Project Application Requirements** – We believe that Application Fee money should be refunded if a project/batch is not awarded REC dollars.

7. **Contract non-execution/collateral non-payment** - We suggest that there be a wider time window after award date of REC's to sign the Master REC contract. We propose that Approved Vendors be allowed 60 days after being notified of REC award to sign the Master REC Contract with the applicable utility. (From our experience we had various issues come up at the last minute and believe the timeline to sign the REC contract was very aggressive.) Investors could drop out of a deal; unforeseeable circumstances could halt a deal so we ask the IPA to revise this section with a little more wiggle room to work out those issues. The Approved Vendor would need to have ongoing lines of communication with the IPA that they are working toward signing the REC contract by providing project viability. This can either be done as an extension or as some type of reprieve to get the project finalized post REC award date.

Thank you for your considerations,

A handwritten signature in cursive script that reads "Corey Miller".

Corey Miller
Director of Sales