



Ampion, PBC.
75 Arlington St, Ste 500
Boston, MA 02116

June 29, 2023

Illinois Power Agency

105 West Madison Street, Suite 1401
Chicago, IL 60602

Re: 2024 IPA Long-Term Plan Feedback - REC Pricing

Ampion, PBC is pleased to submit the following responses to the request for feedback on the Long-Term Renewable Resources Procurement Plan issued by the Agency on June 8, 2023.

TOPIC 6: Community Solar Subscriber Acquisition and Maintenance Costs

Ampion has not seen a decrease in acquisition costs since entering the Illinois community solar market. If anything, we are seeing higher acquisition costs given increased administrative costs associated with consumer protection and program compliance, especially the rigorous disclosure form process which has only been finalized today (6/29.) The transition between program administrators has created a broad array of changes in the ABP portal, which has necessitated constant iterations in the enrollment process for both our acquisition and engineering teams to integrate and comply with Energy Solutions. Both the IPA and Energy Solutions have continued to make changes since the transition, which have required further resource dedication to complying with the Illinois Shines Program. The resources needed to make these changes do not include the resources that participants must dedicate once the requirements and processes are actually finalized. Additionally, the majority of Ampion's acquisition for small subscribers is accomplished through in-person sales due to the fact that community solar is a complex product that requires education during the sale, following the sale, and even throughout the customer's subscription term. Therefore, the cost-savings associated with web-based enrollments are negligible. While utility consolidated billing for community solar significantly improves the billing experience for subscribers, we have not seen a significant impact on acquisition costs. Furthermore, the implementation of utility consolidated billing is still in its infancy and until it becomes standard practice in the market, the true impacts on costs are unknown. Finally, every aspect of the market operations of AVs and designees is affected by continued inflation and a tight labor market, which would argue in favor of a higher rather than lower adder for acquisition and maintenance costs. Ampion strongly recommends that the IPA keep the existing \$14.82/REC adder until tangible reductions in costs associated with web-based enrollment and utility consolidated billing can be proven by acquisition and subscription management companies. To date, there is no indication that there are tangible reductions in costs.