

**COMMENTS OF VISTRA CORP.
ON ADJUSTABLE BLOCK PROGRAM QUESTIONS
POSED BY ILLINOIS POWER AGENCY**

Vistra Corp. (Vistra) is submitting the following comments in response to certain of the “Adjustable Block Program Questions” posted by the Illinois Power Agency (IPA) on November 12, 2021. Vistra appreciates the opportunity to comment on these important implementation topics.

IPA Questions and Vistra Comments

Annual Block Capacity

- 3) What considerations should be made when redistributing uncontracted capacity at the end of a delivery year? Should wait lists be pure first-come first-served or some other process?

Vistra Comment: Uncontracted capacity should be redistributed to those areas in which it is most/more difficult to develop projects, such as environmental justice communities and equity eligible communities. This approach will promote the objective of developing as many projects as possible in these historically under-served areas. Such reallocation should not be ad hoc but rather should be implemented through a formula or set of criteria that is announced in advance of the application window. After the redistribution of uncontracted capacity, it may be appropriate to open a second application window for projects in the areas to which capacity was reallocated.

Vistra does not believe that a wait list (that carries over to the following year or application period) should be used. Rather, unselected projects that continue to be interested in the program should be required to reapply each year (or in each application period), if still interested, based on up-to-date information. (As Vistra commented with respect to the Large Customer Self-Direct Program questions, if there were a wait list, the IPA would still have to verify in the subsequent year or application period that the project still met all requirements). If a wait list is maintained, selection of projects from the wait list in a future year should be on a first-come first-served basis based on the wait-listed projects’ respective original application dates.

- 4) Should application fees for waitlisted projects be charged when first applying, or only be due once projects come off wait lists?

Vistra Comment: As stated above, Vistra does not believe a waitlist should be used. Further, any application fees for the Adjustable Block Program that are more than nominal in amount should only be assessed and payable when a project is selected for the Program.

Vistra stands ready to discuss its comments with the IPA, to provide additional information in support of its comments, or to respond to additional questions from the IPA. Please contact the undersigned representative.

VISTRA CORP.

Jeffrey Ferry
Senior Director Government Affairs
217-519-4762
Jeffrey.ferry@vistracorp.com