

**COMMENTS OF VISTRA CORP.
ON ILLINOIS SOLAR FOR ALL PROGRAM QUESTIONS
POSED BY ILLINOIS POWER AGENCY**

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

IPA Questions and Vistra Comments

Non-Profit and Public Facility Sub-program

Public Act 102-0662 of the IPA Act (as modified by Public Act 102-0662) expands the Adjustable Block Program in Section 1-75 (c)(2)(K)(iv) directing the creation of a block dedicated for solar projects installed at public schools, with priorities for projects located within environmental justice communities.

18) Since the Adjustable Block Program will now include a category specifically for public schools should public schools no longer be eligible to participate in ILSFA?

Vistra Comment: Public schools should continue to be eligible to participate in the ILSFA, as well as in the Adjustable Block Program (ABP) through solar projects installed at public schools. A key objective of P.A. 102-0662 is to incentivize and facilitate the installation of solar projects at public schools, both as a “low hanging fruit” means of increasing the use of renewables, as well as providing opportunities for taxpayer-supported public schools to reduce costs. Given the very wide range of public school physical facilities, energy usage, locations, school district funding, and other factors, in this State, some school districts may find the ILSFA more suitable to their needs and circumstances, while other school districts may find the ABP to be more suitable. Given the broad objective of increasing the use of solar energy in public school facilities, there is no need to make available only a “one-size-fits-all” option.

Equity/Workforce Development

35. Previous stakeholder feedback, including that received during the summer of 2021 for the development of the now withdrawn draft Second Revised Plan, suggested the need for stability and sufficient advance notice of changes to the Project Selection Protocol. If the Project Selection Protocol is further updated when should that new Project Selection protocols take effect? Should it be for Program Year 2022-23 (beginning Summer 2022) or Program Year 2023-24 (beginning Summer 2023)?

Vistra Comment: An updated Project Selection Protocol (if one is adopted) should take effect for Program Year 2022-2023. Vistra sees no reason for delay to Program

Year 2023-2024. Vistra will be prepared to move forward, based on either the current or a revised Project Selection Protocol, for Program Year 2022-2023.

36. How should the Agency promote development in underserved areas if a sub-program is not oversubscribed and thus requiring use of the Project Selection Protocol and instead the sub-program is accepting projects on a first-come, first-served basis?

Vistra Comment: Even under a first-come, first-served protocol for ILSFA projects, the IPA should continue to score, rank and prioritize proposed projects. This will help to ensure that even in the event of under-subscription, projects meet a baseline set of criteria in order to be selected.

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.

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