

## Illinois Power Agency

### RE: Equitable Distribution of Group A/Group B RECs

The Solar Business Coalition, comprised of renewable energy businesses located in Central and Southern Illinois, have appreciated your past consideration of correspondence we have submitted about programming for our region. Additionally, the Stakeholder process that the IPA always does prior to launching new program initiatives, is a great way to consider the comments/concerns of all interested parties. In keeping with the spirit of our open communication, we write to you today regarding the distribution of RECs for each of the established categories as you consider the equitable distribution of renewable energy credits between Group A and Group B.

As you are aware, when the Future Energy Jobs Act application process launched in January of 2019, Group A was already at a deficit/lottery situation. If it had not been for the discretionary dollars that the agency had smartly resigned and ultimately allocated towards meeting the Large DG demand for Group A, our businesses/customers would have suffered many adverse effects. Accordingly, we, as a group, again thank you for that allocation that assisted us in making sure that already built systems were funded and those in the pipeline still received REC funding even if it was at a slightly lower price than modeled due to the circumstance.

We now find the IPA in a similar situation in trying to determine fair allocation of the 75MW per year, per category, that will be distributed between the two regions and, accordingly, are reaching out to request that historic lessons be taken into consideration as the allocated capacity for each group is determined. We in Central/Southern IL (Group A) do have some advantages over our cohorts in Northern IL (Group B). Namely, those advantages are:

- More land space to support ground mounts for larger commercial, industrial and agricultural installations.
- Larger spacing between homes/businesses in residential and small commercial installation populated areas that allows for an increased solar resource again translating into the ability for more and larger DG rooftop

installations than those located in metropolitan areas where shading/roof space becomes a limiting factor to the solar resource.

These are just a few of the reasons that we all saw more applications from Group A developers in the FEJA rollout. We wanted to bring this to your attention early on in the LTRRPP process in hopes that we can avoid a similar situation with the rollout of CEJA.

It would be our suggestion/recommendation that the IPA remove the allocation altogether and just allow the 75MW capacity, per category, per year, to be filled as applications come in on a first-come/first-served basis. This supports overall development throughout the state and does not create a divide between northern and central/southern IL.

If we can help with any additional data or input to support the IPA's decision-making process, please feel free to "reply to all" here and we, as dedicated Illinois solar businesses and/or the combined coalition, will be happy to assist. Thank you for your consideration of our concerns and information provided herein!

Sincerely,

Solar Business Coalition (SBC)

Comprised of:

WindSolarUSA, Inc.

StraightUp Solar

Advanced Energy Solutions

EFS Energy

Tick Tock Energy

New Prairie Construction/Solar

Ruyle Mechanical

Blue Stone Solar

Senergy Electric

Overturf Electric

Lock Family Construction