

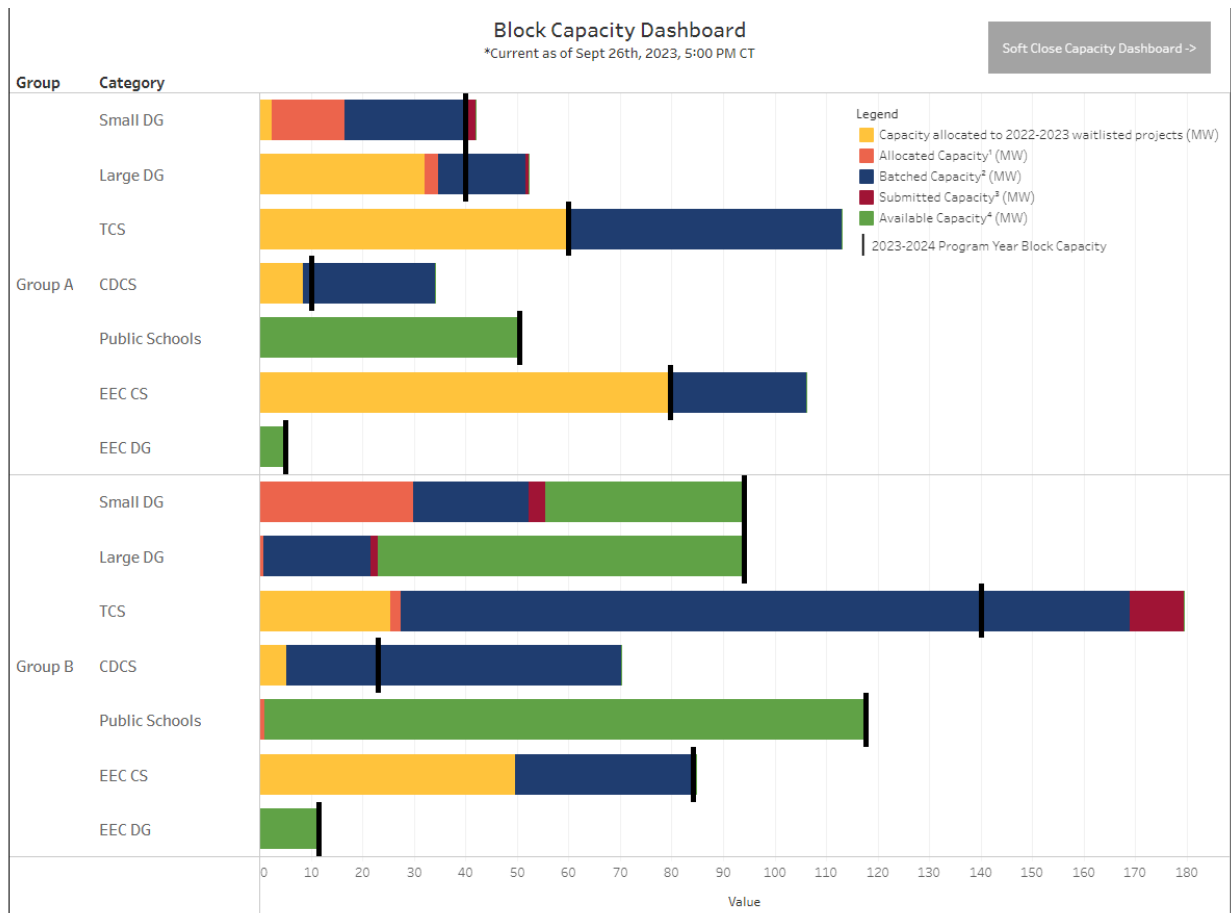


1000 N Old Route 66
 Litchfield, IL 62056
 217-250-2061

9/27/2023

Re: Comments for 2024 Long-Term Plan

Starting with the most important issue that has been addressed in every comment since the program inception. The goal of the program is to keep renewables moving forward seamlessly. This is not possible as every year the Group A blocks fill within 1-6 months. As the block capacity below shows ComEd territory never fills but has much more capacity. This has to be observed every year. Group A needs more capacity. Also this last program year the program allowed 5MW systems increased from 2MW. Four 5MW sites would take the entire block. How is this fair to any other large customers? They don't stand a chance. The large block filled in less than a month. This needs to be addressed.



Next issue, the application fee structure needs corrected. A 200KW project application should not cost almost as much as a 5MW. It does not take any more time to process a 10KW vs a 250KW. It should either be a flat fee or priced per KW all the way up to a 5MW.

Illinois Shines Rec prices. We do not understand why the rec prices are dropping at such a significant rate. Most solar projects are financed. Interest rates have almost doubled in the last year. Yes the federal tax credit has increased to 30% from 26% but the cost of materials is still on the rise. Electrical components have increased on average 80% this year. The solar panels have not increased but racking and inverters have went up on average 8%. Also now that prevailing wage is required the cost of labor has doubled in most situations. Finally the utilities have decided to improve all of their dated equipment on the backs of solar projects. In the last three years we have had a staggering amount of projects that have required costly engineering studies. After the customer pays an abundant amount for the study they are then faced with the ultimatum to pay a massive electrical upgrade charge or forgo the money they paid for the study. In the last two years the only thing that has decreased is the srec prices.

Disclosures should not have to be signed before we engage with customers. We send the disclosures with our contracts and most of the time the disclosure gets sent to junk mail. Because of this the contract is usually signed before the disclosure. This has caused us to be flagged on projects when it is not our fault.

Srec payment timelines. Both companies that have managed the srecs have provided false information to the end customers. They both have told the customers that we did not file for the credits when the program opened. This is a false statement. As everyone is well aware when the program opened on September 1, 2022 the entire system crashed. It did not reopen until later in 2022. Part 2 was not even available until the first part of 2023. When our end customers called into the program administrator they were told the program opened on September 2022 and they were not submitted until later. This has led to 2 unjustified complaints towards our company. These complaints should be removed and reentered as complaints against the administrator of the program.

Solar Leases, this is mostly directed to the residential side. Companies are taking advantage of consumers. No lease should be longer than the warranty of the products. Companies are writing 30 year leases. The same system we sell outright cost a customer 3-4x over the 30 years on a lease. To make matters worse most of these companies are out of business within two years leaving the customer stranded. There should be a cap on the length of PPA's and Leases.

In the past none of our comments have been taken into consideration. Hopefully this year the program can use our comments to rectify the ongoing issues.

Thank you,

David Ronen

President

