



April 5th, 2024

TO: Illinois Power Agency

FR: Climate Jobs Illinois (CJI)

RE: March 22 Request for Public Comments on 2024 REC Contracts

Please direct questions and comments to:

Joe Duffy, Executive Director: [REDACTED]

Mia Korinke, Campaign Mobilization Director: [REDACTED]

About Us

Climate Jobs Illinois is a coalition of labor organizations advocating for a pro-worker, pro-climate agenda in Illinois. Our mission is to advocate for a clean energy economy at the scale climate science demands, create good union jobs and support more equitable communities. Our coalition represents hundreds of thousands of Illinois working men and women who are the best trained and skilled to build Illinois' new clean-energy economy from the ground up. By focusing on the construction of clean energy sources as a way to combat the climate crisis, Climate Jobs Illinois offers a compelling new approach to creating an equitable and clean economy. Building a clean energy economy is an opportunity for labor to lead on climate by creating high-quality family-sustaining jobs that spur economic development while reducing carbon emissions.

Climate Jobs Illinois is a state affiliate of the Climate Jobs National Resource Center. Climate Jobs Illinois is directed by a coalition representing hundreds of thousands of union members across Illinois, and our Executive Committee is comprised of leadership from:

- Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers Union Chicago & St. Louis
- Mid-American Carpenters Regional Council
- International Brotherhood of Electrical Workers Local 134
- International Brotherhood of Electrical Workers State Council
- Illinois Education Association
- Illinois Federation of Teachers
- International Union of Operating Engineers Local 150
- Midwest Region of Laborers International Union of North America
- Great Lakes Region Laborers International Union of North America
- Service Employees International Union State Council
- International Association of Heat and Frost Insulators and Allied Workers
- Illinois Pipe Trades Association

Background

On March 22, the Illinois Power Agency (IPA) solicited [public comments on its proposed 2024 REC Contracts](#). On behalf of our coalition members and their rank-and-file union members, Climate Jobs Illinois submits the following comments in response to the IPA's updated REC Contracts for 2024.

Comments

Our coalition is supportive of the steps that the IPA has taken to help make solar energy solutions more accessible to communities throughout Illinois. With over 9.2 GW of clean energy capacity statewide – and an additional 4.3 GW of capacity in the pipeline – Illinois continues to be a leader on clean energy production.¹ With the changes proposed in the IPA's 2024 REC Contracts, we believe the IPA is making good on its promise to remove barriers for solar development in undersubscribed market segments, and encouraging more equitable solar development in our state.

Firstly, we support the IPA's \$5/REC Roof-mounted Community Solar (RCS) Price Adder for Traditional Community Solar and Public Schools projects. The RCS Price Adder will help stimulate rooftop community solar development in urban areas and diversify the IPA's statewide community solar portfolio. This adder will also help promote equitable solar development by

¹ U.S. Energy Information Administration. (2024, February 2). Preliminary Monthly Electric Generator Inventory. <https://www.eia.gov/electricity/data/eia860m/>

compensating for the additional costs associated with rooftop installation and encouraging creative solar solutions for urban communities.

As stated in previous comments, we are also happy to see that the IPA is removing the 5% REC contract value collateral requirement for public school solar projects with a Tier 1, Tier 2, or Environmental Justice designation. Removing this barrier for public schools in low-income and environmental justice communities will help promote activity in the Public Schools Block, where many would-be participants are affected by financing constraints and debt limitations. Combined with the implementation of the IRS' elective pay ("direct pay") delivery option for federal clean energy tax credits, the IPA's adjusted REC Contracts should help ease the financial pressure on public schools that wish to pursue solar.