

**From:** [Sameer H. Doshi](#)  
**To:** [IPA.Solar](#)  
**Subject:** [External] Re: Illinois Power Agency Requests Stakeholder Feedback on Draft REC Contracts  
**Date:** Friday, April 5, 2024 18:33:16

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Hello,

Below are my comments on the three draft REC contracts published by the Agency on March 22, 2024.

I am writing only as myself, on behalf of no other entity; I haven't discussed or shared this with anyone; and I'm trying to focus only on administrative clarity and consistency.

### **Draft 2024 15-Year Illinois Shines REC Contract**

I suggest that the new term "local subscribers" -- which appears in Section 1.96, Section 2.7, Exhibit A, and Exhibit C-2 -- should be defined within the contract, for administrative clarity. That could entail (i) an express definition, or (ii) a definition with reference to Illinois Shines governing documents (*e.g.* the proposed 2024 LTRPP at page 173, footnote 331), or (iii) a definition like "as determined by the IPA" or "as defined under the Applicable Program," or something else.

On Exhibit A, Schedule D, page 1 (which is the 73rd page of the contract), paragraph 5:

- \* "T" should be added to the list of lettered items, as new removal pathway T (re: Section 3.5) won't involve any payment by Seller.
- \* "H" was deleted from the list of lettered items in this draft, but I think it should be included in the list (for the same reasons that items G & I are included).
- \* "M" was added to the list of lettered items in this draft, but I think it should **not** be included in the list (Article 10 is not prescriptive about how Seller makes payment; note that item P, which also references similar language in Article 10, is not in the lettered list).

On Ex. A., Sch. D, Att. A, page 5 (which is the 79th page of the contract): in the description of item S (removal pathway under Section 4.2(g)), it should mention Seller's return of Advance of Capital under Section 5.6, similar to the descriptions of most other removal pathways.

### **Draft 2024 20-Year Illinois Shines REC Contract**

In Section 4.2(c), the reference to "Section 4.2(f)" should instead say "Section 4.2(g)". [re: return to Seller of Surplus RECs]

On Exhibit A, Schedule D, page 1 (which is the 64th page of the contract), paragraph 5:

- \* "U" should be added to the list of lettered items, as new removal pathway U (re: Section 3.4) won't involve any payment by Seller.
- \* "H" was deleted from the list of lettered items in this draft, but I think it should be included in the list (for the same reasons that items G & I are included).

On Ex. A., Sch. D, Att. A, page 5 (which is the 70th page of the contract): in the description of item T (removal pathway under Section 4.2(f)), it should mention Seller's return of Advance of Capital under Section 5.6, similar to the descriptions of most other removal pathways.

### **Draft 2024 Illinois Solar for All REC Contract**

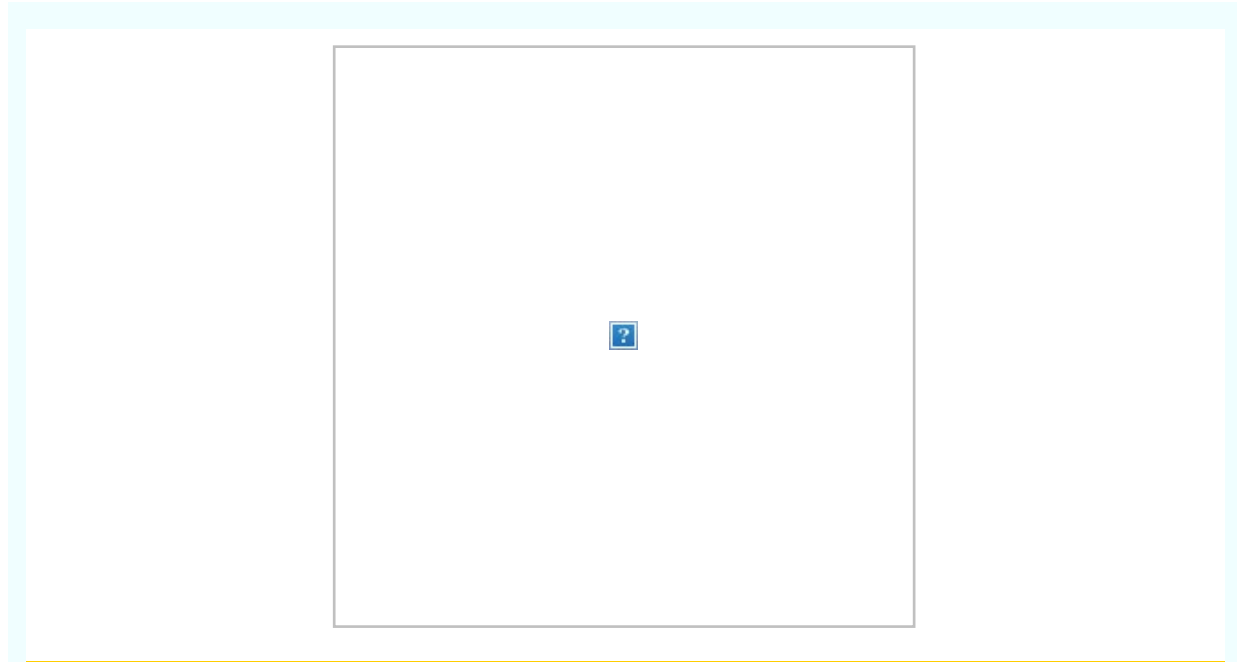
On Exhibit A, Schedule D, page 1 (which is the 74th page of the contract), paragraph 5:

- \* "U" should be added to the list of lettered items, as new removal pathway U (Section 3.5) won't involve any payment by Seller.
- \* I respectfully suggest that the Agency consider whether some of the following should be removed from the list of lettered items: E, M, P, Q, R, S. Rationale: the respective removal pathways for those items [re: Sections 2.4(d), 2.7(a) through (c), and 4.2(g)] are contractually written no more prescriptively regarding how Seller pays than are the contractual sections for items A, B, C, I, J, L, N, O, which are **not** in the list.

Thank you for your consideration,  
Sameer



On Friday, March 22, 2024 at 03:25:22 PM CDT, Illinois Power Agency <ipa.contactus@illinois.gov> wrote:



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## **Illinois Power Agency Requests Stakeholder Feedback on Draft REC Contracts**

On March 22, the Illinois Power Agency posted drafts of the 2024 REC Contracts for both Illinois Shines and Illinois Solar for All (ILSFA) Programs. To submit comments, please see the [Request for Stakeholder Feedback](#) on the following 2024 Draft REC Contracts:

- **2024 Draft Illinois Shines (ABP) 15-year REC Contract;**
- **2024 Draft Illinois Shines (ABP) 20-year REC Contract;** and
- **2024 Draft ILSFA REC Contract.**

To view the redline documents showing the proposed changes against the applicable 2022 REC Contracts, please visit the [Stakeholder Engagement page](#) on the IPA website.

**Responses are due by April 5, 2024, and should be sent to: [IPA.Solar@illinois.gov](mailto:IPA.Solar@illinois.gov)**

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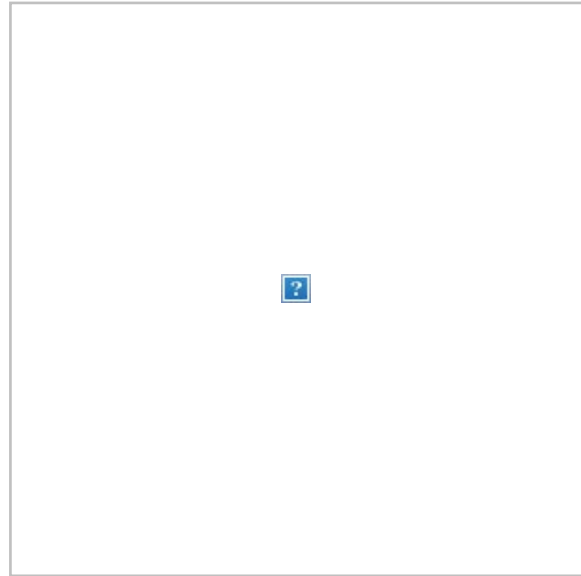
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