



Illinois Power Agency

November 20th, 2024

SUBJECT: Feedback on REC Price Cost Collection

To Whom It May Concern,

Regarding the granularity of accounting in Feedback Request #3, we would like to raise the following concerns:

1. **Administrative Feasibility:** The level of detail required under this proposal, especially for smaller solar companies like ours, introduces significant administrative burdens. We do not have resources or systems to collect and report such granular data consistently. Our company only calculates pricing for projects as a whole. We do not currently have a system for calculating specific buckets and/or staff and time to complete post installation job costing.

Creating this requirement would significantly increase the administrative burden of the program and could inadvertently limit participation in the programs and create disparities within the industry. It is hard enough for us small, local companies to participate in the program. Please do not make it harder for us by adding this administrative burden on top of current requirements.

2. **Data Privacy and Competitive Concerns:** Sharing sensitive cost data—even under assurances of confidentiality—poses risks, particularly under the Freedom of Information Act (FOIA). Similar data is not collected or disclosed in other State programs that we are aware of, and doing so could expose proprietary information, providing a competitive advantage to larger players who can leverage this data. We strongly recommend reevaluating this aspect to ensure safeguards are adequate.

We urge the Agency to consider simplifying the data collection requirements and focus on statewide markers or average numbers wherever possible. Maybe require this for very large projects, but exempt any project less than 500kW or 1MW.

Thank you,

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