

From: [Kelly Herz](#)
To: [IPA.Solar](#)
Subject: [External] Kelly Herz –Feedback on REC Price Cost Collection
Date: Friday, November 22, 2024 4:04:12 PM

Hello,

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

Administrative Feasibility: The level of detail required under this proposal—especially for smaller solar companies—introduces significant administrative burdens. Many Designees do not have resources or systems to collect and report such granular data consistently. Our company only calculates pricing data for the purpose of generating sales contracts. We do not currently have a system for calculating administrative costs for any projects.

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.

However, if this proposal is implemented, we would request clarification on which category the current administrative burden of Illinois Shines program requirements would be classified. For our company, these costs are at least as much as the interconnection category, and would only increase under this proposal.

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.

Thank you,

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