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From: Michelle Knox [Redacted]  
 Sent: Wednesday, March 19, 2025 11:27 AM  
 To: IPA.ContactUs <[IPA.ContactUs@Illinois.gov](mailto:IPA.ContactUs@Illinois.gov)>  
 Cc: Kara Blankenship [Redacted]  
 Subject: [External] DRAFT REC PRICING COMMENTS

Good morning! I am writing in response to the below copy/pasted DRAFT REC PRICING for Program Year 2025-2026.

## Draft REC Prices – Illinois Shi

### Distributed Generation

	2024-2025 Prices		Draft 2025-2026 Prices		Group
	Group A	Group B	Group A	Group B	
0 - 10 kW	\$73.71	\$83.87	\$60.90	\$73.08	-17.4
>10 - 25 kW	\$63.53	\$77.53	\$54.20	\$65.04	-14.7
>25 - 100 kW	\$55.89	\$70.23	\$56.27	\$67.53	0.7%
>100 - 200 kW	\$53.63	\$63.34	\$52.70	\$63.24	-1.7%
>200 - 500 kW	\$46.58	\$54.60	\$43.35	\$52.02	-6.9%

As a solar business owner who started my business in 2008 and has participated in REC procurements since 2015 in primarily the residential and small commercial market, the proposed decreases for Group A, in the 0-10 and 10-25kW categories of 17.4% and 14.7% respectively, seem excessive. In our region, we are already experiencing a "chill" to the solar market due to Ameren's policy change effective 1/1/25 moving from full retail net metering to supply only net metering. In addition to this, our region also has seen deteriorating solar policies in both the public utility areas of municipal and rural electric cooperatives in terms of the overproduction feedback rate dropping as low as 3.32 cents.

With the current RPS state goal of 40% renewables by 2030, coupled with changing policies to the compensation rates for overproduction put back onto the local grid systems, these considerable drops will serve to hurt not only the progress towards meeting compliance of legislatively mandated RPS standards, but also established small businesses and new emerging businesses that have entered the Illinois marketplace due to our robust procurement policies from FEJA and CEJA. These businesses also foster economic development through employment of staff and installers, purchase of solar products through distributors, and financing of systems through local banks. In the past, we've experienced drops of around 4%, which have been manageable. The proposed drops are over 4.35 times that amount for the 0-10kW category and 3.675 times that amount for the 10-25kW category!

Distributed generation from systems under 25kW help to stabilize the grid and can generally be completed without requiring grid infrastructure upgrades. Although Ameren caps infrastructure upgrades for these two categories at \$200,

municipal and rural electric cooperatives presently have no such caps. In fact, in some cooperative territories, "engineering studies" are presently required for systems over 10kW AC that range anywhere from \$600-\$1,500 BEFORE it is even determined if a transformer/line upgrade is needed. Lowering the REC prices substantially for these groups of residential, small business and ag producers, will certainly serve to make "going solar" more difficult for those that live in rural or municipal areas. Those living in Ameren territory will feel less of a blow due to the fact that they are able to enjoy the Smart Inverter Rebate after losing full retail net metering. Those living in Public Utility territories do not have this cushion. This holds true for the 1,000,000 public utility ratepayers in Illinois regardless of if they are Group A or Group B.

At a time when there is national uncertainty and chaos due to a change of administration that does not appear to support policies that are already in place to help grow renewable energy development, as a state, we need to provide some level of certainty to those that are considering renewable options. I respectfully ask that the IPA reevaluate the DRAFT REC pricing for these Small DG categories accordingly to support continued solar growth at the state level. Small businesses, their supply chains, labor partners, and local banks, as well as consumers interested in making clean energy choices in Group A territory, appreciate your consideration of this request. Thank you!

Best Regards,

Michelle

**Michelle Knox**, Founder  
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