



May 7, 2020

Anthony Star, Director
Illinois Power Agency
105 West Madison Street, Suite 1401
Chicago, IL 60602

Delivered electronically to IPA.solar@illinois.gov

Dear Director Star,

Please find below Certasun's response to your REC Contract Request for Stakeholder Comments dated April 9, 2020. The numbering below refers to the numbering in your request for comments.

2. (Removal of Projects for Convenience): We applaud the Agency's consideration of a methodology to remove projects from a REC contract prior to energization. However, we believe there ought to be circumstances under which certain projects could be removed without penalty.

Homeowners cancel installation agreements for very reasonable reasons. Consider all of these reasons for actual cancellations we've had after REC contracting but before installation:

- Employer transferred customer out of state
- Customer's home was severely damaged by fire
- Customer lost his job (a particularly salient example in light of COVID-19)
- Utility required interconnection study at a cost of over \$1000
- Utility denied net metering on the basis of an unrealistic shading analysis that did not consider shading
- HOA required changes in panel layout that significantly degraded performance
- AHJ would not allow solar panels on the front (south-facing) roof plane

We believe it is unreasonable for a utility counterparty to be entitled to penalties (including forfeiture of REC collateral) when a project cannot proceed for reasons like this.

We acknowledge that it would be bad to allow faux projects into the REC contracting process. However, we believe it should be possible to distinguish between bad and good actors based either on the reason for the cancellation or the percentage of projects in a batch that are cancelled.

Sincerely,

Josh Lutton, President

Certasun