



682 State Route 31 • Oswego, Illinois 60543-8500

September 28, 2018

Honorable Brien J. Sheahan, Chairman
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, IL 60601

Honorable Anthony Star, Director
Illinois Power Authority
160 N. LaSalle Street, Suite C-504
Chicago, IL 60601

Illinois Power Agency
Illinois Adjustable Block Program Administrator
160 N. LaSalle Street
Chicago, Illinois 60601

Re: Method of Disbursement of Renewable Energy Credit Dollars for
Solar Grants as required by the Illinois Renewable Jobs Act

Gentlemen:

On behalf of the Board of Trustees and myself, we feel that it is our duty to respond to the invitation to comment by the Illinois Power Authority (IPA) to the appropriate method to be adopted to determine the allocation of Renewable Energy Credits (RECs) for Solar Grant dollars accumulated by the contribution of rate payers and taxpayers and collected by Commonwealth Edison and Ameren for the last ten(10) years.

Since the fund from which these REC dollars for Solar Fields will be paid are dollars directly collected from taxpayers and rate payers, not only within our District, but throughout the State of Illinois, it is our opinion that the method to be determined for the disbursement of those dollars should establish a priority to be granted to municipalities and non-profit organizations and thus directly return those dollars, first, to the taxpayers and rate payers who contributed to the fund as required by the Illinois Renewable Jobs Act.

The Fox Metro Water Reclamation District serves in excess of 300,000 people in a four (4) county area. The Fox Metro rate payers alone are believed to have contributed over \$27 Million to the fund while the Fox Metro Water Reclamation District itself has contributed over \$250,000.00.

Fox Metro has recently acquired 45 acres north and adjacent to its main facility in Oswego, Illinois and is actively negotiating the construction of a Solar Field covering ten (10) acres. After all credits for various grants available through the development of Solar Power and the

J.S. Sotir, President
M.C. Funkey, Vice President
C.F. Childress, Secretary & Clerk
D. Krahn, Treasurer
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T.F. Muth, District Manager
D.C. Ingemunson, Attorney
J.W. Frerich, Engineer

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savings to the users, Fox Metro expects to save the rate payers over the 25 year expected life of the Solar Field \$3.25 million. The people served by Fox Metro established the fund and we believe are entitled to a priority when those funds are allocated. The method for the disbursement of the RECs will directly determine if this construction is possible, if the acquisition of the property is immediately beneficial and if the savings to the rate payers and taxpayers is realized.

We are aware of 7 applications expected to be filed by municipalities within the District's Service Area in addition to Fox Metro Water Reclamation District and including the City of Aurora, the second largest City in the State.

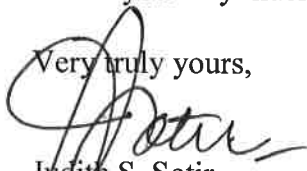
We are further advised that an accurate estimate of the savings indicates that one (1) 2MW Solar Field Grant would save the taxpayers approximately 3.25 million dollars over the twenty-five (25) year term of the field or at least \$130,000 per year.

A lottery system could well ignore the creators of the fund and fail to provide reimbursement directly to those taxpayers and rate payers responsible for the accumulation of the fund and therefore, such a method is not in the best interest of the taxpayers of the State of Illinois. The aspects of our present economic climate would indicate clearly that the applications for RECs for Solar Fields will greatly exceed the dollars in the fund. Clearly, it is inequitable to adopt a system that would benefit interests other than the interests of the parties directly responsible for the creation of the fund.

Accordingly, we urge all authorized to craft the method for disbursement of the RECs to **grant priority to municipalities and non-profit** interests that are presently engaged in the development of Solar Energy for use by those municipalities and non-profit interests and thus return to the taxpayers and rate payers, first, the money that they have contributed.

Thank you very much for your attention.

Very truly yours,



Judith S. Sotir
President Board of Trustees
Fox Metro Water Reclamation District



Thomas F. Muth
District Manager
Fox Metro Water Reclamation District

cc: Senator Jim Oberweis, Senator Jennifer Bertino-Terrant, Senator Linda Holmes, Senator Sue Rezin, Representative Keith Wheeler, Representative Mark Batinick, Representative Linda Chapa LaVia, Representative Stephanie Kifowit, Representative David Welter, Representative Mike Fortner, Representative Grant Wehrli, Trustee Judith Sotir, Trustee Christopher Childress, Trustee Michael Funkey, Trustee David Krahn, Trustee Albert Heriaud, Attorney Dallas Ingemunson