

September 26, 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

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

Gentlemen:

As a Trustee of the Fox Metro Water Reclamation District, (Fox Metro), I feel that it is my 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 rate payers of Fox Metro, it is my opinion that the method to be determined for the disbursement of those dollars should establish a priority to be granted to Fox Metro, other 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. 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.

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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 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 I 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.

A lottery system could well ignore the creators of the fund and fail to provide reimbursement directly to those rate payers responsible for the accumulation of the fund and therefore, such a method is not in the best interest of the rate payers. 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, I urge all those authorized to craft the method for disbursement of the RECs to grant priority to Fox Metro, other 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,

A handwritten signature in cursive script, appearing to read "Chris Childress", followed by a long horizontal flourish line.

Chris Childress

Secretary/Clerk Fox Metropolitan Water Reclamation District

cc: Illinois Power Authority Plan Administrator - VIA E-mail ([comments@illinoisabp.com](mailto:comments@illinoisabp.com))