

Adjustable Block Program REC Contract Request for Stakeholder Comments

September 4, 2020

Background

Public Act 99-0906 (the “Future Energy Jobs Act”) provided for the establishment of the Adjustable Block Program (“ABP”) to procure of Renewable Energy Credits (“RECs”) from new photovoltaic distributed generation and community solar projects through 15-year contracts. A standard REC delivery contract between the utilities and Approved Vendors was developed and was published for use under the ABP in January 2019 (the “January 2019 REC Contract”). On October 21, 2019, the Illinois Power Agency (“Agency” or “IPA”) filed its first revised long-term renewable resources procurement plan (“Revised Plan”), which was approved by the Illinois Commerce Commission (“ICC”) with modifications in Docket No. 19-0995 on February 18, 2020. Under the Revised Plan, the Agency proposed a substantial refresh of the January 2019 REC Contract based upon lessons learned from the execution and early administration of the initial contracts.¹ A copy of the Revised Plan is available [here](#).

In connection with the development of a refreshed REC Contract, the Agency issued an initial Request for Stakeholder Comments on April 9, 2020 for which written comments were received on May 12, 2020. The Request for Comments and the stakeholder comments are available [here](#).

On July 24, 2020, the Agency posted the first draft of the refreshed REC Contract (July 2020 Draft REC Contract), which is available here: [here](#). On the same date, the Agency issued a Request for Stakeholder Comments to seek feedback on the July 2020 Draft REC Contract, for which written comments were received on August 14, 2020. The Request for Comments and stakeholder comments are available at <https://illinoisabp.com/rec-contract/>.

Two (2) workshops were held on July 31, 2020 and on August 7, 2020 to facilitate stakeholder engagement on the REC Contract development process prior to the written comments submission deadline. The stakeholder webinars and copies of the presentations from the REC Contract workshops are available [here](#).

Second Draft of the Refreshed REC Contract and Process for Submitting Comments

On September 4, 2020, the Agency posted the second draft of the refreshed REC Contract (September 2020 Draft REC Contract), which is available at <https://illinoisabp.com/rec-contract/>. This Request for Stakeholder Comments is to seek feedback on the September 2020 Draft REC Contract. The deadline to submit written comments is on September 18, 2020 and one (1) workshop is planned to facilitate stakeholder engagement on the REC Contract development process prior to the written comments submission deadline.

¹ The refreshed contract would also serve as the basis of a refreshed Illinois Solar for All REC delivery contract.

All comments/proposed edits received in accordance with the process outlined below will be reviewed by representatives from the IPA, the Program Administrator (InClime), Ameren Illinois, ComEd, MidAmerican, Staff of the ICC, and NERA Economic Consulting. The timeline and process for interested parties to provide comments is as follows:

Written Comments are due by 5:00 PM Central Prevailing Time (“CPT”) on September 18, 2020 and should be sent to: IPA.Solar@illinois.gov

- Please provide telephone and email contact information in the event that the Agency or its Program Administrator seeks clarification regarding your comments.
- Each of your comments must be clearly indicated by tracked changes to the Microsoft Word version of the draft contract. We strongly encourage you to provide explanatory notes either in a separate document or highlighted in tracked changes.

In general, responses will be made public and published on the ABP’s website (<http://illinoisabp.com/>) or the Agency’s website (<https://www2.illinois.gov/sites/ipa/Pages/default.aspx>). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions. Independent of that designation, if the Agency or its Procurement Administrator or the ABP Program Administrator determines that a response contains confidential information that should not be disclosed, it reserves the right to provide its own redactions.

Stakeholder Workshop

A workshop will be held on Friday, September 11, 2020 to discuss the September 2020 Draft REC Contract and to facilitate stakeholder engagement on the REC Contract development process.

Workshop: Friday, September 11, 2020. 10:00 AM to Noon (Central Prevailing Time)

Meeting link:

<https://illinois.webex.com/illinois/j.php?MTID=m9a415b046e5c66dff565a71a975747ca>

Meeting number: 133 521 7801

Password: 9X64

Join by phone

+1-312-535-8110 United States Toll (Chicago)

+1-415-655-0002 US Toll

Access code: 133 521 7801

Proposed Timing of Implementation of the Refreshed REC Contract.

Section 6.7 of the Revised Plan states that once the refreshed REC Contract is finalized, “projects approved by the Commission after the contract finalization date would use the new contract, regardless of application date. The Adjustable Block Program will also provide an “off-ramp” option offered for any already applied projects that were expecting to be subject to the original contract and could now be non-financeable (or otherwise unable to be developed) under the updated contract.”

At this time the Agency is proposing that the Refreshed REC Contract will not be formally finalized until such time as funding is available to allow for the opening of additional blocks of capacity (block 5 for community solar and large distributed generation, block 4 for small distributed generation). In this way the current REC Contract will continue to be used for current blocks of capacity including projects selected off waitlists. The Agency would like feedback on whether stakeholders and interested parties have a view on this proposed timing of release of the final refreshed REC Contract.

Should you have any questions or need additional information, please contact Brian Granahan at 312-814- 4635 or Brian.Granahan@Illinois.gov.