



Re: "ILLINOIS POWER AGENCY Indexed REC RFP"

Dear IPA and Nera Staff,

Please find our comments to the LLINOIS POWER AGENCY Indexed REC RFP on the following pages.

Thank you for your time and consideration,

A handwritten signature in black ink that reads "Brennan Downes".

Brennan Downes,
VP Development



Comment #1

Document: “Stakeholder Workshop Presentation (February 7, 2022)”

Slide: 44

Text:

Slide Title: Project Site: Brownfield Site Photovoltaic Projects

- Location Information.
 - Complete address for the Project in Illinois
 - Map of the Project site clearly showing the location of the Project
 - Project must be entirely contained within the brownfield site, and Projects that are co-located with another facility on a greenfield site must disclose this fact
- Project site.
 - Project site must be regulated by the US EPA or Illinois EPA under one of four Programs in the Act (listed on the next slide); OR
 - Project site is located at the site of a coal mine that has permanently ceased coal production, permanently halted any re-mining operations, and is no longer accepting any coal combustion residues; has both completed all clean-up and remediation obligations under the federal Surface Mining and Reclamation Act of 1977 and all applicable Illinois rules and any other clean-up, remediation, or ongoing monitoring to safeguard the health and well-being of the people of the State of Illinois, as well as demonstrated compliance with all applicable federal and State environmental rules and regulations, including, but not limited, to 35 Ill. Adm. Code Part 845 and any rules for historic fill of coal combustion residuals, including any rules finalized in Subdocket A of Illinois Pollution Control Board docket R2020-019

Comment and Suggestions:

We suggest that the yellow highlighted portion of above be

- 1) Only applicable to the part of the mine that the project will be placed and
- 2) the latest date for which the mine takes the residues (as applicable to part (1) of this note) be prior to start date of construction of the project on the applicable land. (with all other applicable rules within this program being applied).

We suggest that the green highlighted portion of above be allowed to be part of a greenfield project if a submeter for energy produce only from that part of the project that is designated as “Brownfield” is installed and used for billing, tracking, etc.