

Submitted Electronically to: Illinois-RFP@nera.com

February 9, 2022

Dear Procurement Administrator:

EDP Renewables North America (EDPR) would like to offer the following responses to the Illinois Power Agency's (IPA's) request for feedback on the 2022 Indexed-REC Request for Proposals Process and Rules. EDPR is the fourth largest wind energy owner and operator in the United States and around the world. In Illinois, we own and operate seven wind farms totaling more than 1,200 MW of wind power. We are also in the late stages of development of several utility-scale solar parks in Illinois.

EDP Renewables was awarded contracts in a previous IPA wind energy procurement which has provided us with direct experience working with the IPA RFP process. The following comments relate to the requirement for Qualified Persons to install photovoltaics and address language preferences for the Pre-Bid Letters of Credit.

Qualified Persons

Further detail regarding the use of Qualified Persons as defined in Section 16-128A of the Public Utilities Act is recommended. EDPR recommends clarifying that the obligatory scope of Qualified Persons performing installations of photovoltaics is limited to the integration and wiring of the photovoltaics after the physical setting and mounting of panels has been completed. This enables a broader scope of individuals to participate in transporting panels and other solar panel work that does not involve electrical expertise.

Letters of Credit

Bidders may provide bid assurance collateral in the form of a letter of credit, however the available letter of credit forms are not suited for execution with many major banks. Each utility must provide two letter of credit forms: one that allows for delivery electronically and one for deliveries by mail. This is necessary to meet the needs of various banks. For example, Deutsche Bank US requires electronic submission whereas BBVA US and LBBW NY do not allow the management of documents electronically and must receive documents by mail.

We asked multiple banks if they would sign these letter of credit forms and compiled their responses in the attached word documents. Please see attached letter of credit forms for the necessary changes.

We appreciate your time and consideration of these comments as well as those of the Clean Grid Alliance and would be pleased to have the opportunity to provide further information on these topics.

Thank you,



Amy Kurt
Director of Development, Eastern Region
EDP Renewables North America

