

Spring 2022 Indexed REC Draft Contract and Draft Rules

Response to Illinois Power Agency Request for Stakeholder Feedback

February 9, 2022

Company:

Invenergy LLC (“Invenergy”) is a leading privately held developer and operator of sustainable energy solutions headquartered in Chicago. Invenergy has completed development on 17 sustainable energy projects in Illinois and is pursuing additional opportunities in the state. Proud of our Illinois roots, Invenergy has long looked to provide value to the state by siting some of our most innovative projects on Prairie State Soil. Our Grand Ridge Energy Center, three energy technologies co-located at a single site, received Power Engineering and Renewable Energy World Magazines’ 2015 Project of the Year Award for Best Renewable Project as well as Energy Storage North America’s Innovation Award.

Through our growth journey, the state of Illinois and the Illinois Power Agency (“Agency”) have been crucial partners. Invenergy commends the efforts of the state to expedite the decarbonization of our energy grid and the thoughtful expansion of renewable energy deployment.

Invenergy submits the following responses and respectfully request that the Agency consider the feedback provided below.

Project Labor Agreement Requirements:

Statute requires that if construction activities began on or after Sept. 15, 2021, then the REC suppliers must enter into a Project Labor Agreement prior to construction. The Procurement Administrator proposes that the PLA shall be filed with the Director of the IPA within 30 days of the later of: the execution of PLA or PLA amendment or Effective Date of Agreement.

During the February 7th, 2022, workshop, the Procurement Administrator further solicited feedback regarding timeline of PLA filing and whether 6 – 12 months after would be a more appropriate due date.

RESPONSE: Invenergy agrees with the Administrator’s thinking that the PLA should be produced after the bid is due and should not be a requirement for a bid. The commitment to enter a PLA should be sufficient as a bid requirement. PLAs and contracts are negotiated closer to NTP. It is not prudent for PLAs to be negotiated prior to receiving a bid as timelines and needs can often change when moving through permitting processes.