

[Commenter 1]

**Comments on
REC Rollover
and
Redistribution
Methodology**

From: [Commenter 1]

Sent: Thursday, September 3, 2026 6:40 PM

To: Illinois-RFP <Illinois-RFP@nera.com>

Cc: [Commenter 1]; [Commenter 1]

Subject: [Commenter 1] Comments: Fall 2026 Indexed REC RFP

Good Afternoon IPA Procurement Administrator,

On behalf of [Commenter 1], please find attached our stakeholder comments in response to the Fall 2026 Indexed REC RFP Invitation to Comment.

Our submission includes a redline of the Draft Indexed REC Agreement in Microsoft Word format with tracked changes and a separate stakeholder comments document addressing the Preliminary Proposal Requirements and providing responses to requested feedback related to REC rollover and redistribution.

Please don't hesitate to reach out should you have any questions or would like clarification regarding any of our comments.

Thank you for the opportunity to provide feedback. We would appreciate confirmation of receipt of our submission at your convenience.

Sincerely,

[Commenter 1]

[Commenter 1]'s title

Request for Information – REC Rollover and Redistribution:

Comment 1 – Preserve at Least 80% of Unfulfilled REC Quantities for Rollover to the Same Technology

The RFI requests feedback as to whether or not some quantity or percentage of unfilled RECs should be held back for rollover to the same technology category rather than dynamic redistribution in the same procurement event. We recommend that, if dynamic redistribution is used, at least 80% of the unfilled REC target for each undersubscribed technology category be retained and rolled forward to the same technology category in the subsequent procurement event. No more than 20% of the remaining target should be available for redistribution to an oversubscribed technology category in the same procurement.

Dynamic redistribution has value because it allows the IPA to make progress toward overall REC procurement objectives when one category is undersubscribed and another contains additional qualifying bids. However, unrestricted redistribution risks effectively converting technology-specific procurement targets into a technology-neutral procurement. That could disproportionately favor technologies that have shorter development timelines or larger quantities of immediately available projects. Certain technologies can involve longer and more complex development timelines related to interconnection, permitting, transmission, siting, equipment procurement, and other project development considerations than others. An undersubscribed technology category in a single procurement should therefore not necessarily be interpreted as evidence that the target for that technology is no longer appropriate or that viable projects will not be available in a later procurement.

Maintaining a substantial technology-specific rollover also protects the opportunity for Illinois to procure a diverse portfolio of renewable resources. Different technologies provide different development profiles, geographic benefits, production characteristics, and contributions to the State's overall renewable energy portfolio. Allowing a large portion of an undersubscribed technology's target to be permanently absorbed by another category could reduce that diversity over time. For example, if solar is significantly oversubscribed while wind is undersubscribed, unrestricted redistribution could result in the IPA procuring substantially more solar at the expense of future wind procurement opportunities. While that may maximize REC procurement in the immediate event, it may also create an unintended technology concentration and diminish the opportunity for wind projects that are still advancing through the development process.

An 80% rollover requirement would strike an appropriate balance. It would preserve most of the planned procurement opportunity for the original technology while still allowing the IPA to use up to 20% of the unfilled quantity to take advantage of qualifying bids available in another category.

Request: For each undersubscribed technology category, at least 80% of the Remaining Target should automatically roll over to the subsequent procurement for the same technology category; and no more than 20% of the Remaining Target should be eligible for dynamic redistribution during the current procurement. This approach would preserve flexibility while maintaining the integrity and purpose of the technology-specific procurement targets.