

[Commenter 1]

**Comments on Indexed
REC RFP Rules**

From: [Commenter 1]

Sent: Thursday, August 22, 2024 1:11 PM

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

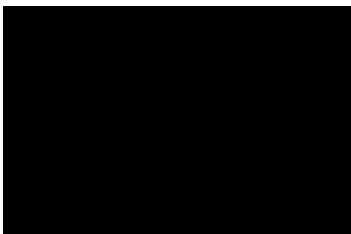
Subject: August 9, 2024 invitation to comment

Please find attached the comments of [Commenter 1] for the August 9, 2024 Illinois RFP invitation to comment.

Best regards,

[Commenter 1]

[Commenter 1]'s contact information



August 22, 2024

Comments and feedback of [REDACTED]

As structured in the Spring 2024 RFP, the bid assurance collateral requirement differences between utility wind and utility hydropower are unfair and create an unlevel playing field. The bid collateral assurance rate per MW for hydropower should be significantly less than utility wind. In all cases for utility wind, the primary constraint on a successful utility scale project is solely the cost of the interconnection upgrades since there are only minor differences due to site specific requirements or equipment. In essence, the resource for utility scale wind and utility scale solar is unlimited. Dams create a cap on the total hydropower project capacity. New hydropower at existing non-powered dams has an additional constraint which is the small number of sites that exist. And because of the limitation on the prime mover resource available the projects are constrained in size Relative to wind or utility solar projects.

Therefore, it is the opinion of [REDACTED] that the bid assurance collateral rate should be reduced to less than the rate currently available for utility scale wind power projects to help create a more level playing field relative to bid assurance collateral. [REDACTED] recommends the following bid assurance collateral rates for hydro at non-hydro dams:

AIC	\$1,000/MWh
ComEd	\$2,000/MWh
MEC	\$250/MWh

Best Regards,

[REDACTED]