

[Commenter 5]

**Comments on Draft
Preliminary
Proposal
Requirements**

From: [Commenter 5]
Sent: Mon 6/15/2026 5:03 PM
To: Illinois-RFP <Illinois-RFP@nera.com>
Subject: Comments on June 1 ISC Draft

Dear IPA ISC team,

Following on our earlier request for clarification regarding the language in the ISC Draft Proposal Requirements that Bidders “Must provide evidence that a single entity, either the Seller or the Bidder, has notice to proceed in owning or operating energy facilities with a combined nameplate capacity of at least 100 MW AC.”

While we understand CRGA’s requirement that the Bidder or Seller demonstrate commercial readiness and ability to develop projects, it seems overly restrictive to focus on a single entity. Providing a clear explanation of the relevant experience and relationships of the involved entities is already a requirement of the proposal, and should provide IPA with the information necessary to determine what experience is relevant.

If you believe it is necessary to consider only one entity other than Bidder, rather than limiting consideration only to a parent, we suggest you consider the edit “ a single **affiliated** entity **of** either Bidder or Seller.” This would allow more flexibility for Bidders to consider and document evidence of commercial readiness from a relevant entity in a broader range of structures, reflecting the practical demands of financing, third-party tax equity financing and other investment structures. This is consistent with other guidance in the June 1 Proposal Requirements stating that “If the Bidder and Seller are different entities, the Bidder must be a parent **or an affiliate** of the Seller.”

Thank you for your consideration,

[Commenter 5]

From: [Commenter 5]
Sent: Friday 6/5/2026 4:49 PM
To: Illinois-RFP <Illinois-RFP@nera.com>
Subject: clarifications re IPA ISC RFP

Hello,

Reviewing the IPA Indexed Storage Credit FINAL DRAFT PROPOSAL REQUIREMENTS,

1) We note the guidance related to bid evaluation that “If selecting the Marginal Project would result in exceeding the Target by no more than 50%, then the Marginal Project is selected.” To

confirm, the Target here (if in reference to ComEd) is the full 588 MW Target and not the remaining target after accounting for projects already selected?

2) We note the RFP Part 2 requirement to demonstrate Commercial Readiness, and specifically the guidance that Bidders “Must provide evidence that a single entity, either the Seller or the Bidder, has notice to proceed in owning or operating energy facilities with a combined nameplate capacity of at least 100 MW AC,” and that Bidders provide supporting evidence including “Notice to Proceed for the facility. All such documentation must name a single entity (either Bidder or Seller) as the entity that owns or operates the facility. If the Bidder or Seller is not named then a single entity (either Bidder or Seller) must have owned or operated the facility(ies) at the time of the issuance of the notice(s) to proceed.”

We also note the guidance in section 3.2 and in the guidance on Identification of the Project Team and Contributors that “If the Bidder and the Seller are different entities, the Bidder must be a parent or an affiliate of the Seller and must have a role in the Project.” [emphasis added].

First, we would like to clarify what is meant by evidence of notice to proceed in the context of facilities which are currently in construction or operation- would this include dated letters or other third-party communications communicating project status?

Related to that, is evidence of NTP an included/possible method of demonstrating commercial readiness or the only metric IPA will evaluate/accept? Specifically, is evidence of ownership/operation of energy facilities after NTP, that is in construction or operation, also an acceptable means of demonstrating commercial readiness? Documentation to provide evidence of owning or operating facilities could include contracts, including redacted purchase and sale agreements and/or operations and maintenance agreements, screenshots of ISO/RTO accounts, FERC ownership transfer approvals, etc. Further guidance on what type of evidence will be acceptable to IPA is appreciated.

We would also like to clarify (and register concern) over the requirement that all documentation must name a single entity. It is extremely common for investment in energy facilities to be structured through special purpose vehicle companies such as project llcs, through various parent structures. This is particularly true of energy storage facilities which often have third-party tax equity investors and debt in an entity above the project vehicle, but within a larger hold-co or operating structure. Is IPA’s intent to limit review of owning and operating energy facilities solely to the Bidder and one single parent entity or do you intend to consider all parent entities? In many instances, looking only at one parent would disregard affiliated entities under common control with the Bidder which have developed and now own and operate facilities seemingly relevant to demonstration of commercial readiness. If it is your goal to ensure that the Bidder/Seller and its affiliates have the relevant experience to develop, own and operate the facility, then it would be helpful to define the conditions under which activity by affiliates can also be considered.

[Redacted]

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