

[Commenter 6]
Comments on
Indexed REC
Contract

From: [Commenter 6]

Sent: Friday, March 26, 2026 5:57 PM

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

Subject: Stakeholder Comments – Revised Section 6.1 of Draft Indexed REC Contract

Dear Procurement Administrator,

Please find attached [Commenter 6]'s comments to the additional revisions to Section 6.1 of IPA's Draft Indexed REC Contract.

Should you require additional details or clarification, we may be reached at:

- [Commenter 6]'s Email
- [Commenter 6]'s Phone

Thank you in advance and best wishes,

[Commenter 6]

ARTICLE 6: REPORTING REQUIREMENTS

6.1 Monthly Generation Report

Seller shall, on a monthly basis, provide to Buyer and the IPA (i) hourly MWh generation data applicable to the Project and (ii) hourly real time locational marginal prices at the applicable hub indicated in the Product Order (either PJM-NIHUB or MISO-IL) for each calendar month of the Acceptable Vintage Period within five (5) Business Days after the conclusion of such Vintage month. This information provided shall be rounded to the sixth (6th) decimal place and shall be provided in Microsoft Excel format. For purposes of verification, Buyer and the IPA shall be granted read-only access of information for the Project by Seller within PJM Power Meter system or MISO Market Portal, as applicable, within thirty (30) days of: the Effective Date of this Agreement or the Date of First Operation (or the Hydropower Refurbishment Completion Date if the Project is a Hydropower Project that is newly Modernized or Retooled), whichever is later; such data shall be treated and maintained as confidential and proprietary by the IPA and Buyer. Should access within PJM Power Meter system or MISO Market Portal be unavailable, the Parties shall work together to allow Buyer and the IPA to be granted access to equivalent information that may be obtained from another source for purposes of independent verification. The acceptability of alternative sources of information shall be at IPA's reasonable discretion. In the event that the hourly MWh generation data submitted by Seller differ from the data accessed independently by the IPA pursuant to this Section ~~06.1~~, the IPA shall select, in its reasonable discretion, which data is more accurate, and shall be used said data for purposes of preparing the Price Calculation Notice(s). The Parties agree that the issuance of the Price Calculation Notice may be delayed due to delays in granting the IPA access to such information that would allow IPA to independently verify Seller's submitted data pursuant to this Section ~~06.1~~.

If Seller, Buyer or IPA uncovers errors related to the hourly MWh generation data for a Vintage Month provided by Seller that exceeds 3% of the aggregate generation data for the Vintage Month, the party uncovering such errors shall notify the other parties within three (3) months of the original deadline for data submission for such Vintage Month and Seller, within thirty (30) days of being made aware of such error, shall confirm the error and submit corrected data to Buyer and the IPA for recalculation of the REC Monthly Price by the IPA. The IPA shall endeavor on a commercially reasonable basis to issue to Buyer and Seller a revised Price Calculation Notice for such Vintage Month within thirty (30) days of receipt of such corrected data. Upon receipt of the revised Price Calculation Notice, Seller shall submit in its upcoming invoice a separate line item (or a separate invoice if the invoice related to the Latest Vintage Month has already been issued) that includes a payment adjustment based on the revised Price Calculation Notice; such payment adjustment shall be calculated as the multiplicative product of (a) the REC quantities of such Vintage Month that were previously paid and (b) the difference between the initial REC Monthly Price and the revised REC Monthly Price for such Vintage Month. For avoidance of doubt, this payment adjustment shall be due to a change in the REC Monthly Price only and there shall be no changes in the quantity of RECs related to this payment adjustment. The Parties shall work together to confirm the correct data, and failure of Seller to confirm the error and submit corrected data on a timely basis may delay the issuance of the Price Calculation Notice(s) for subsequent Vintage Months.