

[Commenter 9]

**Comments on Indexed
REC Contract**

From: [Commenter 9]

Sent: Friday, August 30, 2024 5:58 PM

To: Illinois-RFP

Subject: Comments on REC RFP Topic 1 - Energy Transition Community Grant Areas

Thank you for the opportunity to comment on the REC RFP with regards to the Energy Transition Community Grant Areas. [Information about the commenter], and we see this program as another key way to support communities as they transition away from a fossil fuel dependent economy. We will provide responses directly to the questions as proposed by IPA:

1. For purposes of future RFPs, including the Fall 2024 Indexed REC RFPs, should the Energy Transition Community Grant Areas be determined using the area covered by a 30-mile radius around fossil fuel facilities, nuclear facilities, and coal mines qualified by the DCEO as opposed to the host villages, cities and counties applicable to these qualifying facilities and mines? Why or why not?

We would suggest a geographic boundary that is consistent across eligible communities, either by land acreage or population size. Relying on the city/village or county boundaries results in inconsistencies in the geographic area eligible around each closure (e.g. Village of Hennepin vs. Peoria County).

Alternatively, IPA could utilize county boundaries as the area irregardless of if the facility is located within a city or village boundary.

2. Using a 30-mile radius around qualifying facilities and mines would extend some of the areas into states adjacent to Illinois. If a project is located in a state adjacent to Illinois (not located in Illinois) and within the 30-mile radius, should the project be eligible for the downward strike price adjustment? Why or why not?

Projects located outside of Illinois should not be eligible. This policy was designed to support Illinois communities impacted by a transition.

3. The list of qualifying fossil fuel facilities, nuclear facilities, and coal mines is updated by the DCEO on an annual basis due to the recency requirements under Public Act 102-0662. The current list of qualifying facilities and mines is provided in Table B in Appendix B. For purposes of the Indexed REC RFP, should all facilities and mines qualified historically by the DCEO be used in determining the ETCGAs? For example, should a coal facility that was qualified by the DCEO in 2023, but not in 2024 due to the recency requirement, continue to be used for determining ETCGAs? Why or why not?

The time frames involved in the permitting and construction of utility scale renewable energy projects make the same 6-year window of eligibility less appropriate. We would suggest a longer time window, perhaps 15 years. Additionally, in some cases environmental

clean-up and reclamation could take some time, also limiting renewable energy redevelopment in a short period of time.

Thank you again for the opportunity to comment.

[Commenter 9]

[Commenter 9's contact information]