

From: [Commenter 2]

Sent: Fri 2/25/2022 5:45 PM

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

Subject: Draft Coal-to-Solar REC Contract

Hello,

Below are my comments on the Draft Coal-to-Solar REC Contract published by the IPA and its Procurement Administrator on February 18, 2022.

Disclaimers: These comments are only about technical coherence. I am speaking solely for myself, on behalf of no entity. In my professional legal work, I represent various environmental organizations and renewable energy industry interests in matters outside Illinois. I have not shared or discussed these comments with anyone.

* Section 1.49's final sentence needs the following edit, to be consistent with the first sentence of the same section and also with page 411 of Public Act 102-0662 [IPAA § 1-75(c-5)(2)(H)]:

Similarly, if the Earliest Vintage Month is June 2023 and the Coal Electric Generating Facility is interconnected to the PJM Interconnection, LLC transmission grid and had a generating capacity of at least 1,200 megawatts as of January 1, 2021, then the Latest Vintage Month shall be June 2038, unless extended pursuant to Section **Error! Reference source not found.** up to a maximum extension of seven hundred thirty (730) days.

* Exhibit D (Form of Invoice) should have a field for the "Vintage" of RECs Delivered, in addition to the Quantity of RECs Delivered. This would be consistent with the final paragraph of Section 5.1.

* In Exhibit F-1, second paragraph, first sentence, I would edit as follows. The rationale for my proposed edit is that there are multiple possible Delivery Term durations under this contract (see section 1.49), and the duration isn't really important to this sentence or paragraph.

For example, if the Annual Quantity is 3,650 RECs and the Delivery Term starts on August 1, 2020, then ~~the Delivery Term is August 1, 2020 through July 31, 2035 and~~, for each day during the 365-day period of August 1, 2020 through July 31, 2021, the Daily Quantity can be reduced from 10 RECs to 5 RECs.

Thank you,

[Commenter 2]

[Commenter 2]'s contact information