Freedom Field
Making Renewable Energy Work

September 13, 2011

Comments on the Proposed Illinois Power Plan

Thank you for providing the opportunity to submit comments on the 2012 Draft Procurement Plan (the "Draft Plan"). The Solar Carve Out in the Illinois Renewable Energy Standard (RES) is one of the most aggressive solar mandates in the nation. If fully and strategically implemented, this policy could be an engine for job growth and economic development in Illinois.

Freedom Field is located in Rockford, Illinois, proud home of the only solar panel manufacturing facility in Illinois. Freedom Field is heavily involved in promoting solar as an economic development tool for our chronically unemployed economy. But...The carve out does really nothing to promote jobs for our small business contractors as such a carve out effectively and in reality excludes our small and medium sized businesses from the process. As a leadership example we have installed 12.3 KW of these homegrown panels, using a local contractor with local IBEW labor. An installation this size would not attract attention from a large experienced firm and as a result was unduly expensive, though it in theory lowered the cost of the next job in the community. Our small contractor did secure a follow-up job as a result of this opportunity which did not have the economics due to some first cost issues.

Both in terms of jobs and in equity, the net billing disparity, combined with this proposal, between wind (at 2 MW rated) and potentially "big box" type of installation (100- 500 KW) solar is patently unfair to our businesses and installation base. Though we are glad to see locally clean tech manufacturing jobs, the installation jobs are done by large come and go contractor and developers, the result is no building of local capacity to visibly convince the public of distributed solar advantages , and to actually drive down costs of systems by the experience curve.

Since it is generally agreed that the "jobs creators" are small and medium sized businesses, the defecto result here is contra to most public policy for permanent jobs growth in our communities. Looking at this as an Economist, the tradeoff is short term plantation economics, versus nurturing a local economy importantly more concerned with quality of life, (schools, local issues), than dividends for distant stockholders. It is well established that diversity over time creates efficiencies that scale does not ever promote.

In effect I believe we are just outsourcing our future as this stands, and perpetuate the u-virtuous circle of job flight from the State. If we do not promote home grown business, we will continue to have to bribe companies to stay with tax dollars.

Solar module prices have plummeted in the last two years and rooftop solar has never been more cost-effective. "Fuel" costs are zero, transmission costs are zero, and distributed solar delivers benefits to

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the electric distribution system by providing power at peak hours when other generation resources are at their most expensive. Initiating an SREC procurement program for distributed solar systems in 2012 would allow the state to take advantage of these values to mitigate the long-term price risks associated with other resources in the IPA portfolio while supporting badly needed job growth and economic development.

We respectfully recommend that the IPA modify the Draft Plan to include language stating affirmatively that the Agency will (1) create a procurement program for solar renewable energy credits (SRECs) from distributed solar energy systems; (2) implement the program over multiple years to encourage sustainable, long-term growth of Illinois' solar industry; and (3) hold a series of workshops prior to the Spring 2012 procurement events to seek stakeholder input on program features and implementation procedures. Thank you for your consideration.

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