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Quality Electrical Work Since 1996

Submitted to the Illinois Power Agency by Cathy Philbin, Good Electric, Inc.

I appreciate the opportunity to submit comments on the 2012 Draft Procurement Plan (the "Draft Plan"). While the Solar Carve Out in the Illinois Renewable Energy Standard (RES) is aggressive among programs throughout the country it must be fully implemented in a strategic fashion for the policy to drive economic development and more importantly job growth in Illinois.

As outlined in the Draft Plan this will NOT be the case and this is of great concern to me and my company as this will affect the future of solar in Illinois. As I understand the Draft Plan, the IPA will procure RECs, including SRECs through an auction which has been designed with large, utility-scale projects in mind. What about developers and owners of small and mid-sized distributed solar systems? I don't see how they will be able to participate as the bidding requirements are too complex to justify participation for small projects. This will have significant and negative impact on small business owners and home owners who want to install solar systems as the cost is too high for many.

Yes, we all know that module prices have come down significantly in the past two years making solar more cost-effective but total up-front costs are often a stumbling block for my customers. Small scale distributed solar will deliver the same benefits as the utility-scale systems with no "fuel" costs, no transmission costs and power is produced at peak hours when other generation resources are most expensive. Illinois needs an SREC procurement program for distributed solar systems in 2012 as this will prove the IPA supports job growth and economic development for the citizens of the State of Illinois, Good Electric, Inc. is a small electrical contracting business we have retrained our staff to install solar systems, concentrating on homeowner and small business owners, SRECS are a great incentive to help these customers make the leap to this greener way of life. SRECS coupled with other incentive plans will help my customers make this investment which ultimately benefits the entire electric grid.

It is our recommendation that the IPA modify the Draft Plan to include language that the Agency will create a procurement program for solar renewable energy credits (SRECs) from distributed solar energy systems implemented over multiple years to encourage long-term growth of the Illinois solar industry. We would also like the IPA to hold a series of workshops prior to Spring 2012 procurement events to seek stakeholder input on program features and implementation procedures.

Thank you,

Cathy Philbin
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