

Adjustable Block Program Request for Stakeholder Feedback November 12, 2021

5) Co-location of Distributed Generation Systems (Section 6.5.2, pg. 149) a) The Agency recognizes that in rural areas of Illinois it is not uncommon for a parcel to have buildings (and thus load to be offset by distributed generation) that serve separate residential and agricultural uses, and will evaluate requests to consider those uses separately for the application of this standard. For this draft Second Revised Plan, the Agency welcomes stakeholder feedback on how to develop and apply criteria for making such evaluations.

We here at 174 Power Global greatly appreciate the work that IPA has done to this point to support the solar industry in Illinois and all the work that is going into the implementation of the Climate and Equitable Jobs Act of 2021. We wholeheartedly support the idea of co-location of systems on parcels where there are separate uses. To build upon the idea of co-location we think that it should extend to large industrial facilities that occupy multiple parcels and have multiple meters. Currently a large industrial facility that has multiple meters and one account is limited to building a system for self-consumption at 2MW, which will increase to 5MW under the new legislation. We would argue that these facilities should be able to co-locate systems if they have the electricity demand. This would help heavy energy use industrial facilities to reduce their carbon footprint, decrease their operating costs, and in many cases increase their workforce. We believe that the goals of the Climate and Equitable Jobs Act would be best served by allowing these facilities to co-locate solar facilities to the greatest extent possible.

6) Community Solar (Section 6.5.3, pg. 150-151) a) For this draft Second Revised Plan, the Agency seeks stakeholder feedback on if small subscriber adders should be reduced. The shift to online marketing and enrolment is likely an additional cost savings for community solar providers that may not be reflected in the current adder. To elicit feedback on this topic, and in lieu of additional data or cost modeling, the Agency suggests starting with the midpoint of the range of costs reported by GTM Research, or \$14.82/REC for 50% or over small subscriber levels. This approach produces adders very similar to the current Minnesota adder.

While we believe there may be some savings in customer acquisition with online marketing and subscriptions, we do not believe reducing the adder makes sense for the success of the program. As per the latest IPA Long Term Renewable Resources Procurement Plan (8/16/21) the small subscriber adder for over 50% small subscriber was \$22.34 for Group A and \$21.77 for Group B¹. Reducing this incentive by 32% relative to the Group B level would hinder the goals of the incentive. With respect to Minnesota, which is being used as the guide for this new incentive level of \$14.82/REC, while it is true that Minnesota has had a successful community solar program the one area where their program has fallen is in attracting small subscribers. According to Xcel, as of July of 2020 about 86% of their solar garden capacity is subscribed by Commercial and Industrial clients². If Illinois wants to truly extend the benefits of community solar to small residential customers, it is essential that the current REC levels be maintained.

¹ <https://www2.illinois.gov/sites/ipa/Documents/DraftSecondRevisedPlan16August.pdf>

² <https://energynews.us/2020/07/07/in-minnesota-community-solar-maintains-growth-despite-challenges/>

Sincerely,

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