



Illinois Power Agency
Michael A. Bilandic Building, Suite C-504
160 North LaSalle Street
Chicago, Illinois 60601

Re: IPA Finalization of Community Solar Co-Location Guidelines

To Whom It May Concern:

On September 29 the Illinois Power Agency (IPA) released its draft Long Term Renewable Resources Procurement Plan for public comment (“LTRRPP”). The LTRRPP is intended to be a comprehensive explanation of how the IPA will procure distributed, community, and utility scale renewable generation, with a particular focus on solar and the Adjustable Block program authorized by Section 1-75(c)(1)(K) of the Illinois Power Agency Act. Forefront Power limits its comments to the issue of “co-location,” which involves how closely two or more community solar facilities may be placed while still retaining eligibility for the Adjustable Block program. ForeFront Power is actively developing a portfolio of such projects across Illinois, and we look forward to breaking ground as soon as the Adjustable Block’s first blocks open. However, ForeFront Power—like all developers—faces risk in developing projects until eligibility for the Adjustable Block program, including issues of co-location, are resolved.

ForeFront Power’s primary concern with the draft LTRRPP for public comment the limitations on co-location of Community Solar projects. The Illinois Power Agency Act, as modified by the Future Energy Jobs Act (“FEJA”), does not address this issue directly, and the draft plan takes the approach of suggesting restrictive guidelines in order to limit co-location. These restrictions on admission to the Adjustable Block program include an outright prohibition on the co-location of more than two megawatts of facilities with common ownership on an individual parcel, a prohibition on the co-location of more than two megawatts of facilities with common ownership on *neighboring* parcels, and rules regarding the subdivision of land intended to prevent the gaming of these restrictions. In addition, the IPA appears to suggest that multiple community solar projects cannot share a single interconnection. If enacted, ForeFront Power believes these restrictions on admission to the Adjustable Block program—the primary (and perhaps exclusive) way to secure long-term REC purchase agreements through Illinois utilities—would be the most onerous restrictions on Community Solar REC purchase programs in the nation. These restrictions on admission to the Adjustable Block program would reduce the benefits of subscribing to consumers (through higher costs) who may not be otherwise able to take advantage of solar, would reduce the benefits that utilities would receive through distribution network upgrades (paid for by solar developers through the interconnection process rather than all ratepayers), and could ultimately imperil the rollout of a robust Community Solar program.



ForeFront Power wishes to stress, however, that the answer to the problems identified above is not removing all restrictions on the Adjustable Block program. ForeFront Power noted the IPA's reference to the Minnesota experience. While ForeFront Power believes that the Minnesota experience is unlikely to be repeated in Illinois, ForeFront Power does agree it is harmful to the market and consumers (and not necessarily consistent with statutory goals) to allow limitless or minimally limited co-location. Any solution will have to balance the statutory goal of geographic disbursement with the economic benefits of shared development costs (especially interconnection costs), economies of scale, and the ability to serve a large local customer base where interest in subscriptions potentially far outstrips a single two-megawatt facility.

As a proposed compromise to the Adjustable Block program's co-location requirements, ForeFront Power proposes an approach whereby two Community Solar projects be allowed to co-locate on a parcel or on neighboring parcels, and share a single interconnection point. A total of four megawatts would therefore be permitted on a total of one parcel, or two contiguous parcels.¹ In other words, the IPA's proposed maximum of two megawatts on contiguous properties would be doubled to four megawatts. This would allow Community Solar projects to achieve the efficiencies of scale, and pass through those savings to our customers. It would also facilitate serving larger groups of customers, particularly in areas where relatively less land is available but demand for Community Solar is high. Just as important, the ComEd, Ameren, and MidAmerican distribution grids would receive investments through our interconnections that will enhance their stability and reliability (this occurs more frequently with larger projects, and thus more so with up to four megawatts sharing a common interconnection). Thirdly, the potential for conflicts between neighbors about co-location restrictions (especially if co-location restrictions are used as an excuse to invalidate land leases) could be avoided if adjacent parcels can participate and the total cap is modestly raised. Finally, a program cap of this size allows the benefits mentioned above, but also will ensure geographic diversity and is in keeping with the spirit of "Community" Solar projects, as no project need be sited on land larger than approximately 35 acres. A balanced approach which respects the cost and grid benefits of Community Solar is appropriate and necessary to benefit consumers and utilities, and bring successful projects to Illinois.

Respectfully,

Robert Hatton
Land Development Manager

¹ In the draft LTRPP for public comment, the IPA proposes treating multiple sub-two-megawatt community solar projects that are on the same parcel or neighboring parcels as if their nameplate capacity is the total of all such projects (i.e. if there are six 300 kW projects, the IPA recommends treating it in the Adjustable Block program as if each project is part of a single 1.8 MW project). ForeFront Power recommends that all co-located projects under its recommendation be treated as a two-megawatt project if the total nameplate capacity is above two megawatts.