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November 13, 2017

Mario Bohorquez, Planning and Procurement Bureau Chief
Illinois Power Agency
Mario.Bohorquez@ILLINOIS.gov

Re: Comment on IPA 2017 Draft Long-Term Renewable Resources Procurement Plan

Dear Mr. Bohorquez,

The effort and cost of acquiring, maintaining, and managing Community Solar subscribers from both median and low income families is a significant challenge. It may even be an impediment, to meeting the objective of "developing new generating facilities and expanding access to the benefits of renewable energy across a broad cross-section of the state's economy." Even with generous financial incentives many customers may be unable to participate.

We propose an efficient alternative to this potential unintended dilemma. It might be called an "everyone-in" municipal/community solar model. In an "everyone-in" Municipal Solar project, every ratepayer in a municipality would automatically be a subscriber in a solar project (unless they chose to opt-out). Analogous to the Community Choice Aggregation program, a municipality would obtain approval from its residents to select on their behalf a solar developer to build, own and maintain a solar farm. Every ratepayers would "own" (have an "interest" in) a portion (e.g. 1,000 watt) of the power capacity of the solar farm and would be credited (virtual net metering) for the amount of energy (KWh) produced. Every ratepayer would have the same subscription fee which would be less than the credits.

An advantage of this model is that all low-income families, along with everyone else, would automatically be subscribers and would receive the same credits as everyone else but their subscription fees could be made significantly lower than that of the larger group. Also, if the number of low- income households in a municipality is less than% compared to the total population, a prescribed number of low-income households outside the municipality could be included. (In Oak Park, approximately 37% of households are low-income. That is, annual income is at or below 80% of area median income.

Unfortunately, If the 2MW limit for Community Solar projects is applied to this model, an "everyone-in" Municipal Solar project could have only 2,000 subscribers (if each subscriber "owned" only 1,000 watt).

We request flexibility to the 2MW limit for "everyone-in" Municipal Solar projects. As an

example, a simplified spreadsheet for a municipality such as Oak Park with 24,000 subscribers is attached (It would require a 24 MW solar farm for every subscriber to "own" 1,000 watt).

We understand that one reason for the 2MW limit was to prevent gaming the system by large developers. We believe that the "everyone-in" model should be allowed because it would achieve many of the primary objectives of the "Solar For All" program. Also, it might encourage some subscribers to invest in smaller solar projects within the municipality.

Summary of Advantages:

- Minimizes administrative cost.
- Eliminates cost for acquiring subscribers.
- Reduces barriers to participation.
- Maximizes community involvement.
- Residential and commercial customers have the same subscription fee and same credits.
- No up-front payment from subscribers. Simplifies the calculation of credits per subscriber (Total KWh produced divided by total number of subscribers).
- Simplifies portability.
- Maximizes participation and minimizes subscription cost.
- Includes low-income customers at reduced subscription cost.
- Provides a model for low-income communities.
- Simplifies the addition and removal of subscribers. When a Subscriber is added, the monthly subscription fee and the credit goes down for everyone. When a subscriber is removed, the monthly subscription fee and the credit goes up for everyone. (The change would be the difference between dividing the total KWh by 23,999 rather than 24,000.)
- Greater transparency allows greater educational access. (Because everyone has the same subscription fee and the same credits, privacy would not be an issue and production data and other operational parameters could be open to schools for possible inclusion in the curriculum. Also, there would be no impediments to having a public display of information by means such as electronic billboards.)

Suggested wording for addition to the Long-Term Renewable Resources Procurement Plan:

Exception to the 2MW limit. Community Solar projects greater than 2MW are allowed and encouraged if they meet the general objectives of the "Solar For All" program and have all of the following elements:

1. The project must be initiated by a municipality, or other community non- profit.

2. By legal means, the municipality must obtain consensus from its residents to implement on their behalf all aspects of a community Solar Project. This includes selecting a solar developer to build, own, and maintain a solar farm.

3. All rate-payers in a municipality, by virtue of their residence must automatically be subscribers.

1. Rate-payers have the right to opt-out at any time with no penalty.

2. All subscriptions must be portable (i.e. retained by the subscriber even if the subscriber relocates or changes address within the same utility service territory.)

3. The developer selected by the Municipality must be approved by the IPA (Must be an Approved Vendor.)

4. The contract signed by the Municipality with an Approved Vendor must be for a period of at least 15 years.

5. All subscribers, residential and commercial, shall pay the same monthly subscription fee and receive the same energy (KWh) credit on monthly electric bills.

6. Subscribers shall not be required to pay any up-front charges.

7. The monthly credit to each subscriber shall be calculated by the formula: (Total KWH produced) divided by (total number of subscribers).

8. If the average monthly credit decreases by more than_____% of its initial value, (due to an increase in the number of subscribers, or due to an increase in population, or due to an increase in portable relocations) the municipality may appeal to the IPA to allow an increase in the power capacity (MW) of the solar farm. The requested increase should be large enough to bring the average monthly credit back to its initial value.

9. The monthly subscription fee of all low-income subscribers must be

____% less than that of the larger group.

10. The electric utility shall collect subscription fees as a part of the monthly electric bills and transfer the total funds to the municipality. The utility may add a charge, not to exceed_____% of the subscription fee, for this service. The municipality shall make a monthly, revenue neutral, transfer of the funds to the developer.

11. If the number of low income subscribers is less than_____% of the total number of subscribers, low-income customers who are not residents (but within the territory of the utility) shall be invited to become subscribers and to spread the word (e.g. through churches and other Community non-profit organizations) to other low-income customers. The methods of inviting households that qualify as low-income shall be done in a manner so as not to imply a "class" difference. The acquisition of additional low-income subscribers shall be done entirely by community entities at no cost to the project. The IPA shall annually evaluate the success of adding low-income subscribers. It is expected that most low-income subscribers who are not residents will come from nearby communities. However, low-income customers in communities where solar farms are located should also be considered as potential subscribers.

12. A robust educational/public relations program shall be implemented to assure that all subscribers, including non resident ones, understand the project, the benefits to be expected, and their rights.

13. Production data shall be made easily accessible via a web site by schools and the general public. In addition to a web site, the performance of the project and its environmental benefits should be "advertised" by means such as electronic billboards.

14. During the construction phase, the municipality shall retain the services of a certified electrical inspector/project administrator with extensive knowledge in the solar industry to assure that high quality systems are installed that will provide optimal performance for the life of the project.

15. A report on performance and any issues shall be reported to the IPA every _____days.

* According to the 2016 United States Census for Oak Park, the median household income (in 2015 dollars) is $80,196. Using the income guidelines on page 157 of the IPA Draft Plan, low-income for Oak Park is at or below $64,157. According to Areavibes.com, 37% of Oak Park households have income at or below $60,000. The number of households (from 2016 U.S. Census) is 24,519. For the purpose of this analysis, it is assumed that the number of subscribers is 24,000.

Sincerely,

Anan Abu Taleb, Mayor
Village of Oak Park