November 13, 2017

Mario Bohorquez
Planning and Procurement Bureau Chief,
Illinois Power Agency
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Dear Mr. Bohorqez:

Vote Solar appreciates the opportunity to comment on the Illinois Power Agency's draft Long Term Renewable Resources Procurement Plan (LTRRPP), a central and critical feature of the successful implementation of the Future Energy Jobs Act (FEJA). We offer this letter to address co-location of community solar projects, a narrow but important issue addressed in the plan.

The IPA is correct in pointing out that the General Assembly set a 2 megawatt (MW) cap on the size of community solar projects in PA 99-0906 for a reason, and that it would be inappropriate for the Agency to ignore that language. The law envisions the development of smaller solar projects distributed in communities throughout the service territory, rather than a fewer, larger projects which, while achieving welcome efficiencies of scale, also limit the economic development benefits of solar to a smaller number of communities.

It is also important to acknowledge that there are two other clearly articulated objectives of FEJA that are in tension with the goal of spurring development of small community solar projects. Specifically, the General Assembly spelled out in no uncertain terms its objective that community solar projects would result in "robust participation opportunities" for small customers, including but not limited to residential customers.[i] In addition, the General Assembly clearly envisioned that the plan would result in meeting the solar generation goal within the limited incentive budget. Interpretation of the 2 MW cap on community solar projects as prohibiting any co-location will increase the cost of the program, which is likely to reduce the number of small customers served by community solar projects and/or require the use of adders from a limited pot of incentives through which to meet the solar goal.

Further, the General Assembly left the issue of co-location unaddressed, neither prohibiting or expressly encouraging it, thereby delegating to the agency the authority to set program parameters in order to balance multiple objectives. It is appropriate and constructive for the IPA to permit the use limited co-location, not to undermine the intent of the law, but in order to achieve all three objectives of spurring development of smaller projects across the service territory, giving residential and other small customers access to solar power, and meeting the state's solar deployment target cost-effectively.

Vote Solar therefore recommends the following modest changes to IPA's proposed prohibition on co-location.

- For each parcel of land (as defined by the County the parcel is located in), no more than 2 MW of community renewable generation may be installed unless the community renewable generation project demonstrates that at least 25% of its total generating capacity will serve small customers with demand of 25 kW or less, over the life of the project. Community renewable generation projects

dedicated to serve 25% customers with demand under 25kW are exempt from the 2 MW cap, and may co-locate systems up to an aggregate nameplate capacity of 4 MW.

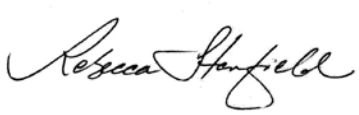
- A parcel of land may not have been divided into multiple parcels in the two years prior to the project application (for the Adjustable Block Program), or bid (for competitive procurements) in order to circumvent this policy. If a parcel has been divided within that time period, the requirement will apply to the boundaries of the larger parcel prior to its division.

- If there are multiple projects owned by a single entity (or, non-separate entities) located on one parcel of land, or on contiguous parcels of land, any size-based adders will be based on the total size of the projects. For projects meeting the small customer exemption, a single entity can co-locate projects adding up to 4 MW on a single or contiguous parcel of land.
- Projects owned by separate entities may be located on contiguous parcels. If there is a naturally good location from an interconnection standpoint, one owner should not be allowed to prevent another owner from developing a project in that location.
- For projects located on contiguous parcels, if the total combined size of the projects is greater than 2 MW, then the projects must be owned by separate entities, unless those projects meet the small customer exemption.
- Projects must have separate interconnection points, unless those projects meet the small customer exemption.

In addition to the position articulated in this letter, Vote Solar supports the comments submitted today by the Illinois Solar for All Coalition, and by the Environmental Law and Policy Center as regards all issues other than those addressed herein.

Again, we at Vote Solar appreciate your critically important work to implement the Future Energy Jobs Act, and thank you for the opportunity to weigh in on this draft. Please feel free to contact us for any clarification or follow up you may need.

Sincerely,



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[i] PA 1-75(c)(1)(N) (emphasis added): "The long-term renewable resources procurement plan required by this subsection (c) shall include a community renewable generation program. The Agency shall establish the terms, conditions, and program requirements for community renewable generation projects ***with a goal to expand renewable energy generating facility access to a broader group of energy consumers, to ensure robust participation opportunities for residential and small commercial customers and those who cannot install renewable energy on their own properties."***