



WILL COUNTY LAND USE DEPARTMENT

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November 13, 2017

Anthony Star
Brian P. Granahan
Illinois Power Agency

Dear Director Star and Mr. Granahan:

Will County is pleased to offer the enclosed comments on the Illinois Power Agency's September 29th Long-Term Renewable Resource Procurement Plan: Draft Plan for Public Comment.

Background: Will County and Solar

Will County is a north central county of Illinois, serving nearly 700,000 residents in 24 townships and 38 communities. Will County is greatly concerned with the advancement of the solar industry and its positive impact on Will County jobs of which Will County expects this impact to be significant in the next four years and beyond. Will County is currently amending its Zoning Ordinance to accommodate solar development, was the 1st county in Illinois to receive a SolSmart designation, is reviewing applications for several solar farms, is considering deploying solar at its landfill and other brownfield sites, and anticipates many solar rooftop projects.

Community Solar

Will County believes the maximum size allowed for a community solar facility should be increased from the proposed 2 MW to 4 MW. Will County believes that in allowing 4 MW verses 2 MW-sized community solar facilities, industry and consumer wants would be better satisfied to match an increasing customer demand for community solar PPA and purchase options without creating a situation in which developers may attempt to abuse the community solar guidelines set forth in the Draft Plan as demonstrated by states like Minnesota. This increased allowance could prevent the attempted deviation from co-location limitations set forth in the Draft Plan. The Draft Plan provides that ultimately, community solar in Minnesota was capped at 5 MW with co-location opportunities and 1 MW per parcel capacity limitations. Developers will be creative in order to maximize profit via higher REC value categories of solar. By compromising on the size of the system and denying co-location as the Draft Plan proposes, the integrity of Public Act 099-0906's intent for diverse, plentiful solar developments throughout the State will remain intact while satisfying the wants of the solar industry and consumers.

Will County would like to propose the following language for section 7.3.1:

- For each parcel of land (as defined by the County the parcel is located in), no more than 4 MW of community renewable generation may be installed.
 - 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.
- 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 4 MW, then the projects must be owned by separate entities.
- Projects must have separate interconnection points.

Extensions

Will County would like to pledge support to maintain the following language in section 6.15.2:

- An indefinite extension will be granted if a system is electrically complete (ready to start generation) but the utility has not approved the interconnection. The Approved Vendor must document that the interconnection approval request was made to the utility within 30 days of the system being electrically complete.
- A 6-month extension will be granted for documented legal delays, including permitting delays.
- A 6-month extension will be granted upon payment of a refundable \$25/kW extension fee, for distributed generation systems, and up to two 6 month extensions for community solar projects (the second extension is only for achieving the required subscriber rate, not for project completion and energization, and will require an additional refundable \$25/kW fee).
- The Agency may also, but is not required to, approve additional extensions for demonstration of good cause.

In consideration of Will County's pledged support for the above portion of the Draft Plan, Will County would like to suggest contemplation of a possible financial penalty equal to the refundable fees set forth in section 6.15.2 of the Draft Plan to be paid by the utility to the Illinois Power Agency to support the administration of programs set forth in the Draft Plan.

Adders

Will County would like to propose additional financial consideration for community solar in the form of adders given the extra effort this type of solar development requires in the form of subscriber requirements, advanced community engagement, and customer retention.

Qualifications for REC Participation

Will County believes proof of a solar project's solidity before RECs are reserved for said project must be regulated more heavily given the demonstration in other states of developers who were not subject to such requirements and most of the REC queue capacity was taken by projects that

ultimately dropped out of the queue due to inability to bring projects to fruition. Will County recommends requiring a signed ISA, non-ministerial permits, and a signed lease before a solar project can be placed into the queue for REC receipt.

Conclusion

Thank you for your time and consideration of these comments as you revise the Plan. Will County is open for continued discussion of these comments at anytime.

Sincerely,

Dean Olson
Resource Recovery & Energy Division Director