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TO: Illinois Power Agency
ATTN: Anthony Star, Director
RE: 2022 Long-Term Renewable Resources Procurement Plan
DATE: February 26, 2022

Dear IPA,

We respectfully submit the following comments on the draft 2022 Long-Term Renewable Resources Procurement Plan (LTP). As our comments largely seek to clarify information that is unclear in the LTP they are not provided in redline format.

Block Opening Dates for Traditional Community Solar Projects by Project Type.

Background: Sec. 7.4.3 states *that "Capacity for the Traditional Community Solar category for the first two years after the effective date of Public Act 102-0662 will be allocated to waitlist projects".* The same section further states that *"Section 1-75(c)(1)(K)(iii) provides that "capacity for this category for the first 2 delivery years" shall be allocated according to the block reopening process described in Section 1-75(c)(1)(G)(iv), with this category opening for project applications "starting in the third delivery year after the effective date" of P.A. 102-0662 "or earlier if the Agency determines there is additional capacity needed for to meet previous delivery year requirements."*

Comment: This section describes the block re-opening process for waitlisted and non-waitlist projects. However, it does so in an unclear manner. For example, it references "this category" of project without clearly specifying exactly what category it is referring to. Furthermore, it references opening dates with respect to both number of years or delivery years following the effective date of Public Act 102-0662 without specifying what year such math results in.

Recommendation: For clarity, Table 7-2 which outlines the dates for block re-opening should have an additional column added to it describing exactly what type of project (wait-listed versus non wait-listed) will be eligible to apply on each of the dates described therein.

Block Capacity for Traditional Community Solar in Delivery Year 2022-23

Background: The Traditional Community Solar section of Table 7-3 contains a footnote with the same unclear language referenced above. Further more it includes a strike-through of the Traditional Community Solar section.

Comment: It is not clear what this strike-though means. For example, does it mean that no Traditional Community Solar project applications will be accepted on August 1, 2022 for the 2022-2023 delivery year?

Recommendation: If the intent is that the 2022-2023 delivery year will not include any capacity for traditional community solar then the footnote should clearly specify that along with Table 7-2 per our recommendation above.

Traditional Community Solar Scoring System

Background: Sec 7.4.3 describes a scoring system to select community solar projects in the event that the Traditional Community Solar capacity allocation is over-subscribed in the block opening.

Comment: We fully support the scoring system approach as it rewards projects with a higher level of maturity and which provide a larger number of benefits.

With respect to pollinator friendly habitats and demonstration of such commitment, we support this as a scoring criteria and refer to you to the approach adopted by Massachusetts whereby solar facilities are certified by a 3 Party for their pollinator friendly status and such status is monitored during the operational period: https://ag.umass.edu/clean-energy/services/pollinator-friendly-solar-pv-for-massachusetts

With respect to other project characteristics which could be included in the scoring system we refer you to New Jersey which has used scoring systems in its community solar program for a few years now and is advanced in their thinking on the subject. Chief among the scoring is evidence of community engagement and support: https://njcleanenergy.com/files/file/CommunitySolar/FY21/8C%20Community%20Solar%20Energy%20Pilot%20Program%20Year%202%20Application%20Form%202020-10-01_fillable%20PDF%20Appendices.pdf

REC Adder for Small Subscribers

Background: Sec 7.5.6 describes an adder for small subscribers: *"As the Agency had already proposed basing the highest level adder as being at the 50% of higher small subscriber level, the amount that was previously broken out as an adder is now proposed to be included in all community solar REC prices. The Agency proposes maintaining its suggestion from the withdrawn draft Second Revised Plan of having that adjustment set at $14.82/REC"*

Comment: The discussion is unclear. On one hand it proposes an adder of $14.82/REC on the other hand it suggests that this adder is included in the community solar REC price. This leaves the reader to question whether the proposed REC values contained in Table 7-4 are inclusive, or exclusive, of the $14.82/REC adder.

Recommendation: Small subscriber origination and management costs are material. Given the discussion in the draft 2022 LTP which casts doubt on the legality of more cost-effective subscriber origination approaches such as Community Choice Aggregation, such origination

costs will remain material throughout the lifetime of the program. Therefore, we support the small subscriber adder as an inclusion in the REC price. We also recommend that it be additional to the values contained in Table 7-4. In this way, for example, the REC price for > 2000 KW Community Solar project in Group B would be $57.65 ($42.83+ $14.82).