

Illinois Power Agency

02.28.22

2022 Long-Term Renewable Resources Procurement Plan (DRAFT COMMENTS)

Future Green Comments on Section 7. The Adjustable Block Program

7.2 Program Administrator. We strongly support a mentorship program to assign a dedicated staff person to each new approved vendor and respectfully suggest that the program be paired with an aggressive public education campaign directed to the targeted (minority, women, social justice, rural etc.) communities. The Public education campaign should be robust and include church and school visits as well as social media and traditional TV and radio ads. This will address long standing issues related to a general lack of awareness of new resources and opportunities which serve as a limiting factor to wider participation.

7.3.4 Opening of 2022 Delivery Year Blocks & Subsequent Annual Block Openings. We agree with the overall strategy of transitioning to an annual allocation of REC blocks to remove the funding constraints that prevented the opening of new blocks of capacity. It follows that opening the 2022 Adjustable Block Program for new applications will occur on a delayed schedule of August 1, 2022, or after the Long-term Plan is approved.

7.3.5. Uncontracted Capacity at the Close of a Delivery Year. We agree with the methodology the IPA has suggested to reallocate blocks of uncontracted capacity to waitlisted projects. The timely reallocation of unused blocks will ensure that eligible priority waitlisted projects are addressed in an efficient manner.

7.4.5. Community-Driven Community Solar. We suggest that you include use of the term “community wealth building” as it will more clearly communicate the intent of the program and inspire constituents in social justice communities to get into renewable development.

7.5.3. Adjustments. The agency belief that adders or adjustments are no longer needed is not supported by current market conditions. Adders are necessary, especially in CO-OP territories where demand charges are often much higher and statutes prohibit solar from offsetting these higher charges. A secondary and related market condition that is occurring is the shifting of the costs of interconnection equipment upgrades from the local utility to project developers. Cost recovery for grid modernization upgrades are allowed under utility regulatory programs which is the appropriate place for them. The absence of adders or adjustments will be a limiting factor in these areas and the cost shifting of equipment upgrades for interconnection runs counter to the spirit of the law given that many schools districts located in CO-OPs are also in Tier 1 and Tier 2 districts.

7.5.6. Community Solar. We would advocate for a more granular approach to the issue of robust adders with the possible inclusion of further use of real time market data in the various areas and blocks.

