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**Sent:** Monday, October 2, 2023 8:46 AM  
**To:** IPA.ContactUs <[IPA.ContactUs@Illinois.gov](mailto:IPA.ContactUs@Illinois.gov)>  
**Subject:** [External] Feedback for Community Solar Program

Illinois Power Agency  
105 West Madison Street, Suite 1401  
Chicago, Illinois 60602

On behalf of NAIOP Chicago, the leading organization for developers, owners and related professionals in office, industrial and mixed-use real estate, I respectfully request that the Illinois Power Agency (IPA) make critical revisions to the Long-Term Renewable Resources Procurement Plan (LTRRPP) to ensure equitable participation of rooftop solar developers in the Illinois Shines community solar program, a crucial initiative aligned with both the Future Energy Jobs Act and Climate and Equitable Jobs Act objectives. We appreciate the IPA's commitment to consistently evaluating and updating the LTRRPP to ensure that Illinois remains at the forefront of renewable energy adoption and welcomes the opportunity to highlight how certain aspects of the existing guidelines may unintentionally stymie the progress of rooftop community solar projects, especially in densely populated areas of the state like Chicago.

NAIOP Chicago urges the IPA to amend its proposed co-location standard for rooftop CS facilities to more closely reflect the co-location standard for Large DG systems. Two Large DG systems on separate but adjacent buildings and connected behind separate meters are not considered co-located and do not receive RECs priced for a larger system. The same should be true for rooftop CS projects.

The Agency has expressed a clear interest in incentivizing community solar projects on rooftops, the built environment and close to population centers. However, the IPA's current CS co-location standard **was written with regard to greenfield farmland**, which can benefit from economies of scale by locating on adjacent parcels. Two adjacent rooftop projects do not earn economies of scale by such proximity.

The IPA already recognizes this reality in its Large DG co-location standard, which does not provide reduced REC pricing to projects on adjacent buildings. Applying a co-location standard created for greenfield CS projects to rooftop CS projects creates unintended impediments to the rooftop projects the Agency is attempting to incent. To prevent this unintended consequence, **NAIOP Chicago recommends the Agency alter the standard to eliminate reduced pricing for rooftop systems on separate parcels and rooftops.**

I'm happy to provide further feedback or answer questions in the case that IPA would like to discuss our recommendations.

Sincerely,  
Bill Loftus, *President*, SPACECO, Inc.  
and *Legislative Chair*, NAIOP Chicago



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