



COMMENTS ON THE DRAFT LONG-TERM RENEWABLE ENERGY RESOURCES PROCUREMENT PLAN ON BEHALF OF SUMMIT RIDGE ENERGY

September 29, 2023

Summit Ridge Energy (SRE) appreciates the opportunity to comment on the Draft Long-Term Renewable Energy Resources Plan for Public Comment (“Draft LTRRPP”) released on August 15, 2023.

I. Introduction

Summit Ridge Energy appreciates the thoughtful design and administration of the LTRRPP and we are excited by the agency’s commitment to encourage solar development in the Adjustable Block Program (ABP) on preferred sites, such as rooftops.

Through our experience in Illinois and across the country, rooftop community solar facilities achieve many of the goals in CEJA including, but not limited to, lowering barriers of entry for overburdened communities to participate in the workforce development created by the state’s clean energy economy, site generation closer to population centers where electric demand is higher, increased grid benefits by relieving points of congestion and lowering utilities’ costs for modernization, and decrease the use of prime farmland for energy generation. As such, SRE will focus our comments on community solar rooftop development in the LTRRPP and lend our support for comments submitted by the “Joint Solar Parties.”

II. Comments on Draft LTRRPP

A. Chapter 3

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

B. Chapter 7

The IPA also asked for feedback on how to provide REC price certainty while also ensuring that the Agency maintains the flexibility to be responsive to market activity. Summit Ridge Energy does not recommend altering the 70-30 split.

a. Schools Program

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

b. REC Pricing

Summit Ridge Energy has reviewed the REC pricing model and strongly feels the current model and tools grossly undervalue rooftop community solar facilities and offer the following substantive model comments:



- **Roof-Mounted Community Solar**

The number of community solar installations in Illinois has increased dramatically in recent years but there are very few community solar systems located in urban areas. This is primarily due to a lack of available land. There is, however, a large amount of available roof space in the state on which community solar projects can be sited. Unfortunately, under the current REC structure, many of these projects are not financially feasible.

While community solar rooftop projects are incentivized through the TCS scoring system (2 pts. for being sited on a rooftop within the Built Environment category), they are not on equal footing with ground mount community solar systems when it comes to financial viability. Rooftop facilities have shorter system lives (20 years instead of the typical 35-40 years for ground mount systems), they produce significantly less energy (approximately 20% less than a typical ground mount system on single-axis trackers), and the cost of labor for them can be more expensive due to typically being located in urban areas.

To address the disparities between the two system types, SRE proposes that a REC adder be implemented for rooftop community solar systems. To illustrate the impact of the primary two differences in terms of REC price, SRE used the REC Pricing Model for the draft 2024 Long-Term Plan. While keeping all other inputs constant, we first adjusted the capacity factors downward by 20% and then adjusted the EPC price up by \$0.10/watt. The results from each step are shown in the table below using Group B TCS projects as the baseline for comparison.

System Size (AC)	Baseline: Group B ABP Community Solar	Capacity Factor Decrease of 20%	\$0.10/W increase in EPC Cost (Labor)	Resulting Rooftop Community Solar REC Adder (\$/MWh)
0 - 25 kW	\$53.70	\$71.24	\$78.93	\$25.23
25 - 100 kW	\$60.88	\$80.26	\$88.14	\$27.26
100 - 200 kW	\$62.28	\$81.89	\$89.32	\$27.04
200 - 500 kW	\$55.14	\$72.93	\$79.49	\$24.35
500 - 2000 kW	\$47.38	\$63.31	\$68.98	\$21.60
2000 - 5000 kW	\$35.92	\$49.36	\$54.40	\$18.47

As can be seen from the results above, the size of an adder that will sufficiently levelized the playing field for rooftop community solar projects is not insignificant. It will allow many projects that would otherwise not be built to achieve financial viability, however, and pave the way for the myriad of benefits that rooftop community solar provides.



c. Small Subscribers

In Section 7.9.6.2, the LTRRPP proposes a material change that will negatively impact the ability of small subscribers to participate and benefit from community solar. The changes proposed to limit subscriptions for small subscribers are not supported by statute or policy. Importantly, the subscribers who will likely be impacted most are small business owners who consist of approximately 45% of the private workforce. Ensuring, the state’s 1.2 million small businesses have the opportunity to benefit from the savings associated with their subscription will boost their opportunities to improve their bottom lines. SRE is concerned the proposed changes will prevent small business owners from participating in the program moving forward and have material impacts on current subscriptions who are permitted to be grandfathered if their energy needs change in the future.

d. Co-Location

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

e. Traditional Community Solar

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

f. General ABP Comments

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

C. Chapter 8

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

D. Chapter 9

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

Timing of Top-Two in Queue Position Points

SRE notes that due to recent interconnection rule updates, developers are no longer able to remain in an interconnection queue for up to a year before beginning construction and making the full 100% interconnection deposit. Thus, the currently proposed rule that says one can only get the 2 points for having a top-two position in queue if they have executed an ISA presents an issue with timing, as developers must effectively pay the full interconnection deposit before knowing if they have received the points for this. SRE recommends that this stipulation be removed, so that a project can receive the 2 points in this sub-category if it can properly demonstrate that it has a top-two position without having a signed IA (so that it can decide to whether or not to proceed with full payment based on whether it receives the points).



III. Conclusion

Summit Ridge Energy is grateful to the work and due diligence the IPA continues to do to ensure Illinois is a leader in clean energy and community solar. We look forward to working with you. Please do not hesitate to reach out with any policy or technical questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Leslie Elder", with a stylized, cursive flourish.

Leslie Elder
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