

JOINT SOLAR PARTIES COMMENTS ON CHAPTER 4

TOPIC 1: Adjacent State Project Eligibility

Questions

1. Should changes be considered to the methodology for adjacent state project eligibility that go beyond updating of inputs? For example, are there scoring changes that could be made that would more closely or precisely align the criteria with the policy goals cited above?

JSP RESPONSE: Yes. The Joint Solar Parties are concerned that in past iterations, it appeared (from the Joint Solar Parties' analysis) that in some years it was impossible to site a facility in certain states due to certain categories having too few points available at *any location* within that state. An example is development in Kentucky under the 2021 adjacent state scoring rubric, and development in Missouri was restricted to a portion of the state for similar reasons. The Joint Solar Parties appreciate and support that the IPA is working within statutory boundaries and legal limitations on restrictions on out-of-state development while recognizing the benefits of Illinois-based development.

2. Given the large geographic size of projects, particularly utility-scale wind projects, what is an appropriate standard for determining the location of the project? The current standard is geographic center of the project. For simplification, for new requests should the geographic point of reference for the project be changed to the interconnection point of the project?

JSP RESPONSE: The Joint Solar Parties do not have an opinion on this question but note that a GIA or even interconnection application is not required to bid and thus the point of interconnection may not be known.

3. Adjacent state projects that participate in Indexed REC procurements are required to comply with the Minimum Equity Standard, which has a focus on the Illinois workforce. What eligibility requirements can be modified for adjacent state projects that could help ensure projects in adjacent states are held to the same standards as in-state projects?

JSP RESPONSE: The Joint Solar Parties support the goals of CEJA to bring benefits of the clean energy transition to all communities, with an emphasis on bring benefits to historically disadvantaged communities. The Joint Solar Parties appreciate that there may be no equivalent of R3 communities in other states and other states will not have FEJA/CEJA job training programs—all the more incentive to provide opportunities for graduates of job training programs in Illinois.

4. Are there any aspects of the application process for adjacent state projects that could be improved?

JSP RESPONSE: The Joint Solar Parties do not have any proposed changes at this time.