

June 29, 2023

Re: Stakeholder Feedback Request for the 2024 IPA Long-Term Plan

Solstice Power Technologies
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Solstice Power Technologies appreciates the opportunity to provide comments to the Illinois Power Agency regarding the Long-Term Plan for 2024.

TOPIC 2: CS Small Subscriber Limit at 25kW Across All Projects in the Program

1. What are other ways that the IPA can ensure compliance with the statute?

SOLSTICE RESPONSE: Solstice supports the arguments detailed by the Joint Solar Parties regarding how the statutory language specifically refers to subscriptions to a single system. In addition, Solstice would like to add the following concern, based on two years of experience as a community solar customer management firm in the Adjustable Block Program: applying a 25 kW-AC cap across systems retroactively would place undue and unnecessary burden on current subscribers and vendors. Vendors have built trust in the program with small commercial customers by helping to deliver savings commensurate with the electricity consumption of the customer; to suddenly limit their subscriptions to a fraction of their usage would harm both the customer-vendor relationship and overall trust in the program.

2. What challenges do AVs and Designees face in determining whether a single utility account sums to over 25kW across the Program, to ensure the customer would be considered a small subscriber? Please explain in detail so the Agency might understand how to address these challenges.

SOLSTICE RESPONSE: It is not currently possible to determine whether or not a customer is enrolled in another community solar project, let alone what size their subscription is.

3. What information can the customer's distribution utility provide back to AVs and Designees through their community solar portal or other means to identify whether the customer already has one or more community solar subscriptions?

SOLSTICE RESPONSE: Distribution utilities would have to provide information about whether or not a customer is allocated to another community solar project and, if so, what size their subscription is, early in the enrollment process. However, due to how



quickly such information can change, and how difficult it already is to implement transparent data-sharing processes for distribution utilities, Solstice adds emphasis to its response to question one regarding how disruptive introducing this new standard would be.

Thank you for the opportunity to provide comments on these matters. Please contact Alex Pasanen (Policy Coordinator) at alexp@solstice.us if you would like to further discuss these matters.

Sincerely,
Sandhya Murali
Solstice Power Technologies