

Ameresco Comments on Draft Long-Term Renewable Resources Procurement Plan

6.3.3.1 The community solar waitlist should be re-ordered to help diversify the projects chosen. Preference should be given to projects in Cook County, given that there are no projects located there despite having 40% of the state's population. Projects on brownfields or land that was previously developed but has been vacant for a significant amount of time should be given priority as these projects are not only more difficult and expensive to develop, but will also increase the benefits to their communities.

6.4 Community solar prices should not be decreased. For many projects, especially those in more urban areas (where community solar has been lacking) or on properties that have been vacant/unable to be used in other ways, the existing planned decrease along with the ITC step down is making these projects not viable.

6.5.3 The small subscriber adder should stay as is. The widespread utilization of this adder is not due to the adder being overly large, but rather due to the fact that this adder was needed to make the base projects viable in many cases and the 50% small subscriber level was needed to help with the lottery procedure.

6.9.1 Approved Vendor designees should undergo the same full vetting as the Approved Vendors themselves to avoid the noted violation of program guidelines. This should also involve the identification and inclusion of Approved Vendor designees on the Program website to ensure both transparency and accountability with respect to all Approved Vendors and their corresponding designees.

6.12.1 Having a defined list is much clearer than the more general "non-ministerial permits". The SHPO and EcoCat requirements seem valid. However, a Phase I ESA is an overly onerous requirement. These are only good for a certain period of time and with the uncertainty regarding REC funding, may expire before the program opens. Depending on the site conditions, this may not occur during the development period before RECs are submitted. Land use permits are also onerous as communities are forced to spend time and resources to review permitting applications for projects with a high likelihood of not moving forward.

6.13 Approved Vendors should be held accountable for the conduct of their agents, subcontractors, and/or designees and the protection of consumers is critical, which are the primary (and necessary) principles behind the Program's Brochure, Disclosure Form, Contract Requirements, Guidelines for Marketing Material and Marketing Behavior and Program Guidebook. Transparency and clear communication throughout the consumer engagement process is extremely important. It is, however, very important that the Agency maintain its flexibility to update such guidelines in accordance with any regulatory developments in order to ensure reasonable advancement and progression.

7.1 Co-located projects built at different times should be treated as separate projects; only projects that receive REC awards in the same block within the same program year should be considered co-located. The majority of the benefits of co-location are in the construction phase through a single mobilization, bidding process, and possibly better pricing for larger quantities. When projects are constructed at different times, they lose the economies of scale.

7.6.2 The Agency would appreciate stakeholder feedback around requiring all in-person, phone, and online marketing / lead generation firms to register with the Adjustable Block Program; or requiring Approved Vendors and designees to disclose all such partners and their direct contact information prior to utilizing their services within the scope of the Adjustable Block Program.

8.4.2 Due to the large interest and oversubscription of the community solar and public/non-profit DG programs, additional capacity should be given to these areas. The program will stay be able to make a positive impact on low-income residents while ensuring that the incentives are used to build the most viable projects.

8.6.1.2 For master metered buildings, in instances where the building owner/manager is able to pass on benefits with direct economic benefits such as reduced or not raised rents or participation in net metering, these should be restricted to low-income residents. When the benefits are passed on through other means such as increased

services, restricting these to only low-income residents may not be practical, and should be allowed to apply to all residents. Additionally, master metered buildings should be allowed to participate in low-income community solar as well as many of these buildings, especially those that are 100% low income, have the most vulnerable populations who are intended to be served by this program.

8.6.2 Public entities, such as local governments, are definitely community-based organizations and should remain as such. These entities are made up of residents who work to resolve the issues of the residents within their communities and are often the most effective entities to do so.

8.6.2 Non-profit/public anchor tenants should receive ILSFA REC prices. They are a group targeted by the larger ILSFA program and reducing their energy costs helps the communities they serve. These anchor tenants already lose the opportunity for the small subscriber adder, which places them at a lower value than residential subscribers. They should not receive a higher ranking than 100% low income residential projects, but they should be valued higher than private anchor tenants. Any portion of the project not receiving ILSFA REC prices should also not be subject to the requirements of ILSFA including the 50% savings and the trainee hours.

8.6.2 It is counterintuitive the non-profit organizations would not receive ILSFA REC prices and yet projects 100% owned by non-profit organizations for community solar are given extra incentives. This could create a situation where a non-profit could own the system but not be able to be an offtaker because the lower ABP REC prices would not support it.

8.6.3 Removing the ability of tax benefits would significantly hamper the development of solar for non-profit/public facilities. This will reduce the savings available and make projects more difficult for this group since ownership with no up-front costs is difficult, especially considering the purchase price must include the operation and maintenance for 15 years. This seems counterproductive to encouraging solar development and helping those most in need.

8.10 We suggest that the trainee participation years be based off the first program year where an Approved Vendor is issued a REC contract. Before that point, Approved Vendors may not be able to start hiring trainees as they would be growing their workforce without any work for them to do, especially considering the oversubscription of some of the programs. 20% and 33% also seem overly burdensome, especially considering that Approved Vendors may also have resident, MBE, and WBE requirements to meet. Increasing trainee percentages while at the same time dealing with decreasing investment tax credits will make these projects more difficult financially moving forward and possibly even infeasible, especially for projects who based their projects around current year programs and don't receive REC contracts until future program years.

8.12.2 If the 2019-2020 waitlist is not to be used for 2020-2021, those projects should still be given preference moving forward. Significant development costs have been invested in these projects, both by communities and developers, without knowing how oversubscribed the program would be.

Given the size of many of the community solar projects in the ILSFA program, less weight should be given for geographic diversity. When there are very few projects in one utility, the other projects have almost no chance of being selected in that ranking with the current 2-point adder for less than 25% in that utility.

The allocation of the discretionary capacity should be adjusted in the Adjustable Block Program. It is reserved so that the IPA can respond to market conditions. However, despite the vast oversubscription of the community solar program, most of the capacity was given to large DG, especially in Group A. While hundreds of projects wait on the waitlist for community solar, the large DG categories still has funding available. While adding sufficient capacity to large DG to remove the need to distinguish between energized and not energized projects is reasonable, any capacity above the amount needed to award all large DG projects that applied in the initial period should have been allocated to community solar. This could have also been done with extra capacity in Group B to offset the imbalance in large DG between Group A and Group B.