

**ILLINOIS POWER AGENCY LONG-TERM RENEWABLE RESOURCES PROCUREMENT  
PLAN REQUEST FOR COMMENTS**

**C – 4: What criteria should be used to prioritize projects within a block when applications exceed the remaining available capacity in a block? Should the projects be prioritized on a first-come first-served basis or by other criteria?**

We suggest that the prioritization should not simply be first-come-first serve. For example, if a block fills up and becomes oversubscribed in a single day, we do not think the IPA should sort applications by time of submission on that single day. In the case where a block becomes oversubscribed in a single day, we suggest the IPA give priority to projects that achieve the goals outlined in the Illinois Future Energy Jobs Act such as geographic diversity.

**C – 12: What development deposit/credit requirements should there be in addition to any program fees? And for how long should such requirements run?**

We suggest the IPA look to the MW block programs in both California and New York. Both programs have created hurdles which developers must clear before formally reserving incentives for their projects. These hurdles include a combination of project development milestones and deposit requirements. In our opinion, both the California and New York programs have been relatively successful in achieving a balance between ensuring that only projects with a high likelihood of completion reserve incentives, while not requiring developers to risk an excessive amount of capital before confirming whether they have successfully reserved incentives.

**D – 1: How can geographic diversity be ensured?**

We suggest the IPA consider ensuring that RECs for community solar projects are spread across a diverse cross-section of Illinois. For example, the IPA could consider allocating a certain quantity of RECs to each of the following: urban, suburban, and rural counties. Absent strong geographic diversity requirements, it's likely that many (if not most) community solar projects would end up located on agricultural land in a relatively small handful of mostly rural Illinois counties.

**D – 4: How should co-location of Community Solar projects be addressed in light of the definition of community renewable generation projects that is capped at 2 MW?**

We suggest the IPA consider adopting limits on co-location for community solar that mirror requirements for community solar in New York and in Massachusetts. In both states, a project is limited to 2 MW per point of interconnection per parcel of land. In Massachusetts, there are further limits that prevent developers from subdividing land parcels to get around these requirements. Without a spatial limitation on co-location, it's likely that many community solar projects would effectively be larger utility scale projects from a land use perspective—they would likely be projects of 10+ MW, made up of adjacent 2 MW sub-arrays. Many would consider the inclusion of de facto utility scale projects within the community solar program as going against the spirit of the law intended to support distributed generation.