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now introduce Anthony star the director of the Illinois power agency will provide an introduction on process and.

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Great. Thank you, Kevin. Next slide please.

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So as Kevin said I'm Anthony star I'm the director of the Illinois power agency with me today from the IP is Brian grant a hand our chief legal counsel and Kelly Turner, our deputy legal counsel from incline our program and the Seder Kevin Quilliam their

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Kevin Quilliam their CEO and Alex rain their CEO will also be helping out with the presentation this morning.

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So I assume that if you've made your way to this workshop today that you're familiar with the Illinois RPS at some level but, and in particular with the significant legislative changes that happened this fall with the enactment of public act.

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What Oh 20662, more colloquially known as the climate and equitable JOBS Act, or CJ.

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What Oh 20662, more colloquially known as the climate and equitable JOBS Act, or CGI. This comprehensive legislation has makes lots of changes to Illinois energy policy, and specifically significant changes to annoy RPS, it expands the goals and targets

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of the RPS, it increases the funding and

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addresses some of the issues that we've had in the past about how the how funding flows and is reconciled their significant expansions of procurement for renewable energy credits from utility scale and wind, solar programs projects, and then of interest

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today that there's different changes expansions the adjustable block program as well as to the Illinois solar fall program CJ also has a focus on labor and equity and the renewable energy industry, including both transparency through data reporting and

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increased opportunities for participation from individuals and businesses. And as we go through some of the stakeholder feedback. This

morning will be touching on those issues that are very important and important shift for the program and for our work

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on renewable energy more broadly.

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One of the aspects of CJ is that it calls on us to open block to a capacity of the decimal block program within 90 days for the lot taking effect. So that is why we're focused on December 14 which is that day 90 days after a lot takes effect.

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And what happened when blocks open at that time.

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For context we also will be updating our long term renewable resources procurement plan. This is the program that we use to define our programs and procurement and other aspects about how we administer the RPS, and through that plan which goes through

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a proceeding at the Illinois Commerce Commission to approve it, we have that sort of be the shape and form that we then fill in the details of our program.

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So we're in an interesting situation right now in that we're opening new blocks of capacity for the adjustable block program with new provisions flowing from the new law.

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Before we have a new long term plan so what we're doing right now with the stakeholder feedback, processes, today is to really focus on what's necessary for the program to reopen, there will be longer term changes that will be happening through the updating

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of the long term plan, the schedule for that at a very high level is that we will be releasing a draft plan for public comment on January 13. It then we'll have a comment period will make revisions.

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It then goes to a proceeding at the Illinois Commerce Commission. That should result in the plan being approved.

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In July of 2022.

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So, these these parallel processes today we're really focusing on what's necessary for this interim period of when the adjustable block program. We opened with new provisions and through the period at which we play a new plan with, which will have new

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guidance for how we administer programs will be available in next summer.

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We also I want to highlight that the IP is offering more general education opportunities. So today we're is really a stakeholder feedback workshop where we're asking for feedback and comments and questions from you, from the stakeholders of the Jessica

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block program. The Power Hour webinar series is an educational series we started with a kickoff last week of a high level overview of CJ we have another session coming up tomorrow on the adjustable block program and then a series of sessions in the month

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or two, to follow those really be more one way streets where we're trying to provide some education and context and background around the programs and the link you see on the slide will bring you can use to get information about all those webinars and

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register for them. That's also available right off the IPAs homepage. Next slide.

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So we'll go into more detail on all of this, but the at a high level, the structural changes the adjustable block program, I think, are the fall. The big key wants to focus on are the falling first moving to an annual block structure now this is actually

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something that does not happen right away. This is not part of our 90 day reopening plan of the program, but this is something a long term we're going to move toward towards a structural structural we're blocks our annual rather than based upon capacity,

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we expand the program from three categories to six categories in addition to our small dg large tg and community solar, we now have specific categories for projects at public schools, what is known as community driven community solar and equity eligible

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contractor block which is for a specific subset of contractors who qualify as equity eligible contractors, and then there's some changes obviously made within these categories such as the dividing line between small and large dg changing the.

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Sorry about that the maximum size of community solar programs.

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Distribute generation projects will increase to five megawatts, etc. We still will have administratively set rack prices, but there are now new requirements around equity and prevailing wages, there's going to be changes the length in terms of contracts

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that will be talking about at the afternoon workshop, and our consumer protection provisions are going to now be included in our long term plan with in more detail than we've had previously.

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one more slide.

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So a lot, still stays the same from the point of view, if you're an approved vendor or designee or general program participant, the basic structure of the program is unchanged.

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We still have approved vendors, we still will have designees, the concept that a disclosure form is the starting point of a distributed generation project or community solar subscription remains the same or consumer protections remain the same.

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You will submit if you're an approved vendor, a part one application that will be reviewed and approved, and then apart to application when the project is completed to verify that it's energized.

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We will still have the concept that projects are included on batches or product orders as part of a master contract and contracts and subsequent product orders, go through an approval process at the Illinois Commerce Commission.

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We still have the concept of front loaded wreck payments out there that will change for traditional community solar and public schools projects, but also a lot of the program stays the same, but what we're going to focus on today are key things where

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there are changes the program that we acquired for the opening of it again, and where we have either sort of proposals that were we want to

put forth to you, or are specifically open areas where stakeholder feedback would be valuable.

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So in terms of reopening the blacks sets out a set of megawatt capacity for blocks and prices that are listed here in the interest of time, I won't go through each of these you can refer back to these later.

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But again we have certain megawatt capacity for each category and set price, a set pricing structure. One exception to that is for large dg where for projects that are not on waitlist.

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We are going to be updating the prices and that will be one of the items that will be talking about this afternoon.

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So as Kevin mentioned our workshop structure is that we have these seven items that we are asking for stakeholder feedback on that we will be going through one at a time.

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For each of these walks or frame the issue for the, for the topic the issue for consideration. And then ask them the key questions. So I want to know we issued written request for comments, we're not going to list every single question we had from those

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in this last day in the interest of time, but really the key ones but obviously if you review those and you have specific feedback on questions that we don't particularly ways to during the workshop at Feel free to bring those up as well.

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We also will hopefully if time goes as planned have time at the end for more general comments that are not contained in the written request so if there's other topic curious people would not want to raise a reminder that this afternoon we're going to

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have an additional workshop that we focus on the updated direct delivery contracts that starts at one o'clock central time as a separate registration link that should be available in the announcements of this workshop, and to circle back to what Kevin

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had mentioned in the opening of this, what we're asking people to do is if you could submit

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questions through the chat we will try to review those and answer the applicable ones. And then if you do have a question that's more complicated we may ask if you would like to unmute yourself or you can raise your hand if you specific specifically would

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like to speak. We have allocated times for each of the stakeholder feedback topics so we tried very hard to sort of keep to those timeframes so there may be certain cases where we have questions to come in but we need to move on to the next section, if

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there's time at the end we will try we can probably circle back to those or follow up after that.

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In terms of written feedback which is really very helpful. We are obviously are interested in your feedback today but ultimately, when comments are the things that are very useful for us as we really sort of sit down and work through the final details

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of how we will open blocks. Those are mostly due November 4, the community driven community solar request for feedback we issued slightly later that feedback from that is due on November 9.

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Of course if you can submit comments early we, we have a lot of things that we need to do between now and December 14 so early, middle, as always would be appreciated.

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With this I will turn it over to Brian grant a hand to discuss prevailing wage rate. Thank you, Anthony, this is Brian grant him, and I'm the chief legal counsel of the IPA, and is Anthony noted in his introduction.

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We have believed six or seven different topics to work through today one of which is our process for confirming that prevailing wage was paid on projects where prevailing wage requirements apply.

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Just to reiterate a few things from the open workshops like these are certainly very helpful it's very good to take the temperature of

different stakeholders and get some sense of what parties are thinking, however written comments are often the most

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valuable to us because they're static they're fixed, we can refer back to them. So I would say even if you make comments today through your presentation.

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Don't hesitate to reiterate those items through written comments as well as that will ultimately be very helpful to the agency, as we work through how to handle these issues for block reopening.

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Another point that Anthony raised to is just for scope purposes, understanding that this is just what we're planning for block reopening. Many of these issues will be handled in more detail as we develop our next long term relationship recovery plan,

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and we're planning additional workshops and come up processes before we even draft that plan then obviously after we drop that plan. there's a comment process associated with it.

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So in terms of the longer term for the program will have other processes where we can kind of talk through how these things should be handled, but for block reopening that which is required within 90 days of the law.

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Now according to public Act One of the two of six it's to this comment process exists to help us make sure that we've worked through some thorny issues before we can then reopen blocks on December 14.

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So with all that in mind, to go to the next slide.

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One of the primary changes, found in public at one or 2066 to our enhanced waiver requirements applicable to projects participating in the adjustable block program we're in the agency's competitive procurements for those competitive procurements which

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aren't really in the scope of this today's discussion, there's additional requirements, we're going to project labor agreements. Now, for the adjustable block program we have prevailing wage requirements and there are a couple of exceptions list of requirements

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wave requirements that we'll get into is one of the topics here. So, for instance, prevailing wage does not apply to houses worship does not apply to projects classified as residential and there's an express exception regarding large distributed generation

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product wait lists for from prevailing wage found in one dash 75 CYNG for of the IPA at the changes are mostly contained in Section 175 CQ, and see one q one specifically offers language regarding prevailing wage each facility shall be subject to the

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including the feeling wage act agencies shall require verification that all construction performed on the facility by the rewards your contract delivery contract order. Its contractors or subcontractors. So we're drawing a circle around all the crime

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construction activities associated with the project and not just the approved vendor itself, relating to construction The facility is performed by construction employees receiving an amount for that work equal to or greater than the general billing rate

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as that terms find prevailing wage act. So that's the new legal requirement. And that applies upon block reopening to a set of different categories.

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But with the exemption for weightless of our districts and aeration projects. Now, in preparation for employing this new requirement for block reopening, we've outlined a proposed approach and the proposed approach is found in the documents that we released

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last week, through which we seek documentation and verification that the prevailing wage requirement was met, just to walk through that approach really quickly so during the part one application process.

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Should the information provided by the approved vendor indicated that project type is subject really wage requirements than the approved vendor will be required to acknowledge that requirement that the individuals engaging the project construction will

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will be paid prevailing wage. Now, part one, the construction in most cases we're assuming has not itself, yet been completed. So that's why what's being affirmed there, it's just an affirmation that prevailing wage will be paid.

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Then, for part two. When the project has been verified as energized, the approved vendor must certified through neta station at the project has met the bookable requirements of the prevailing wage act for the whole construction of the facility.

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Now, how does that get demonstrated beyond just an added station. What we have proposed for purposes of employing this requirement for block reopening is that the approved vendor must provide a copy of each certified transcript the payroll for the duration

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of facility construction for all involved contractors. The, the program integrator but then review those certified transcripts of payroll, to verify that prevailing wage requirements have been met for the project.

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So that's the process that we've outlined in the documents that we released last week.

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In order to apply prevailing wage requirements.

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At the outset of the opening of blocks within 90 days to get back to the act. So as we go to the next slide, there's a set of questions in for the balance of these presentations generally someone from the IPL be providing background and scope on a specific

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requirement, and then we'll hand it back over to incline for inclined to then walk through some of the specific questions for stakeholder feedback answers may come from the IPA may come from inclined that may be cases we just want to make note of something

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based on the question that's asked.

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But that's going, that's how we're going to operate for purposes of today's workshop.

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So as we go to the next slide.

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All right, thank you, Brian.

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Morning everybody this is Alex Ryan with incline as Brian noted, we will be going through reviewing the stakeholder feedback questions for each of the topics on the webinar session this morning.

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Starting with this one on prevailing wage.

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These questions fall into two different sub headings, one in documentation, and one on verification.

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Under documentation is the certified transcript of payroll or CPP the appropriate documentation to request is proof that prevailing wage was paid.

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If not, what forms of documentation should be provided to verify that prevailing wage wasn't be paid for facilities that were completed before some middle of part one of the abp project application, and which did not pay prevailing wage is for the project

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should prevailing wage is be paid retro actively and be documented through a CCP.

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If not documented by a CCP, how should the program administrator verify that prevailing wage was paid retroactively for already completed facilities.

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Moving on to the verification subheading.

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How can the program administrator confirm that prevailing wages were paid on 100% of the project construction, and not only for this the TPS that were submitted.

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What would be a reasonable benchmark, hours of construction labor per kilowatt of installed capacity to use and how would those vary by project size and type.

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How should the program administrator verify that workers were properly classified in the cities.

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Are there any other best practices for CCP verification that the program administrators should use for verification of prevailing wage requirements.

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The law requires that it will also be mandatory upon the contractor to whom the contract is awarded to insert into each sub contract and into the project specifications for each sub contract, a written stipulation to the effect that not less than the

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prevailing rates of wages shall be paid to all laborers, workers and mechanics, performing work under the contract should all contractors using subcontractors provide a copy of their contracts for the program administrator to verify this language for

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all of the projects subcontracts in place, or wouldn't add test station that this requirement has been made be acceptable.

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With the probation that the program administrator could request further documentation for verification as needed.

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With that, we will review the questions coming in through chat and address any questions that everyone has.

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Thank you Alex, Kevin Quilliam again here.

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There are a couple of questions that came up that are not applicable to prevailing wage but or more general questions, we will hold those until the end of the presentation so that we can stay focused on each particular item that we're covering as we're

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covering it.

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The first question that's come in on prevailing wage was can you elaborate on the benchmark statement, and all send that to the right.

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Sorry, what was the benchmark statement I apologize, I wasn't.

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This is Anthony I can actually handle this one, um, the benchmark statement was one of the questions we asked is, basically, how do we, it was a concept of benchmarking in this context would be sort of assessing whether the hours reported on a project

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or reasonable for the project size.

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So, I'll just, you know, make up some numbers for for simplicity here so you know if you'd expected that 100 kilowatt system is going to require 100 hours of work, typical size your question, question is then you know if we get if we get certification

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that shows only 50 hours of work, were submitted then there's a lot that obviously raises questions. So one of the things I think we were looking for here is based upon the types of work that are subject to prevailing wage industry feedback on the typical

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hours for different sized projects would be very helpful.

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Thank you, Anthony.

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The next question is, is there clarification on exactly what type of project will require prevailing wage, and they can unmute if there's additional questions on

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that Brian yeah exactly what type of project, I'm a little bit confused by that phrasing, there's clarification in the law regarding different categories of projects and you just won't block program.

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And when they're being exemption from prevailing wage so let's say the default is that prevailing wage does apply, except in such cases where the project is a residential be house of worship, or see a waitlist at large distributed generation project is

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an express exemption for weight was the largest regeneration projects, found in section one near 75 c one g for the IPA act as modified by public Act One or 20662. So the better way to approach things might be when this prevailing wage not apply as opposed to thinking through

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specific categories of projects for which for the language.

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So, that's my question hopefully you guys hear me, I guess. I want to clarification, in terms of what David grown and actually just asked me to go as far as like family farms or family farms going to be required to also have prevailing wage because technically

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that's a residence, but they also potentially have any if.

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So if we go back to some of the introductory slides.

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We have a second set of, of, kind of a second topic which is the proposed residential house of worship client classifications. So this is a separate topic that we're handling after this, which is, how do you define a mixed use facility as residential.

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So for purposes of this discussion we're talking more about assuming that prevailing wage does apply. How are we verifying that it was followed and what is the application process look like.

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That question is regarding family farms, so we'll hold that. The next question is regarding construction or small below 10 kilowatt commercial projects before completed interconnected in July of this year before the rules but not yet submitted and would

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they be grandfathered in I think Brian that would probably be most appropriate to hold until that section as well.

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But like to answer that. Well I don't I don't know that that necessarily gets into anything in the next topic, but it is a hole in the law, as it's drafted, where on the one hand you have an exception for residential projects, and you have an exception

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for weight loss of our district generation projects, but you don't have an exception for whitelisted small district generation projects that are non residential and some of those projects may well have been constructed, which raises retroactivity concerns

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regarding the application of prevailing wage. I think we're still in the process of evaluating the right way to handle those projects.

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As in all cases, the IPAs approach the approach that we talked about consistently with the program administrator is making sure that customers that positive experiences to the program.

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And we're going to try to view any whether it's grandfather and whether it's retroactivity similar considerations governed by that principle, but we do recognize that there's a bit of a gap, it seems we're a small dg project that is non residential is

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not, if it was just built a little bit larger and was on a waitlist would actually have an exception apply to it that the small dg does not apply to this model to category.

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And just to clarify that what Brian's referring to our projects that are on the waitlist that meaning they have been submitted to the program and this question was a project that is not on the waitlist meaning that it was just simply by nature of its

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interconnection date, and so I believe that that has not been considered as something that would be grandfathered so if you wanted to put comments in on that you would want to specifically address that.

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The next question is are the requirements beyond just wages, but also benefits that are related to union labor IE education funds vacation fund etc.

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Hello, Brian answer that as well. Yeah, I'm not certain.

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We can do some legal research and if there's additional clarification that's required an RN regarding the application the billing wage act when we're not experts inherently in labor issues and labor standards.

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So if there's additional information that's required from firms and understanding how to comply with the prevailing wage act, then I think I would submit that written questions and we can take under consideration and figure out what additional clarity,

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we need to provide. Next question is can you clarify what is considered residential there are some gray areas such as multifamily and family farms, I think we address that a little bit.

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And we would certainly appreciate clarification that that commenters could make on what they would consider residential or not residential under the confines of the law and Brian if you have any more comments on that.

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I'll let you add those.

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I think that's the next topic in the workshop. So the next question is why is there a prevailing wage requirement for public schools but not houses of worship, that Brian wants to add to that, he can but I would say that we're following the won the lottery

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requires.

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Yeah, qualitative determinations is between project categories that are found in the law are not decisions that the only power agency made.

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Those are decisions that came out of negotiations that occurred over a two and a half year time period. We can't speak authoritative Lee as to why things landed in one place or another, I would say that if you're a solo project developer would fall through

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through trade associations or more directly involved in those negotiations, as to why things came out as they did but, you know, we

have to apply the laws that's been drafted, that's that's our job as an implementing agency.

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Next question is how much is the prevailing wage and does the amount change per scope of work electric work construction, etc.

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My understanding is that the Illinois Department of Labor publishes prevailing wage rates for different categories and I believe different geographies at the state.

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Thank you. The next question is How will certified pay will be submitted will be required to use the Illinois. gov certified payroll portal.

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There are not plans at this time to use that, that portal to to submit payroll, our that certainly could be an option in the future, and any comments that that the stakeholders can provide to us on what would minimize the workload for submitting this

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information and review you.

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One more question I think we've already covered which is what's covered beyond wages insurance engines training and vacation funds and as as Brian said the agency will.

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That

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looks like that's the end of our questions for this section so we can go ahead and move on to the next section. One thing I just want to add real quick is you know any of those questions to be putting the written comments.

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We've done by November 4, and then it'll be very helpful to us because it helps us understand that what we need to address expressively as we prepare for block reopening in mid December, so the more of those things that you can put into your written comments.

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I think the better off, we'll be.

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If you can advance to the next slide we will move on to the next section, residential house of worship classification indoors right.

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If we can advance to the next slide.

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I'm still on the stakeholder feedback questions so, Kevin.

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Sorry about that Brian will try and get that fixed if you want to just go ahead and get started on residential house of worship will work on the slide advancement for you.

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Sure. And I think this is something that has come up a little bit already in some of the questions that are received which is good because it lets us know this is an area where there's some potential confusion and we have some draft proposals.

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I think based on some of the questions, it sounds like there's maybe more specificity, that we, we should offer regarding certain mixed use property types.

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So as discussed briefly in talking about the new prevailing wage requirements, two of the exceptions from prevailing wage concern residential properties and houses of worship.

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So, the act expressly states that projects that are not classified as residential houses of worship, are not exempt from dealing with requirements but those that are residential houses of worship, are, and we felt like we need some further refinements

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these classifications, and the ability to verify whether properties actually fall under these classifications, as part of the project application process to ensure that if they are exempt from prevailing wage we have the right information that that are

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the right level of proof to demonstrate that they in fact would be. So, for purposes of the residential classification now currently we have kind of like a self designation of or the way that the program is operated to date itself designation about residential

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class of properties, it's not necessarily about consequential the project application process.

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But we're looking to change that now that there's a different benefit that applies to being classified as residential. So we're looking to classify residential project as a solar project that is located on a property where electrical usage at the premises

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is predominantly for residential household purposes, and for mixed use buildings or sites for that site to be considered residential more than 75% of the electric besides electric use must be used for residential purposes.

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And again, the purpose here is to say that if you're going to be exempt from prevailing wage, then for purposes of that property, more than 75% of the electricity is usage must be used for residential purposes.

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This is our draft proposal on this front. So thinking about family farms you'd be looking at the balance of electric usage, that the system is ultimately offsetting being 75% and that's, that's our proposal here and we'd love to get some feedback on this.

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The second point is on hot the house of worship classification, new section 175 see one ql defines a house of worship is a property that is both use one exclusively for a road by religious society or body of persons as a place for this exercise we would

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worship, and to recognize is exempt from taxation pursuant to Section 15 dash 40 property tax code. We're trying to figure out a good way to figure out how we can verify that those that those actually do apply for purposes of the tax exemption.

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We're looking at something like a property tax form or something else that demonstrates an exemption for the property tax code, but we're very interested in feedback on this front and then some sort of at a station regarding the use for religious purpose

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is what we're looking for, for a house of worship, but we love to get feedback on this again the qualitative decisions made by the General Assembly regarding the exemption for houses of worship, maybe not for other facilities.

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That's not something under our control. What we would like right now is some feedback and they have some stakeholder questions that inquiry will run through on these specific points.

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So we go to the next slide.

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All right, thank you, Brian.

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Apologies for the technical glitch there we are back up and running on slide 16.

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So look at the stakeholder feedback questions for this particular topic, there's there's two sub headings residential on houses of worship.

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So under residential is 75% of a sites electrical usage for residential purposes, the appropriate standard for considering a mixed use property as residential.

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What should be considered acceptable documentation to verify a residential classification.

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And under houses of worship for houses of worship. Are there specific considerations that should be included in the affidavit that the facility is used exclusively for religious exercise or religious worship.

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And with that we can start taking questions from the chat.

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A few a few questions came in late about prevailing wage we'll add those in at the end, stay on with house of worship. Now, the next first question is under house of worship with private schools on the same properties House Of course you have to be prevailing

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wage.

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So I think at this point.

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That's the opening question that we'd love feedback on through comments, the law, on the one hand says exclusively.

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On the other hand,

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it's very difficult to to read that as literally as it may seem, because the properties are rarely use exclusively for any given purpose.

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So, to think that because there's a private school in the property that it's not being used exclusively for religious practice. seems like a challenging way to apply an exemption.

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Given that many churches also have corresponding schools associated with them. So I think it's something that we have to consider, and we're very

interested in feedback, anyone has any experience with the jurisdictions applying a standard like this.

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I don't know that it exists in other jurisdictions, but if it does that would be helpful to us. It's just one of these calls that we're going to have to make.

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Thank you. The next question is, what a corporate owned multifamily be considered residential is 75% of the property is

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our proposal was to base it on electric activity on electric usage, rather than number, you know, square footage or something like that. So I think, again, that is our proposal we're seeking feedback on it and to preserve best the best way to define what

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is residential project property.

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Thank you, Anthony The next question is actually what if 75% of electrical usage general residential changes. After installation, which is somewhat related to that.

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Think as it stands right now under our proposal, we're looking at mixed use facilities, as of the time of installation.

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And I don't know that we necessarily have the means to be able to measure what happens thereafter.

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But Anthony I don't know if you have any additional thoughts on that that's something that's probably poses a challenge but one that I don't know that we have the tools to be able to solve.

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Yeah, I would agree I mean, for items like this at some point you have to pick a time, the moment in time in which you're determining whether something is qualified, or, or does not qualify for tie, I would view this as part of the project application.

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But again, if, if someone has a suggestion for another way to monitor this and what would be reasonable time for it to be maintained, certainly would be interested in that as well.

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I think it's good to have the context, we're talking about an exemption from a wage paid through labor requirement and not the eligibility of a system writ large.

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So it's not that projects that change their usage status or projects that might be in a similar boat can participate in the program, there's a point at which, if you're looking to participate and you may fall under prevailing wage it's probably in your

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best interest to follow the brilliant Ajax pay those events of those companies are being paid prevailing wage. And then there's no ambiguity associated

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We're on 75% will go to the next one which is does the exemption apply to community solar serving at least 75% residential and or house of worship,

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know that this is not, this would not apply in that way. That's not a residential project. If it's a community solar project, it's a Greenfield project it's not directly offsetting that customers use the subscribers.

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Hopefully that's off the subscriber shares and then they can change over time is not what we're looking at, and making a determination about whether a project would qualify for this prevailing wage exemption.

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Thank you. The next question is, at this point is the 25 kilowatt threshold prevailing wage set in stone.

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It's like having a didn't hear the last part of what you said.

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It's been 25 kilowatt threshold for prevailing wage set in stone. The 25 kilowatt threshold for prevailing wage. I'm not sure that I follow that the 25 kilowatt threshold prevailing wage there's prevailing wage applies across the board, unless the system

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is a waitlist of our stream generation project or a residential project or a house of worship. The 25 kilowatt threshold.

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Ultimately concerns whether a project is small dg project or a large CPG project. So I guess I'm not sure how for prevailing wage purposes, that it must This is a question about whitelisted project status specifically.

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I'm not sure that I follow how that applies.

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Okay, if I it's norm Johnson is the person asking the question norm if you'd like to unmute and clarify it you can feel free to do that if not we'll move on, give you a couple seconds to do that.

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Okay, we'll move on to the next question. What a residential bill be considered acceptable documentation.

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The documentation for residential versus commercial we would certainly be interested in in hearing stakeholders feedback on what would be acceptable documentation, both promote a perspective of ease of use of the customers providing the information and

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integrity of the programming system.

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I would certainly encourage that Brian you have anything to add to that.

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I think anything regarding acceptable documentation is something we're we're operating a little bit blind at the outset, at least, so parties are providing written comments and believe that there's ways to demonstrate, say a mixed use facility has uses

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a certain type, or the facility qualifies as residential or the facility qualifies as a house of worship, those sorts of items are really valuable.

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Well,

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those sorts of items are very valuable to us we've been comments

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to circle back to the previous question about 25 kid every threshold. I'm not sure if this is what the questioner was asking but in our proposals for request for feedback, we had suggested that the projects larger than 25 k WAC and size record that want

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to be classified as residential would be required to provide documentation rather than an added station so if that if that was the question again. That was a proposal we considered in terms of will be good great point in terms of level of documentation

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required if if that seems like it's too high or too low, again, heavy something that wouldn't comment with an explanation for why a different proposed break point would make sense.

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Yeah, that's something where I think we felt like asked to be the point in which the burden shifts in there has to be a demonstration that the project is residential, that's just the point that we chose it follows the small DD large as you break point

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in the law, but it doesn't speak to whether prevailing wage applies to projects above or below 25 kilowatts and size.

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Thank you. There's two more questions that are go back to the prevailing wage question from before will will hold those until the end, and and cover them then.

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Are there any more questions before we move on to the next topic area.

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Okay, we will move on to the next topic areas in which is equity eligible contractors.

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This will be covered by Anthony star.

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Thank you, Kevin. Next slide please.

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So as I mentioned in my introduction, one of the changes the adjustable block program resulting from CJ is the creation of a new project category of projects from applicants that are equity eligible contractors, specifically with the Lord to find equity

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eligible contractor, as is the business that is majority owned by eligible person, or nonprofit or cooperative that is majority owned by eligible persons or is a natural person that is eligible person offering personal services as an independent contractor.

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So to unwind that a bit. The, the, also then defines what an equity eligible person is. And there's a number of categories there of someone who is a graduate from a variety of job training programs, someone who is a graduate of currently enrolled in the

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foster care system, someone who was formerly incarcerated, or someone whose primary residence is in what's known as an equity investment eligible community, and equity eligible to me equity investment eligible community is either what's known as an r

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three area. This is a geography that was created I believe as part of the cannabis legalization Illinois for equity determination in that program. And then they could also be an environmental justice community as to find and through the IPAs long term

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plan. We use environmental justice communities in the Illinois solar for all program for reserving a portion of the funding of that program for projects that are located in what is known as environmental justice community so we there's two geographies

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that can be considered is a fairly substantial overlap between the two of them, but it's not exactly the same and one things that will be working on is maps that show those communities and there are overlaps.

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What we're seeking feedback at this time is how to the approach to the requirements way to how do we certify a contractor as equity eligible contractor, and then also the Act gives us provisions about how do we allocate capacity within this category that

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will go through. One thing I want to note here is that x has provisions in it related to equity eligible contractors being able to receive advances on wreck payments.

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Typically, in the adjustable block program payments are not made until after a project is energized, the General Assembly and developing this category recognized financial challenges equity eligible contractors may have and to seek to overcome those,

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in a provision to allow for the advance of rec payments. That has to be developed through our long term plan so that will be part of separate process to develop that and will be implemented upon approval of that plan so that is not a feature of the equity

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or contractor category that is applicable. At this time for the initial opening slide.

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So in terms of our proposed approach, what we're suggesting is that we will do the equity eligible contract certification at the approved vendor level, and that it will be so a supplemental application to our existing approved vendor application so either

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new presenter, would have that as an option as they fill it out, existing approved vendors could go back and fill out that supplemental application, and it will go basically go through the three requirements, the requirement and listed here that you know

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whether you're a business nonprofit individual will obviously need information about owner structure ownership structure or board composition and case for nonprofit, and then information about each of the individuals.

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We also are proposing that the 75 megawatts of nameplate capacity for this block that we would allocate 70% of that to projects and Group A, which is generally the comment area and they will co ops municipal utilities in the PJM part of the Illinois and

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30%. I'm sorry this slide has it backwards that it should be the other way around. 30% is in Group A 70% is in Group B we will we will get that corrected.

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If I believe that's a typo, that may have been in our comments as well but again that generally follows the structure of allocation that we've had throughout the program at this time we're not suggesting any specific allocations between distributed generation

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projects and community solar projects that are equity eligible contractor could submit.

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Excellent.

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All right, thank you. Anthony.

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All right, questions that we're looking for a specific feedback on on related to equity eligible contractors fall under for headings registration process duration of certification, etc marketing, and block sizes and group allocation.

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So under registration process should any information submitted to the east the application process be designated as confidential.

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Will affidavit from the applicant certifying that the information submitted is complete and accurate be sufficient to verify eligibility.

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What documentation should be required to confirm that individuals are a graduate of or currently enrolled at the foster care system, or to confirm individuals who were formerly incarcerated.

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Under the heading of duration of certification. How long should EC certification last, should it coincide with the AV renewal process that's requiring re verification each year.

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How long does eligibility needs to be maintained.

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Under the heading of etc marketing should easy's be provided with a unique program badge that they can use to identify themselves as program approved VCs should designees VCs be provided with the program badge, or other graphic.

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And lastly under block sizes and group allocation is the proposed capacity for the EC blocks 70% to group A and 30% to Group B respectively, a reasonable allocation.

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Should the capacity allotted for these these be further divided across the small big large the large CG and community solar, or should the allocation only exist at the group level.

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And now we'll take a look at the questions coming in through the chat.

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And again, one quick, go ahead and just want to reiterate, is a double check the request for stakeholder feedback, we put out and we did have the allocations listed this way and that was an error on our part we meant that 30% should be would be allocated

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to group A and 70% group be similar to other applications we've done to our apologies on that.

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Thank you.

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The first question that's come in on this is our. He sees allowed to construct large dg and community solar projects, only. I don't believe there's any limitation on them.

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Closing small distribute generation projects, yeah this is Brian, there's, there's not aware of any limitation and I think it's the way that that maybe that's just a matter of phrasing, but the way that it's phrasing would its way it's phrase would make

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it seem like there's some sort of limitation on an entities ability to do something, when what we're really talking about here is the ability to

participate in a dedicated lane, and have capacity set aside through that dedicated Wayne, and there's nothing

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in the law that I'm aware of that would prohibit projects of that type from being able to be counted through that dedicated Wayne.

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And, and just to elaborate on that slightly as Brian was explaining those are lanes so you would have to choose a lane between something like a school project or easy project.

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The next question is will this allocation be clickable to whitelisted projects to.

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I'm not positive I follow the question in the sense that the East category is a new category so there is in fact know waitlist for today because it has not yet open.

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I guess what I feel like there might be a question might be asking something slightly different. So, go ahead. But yeah, that's see like you'd like to come off mute and I like Brian go ahead as well.

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Alright, thanks. Thank you for, I'm sorry, it wasn't very clear, I'm just trying to figure out if you said the approved vendors can go back and certify themselves the existing approved vendors and if there were projects that do have EC qualification well

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they can be qualified with etc but they're currently in the existing waitlist. I guess what you're saying they're not going to be a part of this blog allocation, they're not going to benefit from this book allocation, the existing waitlist that projects.

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I would point out that nothing would preclude you from taking your project off of the waitlist and then reapplying it under this under this lane.

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Yeah, it would be great to be up to you. What might be an issue here it's just the mechanics of how that's done. And I think it's the sort of thing where, if there's a specific factual scenario, I think written comments might be quite helpful.

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The one thing I could see as a waitlist a given waitlist ultimately reaches a certain capacity.

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Is there a way to then have that project that's part of another waitlist to be able to participate in the easy blog, I don't think there's any prohibition against that, what maybe it issue is just the mechanics of how exactly that's done and some of the

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timing questions. And it might be helpful to just sort of get a sense written comments. What scenario you have in mind because then we can build out mechanics to be able to accommodate that.

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Well then, yeah, we'll provide a written comments.

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Next question is Will contractors be able to qualify for EC and also pull from other tranche allocation funds as well. That's from Robbie I don't know if you want to clarify Robbie but I'm assuming that you're asking, could you do some easy projects and

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then also perhaps use do a school project as well as the same contractor, we can answer that question, all that, Anthony and Brian answer that and if you had a different question let us know.

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My initial reaction is if an approved vendor is an EC vendor that they if they don't have to submit a product into that category if they didn't want to buy a product and only exist within one category, so that I think that's that that's the new nuance

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that I would want to make their.

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Thank you.

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The next question is how does the company become an EC approved. That's a great question that we are seeking your input on. And so the requirements are listed in the law but how we actually go about verifying those requirements are something that we're

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seeking feedback from stakeholders on mechanically it will be part of the, the approval process that we have for in the program that you are already familiar with but the exact questions that we asked in the documents that we use verification, or something

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that we are very much seeking stakeholder feedback on.

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The next question is if a contract.

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Well, we just had a little thing, I think, I mean as we point out in our request for comments, but I think this kind of several levels this first is that there are these three types of entities that can become an ECM business and nonprofit or individual,

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then we need to know that either the ownership structure or board composition, and then because ultimately the ownership flows down to individuals, we will need to know about the individuals that are either the owners of the business or the board.

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If it's a nonprofit and information on them about which criteria they qualify as and again, we met we list those all in the application in the request for comment and they flow right from the law, you know, roughly speaking, participation job training,

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former foster care participants, living in an equity investment eligible community etc.

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And to expand slightly on that the approved vendor application processes is an existing process that we have, and some of those pieces are already there and the pieces that aren't there what we're seeking feedback on, so you can certainly go to the adjustable

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block Program website, Illinois abp calm and take a look at that approved vendor application and let us know what you would add, for the questions that we would ask

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the next question is if a contractor is not easy, but uses an easiest subcontractor particular project would that make the project, easy block qualified.

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Our proposal at this time is to limit EC qualification to approve vendors that were interested in feedback on that and I think that is something that in the long term plan, we what we want to look at other ways in which he sees can participate as program

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participants but in terms of the initial opening of the EC block and the complexity of all the items at issue and the complexity of working through the nuance of that our proposal at this time is so limited to approve vendors, and then potentially expand

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that over time through consideration at the policy issues in our long term plan development.

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Yeah, the law is written fairly narrow we on this front.

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Regarding the applicant for the CD Mr incentive. If you believe there's a reading of the law that would allow for us to accept something like a cup, a subcontractor status for qualification for this category.

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I would say offer that theory in your written comments, but ultimately maybe something that has to be brought before the ICC as we consider our long term plan

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a related question to that is will AV AV DS which I'm assuming is approved vendor designees be eligible to be easy approved or only a proven

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effective.

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So that again. The question is well approved vendor designees be eligible to be easy approved, or is it only the approved vendors that can be approved.

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So similar to the last question about more specific to Mercedes proposal at this time it's eliminated to approve vendors and not designees because I think this complexities that come up very quickly there, but we're interested in feedback on that if someone

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can you know can articulate something that's consistent with the law and, and practical goals for Destiny's recently will take that into consideration, whether that can be done for block opening or something that's woven into our long term plan.

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Obviously, I can't can't say right now until we see what is specifically propose. But again, I mean, conceptually to me.

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The important thing here is that the equity eligible contractor category, my understanding was created to ensure an increase in diversity and wealth building in the solar industry and so we want to make sure that if there are participants, taking part

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in this category that is structured in such a way that the benefits of the category.

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When we get to the next phase of it where there's advances of capital that those benefits are flowing through to the entities that the General Assembly intended it should when they develop this category as part of the adjustable block program, you know

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those lines, it seems to be written fairly prescriptive Lee and in a more limited way, specifically to address any risks of gaming, or any risks of the direct participants, not those folks be measured potentially somebody who's behind them.

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So, you know, we're trying to apply the law as faithfully as we can, if you have ideas about another way to read the law that I would say put those in the comments.

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Thank you. The next question is actually just a comment but I'll read it for everyone. It's very much worthwhile finding ways for easy to work with, or partner with established developers, or owner operators to enter this highly technical and complex

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field joint solar parties are likely to address this in comments.

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The next question is, if a vendor that has a business has partial ownership that is easy eligible. Is there a certain percentage ownership is required to qualify for etc.

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And I'm assuming that the question is, what percentage of the business has to be owned by an easy eligible entity in order to be an easy if there's a different interpretation.

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So our Ask this question, then please feel free to to elaborate, but I'll post that to Anthony and Brian.

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post that to Anthony and Brian. I would go back to the definition of equity eligible contractor that's in the act which is eligible equity eligible contractor means a business that has majority on by eligible persons or nonprofit of core operative if

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the majority are governed by eligible persons or as a natural person. So, that would, if I understand the question correctly I think that's a pretty simple standard that it's the majority ownership.

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But again, if there's a nuance the question that that doesn't capture please, please raise your hand and and and you know, you know, explain the nuance that I may have missed in that response.

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Thank you, that looks like the end of the questions there, if there's will give about 10 more seconds for any more questions.

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Okay, we will move on to the next section then public schools. Kelly Turner from the IPA will be presenting this section.

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Good morning, everyone.

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My name is Kelly Turner I'm the Deputy legal counsel for the IPA, as Kevin mentioned we're going to move now into the public school projects category which is a new program category, established under the changes from public public act.

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102662. If you can move to the next slide please.

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Thank you, some basic information here at the outset, as I mentioned the public schools project category is a new category under SegA.

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And it provides the opportunity for incentives for both distributed generation, and community solar projects located at public schools.

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As Anthony mentioned in one of the introductory slides, this category will account for 15% of the ATP program capacity that the provisions of CGS specifically provide that the first block for the public schools category will be for at least 50 megawatts

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of total nameplate capacity.

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So, as explained on the side here.

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The agency may create subcategories within this category to account for the differences between the project sizes or locations, and projects located within environmental justice communities or within organizational units that fall within tier one or tier

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two shall be given priority, your references to tier one and tier two. And as you will see on the next slide.

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tier three and tier and for our categories that are determined based upon the results of the annual evidence based funding distribution process for public schools in Illinois.

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And our proposed approach for the public schools category relies upon those categorization from the evidence based funding distribution, as well as the environmental justice community designations that are contained within chapter eight of the current

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long term plan.

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So if we can go to the next slide, we will see a chart which explains the agency's proposal for the creation of additional subcategories under the umbrella of the larger public school project category.

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As you can see, what we're proposing is that 70% of the capacity for the public schools category or 35 megawatts from the initial opening capacity will be allocated to schools that are either in the tier one or tier two category and or public schools

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that are located within an environmental justice community.

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The proposal that allocate the remaining 30%, or 15 megawatts from the initial opening capacity to projects that are located. That tier three or four schools or schools that are not and schools that are not located in an environmental justice community

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within this overall split of 7030 days agency proposes that we will further breakdown allocation by size within these categories.

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So, 25% of allocation to projects that are less than 250 kilowatts and size 25% for projects between 250 kilowatts and one megawatt and 50% for projects that are over, one megawatt.

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Additionally, and this is part of our proposal, but it's not on the slide.

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The agency proposes that if the. These allocations are not filled within 180 days of the category, opening the projects will then be accepted on a first come first served basis regardless of funding Tier or location relative to an environmental justice

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community or the project size.

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Um, with that I think we've covered what our proposed approaches so I will turn this back over to the incline team to walk through the questions for stakeholder feedback.

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Thank you, Kelly.

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All right, there are four questions listed on this slide on which we are specifically looking for written feedback.

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First is the proposed breakdown of 70% percent of capacity or 35 megawatts for schools that are categorized as tier one tier two and schools located within environmental justice communities, and 30% of capacity or 50 megawatts for tier three tier four

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schools, the appropriate breakdown, or the prior year's results of the annual evidence based funding distribution process, a timely source to determine tier one or two tier two status.

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Are there other ways to verify that a school qualifies for tiers one and two and environmental justice community categories are the proposed size categories, less than 250 kilowatts 250 kilowatts to one megawatt, and over one megawatt appropriate allocations

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for each category.

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Should specific allocations be made to groups or to community solar projects prior to refinement of this through the long term plan update.

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We can take a look at questions coming in from the chat and see there's at least one.

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Thank you. The first question is will the S wreck rates for public schools reflect the inability of public schools to directly use federal tax credits and accelerated depreciation.

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The rep prices for the initial opening of this block are set in the law so we do not have the ability to modify them at this time now through the long term plan development will be reconsidering wreck prices more generally for the future.

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That being said, this category is for projects located at public school so there I don't believe there's anything that preclude a project that is either finance through a lease or PPA where another entity would be able to use the

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various tax credits and accelerated depreciation so that may be the one way in which that this would accommodate that question.

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you and Anthony may be worth talking through what we've done in similar circumstances regarding say nonprofits and public facility products and solar for our program, simply because there may be entities on this call or other stakeholders who aren't as

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familiar with that approach.

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Sure. So this very issue can has come up and solar for all which is the our other incentive program for distributed generation and community solar that focuses on low income households and communities, and in that program there is a specific sub program

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for nonprofits and public facilities and we looked at rec pricing in that as we develop that program under the assumption that those entities would not be able to take advantage of various packs options.

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We subsequently have refined that to have two different options depending on if a project was financed that way or was not. And in that program what's different from the festival block program is a requirement about what portion of the savings from the

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project flow through to the customer. So one way we try to account for that in that program was the idea that if a project was able to take advantage of tax credits to its financing structure that the Savior's requirement they'd have to flow through to

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the customer the school or, you know, either nonprofit or public facility would have to reflect the fact that that that that those taxes are being captured.

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Thank you. The next question is if there is, is there a prioritization across the project types of tier one tier two NEJIIE what a tier one and tier two project be selected prior to selecting environmental justice projects.

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Our proposal was to basically put those all into one bucket, we're not experts in school funding formulas.

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We do know quite a bit with environmental justice community designations as we you know develop those as part of our plan, but our, our initial proposal was really to have a prioritization for those and then everything else.

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Again, this will be the sort of thing if there are nuances of what projects fall into those different tiers that we maybe haven't appreciated written comments on that would be very helpful.

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And we can think about further refinement of that.

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Thank you. The next question is what qualifies as tier 123 and four, I believe, Kelly cover that a bit but if there's something. Yeah, I can expand on that a little bit so that comes from the evidence based funding distribution process for public schools

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in Illinois, and there is an evidence based funding distribution calculator that is linked in the stakeholder feedback document this designation comes directly from the statute, and it refers to

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the statutes that deal with the funding for public schools. So, in terms of that, that prioritization and how that designation works we don't have any control or authority or input on those on those designations but there is a link within the stakeholder

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feedback document that was posted on the 14th on the abp website that can give you some more information on those.

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Thank you. The next question is can you share any context, behind the suggestion for 7030 split was it simply offered as a starting point.

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Hey, that's a fair characterization of it.

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Okay.

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Is there a defined timeline for opening the initial block or public school category

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that agency has until nine. Sorry 90 days from the effective date of the act so until December 14 to open blocks we're planning on opening blocks on that day.

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In terms of a timeline. I think I mentioned this, but we did suggest that if there is available.

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Capacity that's not filled within 180 days of that opening projects will be accepted on a first come first serve basis.

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I, I'm not sure if the question is specifically will.

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Is there a timeline for this to close. I don't think that that's part of our proposal.

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I think it said that it would remain open until there's no capacity, available.

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Dave if you'd like to expand on that, feel free.

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Yeah, I was just curious whether or not the public school program would be become open for. If we have a school that, you know, could be either you know potentially adding to the way it was now, or can be added to the public school program on December

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14. If that program was going to open up some applications for that. On December 14 of before.

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And the answer that Dave is that it would be on December 14.

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Okay, thank you.

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Okay, we'll give a few seconds to see if anyone has any more questions.

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Okay, we have a short break in the schedule. Now the time is 11 and 15 rough, sorry 1015 roughly so we will go until 1020 on the break and perhaps should we circle back to some of the questions on prevailing wage that actually that that were asked earlier

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maybe we can address some of those now. and keep to our which will take time.

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Sure, we can do that someone had asked to show the previous slide. So we've adjusted that so you can see that

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it's good go to the prevailing wage questions here.

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One question on prevailing wage is will the disclosure form show what classification the worker will be in.

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I don't think so because the disclosure form is about information about the system, not the details of who will be doing the, the installing so it's it's the information for the customer to understand their systems, I do not see at this point time that

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there would be a connection between prevailing wage requirement and what on a disclosure form.

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Okay. Something One thing to note on that point is our consumer protection requirements will be put before the commission, through our long term plan, so it's possible that you know as we're developing our new long term plan, we may believe that there's

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additional changes to the disclosure form additional changes to other consumer protection requirements, additional changes that might be warranted by other changes in the law that we want to introduce new requirements.

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So I think what we're doing right now is trying to provide for temporary solutions to get through the block reopening while taking some of the bigger picture issues of whether the interactive effects between new requirements, holding some of those over

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for the long term plan development process.

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Next question is the biggest question initially will be what prevailing wage classification applies to the type of work perform. There is extensive experience in the application of prevailing wage to wind projects states, high impact business program

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but comparatively little really wage application to solar projects.

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When the IPA rely on that. I do else interpretation of the appropriate classification.

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That was certainly my expectation as a starting point because again we do not have the same experience with prevailing wage that other entities to me do have.

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But if there's specific things in stakeholder feedback written comments on this though that would be really helpful for us to help assess where those where those boundaries are drawn yeah that was that was exactly what I was going to say is just if you

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have alternative ideas, or there's challenges with with that approach that you think may not be obvious, but those are written comments, and we can take them into consideration.

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The next question is since, US Department of Agriculture reap grants RAPI recipients have to show a certain percentage of income from a business located in rural farm etc.

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Does this push them out of the residential exception to prevailing wage.

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I think this would still be governed by our 75% mix usage but there's some reason why there's a disconnect created there, and we don't really we're not experts in grants either.

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I'd say put that into written comments and we can take under consideration.

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That's an area where because we don't have inherent expertise, I think it'd be helpful for us to receive written comments, understand a little bit better, the nature of the question and then see if there's something that we want to provide that's, that's

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kind of more descriptive clarification.

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Prior to block opening.

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Next question is What if the main contractor pays prevailing wage but a subcontractor brought on doesn't follow through and pay prevailing wage properly.

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Well I think at that point prevailing wage, as it's set out in the Why is not followed Mr responsibility, the main contract or at least the approved vendor, the direct recipient segments, Mr incentive funds to make sure that for all construction activities

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in the project building were just being paid. So, That is the way the laws written it's intended to encompass, not just the direct applicants and not just the main contractors but also subcontractors and that is the way that we would evaluate compliance

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with prevailing wage requirement.

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The next is it just a comment that delivery service type according to the utility company bill would be the easiest way to determine the prevailing wage requirements, I'm assuming that's the delivery service type would be the easiest way to determine

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residential status. Yeah, I think we were looking at that and Anthony correct me if I'm wrong, it may vary between the utilities, as to whether we have kind of a clean break about whether there's a residential.

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Ultimately, something's been residential is meter residential customer is being assessed as residential customer that is using utility or not. I know that we had some discussions about that and yeah that's correct I think a few layers of that one is the

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vast majority of residential projects or it's very easy to determine the residential, it's when you get out to the margin that there are some that that there's some interesting gray areas and so there are, if you look in particular you look at Emory and

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definition of their Ray classes, there are some again at the margins that are there are not as clear to return types of buildings that are people live in, but we're the line is between residential and something where someone is staying in another sense

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gets a little murkier so that's one issue. The other layer of issue there is that we, for real cooperatives and municipal utilities they may not have as complex distribution rate structures that make these sorts of nuances so again while you know 90 something

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percent of the customers in Illinois are served by commented, American or a mid American. We also do need to recognize that it will be our customers and rural co ops in municipal utilities, for whom the information that might be available to assess something

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is going to be a bit different.

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And I'll add if you have if you live in a, or familiar with municipal utility or rural cooperative and you have some feedback for us on what would be appropriate to use for the specific entities that you work with that would be very helpful to us in feedback.

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The next question is, I think what norm is asking is do projects in the small category have to pay prevailing wage I thought I read small projects, not need a public entity.

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It will be it will be required. Either way,

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residential projects are exempt from prevailing wage requirement, many projects within the small district generation category. Well that is existed previously probably less Oh is it just going forward, are exempt by virtue of being residential, but if

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a project is small, but non residential, it is not exempt from prevailing wage.

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I think there's a tendency sometimes people conflate are small, big and large dg categories as residential versus non residential and in reality, that's not correct because there are small dg projects that are non residential projects, and as a same way

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as that there can be large CG projects that are residential such as an apartment building. Yeah, those are concentrated in the prevailing wage exception as well.

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For multifamily residential, so that's that's the dividing line again it's not a choice to be made by the IPA it's just the application of one dash 75 see one q one, and how it defines what projects would be exempt from privilege.

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Thank you. There's a couple of other questions that came in that day either were came in a bit later were classified in different areas so I'll go through those quickly.

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This is a question on educational facilities.

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We can still weightless school projects in hand correct

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if the question is, could you submit an application today for a school project, it would go into presumably large CG weightless because again the school category does that does not is not yet open there's no way to apply today as a school project.

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I think the open question there and you know being. I think Brian alluded to this in a previous response. If there's a pragmatic considerations around what would happen in terms of how a project that was on a waitlist could move into a new category upon

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block opening. I'm eternally be interested in feedback on that.

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Okay, a couple of unrelated questions from the beginning of the presentation. When will the agency discusses plans for the community solar waitlist.

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We are still working through some of the details of that and issues around how the looking at it, affiliates and some of the decisions that will have to come from that so we expect to have some information on that shortly, including likely some requests

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for a specific stakeholder feedback on some of the decisions about how allocation works. Yeah, it's a little I honestly do prioritize because that's not the right way of looking at it and certainly it's not the priorities in terms of what we consider

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to be a real policy priority.

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But because there's more of a stage process that allows us a little bit more time in withdrawing from project existing project applications from that category.

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We're trying to get through these things so that we can then put things into a place where 90 days block reopening we have these categories kind of set up, and then, and then we'll be dealing with community so our waitlist allocation questions, say in

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the next few weeks.

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related question to that as whether that process will include a workshop similar to this.

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That is to be determined. My initial reaction is that the issues that we need to work through may be ones that a written feedback session with me written feedback would be sufficient.

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But we certainly can give that some additional thought

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there's a process question about whether small dg is 4% lower than the last Digi block on reopening rather than the last large trend 25 kilowatt Digi block those types of questions I think are more will be covered in tomorrow's presentation by the IPA,

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which tomorrow's presentation happens to cover the adjustable block program. So any questions on that I would encourage you to tune into that.

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The, the, what you're referring to is the power hour, and what we're doing through that series is just educational webinars about what's in the law, and not necessarily interpretive questions regarding how the law would be applied.

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So those are intended to be more educational overviews.

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And the registration for that is on the power agency's website for those interested in attending

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question about whether the PowerPoint will be available on the IPA website, and it will be posted both on the VPN the IP website after the workshops. I think I got all the questions that were missed, as we switched from topic to topic if anyone has any question that I didn't cover that you have not had answered yet and he'd like to cover right

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now I'll give you a few seconds to enter that.

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Okay, we'll have a time at the end as well for any additional questions that folks come up with Anthony if you're ready for the break we can go with that.

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Starting now and we'll be back at 1035.

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That sounds good to me.

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Thank you everyone.

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Welcome back everyone will now move on to the next section demographic and geographic data, which will be covered by Kelly turn.

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Hi everyone, sorry, can you hear me I was having some audio issues coming back from the break.

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I'm clear.

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Thank you.

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Okay, welcome back from the break we will just go ahead and dive into that proposed process for the collection of demographic and geographic data. if you can flip to the next slide please.

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The IPA is required under CG to collect demographic and geographic data from applicants and program participants for the purpose that is listed here at the top of the slide data collection data analysis and reporting are critical to ensure that the benefits

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of the clean energy economy provided to Illinois residents and businesses are equitably distributed across the state.

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The changes to the IP act under CGI require specifically that the agency collect this data for each entity awarded contracts under any agency administered program.

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So in the case of the adjustable block program that would include approved vendors, they are awarded rep contracts through the program.

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These new requirements include the collection of data as I already mentioned from applicants, and program participants, which in the case of the adjustable block program may expand beyond approved vendors, as the holders of the rack contracts and also

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include subcontractors. It may include project hosts that may include customers.

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So the agency's proposal to implement these new requirements, is to include the collection of this information on the approved vendor

application, and then on an ongoing basis we will continue to gather this information through the annual approved vendor

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renewal process.

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So we can flip to the next slide.

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On this slide you will see the general information that we will seek to collect on the application or through the annual renewal process form the stakeholder feedback document that was published on October 14 contains the specific questions that will

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be included on the form. They are more detailed than this but we just put the general topics on here so that people could see them.

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The questions will be added to the application and renewal forms as required fields. So, the application or renewal forms will not be able to be submitted without answers to these questions provided the topics I'll just run through them really quick,

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number of full time and contracted employees, number of employees in our outside of Illinois, whether the organization is minority owned or a female owned business or small business, the gender identity of employees, age, race, ethnicity and education

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level of employees numbers of employees who are formerly incarcerated, or are graduates of are currently enrolled in the foster care system, and employees who are veterans reserves, National Guard members or disabled.

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As a mentioned on the stakeholder feedback document there are there are more specific information related to these questions, and I encourage all of you to go and look at those and provide written feedback on those.

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Before we move on to the stakeholder questions that were issued I also want to note that approved vendors will be required to collect this information from their subcontractors on our proposal, and they will report that information to the program administrator.

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Additionally, all of the data that is collected will be aggregated and reported annually by the APA, signed by the IPA. The abp Program website, and we are also planning to include maps of locations and participants in that day data provision to see the

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public.

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And if we can go ahead and go on to the next slide, I'll turn things back over to Incline, for the stakeholder feedback questions.

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Great. Thank you, Kelly.

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Alright, the stakeholder feedback questions for this topic fall into two sub-headings: data collection and reporting and accuracy of data.

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So only data collection. Are there demographic categories or classifications, that the proposed list that as Kelly mentioned is in the written request for stakeholder feedback fail to capture, please provide specific examples and reasons for their inclusion.

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Are there any proposed demographic categories or classifications proposed that should be altered, please provide specific examples and the proposed changes.

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Are there any proposed demographic categories or classifications that should be removed. And again, please provide specific examples and reasons,

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The agency's seeks feedback on the process for the submission of data collected by approved vendors from subcontractors.

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One possible approach would be for approved vendors to submit subcontractor information on a project by project basis.

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Another approach would be for approved vendors to submit some contractor information on a quarterly basis.

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The agency is also open to alternative proposals for each proposal please provide an explanation as to why a particular approach may or may not be preferable for purposes of subcontractor reporting should approved vendors be required to report demographic

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and geographic data on each subcontractor which will be approved vendor worked on project under the program during the reporting period.

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Should the subcontractors from which the data is collected be limited to those with a direct role in project development, such as sales and marketing and installation.

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Are there other categories of subcontractors to be included or excluded, and if so, why

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new section, 175 seat 20 refers to collecting data on program participants, unquote, might this be understood as referring to customers or hosts. If so, how should the IPA seek to obtain demographic information about customers, and what sensitivities

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apply to making such an increase of customers who is the right entity to collect that information, and how. And how should that information, then be reported back to the IPF

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under the subheading of reporting and accuracy of data. For the purposes of determining and approved vendors geographic location. The approved vendor may be headquartered outside of Illinois for may have more than one branch office is the main office

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of an approved vendor an accurate reflection of that approved vendors geographic location.

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Alternatively, should the branch office with branch office which runs the approved vendors abp participation, be used for Is there a better representation of an approved vendors geographic location, which measures should the agency consider to facilitate

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the collection of different data from approved vendors.

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And that will turn to questions coming in from the chat.

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Thank you. The first question is will this location data be available on a zip code basis by applicants awardee.

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The proposal that we have is to aggregate the data.

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And like for the product for the project maps that are currently on the ADP website that that location data is based on a zip code basis.

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I think that's probably what we would do but if you have any specific feedback on how that data be provided publicly that's something that we would appreciate receiving in written comments.

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Thank you. The next question, the data collected is it applicable only to people working on a VP current programs, or will it be required for all employees, including those working on unrelated projects.

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As written the proposed approach.

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States employees.

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It does not specifically outline employees or subcontractors who are only working on a BP projects.

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Employees are subcontractors who are only working on a BP projects. If there is a way or a suggestion that it should be done that way again I would encourage responses to the written request for feedback as to how that approach could be implemented, and

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why it might be a preferable approach to the one that the IPA has outlined.

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This next question parses that a little bit more. Kelly to ask, does this include subcontractors that may be any electrical or roofing work, prior to installation actually happen.

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Um, I, I think it would obviously depend on if that's a part of the, the application. If they are working with the approved vendor on the project. I would imagine that a subcontractor involved in the project overall would be included on this list.

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If again if there's a suggestion that that certain types of subcontractors or designate should be included and other types of subcontractors or designees should be excluded from the project reporting requirements that is information that we are definitely

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interested in receiving feedback on

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next question is for clarity, does the IPA expect to prove contract approved vendor sorry to collect this information from each of their approved designees, and the designee subcontractors.

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And he could obviously have many designees with hundreds of employees each many subcontractors under each desert.

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Yeah, I think we recognize that there.

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There are many approaches to how this information can be collected and from whom it can be collected, and that is part of what we are seeking feedback on right now I think the way that the proposed approach is written, is that we would be collected the

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approved vendor would be collecting information from all subcontractors if that is a subcontractor, that is nested under another subcontractor, that would be required to be reported by the.

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If there are proposals or suggestions on how to manage the reporting requirements, or a way that we could manage reporting from another entity be beyond the approved vendor, we would look forward to receiving that proposal in written feedback

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question as well this demographic data reporting fall under the annual diversity report the ABS have to submit.

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I'm assuming this is the annual report that they referring to. And if there's an expansion on that you'd like to make you can take yourself off mute and expand on that.

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Yeah, hi, theater, yes so this is regarding the annual report that he already submit, I was wondering if you know the demographic data will fall under separate reporting, or would that be so consumed into the current diversity reporting we have to submit.

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read for approval by next summer, and these are new requirements under the law so certainly thinking about where information is best collected will be part of that and then that could potentially again not making any commitments at this time could include

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my thoughts on that are that that current reporting climate flows out of last approved long term plan. And as we've mentioned several times we'll be updating that plan.

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rethinking what we've had a plan about already about the reporting that goes into the annual report.

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Okay, there's doesn't look like we have any additional questions at this time, we can go ahead and move on to the next subject which is large dg recognizes to go ahead and.

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Thank you. Next slide.

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So the context of what we're talking about here is that we've already brought up several times the fact that the CJ specifies certain price adjustments for block opening.

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And then we will be obviously revisiting rack pricing, to the upgrade or long term plan.

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But for the largest distributed generation category there's a specific provision that the for the price of renewable energy credits for and projects that are not on the waitlist that they'll be determined and published by the agency in other words, rather

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than having the you know the for 10%, the client from US Open block that we have some flexibility in defining those prices. These are also the projects that generally speaking, other than the exceptions we discussed earlier prevailing wage will now apply

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for. So, what we are proposing is a process where we are doing a limited updates to the rack prices to account for the incremental cost of prevailing wage.

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So this will be an interim solution for looking at RGG rep pricing, with a longer term solution, being included in our next long term plan. Next slide please.

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So the approach we we've taken for this is that we wanted to, we decide to go back to our original work pricing model that determine the wreck prices that are currently in effect, and we said well what if we go back to that, look at the labor costs assumptions

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that are embedded in that adjust those to account for prevailing wage is calculate direct prizes and then we'll forward to the current.

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You know, we would be for the next open block. And the way we did this is that we looked at a study that had been done last year, looking at the impact of really wages on solar costs and Illinois.

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wage requirements that range between 23 and 41%, so forth. The thought exercise we took the starting point of that range and then applied it to the labor, and the line item in our contract pricing model and then moved it forward.

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So what that looks like is what you see in the table here, we're generally speaking into roughly two to \$3 increase and rec prices to account for grayling wages.

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Next slide.

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The way we got to this is that if you go deep into the weeds of the record pricing model from the initial long term plan. We have an appendix that lists out cost data we had gone from an NRL study on solar costs and that's what we use in the initial wreck

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price modeling, and there was a line item for labor labor costs, the way the rec pricing model we developed works is that we had five different size projects we modeled the prices, the cost of those and then use those to co create different bins of prices

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that were used for the ultimate categories or size categories for the festival block program. So the numbers listed here are specifically what was in there that model is what do you see in the left side columns.

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These are the installation labor costs that we're assuming they're both expression of dollars per watt DC, as well as what that would, you know, we have up to free to those side projects there installation costs.

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Then again, applying to those that cost to 32% upward adjustment shows you the numbers that are on the right.

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The reason I want to break the these out is because, in terms of thinking about this model and this approach. One thing that will be very helpful from stakeholders would be to look at these labor costs assumptions and, you know, give us a reality check

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if our do the same right and business proposed adjustment for prevailing wage feel in line with what installers understand would be the cost of compliance with prevailing wage.

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So again specific feedback on these

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prices would be helpful. Next slide please.

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Thanks Anthony.

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So to review the questions on which we're looking for specific feedback from you all are the agency's proposed installation and cost estimates appropriate, and if not, what adjustments.

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Should the adjustment and price vary by system size, and should different adjustments be considered for group A and B, rather than a single statewide adjustment.

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And that will turn to the chat.

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Hey, we have one question it's a little bit unrelated but since we don't have any others I'll address it quickly which is how many kilowatts or in each wait list at the moment.

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That information is available on the Illinois ATP. com website. If you go to the that website the program Documents tab, and then scroll down to the block capacity dashboard that information was there.

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One thing I would note on those numbers and correct me if I'm wrong Kevin is that at this point, the projects that are in the 10 to 25 kw range that when they are still classified as large distributed generation they have not been re classified into small

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distributed generation. That is correct it and so that means that the large dg waitlist are showing a larger number than they will be when that reclassification happens.

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The next question is, is back to the topic at hand, I believe, is what about sub, sub further divisions such as Chicago area versus the rest of comment territory and asking about the division of adjustments between a B.

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set prices for each of those. This would, if we were to start dividing our groups up into further subgroups that that will get very complicated and might be this sort of thing that would require approval through our long term plan rather than the change

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we can make midstream right now.

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Yeah, just on this point Anthony there's kind of a constant tension between specificity and elegance transparency and clarity. On the other hand, and so I think we're always trying to grapple with that with the way that we broke them down project sizes

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sizes and prices applicable to it the way we broke it down groups, is how we balance those things to date but certainly as we move into the new long term plan development process at parties feel like because the markets maybe the one with SharePoint or

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because most entities have had more time participate in the only market there's maybe a different rebalancing, I think we're interested in arguments along those lines.

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I would add from the implementation perspective that if there's any additional information you can add on how you would actually make those determinations of where those lines are drawn and then have you as applicants would would prove to the administrator

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that you fell on one side of that line or the other, would be very helpful from the point of determining whether the suggestion is the difficulty of implementing the suggestion so you could add that detail if you haven't that.

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The next question is there are several supply chain forces that have created upward pressure on turnkey installation costs. Examples are steel freight and labor, at the very least these have eliminated the implicit 4% cost curve reduction, built into

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the old plan.

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Do you see the opportunity to address this with upcoming with the upcoming price, updating of rec pricing that will go into the update of long term plan will absolutely factor those and that's part of that refresh process.

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Again we were looking at here is a shorter term solution for the immediate problem at hand, which is the blocks that open in December prior to the approval of that long term plan.

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Thank you. The next question, are large dg project contracts still 15 years or the contracts revise to 20 year contracts

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for distributed generation projects has remained 15 year contracts, with the exception of distributed generation projects, and that project that functionally a distributed generation project but is in the public school category, all public school projects

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in that category A 20 year contracts with a different payment structure, the afternoon workshop will be going into much more detail about those payment structures because those become contract issues and are will be reflected in the refresh the contracts

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that we're planning for block opening.

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The next question is not directly related but we'll go ahead and address it anyway so just for projects that miss the upcoming November 1 deadline which is when, for, for everyone else on the line November 1 is when the waitlist applications will be close

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to new applicants will there be a moratorium on applications until December 14. And the answer to that is, is yes the applications will be paused until December 14 however disclosure forms continue, continue to be

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submitted and completed during that time period.

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Give a couple more seconds to see if there's any more questions.

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Okay, we'll move on to the next topic of community driven community solar.

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Thank you. Next slide please.

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So we've talked a bit about this morning about the new categories within the desktop block program that have been created. We've talked already about the public school category, and the equity eligible contractor category.

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The third new category is what is known as community driven community solar.

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This new category

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has several aspects to it.

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And what is contained in the act is the idea that there is a set of criteria related to how to prioritize a selection of community driven community solar projects that are laid out in great detail and the act.

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But then there was also a provision that for the initial block opening that we should follow what we had in the currently approved long term know what resources procurement plan.

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So, this is something where this is an interim solution to how we collect community driven community solar projects, there will be a more comprehensive consideration of the new criteria that are contained in LA, that will be worked through as part of

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the development of our long term plan.

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So the approach that we're suggesting and this builds off what we had in our long term plan where we had, we put out a proposal, and then the commission when they approved our plan assets to do additional stakeholder feedback to try to refine aspects

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of that proposal we did a stakeholder feedback process in November and December of last year. And then as we develop the long term plan that we published for comment in August.

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We also sought additional feedback and that plan included a refinement of the approach that plan was subsequently withdrawn by the agency when CJ took effect, because we now are developing a new plan to comply with the new provisions of the law, but in

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essence what we're proposing here for community driven community solar for this initial opening is to follow.

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One of the things we heard when we first put out our plan was we had the idea that we would announce block openings would give 60 days notice than 60 days for projects to apply before we will do a selection process.

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We heard very loud and clear that that was two shorter period of time so we're proposing here that when blocks open on December 14, there will be 180 day application window.

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What that means is that projects can submit applicant Part One applications, anytime during that hundred 80 day period but we will not do a project selection until that 180 days has pasts, we would be evaluating, you know we'd be doing review of applications,

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but in terms of the scoring for project selection that will take place after this window has closed.

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The approach first looks at prioritizing projects based upon the development density of the township in which they are located.

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We also would then, and go side points accordingly. We also then would assign a point if a project was issued in response to a site specific request for proposals in our initial proposal.

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We had a requirement that the RFP had to be issued after the block opened that was again something where we got strong feedback on so we were proposing dropping that requirement.

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We also would assign points, a point for projects that commit to serving only local subscribers, we had initially proposed the geography of that, where it was at the township level we're not proposing expanding that to the county level or for the parts

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of the state where county populations are below 50,000 that today's economy, counties, would be eligible as well we understand that wall, can be sold it may be an interesting offer to customers, you need a fairly large population base to find enough subscribers

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for a project so we wanted to be flexible on the geography in areas where they're just fewer potential customers.

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We also oppose point system where smaller projects would be awarded more points, and we would use random selection only as a tiebreaker if projects end up with the same scores.

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One thing to note on the local subscriber and I guess we'll get to this question is that, do you think we have some kind of what some additional thoughts on how size of the project and geographic proximity of local subscribers could be correlated better.

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Next slide.

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Alright, thank you, Anthony.

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So taking a look at the questions on which we're looking for a specific stakeholder feedback. And again, the point the specifics on the points are in the stakeholder document that's posted on the website.

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This question is followed are two different headings project diversity, and local subscribers. So under the heading of project diversity to the point allocation is properly weight considerations and tended to quote, increase the diversity of areas hosting

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community solar projects, the business models of projects size of projects.

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How should the agency to find candidates for the selection process. Should the agency use the definition of community based organization in this video and I sold it for all program.

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This references on section, 8.6 point two of the client long term plan, or should have different standard views.

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The purpose of the points of one of the projects developed in response to a site specific RFP, is to demonstrate community engagement and involvement.

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Are there other ways that community engagement and involvement, could be demonstrated site specific or.

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How could such engagement and involvement.

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Under the heading of the local subscribers. How long over the life of a community solar project should the local subscriber requirement be maintained.

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How should local subscriber turnover be handled.

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Should smaller community solar projects, for example, those below 100 kilowatts or 500 kilowatts, have a smaller area allowed for local subscribers, and if so, what would be recommendations on an appropriate geography.

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In the now withdrawn draft second revised plan, the agency had proposed awarding 1.4 projects that do not take agricultural land, out of production.

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Should this be included as a selection criteria, and why or why not.

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And with that, we can take a look at the questions coming in through the chat.

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First question is a bit more of a comment but 180 days is probably not enough to run a site specific RFP, much less get through the other aspects because interconnection and permits or project specific which is then developer specific,

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we're fairly open to other timeline proposals.

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I would say keep in mind that the next long term plan for data would be due to be approved in July and that would cover the opening of subsequent blocks the different selection criteria so while we obviously want to provide enough time to make this work.

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At some point we get to a point where we may have overlapping

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approaches and I think you know we do need to think about how do we move through this initial block and plan for the future. So I think that is, that would be just one thing that is a little bit of a attention in terms of timing but certainly if, you

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know, feedback on the amount of time needed for this block would certainly be appreciated.

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Next question is from Mark What about the possibility of admirable take implementation, and the let me know if you'd like Mark to expand on the Baltic part, I will confess to not knowing what aggravate voltaic means so if market clarify that I would appreciate

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it. Yeah, good morning everyone admirable take is the concept of integrating some form of agricultural use whether it's pollinators, or different kinds of crops, or even things like animal husbandry on a photovoltaic installation is becoming very prevalent

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around the country, so it doesn't necessarily take agricultural production off of the site, just changes it.

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This is Brian I think we want to be clear about the scope of this workshop, which is what we're doing to prepare for the opening within 90 days of the various flocks of the just one block program is outlined by law, the consideration of different attributes

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that are not part of what we have two different block reopening is something that would be more appropriate for our next long term plan, and the questions become when and how within the category is not specified for the call, could you have, say, whether

02:07:12.000 --> 02:07:24.000

it's an adder whether it's a carve out or whatever it might be within that block and tie that back to the statute, but that's something for future workshops, right now we're just trying to get block opens in a box open in a manner consistent with what's

02:07:24.000 --> 02:07:38.000

in the law for purposes of the community driven community solar block we don't really have the latitude to take into account. Other considerations beyond these items that are pretty much set forth in the law referring back to our last long term plan so

02:07:38.000 --> 02:07:56.000

we're kind of boxed in, in terms of the approach outside of just working within that approach where we have some some ambiguity there.

02:07:56.000 --> 02:08:08.000

Okay, I don't see any other questions at the moment we'll give everybody a couple more minutes on that and then we'll be moving into a summary so if there's any questions that we have not addressed, perhaps that were asked tonight, I missed them or questions

02:08:08.000 --> 02:08:21.000

that have come up. Since, the sections where they were covered that you still have, feel free to go ahead and enter those into the chat box now as well.

02:08:21.000 --> 02:08:26.000

And I'll get about 30 seconds for folks to do that.

02:08:26.000 --> 02:08:43.000

Also during this time what I just remind people that this webinar is being recorded and the slides and recording will be posted to the VPN IPA website so you have an opportunity to go back and look at these things if there's stuff discussed that triggers

02:08:43.000 --> 02:08:45.000

ideas, the written.

02:08:45.000 --> 02:09:05.000

Comment deadlines are generally November 4 except for community driven community solar with the deadline is November 9 so there's still plenty of time to reflect on ideas and provide written comments to us for consideration.

02:09:05.000 --> 02:09:13.000

I don't see any additional questions here I'll hand it over to Anthony for a wrap up in some.

02:09:13.000 --> 02:09:28.000

Great, thank you. I'd like to thank my co presenters today and everyone for attending. I hope this has been helpful and spur some thought on comments that's a good bet to be able to submit to us and a reminder that this happening starting at one o'clock

02:09:28.000 --> 02:09:56.000

Central Time will be the workshop specifically focusing on the new draft record contracts.