

COMMENTS OF COMMONWEALTH EDISON COMPANY

During October 2021, the Illinois Power Agency (IPA) issued requests for stakeholder feedback related to, *inter alia*, the opening of additional blocks under the Adjustable Block Program (ABP) related to projects from Equity Eligible Contractors, projects at public schools, and community-driven solar projects. In response, Commonwealth Edison Company (ComEd) offers these comments, which are intended to apply to the aforementioned projects as well as to the broader ABP.

As the IPA plans for the opening of new ABP blocks and the reopening of existing ABP blocks, ComEd urges the IPA reconsider – and eliminate – the requirement that an executed interconnection agreement (IA) be included with an application. *See* Long-Term Renewable Resources Procurement Plan, Sec. 6.12.1 (June 7, 2021). This prerequisite mandates that electric utilities commit substantial resources, and incur significant costs, related to the processing of thousands of IAs – and, correspondingly, conducting studies on thousands of speculative interconnection requests necessary to produce the IAs - despite the fact that a small percentage of such projects successfully interconnect to the utility’s system. For example, since 2017, ComEd has processed nearly 1,200 community supply IAs, but less than 5% of the projects associated with these IAs have proceeded to completion and interconnection to the grid. Each of those IAs required between one and four interconnection studies to produce them. Moreover, to the extent that such requirement was expected to be an indicia of project maturity, our experience suggests otherwise. ComEd does not see the benefit of continuing to devote material time and customer-supplied funds for processing a high volume of IAs that is wholly out of proportion to the number of projects that actually successfully interconnect.

In addition to these inefficiencies, the value of the IAs is limited – and erodes over time – due to the constantly changing nature of the interconnection queue. By way of background, the ability of a distributed energy resource (DER) to interconnect to the distribution system is limited by available hosting capacity at the location of the proposed interconnection *and* at the time of the proposed interconnection. Because the interconnection rules require that the utility assign 100% of the interconnection costs to each individual project (83 Ill. Admin Code Parts 466 & 467), costs are assigned based on the queue position of the project and are not shared. As a result, a project with the first queue position may require certain upgrades to the distribution system while the project in the second queue position may not (and the reverse may also be true). Moreover, every time the projects in the queue change (*e.g.*, a project withdraws or a project moves forward), the utility must perform “restudies” to re-estimate interconnection costs. This fluidity of the queue leads to substantial unpredictability, and the cost estimates identified in a given IA can thus become irrelevant as the queue changes. This issue is further exacerbated when projects in the queue linger in a holding pattern while awaiting an award of an ABP contract.

For these reasons, ComEd recommends that the IPA not include the requirement that an executed interconnection agreement (IA) be included with an application. Reducing the number of interconnection applications from uncertain projects facilitates orderly processing of interconnection requests and protects the rights of interconnection customers who wish to proceed.