

**RESPONSE TO ILLINOIS POWER AGENCY REQUEST FOR COMMENTS ON  
BEHALF OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION, THE COALITION  
OF COMMUNITY SOLAR ACCESS, AND THE ILLINOIS SOLAR ENERGY ASSOCIATION**

**November 9, 2021**

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The Solar Energy Industries Association, the Coalition of Community Solar Access, and the Illinois Solar Energy Association (collectively the “Joint Solar Parties” or “JSP”) appreciate the opportunity to respond to the Illinois Power Agency’s most recent solicitation for comments for the proposed approach to the new Community-Driven Community Solar category.

The Joint Solar Parties appreciate that opportunity to comment on Public Act 102-0662 (the “Climate and Equitable Jobs Act”) as it includes significant changes to the Illinois power Agency Act, including an overhaul of certain elements as they relate to the Adjustable Block Program (“ABP”). The changes include requirements that certain ABP categories reopen, or open for the first time within 90 days of the effective date of the act. The community-driven community solar projects category is a new and will open for the first time in December of 2021. The Joint Solar Parties recognize that while the community-driven community solar program draws inspiration from other IPA initiatives, it is a new program that is being opened on a compressed schedule. The Joint Solar Parties anticipate the program will be addressed in greater detail for the longer timer in the upcoming Long-Term Renewable Energy Resources Procurement Plan.

1. Do the point allocations properly weight considerations intended to “increase the diversity of areas hosting community solar projects, the business models of projects, and the size of projects”?

**JSP RESPONSE:** In terms of diversity of areas and size of projects, the IPA has previously made clear that it seeks more projects in urban and suburban locations and that it seeks smaller projects and those are directly addressed. The Joint Solar Parties also note that “diversity of areas,” in a vacuum, could address many topics from demographics to income levels but none of those appear to be addressed by the scoring system.

2. How should the Agency define community group for this selection process? Should the Agency use the definition of community-based organization used for the Illinois Solar for All Program (*see* Section 8.6.2 of the current Long-Term Plan), or should a different standard be used?

**JSP RESPONSE:** The Joint Solar Parties have no specific recommendation however the Joint Solar Parties recommend that the definition include flexibility to allow any *bona fide* local group to participate.

3. The purpose of the point awarded to projects developed in response to a site-specific RFP is to demonstrate community engagement and involvement. Are there other ways community engagement and involvement could be demonstrated beyond a site-specific RFP? How could such engagement/involvement be verified?

**JSP RESPONSE:** The Joint Solar Parties note that if a unit of local government is running the process there should be at minimum a rebuttable presumption that there is community engagement and involvement.

4. How long over the life of a community solar project should the local subscriber requirement be maintained? How should local subscriber turnover be handled?

**JSP RESPONSE:** The Joint Solar Parties believe that “local” subscriber (however defined) commitments, as long as those commitments are in force, should require maintenance. In other words, if a certain percentage (whether 50%, 90%, or 100%) of subscribers must be local for a time period, then (much like maintaining small subscriber levels for systems that made the 50% small subscriber commitment in the initial lottery) there should be some enforcement of those minimums. The Joint Solar Parties do not have an opinion on the length of the commitment, but do note that small “community-based” owner/operator groups may have challenges with any scope of marketing due to customer acquisition costs and compliance obligations of the Marketing Guidelines.

5. Should smaller community-solar projects (e.g. those below 100 or 500 kW) have a smaller area allowed for local subscribers, and if so, what would be recommendations on an appropriate geography?

**JSP RESPONSE:** The Joint Solar Parties have no specific recommendation.

6. In the now-withdrawn Draft Second Revised Plan, the Agency had proposed awarding 1 point for projects that do not take agricultural land out of production. Should this be included as a selection criterion, and why or why not?

**JSP RESPONSE:** No. To the Joint Solar Parties, this appears to be a proxy for more rural systems. The point system already incentivizes more urban systems over more rural systems. In addition, the specific community or community group through processes including land use and permitting, site selection (if there is a site-specific RFP), and RFP/bidder/negotiated agreement requirements (such as agrivoltaics—meaning farmland is not taken out of production—pollinator friendly development, or others) can influence development in a way that addresses local interests.

7. **Additional JSP Comment.** Regarding the window of 180 days for community-driven applications, the Joint Solar Parties view this as the minimum possible window for a community-driven project. The Joint Solar Parties recommend that the IPA consider a longer application window to be considered simultaneously submitted to allow communities more time to consider options and learn about the project development process. It may also be helpful for the IPA to schedule periodic Q&A sessions within the application window to ensure communities and community groups have access to the resources needed to apply.