

November 9, 2021

Re: ABP reopening, Community-Driven Community Solar

Introduction

We - the below-listed Joint Commenters - value the opportunity to provide feedback on the IPA's proposals for reopening the Adjustable Block Program. The Joint Commenters appreciate the considerable effort invested by the Agency and the Administrator to meet the challenge of developing robust proposals that enact the myriad goals of the Climate and Equitable Jobs Act (CEJA) under the constrained time period required for Adjustable Block Program Reopening. Our comments are intended to honor the Agency's statutory mandate under CEJA, while also noting the Illinois Commerce Commission's order to the Agency to consider stakeholder feedback in refining its community solar scoring approach. Given these dual mandates, we believe there is ample room for strengthening the community-driven aspect of this program.

The Joint Commenters include:

ACES 4 Youth
Central Road Energy LLC
Climate Reality Project Chicago Metro Chapter
Faith in Place
ONE Northside
Prairie Rivers Network
Sierra Club, Illinois Chapter

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”?

We do not believe the proffered point allocations adequately support community-driven community solar projects. In particular the proposal does not appear to increase the diversity of business models nor prioritize the community-driven aspect of projects. First, we do not agree that development density is indicative of a community-driven process. Nor is project size, and in fact favoring smaller projects may be detrimental to community-based initiatives.

To demonstrate our concern with prioritizing smaller projects we look to a 1 MW community solar project in Cleveland, Ohio administered by the Hough Block Club, a CBO in the Hough neighborhood. The project will use a “partnership flip” model where the organization will split costs with a solar developer, with the option to buy out the developer's share at the end of the agreement. Hough residents are eligible for connection via subscription using virtual net metering. They will also be able to make upfront investments — and purchase shares once the Block Club has achieved full ownership. Local businesses will also be eligible for subscriptions.

The goals here are not only to lower utility bills but to produce energy in excess of that required by the subscribers to allow shareholders to build equity in the project that they can sell-or borrow against for home improvements. The point is that communities may decide that bigger is better, and would allow them to build an income generating asset.

The RFP approach as written could also be problematic as it seems highly subject to gaming by a developer writing the RFP for a municipality it wants to develop in.

Instead, we encourage the agency to prioritize factors such as Community Based Organization (CBO) development or co-development of the project and/or RFP, CBO administration and operation of the project, CBO majority ownership (perhaps through a partnership-flip model), and/or CBO project site ownership. Prioritization of projects developed in response to a site-specific RFP should only be awarded where the RFP was authentically co-developed in partnership with a CBO. We support some degree of a “local” subscriber but do not believe projects must require 100% local subscribers to be prioritized and again, urge highest prioritization of CBO involvement as noted above.

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?

Section 8.6.2 Community–Based Organization Network (NCBON) defines a community-based organization as one in which:

- The majority of the governing body and staff consists of local residents,*
- The main operating offices are in the community,*
- Priority issue areas are identified and defined in tandem with residents in the community served by the CBO,*
- Solutions to address priority issues are developed with residents, and*
- Program design, implementation, and evaluation components have residents intimately involved, in leadership positions.*

We support use of the above definition with the important edits noted above.

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?

CBO engagement can be verified via affidavit and documentation demonstrating which parties will serve the various roles in project development and administration, and where project and site ownership resides or will reside in the future.

Ongoing partnerships and collaboration with a community group should be required for prioritization. This could take the form of stakeholder engagement through focus groups, community meetings, etc., in collaboration with local community groups. Documentation of these events and verification by community groups could then be used as a metric of community engagement and involvement.

New Jersey offers another useful example of scoring for community engagement in its Community Solar Energy Pilot Program. In that program, bidding processes (including, but not limited to RFPs), partnership with local governments/community groups (where a formal agreement is in place and there is evidence of ongoing partnership), and land ownership by local governments/community groups are all used as indicators for scoring community engagement points.

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?

We believe that a requirement that 50% of subscriptions is an appropriate percentage to prioritize and that that subscription level should be maintained for the 15 year life of the REC contract. Subsequent to that, the project owner (hopefully a CBO) can determine the subscription requirements.

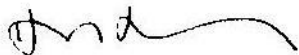
5. Should smaller community-solar projects (e.g., those below 100 or 500 kW) have a smaller area allowed for local subscribers, and if so, what would be recommendations on an appropriate geography?

It seems most appropriate to allow the CBO to determine the appropriate geography.

6. In the now-withdrawn Draft Second Revised Plan, 4 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?

We do not believe this issue is relevant to community-driven community solar projects and opposed the award of points for projects that do not take agricultural land out of production.

Thank you for your attention.



Kim Knowles on behalf of Joint Commenters