

From: [REDACTED]
To: [IPA.Solar](#)
Subject: [External] Cultivate Power - Response to TCS Scoring Strawman Proposal Feedback Request
Date: Friday, September 16, 2022 3:08:15 PM

Dear Sir/Madam,

Please find Cultivate Power's responses to the Illinois Power Agency's request for comments on the Traditional Community Solar Project Selection Strawman Proposal dated September 1, 2022. The comments below are ranked in order of priority with the first point being the most important.

- 1. Minimum Requirement to Enter the Procurement:** In addition to the Minimum Point Threshold for Waitlist Acceptance, Cultivate Power believes that setting a 5-point threshold to enter the procurement itself using the IPA's previously published scoring criteria will focus awards on the best projects possible while staying true to the first-come-first-served nature of the program.
- 2. Siting:** Cultivate Power believes that both R3 and Environmental Justice areas should be included in the Siting category given that the definition of "eligible person" in Section 1-10 of the IPA Act allows either environmental justice or R3 areas to qualify. We believe the intent is to prioritize development in both as they follow the spirit of the law by incentivizing solar development in geographical areas that have been historically excluded and in need of redevelopment.
- 3. Minimum Point Threshold for Waitlist Acceptance:** CEJA sends a clear message with regards to its intent to award revenue contracts to projects in underserved, overburdened, and geographically diverse areas whilst incentivizing developers to have bigger impacts on the communities they are working in. We believe a five-point waitlist threshold will ensure those goals are met and enable greater longevity and purpose for CEJA and support that provision.
- 4. Interconnection Status 4b:** Cultivate Power supports awarding 2 points for a project with a top-two queue position among community solar projects on a substation on the date of the application as it is a more useful proxy for development potential than having the interconnection agreement itself. Giving more importance to queue position is likely to reduce the number of projects sitting in queue and seeking interconnection agreements (IA) that have low queue positions for the sole purpose of obtaining higher IA points. We do not believe feeder position should be utilized in this scoring category because it is not a reliable indicator of project viability or project maturity. A project can often be first in queue on a feeder that requires lengthy upgrades or is assigned a costly dedicated feeder.

Cultivate Power requests clarification that applicants without an executed Interconnection Agreement but with a high queue position (1st or 2nd in queue) will receive 2 points under Section 4.b. We believe this is the intent of the scoring system as written but seek confirmation of our understanding. An interconnection agreement should not be a prerequisite to receiving these two points because utilities can provide a project's substation queue position (or in the case of ComEd, publish the project's queue position on their Interconnection Queue) once the project's first study is completed. This queue position will either stay the same or improve over the course of the project's study process if preceding projects are interconnected or withdraw from queue. Therefore, a first or second queue position can be demonstrated by projects at the time of Part I application submission, and projects without an Interconnection Agreement should be eligible for these two points intended to award less-speculative interconnection.

5. **Built Environment:**

- a. **Agrivoltaics:** Cultivate Power perceives the provision according to which 75% of the project footprint must feature agricultural production at the time of project energization as restrictive due to the relative novelty of this use in the US and especially in Illinois and its increased construction and O&M costs. Agrivoltaics can significantly increase a project footprint and a 75% minimum area of agricultural production would further contribute to this project footprint increase. We believe applications up to 50% of the project's footprint are currently reasonably attainable and are open to IPA increasing this threshold in the following LTRPPP assuming a proven market response.
- b. **Dual Use:** Cultivate Power encourages the definition of dual use be incorporated into the Built Environment Section in addition to the Agrivoltaics definition and believe sheep and cattle grazing should be included in one of these definitions in this category. There are environmental, spatial, and local economic benefits of solar grazing. Grazing will help involve a greater number of landowners and agrarian business owners in project development.

We greatly appreciate all the work the IPA and program administrator have put into the LTRPPP to make this program a great success and remain at your disposal for any further questions.

Best Regards,

Nico Galletout
Founding Member, Cultivate Power



