



Illinois Power Agency Director Anthony Star,

New Leaf Energy, Inc. (NLE) appreciates the effort and consideration the Agency has given to developing the 2022 Long Term Plan and the Traditional Community Solar Project Scoring Strawman, and in the interest of ensuring a healthy program and market, now takes this opportunity to provide recommendations on the proposed scoring criteria. NLE participated in the development of comments submitted by the Joint Solar Parties (JSP) but given the importance of the Traditional Community Solar category for industry stakeholders and the state, NLE wishes to submit separate comments highlighting certain recommendations.

Sincerely,

Sarah Wochos
Senior Director of Policy and Business Development
New Leaf Energy, Inc.



NEW LEAF ENERGY'S RESPONSE TO ILLINOIS POWER AGENCY REQUEST FOR COMMENTS

NLE is aligned with many of the viewpoints presented by the Joint Solar Parties' (JSP) set of comments and wishes to highlight the following recommendations.

Minimum Score Requirement for Waitlist and Interconnection Recency

NLE agrees with the JSP in recommending that the Agency decrease the waitlist minimum score requirement from 5 points to 4 points, while simultaneously decreasing the maximum fractional points available for interconnection recency from 1 point to 0.99 points. Taken together, these two changes would maintain the requirement in the ICC's Final Order that the minimum score requirement be higher than the points available for interconnection. This update also turns the interconnection recency value into a tiebreaker value only, since there are no other opportunities to earn fractional points in the scoring criteria. Under this scoring framework, developers would be required to meet at least one additional policy objective beyond any points available for interconnection criteria. However, NLE believes the competitive nature of the Traditional Community Solar category will incentivize developers to explore any reasonable opportunities to meet multiple additional policy objectives outlined by the scoring criteria, so many projects may still score well above the proposed 4 point threshold.

Interconnection and Project Maturity

The Agency expressed interest in alternatives to substation queue position that could provide a better means for sorting projects by development certainty. NLE agrees with the JSP in recommending that a project should receive maximum points available for the criterion by verifying either a first or second queue position on the substation OR providing a confirmation from the interconnection agreement that the project faces no contingent upgrades, regardless of where that project falls in the substation queue. While substation queue position for most projects is a good proxy for project readiness, it is not a perfect fit. Each substation has different capacity and attributes, meaning that at some substations there are projects further down in the queue that may face no contingent upgrades, therefore finding themselves in a more certain development position. By including projects with no contingent upgrades within this point category, the IPA would move closer to resolving the imperfect proxy problem of using substation queue position as a sign of development certainty.

Scoring Timeframe

NLE agrees with the JSP in recommending that the Agency should identify a specific timeframe for scoring projects. Developers will need to quickly make business decisions regarding their projects, whether they are awarded program capacity or not. A clear, expeditious timeframe for scoring would provide developers with necessary certainty while a drawn out scoring process would create inefficiencies in the market. NLE therefore agrees with the proposal that the Agency provide one week for the Program Administrator to score projects before notification of any deficiencies to developers,



followed by one additional week to serve as a curing period before scores are finalized and published. To lessen the administrative burden on the Agency imposed by an expeditious scoring timeline, NLE similarly agrees with the JSP proposal that the Agency could allow projects to submit earlier than the November 1st program year opening but still count towards “day one” submissions within the first come, first served framework. This scenario would allow the Agency and the Program Administrator additional time on the front end to score what may be a large number of project applications.

Agrivoltaics

NLE agrees with the JSP in recommending that livestock grazing and feeding should be considered part of the agrivoltaics definition and that the Agency should lower the threshold of agricultural activities required for a project to meet the agrivoltaics criterion to 50% of the array footprint. The inclusion of grazing is supported by language in the Illinois Statute cited by the IPA (505 ILCS 5/3.02), where the definition for “crops, livestock, and livestock products” includes the language, “...the keeping, raising or feeding of livestock or poultry.” It also seems reasonable that grazing activities would align with community understanding about what is considered an agricultural activity. NLE notes that while agrivoltaics is a burgeoning opportunity for the industry, farmers, and the state, it does increase the costs of developing and maintaining a project. In order to encourage more initial uptake of agrivoltaics within the industry, the Agency should consider lowering the threshold footprint of the project that would be required for agricultural activities in order to meet the criterion.

Conclusion

NLE thanks the Agency for its continued efforts to manage the Adjustable Block Program while implementing new elements required by the passage of Public Act 102-0662. NLE looks forward to further guidance from the IPA and the continued success of the program.