NEXAMP RESPONSE TO ILLINOIS POWER AGENCY REQUEST FOR STAKEHOLDER FEEDBACK ON THE TRADITIONAL COMMUNITY SOLAR PROJECT SELECTION STRAWMAN PROPOSAL

SEPTEMBER 16, 2022

Nexamp appreciates the opportunity to respond to the Illinois Power Agency's (IPA) Traditional Community Solar Project Selection Strawman Proposal Request for Stakeholder Feedback.

Nexamp is a vertically integrated clean energy company based in Boston, Massachusetts. Nexamp manages the complete project lifecycle of solar plus storage assets from design and construction to customer acquisition and management, operations, and maintenance. Since 2019, Nexamp has been proudly offering its flexible community solar program to Illinois residents and small businesses. We believe that all Illinois residents – regardless of where they live – should be able to benefit from clean energy savings.

Nexamp's commitment to the Illinois community solar market is significant. To date we have invested in nearly 50 MW of community solar projects across the state. Our operational assets serve over 5,000 residents and small businesses through the Illinois Shines Program. An additional three projects currently serve over 800 customers in the Illinois Solar for All Program. As a steering committee member of the Joint Solar Parities (JSP), Nexamp is supportive of the comments filed by the JSP. We submit these comments to provide an additional point of view on the IPA's Strawman Proposal and to raise additional questions we have.

Built Environment

Disturbed Land

There is not currently a map of disturbed land in Illinois which makes it difficult to qualify where disturbed land is in the state. The IPA should include a requirement for verification of the original source of the disturbance, through a property owner affidavit, news article or some other form of documentation. In addition to satellite imagery or a photograph of the site.

Agrivoltaics or Dual-Use Solar

In the IPA's definition of Agrivoltaics, "at least 75% of the project footprint must feature agricultural production at the time of project energization". Nexamp recommends lowering the percentage and applying it to the footprint of the array. Agricultural production is defined as "crops, livestock, and livestock and aquatic products". The production of aquatic products, or Aquaculture, uses much less land than traditional livestock[1]. To ensure aquaculture is permitted the percentage of project footprint would need to be much lower. Additionally, "at the time of project energization" should be changed to "within the first year of operation". Agrivoltaics are new to the Illinois ABP Program. We recommend giving developers time to properly plan and implement their agrivoltaics solutions. This type of integrated system is generally more expensive to build and maintain than a traditional system due to the need for additional materials and farmer compensation.

We recommend that apiculture[2], or beekeeping, should be permitted under the definition of

[1] National Academy of Sciences

[2] See U.S. Department of Agriculture Apiculture definition and resources.

Agrivoltaics. Apiculture includes the maintenance of honeybees and hives which provide farmers and hobbyists with a variety of enterprises including the production of beeswax, honey, and other bee products, crop pollination services, and the sale of bees to other beekeepers. The Illinois Department of Agriculture (IDOA) has developed an Illinois Bees and Apiaries Program[3] which is designed to assist beekeepers throughout Illinois with the management and protection of honeybee colonies. Under the Illinois Bees and Apiaries Act [4], IDOA inspects honeybee colonies for free as a service to the beekeeping industry. The purpose of the inspections is to determine the general health of honeybee colonies. During an inspection, IDOA Apiary Inspectors closely examine beehives to detect diseases and pests and provide advice on needed treatments. Nexamp recommends that an attestation of the commitment to apiculture be provided at the Part I submission, with a requirement to register the colonies with the Illinois Department of Agriculture within the first year of the project's operation.

Nexamp recommends that grazing be considered agrivoltaics. Solar grazing is the use of livestock to maintain vegetation under solar panels and is one practice under the larger umbrella of agrivoltaics.[5] Solar grazing is beneficial for farmers, solar companies, and the environment.[6] Solar grazing keeps farmland in farm production and provides numerous benefits[7]. Solar grazing contributes dairy, meat, and wool to regional markets, reduces or eliminates the need for mowing at solar sites which reduces emissions, and the vegetation at solar sites becomes a source of nutrition and a pasture for livestock.

Developer Cap

Some additional clarity on when the IPA will be determining common ownership for the 2023 Program awards would be helpful. Is the 2023 ordinal waitlist going to account for the Developer Cap or will common ownership be reviewed again in June 2023 and the cap will be applied to the new program capacity?

Any additional clarity on the extent of the lookback and the developer cap period would help developers plan transactions accordingly.

Energy Storage

DC/AC Ratio
On Page 75 of the Adjustable Block Program Guidebook (August 29, 2022) it states the DC/AC ratio is 155%. We recommend that this percentage be increased to 185%.

The DC/AC ratio, also known as the inverter load ratio (ILR), should be increased to accommodate DC coupled energy storage. A higher ratio would allow the overall system to deliver more renewable energy that would normally be lost at the inverter. The stored energy can then be used during a non-peak time when the system will have less power production from the PV system. A higher DC/AC ratio would also be beneficial for arrays that are north facing or heavily shaded due to site restrictions and space restraints.

---

[3] See Illinois Department of Agriculture Bees and Apiaries Program.
[4] (510 ILCS 20/), Bees and Apiaries Act
[5] Cornell College of Agriculture and Life Sciences, Solar Grazing: Livestock as Landscapers
[6] USDA, Agrivoltaics, Coming soon to a Farm Near You
[7] American Solar Grazing Association

Additional Energy Storage Questions

1. If we apply through the ABP as combined solar and storage and decide to just pursue solar, will the project get kicked out?
2. What if we apply for a project as solar and then want to add storage at a later date, potentially even after the project is operational?
3. Since the Operating rules for storage are still unknown, what happens if the rules are cost-prohibitive to the project, causing us to want to pull the storage off of the project and just move forward with solar. How would that affect things?
4. When we apply to the ABP as a paired project, if the solar IA is executed but the storage portion is still in the interconnection queue, is this project still eligible?
5. If the project is AC-coupled, can we still submit it with solar to the ABP? Would we be able to use the battery for wholesale opportunities and still be eligible for RECs for the production that is from solar?