



SolAmerica Energy Feedback on Traditional Community Solar Project Selection Strawman Proposal

SolAmerica Energy applauds the on-going work of the IPA to create an effective approach to advancing renewable energy development in Illinois. Further, we appreciate the opportunity to provide feedback on the traditional community solar project selection strawman. Given the likelihood that projects bid into the program on November 1 could total multiple years' worth of program capacity, we believe it is critical to create an approach now that maximizes desired project outcomes without slowing deployment.

We believe that rooftop and other non-farm-based projects possess beneficial characteristics sought by a wide collection of stakeholders. These include, but may not be limited to:

- **Avoidance of potential land use conflicts (real or perceived)** involving farmland or viewshed. While we strongly support solar development on agricultural land, over-reliance on farms for solar program development can further fuel public opposition. Every opportunity should be made to ensure that solar development includes sites that are out of view or in a more developed context.
- **Project solutions with a smaller material, and therefore, environmental footprint.** Rooftop systems tend to require less materials through avoidance of piles, fencing and concrete foundations as well as use of less material-intensive racking.
- **Increased likelihood of locating projects in more urban areas, a widely shared goal in reaction to the first round of the community solar program.** This can help bring needed tax revenue and investment to urban communities. Further, it can help raise the visibility of project subscribership opportunities to urban communities. Lastly, it helps to ensure a better pairing of generation with load which can lower average interconnection costs while creating a more robust grid.

As proposed, the Traditional Community Solar scoring approach would likely put rooftop projects and, perhaps, other non-greenfield projects at a significant disadvantage. The result will almost certainly be a repeat of the previous program round—a community solar population dominated by projects on agricultural land. While SolAmerica sees use of agricultural land as critical for achievement of Illinois' renewable energy goals (in fact, we are a developer of agricultural projects in Illinois and elsewhere) efforts should be made to ensure that non-greenfield projects are not lost in the flood of farm-field projects.

Currently, interconnection scoring elements carry too much weight relative to built-environment scoring elements. This is a problem because the far larger collection of farm field projects can be expected to have greater momentum regarding interconnection compared to rooftop projects. Per the strawman, an agricultural project with an existing ISA has the potential to position far better than a rooftop project without one. If this were a new program under which no project type had any relative momentum, heavy weighting for interconnection would not be an issue.

Rooftop projects, however, are not starting on an equal footing compared to farm field projects with respect to interconnection. Given the ready availability of usable farmland and ease of gaining site control, farm projects became the dominant model in the early history of the program. Their remains a very large population of farm field projects not selected by the initial program rounds. While we can expect a large proportion of these farm projects to have interconnection momentum, we cannot reasonably expect this



for what will almost certainly be a much smaller population of rooftop projects. In fact, until very recently, rooftop projects had little encouragement. Only in its Brief in Reply to Exceptions dated June 24, 2022, did it become clear that the IPA supported inclusion of rooftop projects in built-environment scoring. Prior to that, and perhaps by accident, it appeared that rooftops would be specifically handicapped due to their inability to reasonably include things like pollinator habitat or agrivoltaics that could be captured by farm projects. That is, had one inferred scoring from the IPA's Brief on Exceptions dated June 17, 2022, rooftops would have received a zero score. Further, had one immediately taken steps to file an interconnection agreement after June 24, it is unlikely they would have a signed ISA by November 1.

While the IPA and its program administrator have consistently, and rightly, advised the developer community not to make investment decisions on draft proposals, it seems unreasonable for rooftop developers to be penalized for not committing time and money towards pursuit of an interconnection agreement for a project type that had no encouragement. Given the above, relatively few rooftop projects can expect to bring a signed interconnection agreement to the November 1 program relaunch.

Additionally, we would simply like to note that, in our view, the over-weighting of interconnection makes it a de facto requirement. In response, the program should expect the developer community to file interconnection applications as early in the development process as possible, for as many sites as possible, for as long as any such scoring remains. This fuels the over-study burden issue which IPA has addressed in the docket. We view this development as inconsistent with the decision to remove the de jure requirement that traditional community solar have a signed ISA.

Rooftop projects without an interconnection agreement are not likely to be less "mature" than farm field projects with an interconnection agreement. We site the following reasons:

1. **Even without an interconnection requirement, the program presents a variety of other gating items to help ensure project maturity.** These include detailed project information, site control and risk of deposit loss which indirectly encourages obtainment of non-ministerial permitting and other forms of project de-risking. In its May 11, 2022, response to objections, IPA said the following:

Further, the Agency believes—and has directly observed—that a project that has satisfied the above criteria but has also entered the interconnection queue to receive an interconnection agreement is no more "mature" than one that has not.

2. **Rooftop projects can offer significant development advantages.** Rooftop projects tend not to require conditional use permitting. Further, for a developer to bid such a system into the program, they still need site control and it is reasonable to assume that they would have already performed structural analysis to ensure that the rooftop can carry the weight of the project. Further, as mentioned above, rooftop solar tends to better pair generation with load (which typically results in a reduced cost of interconnection), improving the economic viability of projects.



We can create a space for this desired project type without slowing annual deployment of available capacity. Here is what we propose.

1. **Award 4 points to any project that satisfies elements 1.a. or 1.b. under the Built Environment category.** This would ensure that farm field projects, with their expected interconnection advantage, cannot entirely shutout rooftop or similar projects such as parking canopy or projects on disturbed land. This adjustment could be temporary, for example, until the next program year, allowing rooftop projects the ability to catch up to other project types regarding interconnection momentum.
2. **Make the maximum scoring potential for the interconnection category 2 points + fractional points.** This can be accomplished by changing 4.b. to 1 point and by making the max score for item 4.c. 0.99 points. Without this change, there will likely still be too many farm field projects that eclipse rooftop projects given that pollinator habitat, while highly commendable, will effectively be an automatic point for all ground-mount projects. Please note that SolAmerica considers itself an early adopter of combining ground-mount solar with pollinator habitat and seeks to include it on all projects wherever feasible. Further, it should be noted that items 4.a. and 4.c. are already somewhat duplicative in that they provide points for having an agreement.
3. **Adjust the minimum score to 4 points,** allowing rooftop projects or other projects that score under 1.a. or 1.b. of the Built Environment category to join the waitlist. We believe rooftop projects on their own, without any other qualifiers, deserve a place in the program due to the numerous benefits they offer.

Given the smaller pool of viable rooftops relative to agricultural land, we believe the above measures will not significantly impact the ability of farm field or other project types to participate in the program. What this would likely do, however, is ensure that a smaller number of rooftop projects have a fighting chance and propel much desired project diversity. We take encouragement from the IPA's commentary from their May 11, 2022, reply to objections:

To the Agency, the best "additional method" for prioritizing projects is one that best supports other important policy objectives. Evidence of the importance of those policy objectives can be taken from the IPA Act, which emphasizes geographic diversity of projects, brownfield site remediation and development, Equity Eligible Contractor participation, and other worthy goals. By contrast, the IPA Act includes no references to supporting projects based on the recency of an interconnection agreement.

This final adjustment to scoring will be entirely determinant. The IPA can create a community solar program that realizes the project characteristics that it and a wide collection of stakeholders have long advocated for without jeopardizing ability to deploy annual capacity amounts. We greatly appreciate your consideration of this feedback.