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United States

TO: Illinois Power Agency
Via Email: IPA.Solar@illinois.gov
RE: Amp Energy - Response to TCS Scoring Strawman Proposal Feedback Request
DATE: September 14, 2022

Dear IPA,

We respectfully submit the following comment on TCS Scoring Strawman Proposal.

Specifically, our comment relates to the scoring in Section 4. This section provides certain scores to applicants having a executed/valid interconnection agreement at the time of program application. Any and all points awarded under this Section (i.e, 4a, 4b, and 4c) require an executed/valid interconnection agreement.

While we are not opposed to including these interconnection attributes in the scoring criteria, we are opposed to such attributes being included in the scoring criteria for applications submitted in the initial opening of the Traditional Community Solar block on November 1, 2022.

It should be recalled that the March 21, 2022 version of the 2022 Long-Term Renewable Resources Procurement Plan stated on its page 187 that:

“An executed interconnection agreement will no longer be required at the Part I application for community solar projects”

Appended to this statement was its footnote 309. This footnote implied that the issue of whether an executed interconnection agreement would be required in the Part I application had been heavily considered by the Agency; that the Agency came to a negative determination; and that the agency was therefore seeking alternatives to demonstrate project maturity.

“The Agency contemplated alternative project maturity requirements for community solar projects but was not able to settle on a suitable and comparable replacement for an executed interconnection agreement. The Agency is open to consideration of any proposals intervenors to in the Plan approval proceeding can offer on how project maturity requirements may be upheld in an efficient manner”

Given this guidance, many potential applicants (very understandably) would not have proceeded with submitting interconnection applications in 2022 so as to obtain an executed interconnection agreement that was not required under the March 21, 2022 draft guidance.

That so many points under Section 4 of the TCS Scoring Strawman Proposal are now awarded to projects with executed/valid interconnection agreements places these applicants at a

significant disadvantage – a disadvantage caused by simply following the draft guidance of March 21, 2022.

To correct this situation and ensure that all applicants are treated equitably by providing sufficient time to obtain executed/valid interconnection agreements, we recommend that Section 4 not apply in the scoring for the November 1, 2022 application window but would begin to apply for the June 1, 2023 application window and all application windows thereafter.

Accordingly, we offer the following edit to the TCS Scoring Strawman Proposal as a footnote to Section 4 header and a revision to 4(C)III:

4. Interconnection Status – Maximum of 4 points permitted*

***This section will only apply to projects which apply on June 1, 2023 or later**

4(C)III - Projects applying on June 1, 2023 with an interconnection agreement effective date....

Thank you for your time and attention to our comment.

Chris McDermott
Senior Director – US Markets and Strategy