

Traditional Community Solar Clarifications October 21, 2022

Minimum Point Threshold for Waitlist

1. Is a Traditional Community Solar project required to meet the minimum waitlist threshold score to secure capacity within the Program?

Section 1-75(c)(1)(K)(iii)(1) of the IPA Act requires the Agency to select Traditional Community Solar (“TCS”) Category projects on a first-come, first-serve basis, and allows the Agency to utilize additional methods to prioritize projects submitted at the same time. As explained in the Agency’s 2022 Long-Term Renewable Resources Procurement Plan, the Agency has interpreted “at the same time” to mean projects submitted “on the same day.” The TCS Scoring Criteria will be utilized to prioritize projects submitted “at the same time” – that is, on the same day – when the collective size of project applications in MW submitted to the Program exceed the capacity available in the Program.

*For the 2022-2023 Program Year opening on November 1, 2022, there is a total of 150 MW of capacity allocated to the TCS category, with 48 MW designated for Group A and 112 MW designated for Group B. **The Agency expects that first-day applications will exceed the capacity allocated for both Groups, and that the scoring mechanism will be required to prioritize applications across all applications within the TCS Category.** As explained in the Plan, the Agency will maintain the “first-come, first serve basis” outlined in the IPA Act, and will prioritize projects received on the same day in accordance with the scoring criteria. This means that project applications will be scored and ranked by the date the application is submitted. Therefore the highest-scoring project submitted on November 2, 2022, will be ranked below the lowest-scored project that met the minimum threshold on November 1, 2022.*

The Agency will only score projects beginning on the day that capacity for the Group/Category is exhausted; therefore, it is possible, though unlikely, that a project that does not meet the minimum waitlist threshold score could obtain a REC Contract. By way of example, if on November 1, 2022 (“Day 1”), projects totaling less than 48 MW are submitted to TCS Group A, the IPA and its Program Administrator would not score the applications submitted on November 1 for Group A. Under this scenario, all Day 1-submitted projects would be eligible to receive a REC Contract, provided that they meet program requirements and are ultimately Part I approved. If, on Day 2, projects submitted to TCS Group A would cause the 48 MW threshold to be exceeded, all Day 2-submitted projects would be scored, project applications which failed to meet the minimum threshold would be rejected, and remaining projects would be rank-ordered from highest to lowest score. This process would repeat for applications submitted on Day 3, and so on for all projects submitted on subsequent days prior to the close of the Delivery Year on May 30, 2023. As explained above, the “first-come, first-serve basis” will be maintained, with scoring used to prioritize projects received on the same day. Therefore, under this example, Day 2-submitted projects ranked from highest score to lowest would sit atop the waitlist. Day 3-submitted projects which meet the waitlist minimum score will also be ranked by score from highest to lowest, with the highest Day 3-submitted project waitlisted next after the lowest-scoring Day 2-submitted project. Projects would continue to be waitlisted by date of application and prioritized within that date by score.

ILLINOIS POWER AGENCY

2. If a project applies and does not meet the minimum point threshold to be placed on the waitlist, can the project reapply at a later date upon fulfilling the minimum requirement? Is there any fallout from being rejected for being below minimum threshold score? Can an application be supplemented at a later date?

Only the documentation provided at project application submittal will be taken into consideration for the scoring process and cannot be supplemented to gain a higher score at a later time. Projects that have been submitted, reviewed, and scored by the Program Administrator will not receive a revised score due to changes in project attributes which occur after application submission. Projects that do not meet the minimum score of 5 points to receive a spot on the waitlist may reapply at a later date, either within the same Delivery Year or in a subsequent Delivery Year. Upon re-application and re-scoring, if the project meets the threshold, it will be added to the waitlist as of the date of the re-application. Application fees will be required for re-application.

3. If applications are submitted which do not meet the minimum score required for the waitlist, but capacity in the category is available, will those projects be selected?

Yes. The waitlist scoring will be used beginning on the day when applications received exceed the available capacity in the Traditional Community Solar category. That is, should first day project applications not exceed category capacity, then all applicant projects which otherwise meet the category requirements may qualify for a REC Delivery Contract.

Siting

4. In order to figure out if county (or a township within Cook, DuPage, Kane, Lake, McHenry, or Will County) does not have a contracted community solar project, will there be any publicly available list/map or guidance on what other counties don't have a project that will qualify?

Project application reports housed on this page: <https://illinoisabp.com/project-application-reports/> can be used to verify this information. Please use Report #2 for the purposes of this criterion.

5. What resources can be used to verify if there is not yet a Community Solar project sited in a county (or a township within Cook, DuPage, Kane, Lake, McHenry, or Will County)?

Project application reports will be used to verify this information. Download the project application reports here: <https://illinoisabp.com/project-application-reports/>

6. If an Approved Vendor submits multiple projects sited in the same county, are all submitted projects eligible for points under the criterion of being the first Community Solar project sited in a county (or a township within Cook, DuPage, Kane, Lake, McHenry, or Will County), or only the first application submitted?

All projects that are submitted in county without an already ICC-approved project may receive the points offered for this criterion. The points for this criterion are not allotted based on applications submitted or applications pending Part I review.

ILLINOIS POWER AGENCY

7. How might an Approved Vendor prove the ownership of land/property where a project is to be sited by a non-profit?

The Agency will accept various forms of documentation for demonstration that this criterion has been met, as long as ownership can be proven through such documentation, including but not limited to: bill of sale, property deed, tax documents, etc.

Equity Eligible Contractors (EECs)

8. Is there an available list of EEC certified designees?

There are no certified EEC Designees at this time, but a list will become available at <https://illinoisabp.com/find-a-designee/> when Designees become certified.

9. Does procurement of materials (e.g. panels, racking, inverters) contribute to the percentage of "REC contract value"?

For purposes of this category, the IPA will assess the percentage of the REC contract value spent utilizing EEC certified Designees to be taken through a comparison of a) the value of the REC Delivery Contract (expected number of REC deliveries x REC price across the contract term) and b) the demonstrated value of agreements for the project development work to be performed by EEC-certified Designees in developing the project, with those agreement submitted to the Program Administrator at the Part II stage. If the latter value meets or exceeds 50% of the former value, then that project will be deemed to have met this criterion.

An Approved Vendor may not utilize an EEC Designee for the sole purpose of procuring materials. Material costs may count toward the percentage of the REC contract value, but those material costs must be tied to the EEC Designee that is performing the electrical, construction, or other site specific project development work that is related to those materials.

10. What is included in "work on the project" as noted in criteria 3.c and 3.d in the Traditional Community Solar Project Selection – Final Guidelines document?

For purposes of criteria 3.c and 3.d within the Traditional Community Solar Project Selection – Final Guidelines document, work on the project was intended to be limited to work outlined in definition for "project development work", as defined in footnote 11 of the document. The Final Guidelines were updated on October 21, 2022 to clarify this item.

Per the definition of project development work, ongoing operations and maintenance over lifetime of REC contract is not included. The work must be related to expenditures within the definition of project development work through Energization/Part II application approval of project.

11. Do we have any clarity on the ability for an EEC designee to subcontract work to non-EEC approved contractors?

EEC certified Designees may work with an Approved Vendor that is not EEC certified, but this would make projects submitted by that non-EEC certified Approved Vendor ineligible for EEC Category.

EEC certified Designees are permitted to utilize nested Designees/subcontractors, but those Designees must be EEC certified in order to receive points for utilization of EEC Designees.

12. Does the EEC Designee need to be named in the Part I application, or can the Approved Vendor simply commit to using any EEC Designee?

The EEC Designee(s) must be named at the Part I application. Applicants may demonstrate this commitment in the application by providing documents including but not limited to: letter of intent signed by all parties, contract, other legal agreement between parties, etc.

As the timeline between the release of the final scoring guidelines and the opening of the Traditional Community Solar application was truncated this program year, the Agency will allow for EEC Designees where an EEC application has been submitted but is pending approval to satisfy this requirement. If this allowance is to be utilized, the named Designee must be approved as an EEC prior to the scoring period for applications.

Built Environment – Disturbed Land

13. What qualifies as “disturbed land”?

Applications for projects seeking to obtain points for being sited on disturbed lands will be evaluated to determine whether they meet the criteria outlined in the definition provided in footnote 1 of the scoring criteria. The Program Administrator will evaluate whether the project is sited on land that is (1) in an altered state, (2) in transition from one cover type (under USGS definitions), and (3) due to disturbances by mechanical or non-mechanical means. All three of these elements must be met to qualify as “disturbed land.” As explained in the scoring guidelines, mechanical disturbances may include forest clear-cutting, earthmoving, scraping, chaining, and other similar human-induced changes. Non-mechanical disturbances may be caused by wind, flooding, fire, animals, or other similar phenomenon. Approved Vendors will need to submit documentation which demonstrates that the land disturbances existed prior to the development of the site for installation of the solar project. Examples of supporting documentation that will be considered are outlined in footnote 1 of the scoring guidelines.

The Agency notes that “disturbed land” differs from “developed land,” which was not included among the scoring criteria pursuant to the direction of the ICC in approving the Long-Term Plan. Instead, the IPA has incorporated scoring criteria which encourages the development of community solar projects on rooftops and other structures.

The Agency will review submitted materials as it relates to qualifications for disturbed land on a case-by-case basis. As each site will differ, the Agency cannot provide a definitive list of examples that will qualify for points under this criterion. Points will only be awarded for this criterion if the definition of disturbed land is satisfied by the documentation provided.

The Agency will review submitted materials as it relates to qualifications for disturbed land on a case-by-case basis. As each site will differ, the Agency cannot provide a definitive list of

examples that will qualify for points under this criterion. Points will only be awarded for this criterion if the definition of disturbed land is satisfied by the documentation provided.

Built Environment - Conservation Opportunity Areas

14. Will rooftops be required to commit to pollinator friendly in order to avoid the COA subtractor? The Illinois Solar Pollinator Guidelines do not really contemplate rooftop arrays. *As the intention of the Conservation Opportunity Areas (COAs) subtractor is to ensure that land that has the potential to be utilized for conservation purposes is not prioritized for solar development, systems that are sited on buildings or structures that are already built within COAs will not be subject to the COAs subtractor.*

15. How does the scoring for the COA subtractor work in conjunction with the other points offered in the Built Environment section?

The ICC Final Order on the Agency's 2022 Long Term Plan states contaminated or disturbed land (+pollinators) would negate the COA subtractor, thus the demonstration of either or both of these criteria would satisfy the COA subtractor. In the original version of the Final Scoring Guidelines document, there was a typographical error that omitted "disturbed land" in criterion 1.e. The Final Guidelines were updated on October 21, 2022, to correct this inadvertent omission.

As an example, a project sited on disturbed/contaminated land that also commits to pollinator friendly habitat will not be subject to the COA subtractor, so scoring for the Built Environment for this project would be 3 points if no other criterion within the Built Environment section were sought.

Built Environment - Agrivoltaics

16. How will the IPA require proof that 50% of the footprint of an array is being used for grazing?

The Part I application must include a description demonstrating the planned agricultural use of the site, and explanation of the viability of that use, and an accompanying attestation of the intent to utilize agrivoltaics throughout the lifetime of the REC contract. Firm demonstration of active agricultural use (such as grazing) is required at Part II. Documentation at Part II should include proof that agrivoltaics plan was followed, or any updates made to the plan through development of the site for grazing. Agrivoltaics plans submitted in the Part I application should include documentation described in Appendix B of the October 2022 version of the Program Guidebook. Please review details on a permissible agrivoltaics plan, including grazing requirements, in Appendix B of the Program Guidebook.

For the purposes of grazing, the Agency understands that round-the-clock grazing is not the norm and animals occasionally must be relocated in order to allow for grazed material to grow. A schedule/plan that outlines the times the herd will/will not be grazing should be outlined within the agrivoltaics plan. Additional aspects of grazing operations that could be included in the agrivoltaics plan are: information on pasture where grazing will occur on the parcel, information on the amount of land available for grazing, size and type of animals for the grazing herd, information on if one or multiple herds will be utilized, future plans for livestock utilization/sale, what resources are available to the herd (or herds) as it relates to soil condition, plant species the herd will graze on, water resources for herd, barn resources (if herd will remain

ILLINOIS POWER AGENCY

on site), plans for the herd during winter months, additional diet supplementation for herd (if relevant), grazing system to be used (continuous, rotational, etc.). Please note these are suggestions and should not be used to limit what information should be included in an agrivoltaics plan focus on grazing should the Agency have missed any such part of a grazing operation that might be relevant.

17. Can grazing be added to land in order for it to count as agrivoltaics (i.e. introduce grazing where there was previously not grazing)?

Livestock grazing is included as a type of permissible agriculture uses under agrivoltaics for the Traditional Community Solar category, as it supports the spirit of agricultural production coinciding with solar energy production. At least 50% of the project footprint must feature agricultural production at the time of project energization. Please review details on a permissible agrivoltaics plan, including grazing requirements, in Appendix B of the Program Guidebook.

18. Can a Traditional Community solar project achieve 1 point for commitment to pollinator friendly habitat and 1 point for agrivoltaics?

Yes, a project may receive points for both agrivoltaics as well as pollinator friendly habitat, as long as requirements for each are 1) within the requirements as outlined in the Final Scoring Guidelines (i.e., agrivoltaics definition and requirements followed; pollinator plan in line with IDNR pollinator score card), 2) commitment is made in the Part I application and plans shared, and 3) documentation of successful implementation of commitments is provided in the Part II application.

Project Application Submission in the Portal

19. Will the Program Administrator provide the ability to submit projects prior to November 1st but still count them towards Day One for purposes of the first come first served requirement? Or, in the alternative, will the Program Administrator provide the blank application form prior to November 1st to help ensure AVs have transparency into what will be required for submission?

The Portal will open Traditional Community Solar applications on November 1, 2022, Projects will only be able to be submitted once the portal opens on that day. No prior access to the application will be permitted.

Required application information for Traditional Community Solar can be found in Sections 1.F., 5.E. and 5.F. of the October 2022 version of the Program Guidebook.

A webinar will be held on Monday, October 24 at 1PM to go over both the scoring criteria and the portal interface for application submittal. Join link for webinar: <https://energy-solution.zoom.us/j/95373684104>

20. Does the IPA or the Program Administrator have a process for addressing Day One bugs in the portal to help ensure fair project submission for all AVs? Will there be a backup such as e-mailing or uploading applications to SharePoint by a certain time?

ILLINOIS POWER AGENCY

Special Traditional Community Solar focused office hours will be offered by the Program Administrator the day of and the day after the application opening as well as a dedicated IT and operations team to answer phones and emails.

21. When will an application be determined to be complete? If completion requires payment of the application fee, will a system be in place to receive the application fee?
In order for applications to be considered fully submitted, they must be batched and payment should be initiated on the application fee. Fees may be paid by wire, check, credit card, or ACH direct deposit. Along with the batching release in the portal on October 27, 2022, a payment feature will be rolled out as well to enable payment for submitted batches.

Interconnection Status – Top Two Queue Position

22. Is an executed interconnection agreement required to claim points at the time of application?

*An executed interconnection agreement is required to achieve the points available for a top 2 queue position. Additionally, the project must have a top two queue position **among community solar projects** on the substation for claiming these points.*

Interconnection agreements must be both executed and valid, meaning not expired.

General

23. If a hearing in which the Authority Having Jurisdiction (AHJ) will vote on the permitting/allowance of a TCS project occurs after November 1, 2022, can the AV still submit the project on November 1, 2022 without official AHJ approval?

A requirement of the Part I application is that all land use permits are submitted. As outlined in Section 7.4.1. of the Agency's Long-Term Plan, "For ground mounted systems over 250 kW a land use permit, when applicable from the Authority Having Jurisdiction ("AHJ") over the project. In the event a land use permit is not applicable, written confirmation from the AHJ that no permit is required must be provided."

Corrections from Original Published Versions of Rationale and Scoring Requirements*Rationale Document*

- *There was a typographical error in the initial version of the Traditional Community Solar Rationale document. The minimum point threshold will be 5 points. Find corrected version here: https://illinoisabp.com/wp-content/uploads/2022/10/TCS-Scoring-Rationale_October72022.pdf*

Final Scoring Guidelines

- *In the Final Scoring Guidelines document, under Verification within the "Qualification and Demonstration, Verification, and Compliance" section, a typographical error indicated that the Scoring Cure Period was "Approximately 32 weeks". The document, on the Program website, has been corrected to read "Approximately 2 weeks." Find corrected version here:*



ILLINOIS POWER AGENCY

<https://illinoisabp.com/wp-content/uploads/2022/10/Final-TCS-Scoring-Guidelines-7-Oct-2022.pdf>. Please keep in mind this is a tentative schedule and the volume and quality of applications may impact these approximations.

- In the Final Scoring Guidelines document published on October 7, 2022, in footnote #12 there was a typographical error. Mention of “Construction and electrical work” in this footnote should have been changed to “project development work”. That correction has now been made in the final version of the document.*
- In the Final Scoring Guidelines document, there was an error omitting “disturbed land” from items that would negate the COA subtractor. That correction has now been made in the final version of the document.*