

From: [Breanna Plucinski](#)
To: [IPA.Solar](#)
Cc: [Paul Makarewicz](#)
Subject: [External] 2024-25 Program Guidebook Feedback
Date: Wednesday, March 27, 2024 3:30:24 PM
Attachments: [image001.png](#)
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Dear IPA,

Please see my comments below regarding the draft 2024-2025 Program Guidebook:

- Pg 17 of 233: Add traditional community solar to the top of the prioritization list for uncontracted capacity. Small and large DG are listed as first and second priority but these categories, while overall beneficial, comparatively provide less overall community benefit than traditional community solar. Since IL Shines is prioritizing overall equity and community benefit, it feels counterproductive to put program categories that serve a single customer over an entire community at the top of the prioritization list.
- Pg 18 of 233: REC prices awarded should be the REC price listed at the time of project application. It is not the fault of an approved vendor that their project has been waitlisted for long periods of time, especially over a year, and they should not be punished for it. The proposed strategy does not provide certainty of REC pricing as a \$48 REC models very differently than a \$60 REC, but the program is treating that price variance as minimal. The most amount of certainty comes from knowing your REC price when you apply and not having that price change.
- Pg 26 of 233: Lump together capacity for TCS instead of having group A and group B. I understand prioritizing one group over the other via REC price incentives, but the capacity caps only limit the amount of Community Solar that can be established in one year in a given area. Community Solar provides some of the largest overall community benefit of any solar project and limiting the number of people who can access solar does not support the IPAs goals of pushing renewable energy equity. It is not equitable to give those who live in Group B territory a greater opportunity to access renewable energy than those who live in Group A.
- Pg 29 of 233: The page above states projects are waitlisted on a first come first serve basis. Then on page 29, the guidebook lists a random selection process to decide between waitlisted projects with the same score. If the waitlist is first come first serve there is no need for a random selection event to break ties as the time your application was submitted would determine your spot on the waitlist. Please clarify or remove the random selection event.

- Pg 38 of 233: Please list examples of program trainings that are expected/approved by the program admin.
- Pg 46 of 233: Please elaborate and specify specifics of what the program admin is seeking in regard to “Designees will submit their training materials and certifications showing that their agents have been trained in accordance with Program requirements.” What materials are you expecting? What training/certification programs? Do the materials need to be agency/admin approved before using?
- Pg 47 of 233: In regard to “Approved Vendors are responsible for managing and actively supervising their Designees (including nested Designees) and ensuring compliance with all Program requirements.” If designees are required to register with IL Shines and provide their own attestation and reporting to program admin then it should not be the responsibility of the approved vendor to additionally ensure the designee has been brought up to speed on program requirements and micromanage them. This should be between the designee and program admin since the program admin reviews and accepts or denies a designee’s application and renewals. I understand adding a note that if an approved vendor knowingly employes/continues to employ a designee that is violating program rules then the AV should be penalized, but an AV should not be responsible for managing a designee when the designee is held accountable independently and performs independent reporting. This would mean an AV needs to develop their own reports, then also review the reports of a designee for compliance but being at the mercy of the designee needing to trust the information is correct, and then also do the same review process for each nested designee who is even further removed from the AV, and then the program admin rereviews all reports. This process is very redundant and not efficient and would not contribute to greater accuracy or compliance in reporting. Especially in regard to nested designees – nested designees are under contract by the designee and therefore is far removed/does not always have any interaction with the AV. Needing to manage designees and their designees puts an unreasonable burden on AVs and will discourage contractors from working on IL Shines projects due to the high level of reporting and tedious management requirements. If the goal is to increase access to renewable energy and associated jobs, then the program should not dissuade contributing to renewable projects within IL Shines via overly burdensome reporting and management requirements.
- Pg 59 of 233: In regard to “As the Program ages, the Agency has seen an increasing number of companies cease operations or become unable to comply with Program requirements, which can leave customers stranded. The IPA is dedicated to ensuring that these stranded customers are able to continue to participate in the Program, so has begun work to provide alternative paths forward to these customers.” – This suggests that operating IL Shines program is becoming increasingly unsustainable and unattainable due to program requirements. The current language paints the picture of

the IL Shines program attempting to fix the byproducts of an overly complex solar program rather than mending the program to be more attainable and sustainable. If primary goals include increasing equity and access regarding renewable energy the program should be lowering barriers to entry rather than raising them. The IL Shines program should do more research as to *why* there is an increase in stranded customers and then work to remedy the root cause of this issue rather than attempting to address the results of the root problem.

- Pg 63 of 233: IL Shines should implement a standard contract length and associated terms. There are various contract lengths depending on the year the contract was signed with different reporting obligations associated with each contract. This adds unnecessary confusion to the program and increases the likelihood of approved vendors accidentally violating program requirements simply because the requirements are ever changing and nonstandard. I personally have needed to discuss with admin to clarify what requirements apply to what contract years and the process made it clear program administrators were even having a hard time keeping the requirements straight based on the back and forth and looping in of additional admins for support. Imagine trying to juggle that with multiple projects on top of the baseline list of general program requirements that are not associated with the REC contract. If the end goal includes increasing equity and access regarding renewable energy then the program should be as straight forward as possible to increase the chances of project success, not increase the chances of approved vendors owing collateral.
- Pg 69 of 233: In regard to “Family members may be considered affiliated entities for the purposes of considering colocation between projects.” – If the parcel owners are related but each own their own individual parcels then they should be treated as separate landowners. Simply being related to someone does not mean you hold the same preferences/wishes as to what your land is used for.
- Pg 82 of 233: Doubling the application cost per KW and tripling maximum application cost should be provided with a detailed and transparent description for what the additional funds will be used for.
- Pg 112 of 233: Regarding “Additionally, the small subscriber adder is now incorporated into the base REC price for community solar projects and a distinct small subscriber adder no longer applies for projects under the 2021 and 2022 REC Delivery Contracts.” – the guidebook does not clarify or specify a difference between a “small subscriber adder” and a “distinct small subscriber adder” please clarify.
- Pg 112 of 233: Regarding “Additionally, the small subscriber adder is now incorporated into the base REC price for community solar projects and a distinct small subscriber adder no longer applies for projects under the 2021 and 2022 REC Delivery Contracts.” – the text above on page 111 states “For projects selected after this change, the

maximum adder for projects with 50% or greater small subscribers will be \$22.34 for projects in Group A and \$21.77 for projects in Group B.” – this phrasing is confusing and leaves the reader unsure of what adders, if any, may apply to their project. Please clarify what adders are available for what contract years, a table may be a better way to display this information.

- Pg 112 of 233: Regarding “The subscribed percentage should be submitted to the utility prior to submission to the Program Administrator.” – are you referring to a subscriber percentage of an overall subscription plan? Are you referring to the Part II application when you say “prior to the submission to the program admin”? This sentence is not clear on what the exact deliverable is and when it needs to be submitted to the program administrator. Please clarify.
- Pg 115 of 233: It is stated that subscriber information is due June 10. Will there be two separate reporting methods so we can report subscriber information in June and the annual report in July? Or will there be one report and we add the subscriber information in June and then save and finish the report by July 15? Please clarify the process and list when the report itself is due in this section.
- Pg 115 of 233: If we are already submitting monthly CTPs and submitting CTPs in the annual report, why must we also submit an attestation? This feels unnecessarily burdensome and repetitive.
- Pg 117 of 233: Please provide details on the compliance plan review process- do we get a confirmation when it is accepted? Do we only hear from admin if it is denied? What is the timeline for reviewing the plans? How long do you have to revise and resubmit a compliance plan if denied?
- Pg 118 of 233: I do not believe the mid-year MES report is necessary since it does not have any role in our overall compliance and does not change the year end report or our compliance at the end of the year. A reminder email from the program admin to meet compliance at the mid-year point would be just as effective and less work on approved vendors, designees, and program administrators alike. If there is a purpose to this mid-year plan that is not obvious, it should be stated in the guidebook.
- Pg 118 of 233: Existing guidance says approved vendors and designees only need to provide demographic and geographic information for construction crews. This should not be extended to MES workforce. We have already experienced issues gathering the baseline data for MES as it is sensitive information. The amount of personal information this program is asking people to disclose is invading personal privacy and will lead to contractors not working with approved vendors or designees due to the unnecessary burden of reporting and data gathering, especially of such private information. This is only making success in this program more difficult, which goes against the goals and

mission of this program.

- Pg 118 of 233: Please list the deadline for submitting subscriber information (June 10 as mentioned on pg 115) here – making approved vendors and designees piecemeal deadlines and requirements together is not setting program participants up for success.
- Pg 151 of 233: If “any brownfield site would necessarily, by definition of a brownfield, be contaminated” then the program should honor that it technically does qualify for both classifications. Admin said “The Agency believes that allowing a contaminated project that qualifies as a brownfield site under Section 1-10 of the IPA Act to receive points in both categories fits within the spirit of this scoring criteria.” And “any brownfield site would necessarily, by definition of a brownfield, be contaminated” but then admin directly contradicts this by eliminating the possibility to qualify for both categories unless the qualifiers are different. This is contradictory and unnecessarily making it more difficult to be scored on a brownfield and contaminated site even though the goal is to develop solar on those sites. If admin was sticking to the true goal, then they would make development on brownfields and contaminated sites as easy as possible/prioritize it as much as possible via scoring.
- Pg 152 of 233: Commitment to use agrivoltaics should be 3 or more points due to the level of difficulty associated with this. Agrivoltaics are done by partnering with an external farmer, if they do not commit to the entire project life or suddenly back out then it’s the approved vendor who pays the collateral and deals with all the fallout. This should be a higher score to represent the risk of this commitment.
- Pg 153 of 233: Becoming an EEC is already incentivized though the lack of MES reporting and capital advancements. In addition, everyone else still needs to meet the same MES requirements as EECs, the only difference is the reporting piece. EECs should not have double the points as other waitlist scores in addition to the other incentives when at the end of the day we all have the same MES compliance requirements, meaning an EEC is not going beyond the baseline requirements and should not be scored as such.
- Pg 154 of 233: The guidebook uses outdated timelines (Nov 2022) please revise to reflect current timelines or specify they are examples.
- Pg 178 of 233: Is there a way we can upload documents to the application? It seems the process is to always fill out some kind of online form and then email attachments to be connected to our forms. It seems like it would be less work for admin if we were able to attach our forms directly.

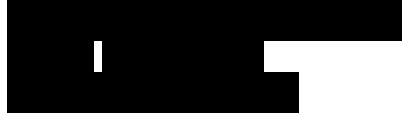
Thank you so much for this opportunity and have a lovely day.



Breanna Plucinski

Development Analyst
(she/her/hers)

AES Clean Energy



Please know I honor and respect boundaries around work and personal time, wellbeing, and caretaking. Should you receive correspondence from me during an off-time, please wait to respond until you are next working or available.