InClime

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5% variation in plot placement

1 message

Dean Eastlake <deastlake@newenergyequity.com> Tue, Dec 4, 2018 at 3:00 PM
To: comments@illinoisabp.com

I believe the limitation of less than 5% variation in plot placement as stated in Section E.2 of the ABP Lottery Procedure and Section 5 Part II of the ABP Draft Guidebook is detrimental to developers in ensuring the best interests of all stakeholders of a Community Solar Project including the intent of the IPA's ABP. It is counterproductive for the IPA to issue an incentive to offset install costs to attract the most efficient use of the incentive funds and then enforce program rules that then unnecessarily inflate install costs.

This limitation does not allow for the normal progression of developing a project site where a project follows a certain course from conception to completion. Many design iterations are typical throughout the development process and are almost always certain after A. Utility feedback and B. Detailed design.

While each site submitted to the ABP will have an interconnection agreement, the majority of the physical interconnection method is unknown at the time of application to the ABP such as the details of how the project is connected to the utility infrastructure, which existing utility infrastructure will be used, where new utility owned equipment required to interconnect will be located and where new system owned equipment required by the utility to interconnect will be located. The actual interconnection route/method and the various upgrades required to interconnect will dictate the array location. We do not have insight or control of this process at the time of application to the ABP. Projects could require unnecessarily increased length of interconnection conductors or simply be found unable to interconnect unless an array configuration or relocation change is made.

The detailed design will require intensive site studies to understand above and below grade conditions which dictate the location of a project on a parcel (reports include: utility provided impact study, detailed wetlands delineation, geotechnical study, soil corrosivity/conductivity testing, groundwater table analysis, foundation push/pull testing, topographic survey, buried utilities survey, etc). After these reports are complete, a civil engineering team and an electrical engineering team analyzes the results and begin to formulate where soil conditions, topography, water drainage/run off, utility infrastructure, etc. will allow access roads, racking foundations, equipment pads, storm water management, erosion and sediment control, etc. All of these dictate the size, shape and location of the array. While thorough desktop analysis and preliminary site investigation has been performed at the time of application to the ABP and our best efforts have been made to locate the array in the optimal parcel location, it is an unnecessary waste of time, money and resources to complete these site studies prior to an actual utility impact study, utility site meeting for interconnection plan and preliminary utility design for site and adjacent infrastructure upgrades.

I recognize that this limitation is meant (at least in part) to avoid gaming the system by submitting two projects for a parcel, one buildable, one not buildable and then essentially having two "lottery tickets" to build one array. A reasonable alternative to the 5% limitation could be a single application for two co-located projects. If selected in the lottery both must be constructed, otherwise neither are awarded. A second alternative could be a maximum overlap of 75% for a lottery winner overlapping its co-located project. This ensures there is not a full project location swap, but still allows for adjustments due to detailed site investigation/design and utility infrastructure optimization.

Thank you for your consideration.

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