



Association of Illinois Electric Cooperatives Comments on the Illinois Power Agency Draft Adjustable Block Program PV System Power Purchase Agreement Disclosure Form

The Association of Illinois Electric Cooperatives (AIEC) is the statewide service organization for 29 electric cooperatives which operate in Illinois. This includes 24 distribution cooperatives and 5 generation and transmission cooperatives. Electric cooperatives are not-for-profit organizations democratically controlled by their member-elected boards of directors.

Member-elected boards of directors of electric cooperatives are responsible for adopting policies governing the business of the cooperative, and municipal systems are governed by locally elected bodies making decisions on behalf of their citizens, including requirements related to ownership and certification of PV systems and their interconnection to the distribution system.

The AIEC appreciates the opportunity to file comments to the Illinois Power Agency (IPA) and the Adjustable Block Program (ABP) Administrator in response to the release of its draft ABP Distributed Generation PV Brochure Text, dated October 3, 2018. We respectfully submit the following comments.

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We suggest inserting the below text in your introductory section:

*This disclosure form is designed for customers of Ameren Illinois, Commonwealth Edison Company, and MidAmerican Energy Company. For consumers in electric cooperative, municipal utility, or Mt. Carmel Public Utility territory, some policies may vary, please contact your provider to learn more details.

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System Design Specifications

The asterisk comment of this section refers to a system being connected to the “grid”. The “grid” is typically understood to mean the regional transmission system. PV Systems of the size eligible for the ABP are not typically connected to the regional transmission system, whether or not they are part of the ABP. They are connected at the distribution system level of the local utility, which is, in turn, ultimately interconnected with the transmission system. As electric

cooperatives, our distribution systems are interconnected to the transmission system or in most cases the wholesale distribution system of the adjoining investor owned utility. Electricity produced on our side of the interconnection is referred to as “behind the meter” and does not typically flow beyond our distribution systems to the grid, but rather is consumed on our systems. The term “grid” in your disclosure form could lead to confusion as to whether the PV System is delivering electricity directly to the “grid” through the distribution system or being consumed “behind the meter”. Therefore, for purposes of consistency with the statute (20 ILCS 3855/1-75(c)(1)(L)(ii) and (iii)), we would recommend the following change:

**Because your system may be participating in the Illinois Adjustable Block Program, your system will be interconnected to the distribution system level behind the grid. Your electric utility remains responsible for the delivery of electric power and energy to your premises and will continue to respond to any service calls and emergencies. A distribution level connected PV system will not function in the case of an electricity outage unless you have an accompanying electricity storage system and the ability to “island” (disconnect from the distribution system level behind the grid).*

Thank you for consideration of these comments.

Nick Reitz
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Association of Illinois Electric Cooperatives