Traditional Community Solar Clarifications #2

October 26, 2022

Resources on Traditional Community Solar (TCS) Guidelines and Scoring

- [Final Scoring Guidelines](#)
- [Rationale for Final Scoring Guidelines](#)
- [TCS Clarifications #1](#)
- [Webinar Slides from 10/24](#)
- [Webinar Recording from 10/24](#)
- [Portal Help Guides (includes batching and Part I CS submission)](#)

Equity Eligible Contractors

1. Can an EEC buy a community solar project that was submitted to TCS that fails to get awarded a REC Contract then submit the application to another category?

   A project submitted to the TCS category cannot be moved to another category without withdrawal of the original application and re-application in the new category. Projects that are re-submitted to the Program in this manner will require a new application fee.

2. Can an EEC buy a what was originally slated to be a TCS project before November 1st from a TCS developer and put it into the EEC Block?
   A project may only be submitted in one category. If a community solar project has not been applied to the Program is sold to an EEC-certified Approved Vendor, the EEC AV may choose to submit the project in the TCS category or the EEC category.

3. Are Approved Vendors who are Equity Eligible Contractors automatically qualified as an EEC Designee?
   Yes, an additional application to become certified as an EEC is not required for EEC certified AVs to act as an EEC Designee. Still, the Approved Vendor must have an active Designee application and be connected with an Approved Vendor through Designee registration, this step is required of all Designees active in the Program and has not changed. Finally, per the Final Scoring Guidelines, any EEC that is acting as a Designee on a TCS project must be named by the Approved Vendor submitting the project. This EEC Designee commitment must be in compliance with the requirements outlined in the Final Scoring Guidelines and must be demonstrated via a contract, attestation, agreement, etc. signed by both parties.

4. Can you please confirm that if an EEC designee uses any subcontractor that is not also an EEC-certified designee , that precludes the project from taking points under the EEC category?

   In the guidance issued on October 21, 2022, the IPA clarified that: *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.*

A project which receives points for commitments to work with EEC-certified Designees under the scoring criteria must utilize nested Designees/subcontractors which are also EEC-certified.

5. Given there are no EEC certified Designees at present, is it possible to get points under this category if the AV applying is not themself an EEC?
   If there are no active EEC Designees at the time of application and the Approved Vendor is not an EEC, then no, there are no points available for this Approved Vendor under the Equity Eligible Contractor section of scoring criteria.

   For this program year, Designees that have submitted an application but are not yet certified as Equity Eligible Contractors by the Program Administrator will be permitted to be utilized as EEC Designees. If a Designee's EEC application is not approved by the Program Administrator, a substitution will need to be made for a qualifying EEC Designee. Applicant EEC Designees will need to be certified by the time the application scoring cure period begins. This allowance will only be made in the initial scoring of Day 1 applications. After such time, all EEC Designees must be certified at the time of Part I application submission to achieve points for the EEC scoring criteria.

Portal Functionality

6. Can 2 people be logged into the same account in the Program portal and be entering applications independently?
   Yes.
7. Is there a file size limit for uploads in the Program portal?
   No, there is no file size limitation for uploads.
8. Will previously batched Part I applications be migrated over from the Legacy portal prior to the 11/1 deadline? If not, will all those applications fall behind the new Part I applications submitted on 11/1 in terms of processing priority?
   All Part I applications that originated in the legacy portal have now been transferred to the new Program portal. Please reach out to the Program Administrator if this is not the case.
9. Will the portal option for TCS apps go live prior to November 1st so developers can populate all of the required application info and save in draft format as opposed to filling out all applications and submitting on November 1st?
   No, the portal will not open earlier than 8AM CPT on November 1, 2022, for Traditional Community Solar applications.
10. The dropdowns for Tracking Type don't perfectly align between the guidelines and the portal. Can you confirm that 1-axis backtracking equals backtracking in the portal, and 2-axis tracking equals dual axis in the portal?
    Confirmed as stated.

Interconnection Status

11. As it relates to the points offered for the top 2 queue position in the clarification document, the IPA states "interconnection agreements must be both executed and valid meaning not

expired". Can you confirm that this requirement applies to scoring criterion item 4.a (Project has a valid interconnection agreement at the time of application (Add 1 point) as well)?

Yes, a valid and executed interconnection agreement is required for both scoring items 1.a and 1.b under "Interconnection Status".

12. Under the "Interconnection Status" scoring criteria section, the first two items are:
    a. Has valid interconnection agreement (1 point)
    b. Has a top two queue position among community solar projects on a substation on the date of application (2 points)

    Can you get points for both of these scoring criteria?

    These points are additive. A project with a valid interconnection agreement will receive 1 point. A project with an executed interconnection agreement and a top two-queue position will receive an additional 2 points.

13. The new Guidebook indicates that a signed interconnection is not required for TCS. Is this the case for CDCS?

    Community Solar systems (either TCS or CDCS) are not required to submit an interconnection agreement in the Part I application, but are required to provide a certificate of completion in the Part II application. Traditional Community Solar Part I application submissions may include an interconnection agreement in order to gain more points should scoring occur.

    All Distributed Generation systems over 25 kW AC in size must submit an executed interconnection agreement in the Part I application.

14. Will projects with interconnection agreements executed after November 1st be able to have interconnection points applied to their score for the first block?

    No, all attributes of a project that will be scored upon for the purposes of obtaining a REC Contract must be present at the time of application submittal. The only exception is the EEC certification of EEC Designees. EEC Designees must be applied at the time of submission, but must be approved by the time the scoring cure period occurs.

15. What is required to demonstrate interconnection queue position?

    For projects interconnecting in the ComEd territory – please use the online portal offered by ComEd to check queue position. A printout, screenshot, email, etc. demonstrating queue position from either the utility portal or an email from a utility representative can be provided.

    For projects interconnecting in the Ameren territory – Please reach out to the utility to assess your queue position. A printout, screenshot, email, etc. demonstrating queue position from either the utility portal or an email from a utility representative can be provided.

    For projects interconnecting with another electric provider – Please reach out to the interconnecting utility's interconnection group to confirm, and provide a screenshot or email demonstrating queue position.

Built Environment

16. Can you get points for both the Pollinator Habitat criterion and Agrivoltaics criterion? Or is it one or the other?
    Yes, you can receive points for both commitment to pollinator friendly habitat and commitment to utilizing agrivoltaics, as long as points awarded do not exceed the 4 point maximum permitted under the Built Environment category.
17. As explained in the October 21 clarifications, 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 12 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." 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 If land is in transition, the transition can't have occurred in the past. Do you mean that building solar will mean it is in transition?
    The land must be disturbed prior to the development of the solar project. That is, the solar development itself cannot be the trigger of the land disturbance.
18. Can you please confirm that if a community solar project is aiming to get points under the contaminated/disturbed or brownfield category, the site plan must show the project is 100% sited over the contaminated/disturbed or brownfield area?
    The Agency will assess documentation provided to demonstrate the achievement of these points against the definitions provided in the Final Scoring Guidelines.
19. What will that be sufficient to secure the points available for disturbed land, contaminated land, and brownfields?
    The Agency is open to any documentation that the AV thinks demonstrates the definitions provided for disturbed land, contaminated land, and brownfields.

Project Submittal – Timing, Other Program Categories, and Other IPA Procurements

20. Are we able to submit a project into this program while also submitting to the indexed REC RFP in an effort to secure a REC contract?   Understanding, that if selected under the indexed REC RFP, we would pull our TCS application and lose the bid fee.
    No, the maximum size allowable for a TCS project is 5 MW AC while for the indexed REC RFP projects must be over 5 MW AC in size (per the definition of utility scale projects). One exception might be a project that is sited on a brownfield. In this case, it is permissible to submit an application to both the indexed REC procurement and the ABP, but if selected in the indexed REC procurement the Approved Vendor would need to withdraw ABP application.

    Please direct all further questions on the indexed REC procurement to the Procurement Administrator here: https://www.ipa-energyrfp.com/
21. Can AVs submit a project into more than one category?
    No, per the Program Guidebook, Section 1.A:
    "If a project is eligible for more than one category, the Approved Vendor may select any one of those eligible categories into which to submit the application during the Part I application

as described in Section 5 below. Approved Vendors will be provided with a drop-down list in the Part I application displaying all categories for which the project is eligible in order to make a selection. <u>An application must be submitted into one and only one category</u>."

22. Does timing during Day 1 of application matter? i.e. will an application submitted at 8am be better positioned than one submitted at 2pm (both on day 1)?

Timing during Day 1 of application submission does not matter. 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. 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. <u>This means that project applications will be scored and ranked by the date the application is submitted.</u>

Application Fee Payment

23. Does the Program accept American Express (AMEX) for the payment of application fees?
Yes, payment with American Express is accepted.

24. What are the additional fees for credit card payment?
The fee for credit card payment is 2.9%, but is capped at $10,000 per month (on a rolling 30-day basis, not calendar month) per Approved vendor.

25. If a project application is completed and batched on November 1, but then paid for some time in the next 10 days, it will still be registered as a November 1 application and not the date that payment was received.
Yes, this is correct.

26. How do AVs obtain a W-9 for Energy Solutions? Most large companies require W-9s to issue payments.
Energy Solutions' W-9 can be provided upon request by emailing admin@illinoisabp.com.

27. How much time do we have to get wire submitted after a batch is submitted?
Fees must be paid with 10 days after a batch has been submitted. If payment is not received within 10 days, the capacity allocation will be withdrawn.

Batching

28. What is the batch minimum and maximum for DG projects?
Batch minimums and maximums are the same for all projects across the Program. The first batch an Approved Vendor submits must be 100kW or larger, there is no batch minimum size after the first submitted batch. The batch maximum size is 5 MW.

29. Can multiple batches be submitted on November 1st?
Yes, multiple batches may be submitted.

30. If you are submitting multiple projects, should you batch all projects together?

As noted above, the maximum batch size is 5 MW AC. This choice is left up to the Approved Vendor, as long as the batch falls within the minimum and maximum batching size requirements. Approved Vendors will also want to keep in mind that once placed on a REC Contract, assignments can only occur at the batch level, not at the project level.

31. Since batches are subject to a maximum of 5 MW in size and that is also the maximum size allowance for a TCS project, do you just not batch them or should each 5 MW TCS project be within its own batch?
All projects submitted to the Program must be batched. A project is not considered fully submitted until it is batched and that batch is submitted. Batches can contain a single project or multiple projects (as long as batching size minimums and maximums are met), this choice is left up to the Approved Vendor.

Siting

32. For scoring criterion, 2.c - *Sited in a county (or a township within Cook, DuPage, Kane, Lake, McHenry, or Will County) that does not currently have a community solar project that was approved by the ICC for a REC contract under the Adjustable Block Program at the time of application. (Add 2 points)* – To achieve these 2 points, does the project need to be sited within Cook, DuPage, Kane, Lake, McHenry, or Will County? Or can the project be sited in a different county without a community solar project?
It can be sited in any county that does not already have a CS project, excluding those most populous counties in Illinois listed here: Cook, DuPage, Kane, Lake, McHenry, or Will County. For the counties in the state that are the most populated (Cook, DuPage, Kane, Lake, McHenry, or Will County) the project must be sited in a township within that county that does not yet have a CS project, as these counties likely already have several CS projects sited within them.

Must be Located within a TOWNSHIP that Does Not Yet Have An ICC Approved CS Project	Must be Located in a COUNTY that Does Not Yet Have An ICC Approved CS Project
Cook, DuPage, Kane, Lake, McHenry, or Will County	All other counties in Illinois aside from Cook, DuPage, Kane, Lake, McHenry, or Will County

33. Can the IPA add County to the Project Reports on the ABP website?
The county in which a project is located will be added to the application reports before the week closes out, found here: https://illinoisabp.com/project-application-reports/

As there will be no ICC approvals between October 26, 2022 and November 1, 2022, this list will be accurate for those AVs submitting projects on November 1st.

General

34. Can Approved Vendors be combined? We currently have each individual project company as an Approved Vendor, but we would like to make the parent company (holding company) an Approved Vendor.

Changes, merging of AVs, or moving projects from one AV to another in the portal must be worked through individually with the Program Administrator. Note that since the process takes time, if there is not already an active AV that the AV want to submit projects under, this may not be possible prior to November 1st as a new AV application for the parent company will be required. Please reach out to the Program Administrator for further assistance. Additionally, please keep in mind that single project Approved Vendors have different Part I application requirements, these can be reviewed in the Program Guidebook.

Minimum Point Threshold for Waitlist

35. When the capacity available is exceeded, triggering the scoring process, will all projects be required to meet the waitlist minimum threshold to qualify for an award?
The Agency will utilize the scoring criteria to prioritize projects submitted on the same day and to establish a waitlist for those projects that after scoring do not fit into the block of capacity allotted for this category. On the day applications submitted for the Traditional Community Solar block exceed the MW of capacity offered by the block, scoring will commence. All applications submitted on the same day will be treated equally in terms of application submission timing. The scoring process works as a tiebreaker to rank order projects that are submitted on the day that capacity is exceeded. All projects submitted on the day that capacity is exceeded will be scored and ranked according to their score. The capacity of the block will be filled in order of the rank-ordered project list until the block of capacity is filled. There is no minimum point threshold for selection on the day that scoring is triggered. Once the block of capacity is filled with rank ordered projects, the remaining projects received will be eligible to join the waitlist, provided that they meet the minimum score required for the waitlist (5 points).

As is clear in the Commission's Final Order approving the 2022 Long-Term Plan, the minimum point threshold is to only be used as a threshold to gain a spot on the waitlist, not as a threshold to gain a REC Contract. This means, for project applications received on the day that scoring is triggered, those scored and rank-ordered projects that fill the capacity of the block **will not** be subject to the 5-point waitlist threshold. Once capacity is filled with the top-ranked projects, those projects which are not selected **will** be subject to the minimum point threshold, and must have a score of 5 points or higher to secure a place on the waitlist. All projects submitted after the day that blocks are filled will also be subject to the minimum 5-point waitlist threshold.

Waitlisted Process & 2023-24 Program Year

36. Will waitlisted projects get priority in the next Program year?
Yes. Once capacity for the Traditional Community Solar category has been reached for the 2022-2023 Program Year, subsequent applications must receive a minimum score of 5 points, per scoring requirements discussed in Section 1.F of the Program Guidebook, to receive a spot on the waitlist. .

In the case that there is uncontracted capacity from other Program categories at the end of the 2022-2023 delivery year, the uncontracted capacity will be allocated to Program categories according to Section 1.D of the Program Guidebook.

For waitlisted capacity not met through uncontracted capacity redistribution, Section 1-75(c)(1)(K) of P.A. 102-0662 provides that "the waitlist of projects in a given year will carry over to apply to the subsequent year when another block is opened." Thus, those waitlisted projects will be given priority in selection within their category under that new delivery year's capacity allocation to that category.

Communications

37. For the Traditional Community Solar capacity, will the IPA publish a list of applications and/or an aggregate number of applications prior to implementing the tiebreaker scoring? The Program plans to announce on November 2nd how many MW of projects were submitted on November 1st, before application review and scoring commences. Additionally, the Program Administrator will seek to update the block capacity dashboard hourly throughout the day on November 1st.