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Witness: David L. Gladey, Lavelle Freeman, John P. Dipaola-Tromba, Jennifer A. Schilling and Elli Ntakou
Request from: Department of Energy and Environmental Protection

Question:

Has the Company considered the potential impact of Section 16, of Public Act 26-127, on the Shared Hosting for Advancement of Renewable Energy (SHARE) proposal? If yes, please explain the Company's analysis and understanding of these potential impacts.

Response:

Yes. The Company has considered the potential implications of Section 16, of Public Act 26-127. The Company's proposed SHARE framework contemplates continued stakeholder engagement to identify locations where a group-study approach may provide mutual benefits to interconnection customers and the electric system. Although the Company has proposed an initial set of candidate projects in this filing, successful implementation of any SHARE project depends upon participation by DER developers with active interconnection requests and their willingness to participate in the group study process and fund their allocated share of any interconnection upgrades identified through the group study process.

This type of participation could be facilitated through existing or future stakeholder working groups that could help identify locations where a group-study approach would provide the greatest value to participating developers and customers. Through this engagement, the Company would seek stakeholder input regarding project viability, developer interest, and the likelihood that available hosting-capacity allocations could be fully utilized.

To the extent Section 16, of Public Act 26-127, affects future solar siting requirements, project development considerations, or project economics, it could influence the willingness of DER developers to participate in specific SHARE opportunities, particularly in locations that may be more reliant on greenfield development. As a result, Section 16 may affect developer interest in particular locations and the viability of pursuing those opportunities through the SHARE framework.

Participation in a SHARE project would be voluntary, and DER developers would have the opportunity to evaluate applicable regulatory, siting, and economic considerations before electing to participate in a group study.

Accordingly, although Section 16 may influence the attractiveness or feasibility of certain SHARE opportunities from a developer perspective, it is not likely to create material risk to the Company

or to customers. Stakeholder engagement and consideration of developer interest are intended to help identify locations with the greatest likelihood of participation and successful utilization of the hosting-capacity benefits created through the SHARE framework. Further, because participating developers would fund their share of any interconnection upgrades identified through the group study process prior to project implementation, neither the Company nor customers would be exposed to the risk that insufficient developer participation makes a particular SHARE opportunity infeasible. To the extent additional hosting capacity is created through the use of standard equipment ratings, that capacity would remain available to accommodate future interconnection requests, including residential customers as well as commercial DER projects that decide to participate given the siting considerations contemplated under Section 16.