

COMMERCE COMMISSION

Illinois Commerce Commission, On Its Own)	22-0486
Motion)	
-vs-)	
Commonwealth Edison Company)	
)	
Order Requiring Commonwealth Edison)	
Company to file an Initial Multi-Year)	(cons.)
Integrated Grid Plan and Initiating Proceeding)	
to Determine Whether the Plan is Reasonable)	
and Complies with the Public Utilities Act.)	
)	
Commonwealth Edison Company)	23-0055
)	
Verified Petition for Approval of a Multi-Year)	
Rate Plan under Section 16-108.18 of the)	
Public Utilities Act.)	

**DIRECT TESTIMONY OF WASIU ADESOPE
ON BEHALF OF ENVIRONMENTAL DEFENSE FUND**

EDF Ex. 7.0

May 22, 2023

I. Introduction

Q. Please state our name and address.

A. My name is Wasiu Adesope, and my business address is 6431 Cottage Grove Ave., Chicago, IL 60637.

Q. By whom are you employed and in what capacity?

A. I recently joined Blacks in Green (BIG) this February as a Sustainable Energy Associate. I am also co-director for Green Energy Justice Cooperative (GEJC), where we are trying to democratize energy and ensure that the dividends from the energy transition are also delivered to low-income people, especially in Black and Brown communities, to increase affordability. This case, which contemplates utility investment for the next several years, including clean energy solutions, is central for our work.

Q. Please describe your education and professional background.

A. I have a Master of Science degree in civil engineering with an emphasis in environmental engineering from Purdue University. While at Purdue, I performed research on renewable energy from natural systems, and I also was a research assistant. Before Purdue, I worked in several positions for the largest Coca-Cola bottling company in Nigeria for seven years, including quality assurance, manufacturing, continuous improvement, and project management.

My curriculum vitae (CV) is attached as EDF Ex. 7.1

Q. Are you a customer of Commonwealth Edison (ComEd)?

A. Yes, I am a ComEd customer.

II. Community Solar Development

Q. Tell us about your current work.

A. The main project I am working on right now is a proposed 12-megawatt (12 MW) community solar development at four locations across Aurora, Naperville, and Romeoville to serve the member-owners of GEJC. Our goal is to enroll 3,000 members with 75% of them from low and middle income (LMI) and Black and Brown communities. The estimated cost is \$36 million. We have structured the project to pay off in ten years through a combination of loans, grant funding and renewable energy credits. After that, we anticipate the benefits to members will rise exponentially.

Q. Why did GEJC decide to pursue a community solar project?

A. Many people, especially in low-income and middle-income and Black and Brown communities, are not able to access rooftop solar. Solar installation is costly and requires that you own a roof, which excludes who rent. Community solar provides an easy option for those interested in getting energy from clean sources that cannot or do not want to purchase the equipment themselves. Community solar is also a fundamental component of an equitable energy transition and energy democracy as it makes participation and ownership available to more people.

Q. Have you begun to enroll members in the program?

A. No. We are awaiting the outcome of our application with the Illinois Power Agency before we begin the recruitment drive.

Q. Please describe the development process so far?

A. We are working with a team that has experience developing cooperative-owned community solar projects. Our focus so far has been on identifying locations and lining up funding. We have been working to identify large facilities (like an Amazon warehouse, for example) that have rooftops that can accommodate up to 4 MW of capacity and enter agreements

to secure the locations. This information is used to develop design specifications for the overall proposal that is used in discussions with potential funders. Funding will consist of a mix of grants, loans, and revenue from renewable energy credits from the IPA and cooperative member payments. We have invested approximately \$100,000 so far, with no guarantee of recovery.

One of the biggest challenges we have encountered is the lack of information about interconnection. There is significant risk in the possible scope of costs to interconnect for each location. Very little information is available at the start of a project to help estimate how much it will be. Solar developers can only provide rough estimates based on prior experience.

I understand that grid interconnection processes are in place to preserve reliability and service quality, but I have learned that developers are largely at the mercy of utilities when it comes to outcomes. For example, though the interconnecting party is typically responsible for the cost of any identified upgrades, it isn't always clear how the cost of upgrades is calculated and there is no way to verify the validity of the required upgrades. Further, there seem to be bottlenecks in the interconnection queue that impacts project timing but are completely out of the developers' control.

Q. What is the funding landscape like for community solar projects?

A. There is a lot of money available for solar development right now from a variety of funding sources but it can be complicated. These are multi-year projects and there are many moving parts that can vary from year to year so we have to be flexible. To make our proposed business model work, we are counting on the award from the IPA with the associated renewable energy credits (RECs). If that doesn't come to pass, we may need to scale down the project. We have learned that the IPA received applications for fifty-four megawatts (54 MW) of solar capacity for the twenty-three megawatts (23 MW) total in available contracts so that is a very

real possibility. That is why have more information about the things we can't control is so important – to be able to react to changing circumstances.

Q. What is next for this project?

A. We hope to hear the results in June or July. The date of the award starts the clock and we will finalize our design and secure the facilities. Then there is a timetable with several stages.¹ Phase 1 is the disclosure form, followed by Phase 2 (Part 1 Submission), Phase 3 (ICC Review), Phase 4 (Contract Execution), Phase 5 (Part II Submission), and Phase 6 (Invoicing and Payment). Our solar projects began in November of last year with an application to the IPA (Phase 2 – Part 1 Submission).

III. Interconnection Process

Q. What information is currently available to help a developer decide where to locate a project cost effectively?

A. Currently, ComEd provides a hosting capacity map and a list of projects in its interconnection queue but it is only updated once a year.² It also doesn't include the date it was last updated so users know how accurate it is. It also does not include information that would be useful, such as additional information on feeders and substations like penetration ratio, connected DERs, and feeder voltage. It would be useful to have information such as hourly load and voltage of feeders and substation transformers in downloadable form. Further, it does not appear that the information on this map has been independently audited or verified. Accurate maps

¹ Illinois Power Agency, Adjustment Block Program Timeline, available at <https://illinoisabp.com/adjustable-block-program-timeline/>

² <https://exelonutilities.maps.arcgis.com/apps/webappviewer/index.html?id=d282a890afb34956a906ae224c9f708e>; see also ComEd Hosting Capacity Presentation at 13, available at <https://www.comed.com/SiteCollectionDocuments/AboutUs/ComEdHostingCapacityPresentation.pdf>

showing hosting capacity in as close to real time as possible are critical to cost effective planning and development for distributed resources like solar.

ComEd also publishes a list of projects in its interconnection queue (excluding Level 1 projects of 2 kW or less). Unlike the hosting capacity map, the interconnection queue page provides a “date current” for the information provided.

Q. Are you aware of examples of distribution system information development and sharing that you believe would be more valuable than what is available from ComEd?

A. Yes, the Department of Energy’s National Renewable Energy Laboratory (NREL) and the Interstate Renewable Energy Council, Inc. (IREC) authored a report, DATA VALIDATION FOR HOSTING CAPACITY ANALYSES.³ The key takeaway from that report is that the “usefulness of hosting capacity analysis (HCA) depends on users’ confidence that the HCA results accurately reflect grid conditions.”⁴ Failure to validate HCA data produces inaccurate representations of the grid, and users cannot trust it. As outlined in the NREL report, California requires utilities to file a data validation plan, invites stakeholders to comment on the plans, and hires an independent technical expert to review the plan and recommend improvements.⁵ I respectfully urge this Commission to review the NREL report and to adopt the recommendation in it not just for ComEd, but for Illinois generally.

In addition, a process is needed to help developers understand that basis of cost estimates and the ability to discuss and question the findings. There also may be a role for bidding in the development of interconnection projects to verify that the utility estimates are tested against what

³ Available at <https://www.nrel.gov/docs/fy22osti/81811.pdf>

⁴ *Id.* at 1.

⁵ *Id.* at 1-2.

others could do the work for. Finally, information about how the interconnection process works and expected wait times should be more transparent and publicly available.

IV. Utility regulation model

Q. Is there anything related to utility investment that the Commission should consider?

A. The current regulatory model incentivizes utilities to spend on infrastructure because that is how they earn a return and make money. The problem is that there will always be more infrastructure to spend money on, whether it's new technology, an expansion of the existing grid network, or replacing existing infrastructure. The incentive to plan and build the grid to maximize profits rather than yield surplus value for end-users can result in "gold-plating" and lead to unnecessary increases in bills. Therefore, the Commission should also focus on utility efficiency. In light of our goals of a clean energy transition and energy sovereignty, as well as making sure that benefits are shared broadly, there should be a discussion of whether to tie utility revenue to how much they invest and how to create a culture of efficiency.

V. Conclusion

Q. What message do you have for the Commission in closing?

A. We need to focus on the development of clean energy to mitigate climate change and do so in a way that benefits all residents of the state. The Climate and Equitable Jobs Act is a good start but requires the Commission to assert its implementation oversight to ensure that utilities are acting in the language and the spirit of the law. Community solar programs are a critical component of an equitable energy transition – one that fosters energy democracy and sovereignty. I urge the Commission to adopt the improvements I've discussed to make those opportunities more accessible and beneficial.