

Hello:

Prior to this evenings council meeting, discussing the approval or denial of a request for a solar farm at the end of Reservoir Blvd in Peoria, I though you needed context to the comments I made to the Planning and Zoning Commission. That Commission denied the developers request for approval by the way.

The following are examples, explanations and questions they raise that go beyond just the emotions of residents involved by your decision:

1. Glare reflection into nine condos directly in the path of the solar panels.

Exhibit #1 is an overview of the area intended for the solar farm, it includes the nine condos located east of the solar project. Superimposed over it, is the direction of the sun and how high above the horizon it would be at times of the day. This illustrates the sun at it's furthest east point, relative to the condos shown.

Now why is this relevant? The condos shown are initially two story dwellings, compared to the solar panels immediately next to them. Unfortunately the solar farm is built on a sloping hill away from the condos as illustrated by **exhibit #2**. By the time you reach the bottom of the solar farm, that two story condo is now many stories above the solar farm. The kitchen and dining windows face the solar farm. The outside patio sits right above it.

Again you ask, why is this relevant? The solar farm panels for this project, track the sun from East to West. The sun is rising right over the condo roofs between 6 am and 10 am. If you happen to be enjoying a leisurely coffee and paper on your patio at that time, you'll probably need sunglasses along with your bathrobe. If you're washing dishes at your kitchen sink from the night before, or sitting at your dining room table enjoying the view, be prepared to be hit with glare from below.

2. The solar farm developer has glare studies to show it's not a problem. He'll also states that the panels have an anti reflection coating to preclude glare.

The next exhibits below counter that argument. I've highlighted pertinent information in yellow within **exhibits #3, #4 and #5**. They discuss anti reflective coatings, glare studies, proximity of solar farms to residential dwellings and angle of the sun producing direct reflection problems.

In summary, glare is a problem with or without anti glare coatings under the early morning times shown previously. Simple tracking of the sun, which the developer says this project will use, often leads to more glare problems. Studies have shown that solar farms, within six tenths of a mile of dwellings, have serious issues.

3. Solar farm access to the Ameren substation and the developers statement that Ameren says the current wiring and mechanical can handle the additional loads.

I live at 3609 N Sandia Drive, in the Lexington Ridge Condominiums complex. Along Sandia Drive, runs an Ameren underground power main line to the substation at the corner of Sandia and Palmyra Drive. That is shown in **exhibit #6**.

That is the closest power access point to the solar farm proposed across the street. The power the solar farm generates is sent to the nearest substation and into the power grid.

In the last three years, non storm related, mechanical issues to the underground and above power equipment have caused six power outages. Some lasted hours long and one blew the manhole cover off the underground access point. This whole underground system was designed and installed 45 years ago. Many of the people sent for repairing it have said it's old and in need of repair or upgrades. Now you are adding solar farms power issues to a system that is currently under stress due to its age.

Exhibit #7 is an Ameren response to my inquiry about the power grid's capabilities. You'll see Brian Cuffle, from Ameren, pointing out that the Ameren approval the developer mentions was so general, that he describes it looking down from 30,000 feet in the air at the current grid. He goes onto say that it's the developer's responsibility to pay for any changes in the system to accommodate the solar farm.

Again you ask yourself, why is this important to your approval or denial? That Sandia Drive underground line feeds at least 134 voting taxpayers of Peoria. Unless you get a strong, written commitment from the developer, to pay for upgrading the power transmission along Sandia Drive to 2023 standards, those taxpaying voters sitting in the darkness and summer heat will remember how a solar farm installation got them to that point.

4. There might be a reason why what seems as a politically correct idea of helping low income families pay for their utilities and also increase the taxes a piece of land pays to the city might not be the best idea after all.

Just like Exhibit #8 illustrates from the announcement in the Peoria Journal Star about the solar farm. This is not a solar farm that sits out in the middle of an isolated corn or soybean field. It is on the immediate edge of the city, at the end of a residential street, less than 100 feet from nine condominiums overlooking it.

If this was such a politically correct idea, then surely other municipalities must have done the same thing. Google solar farms! Look at any and all photos of multiple installations all over the world. You will not find one, that is this close to a residential property. Please consider that everyone else in the world, dealing with similar concerns about where to put a solar farm, have ultimately ended up putting them outside of cities, towns and communities you drive through.

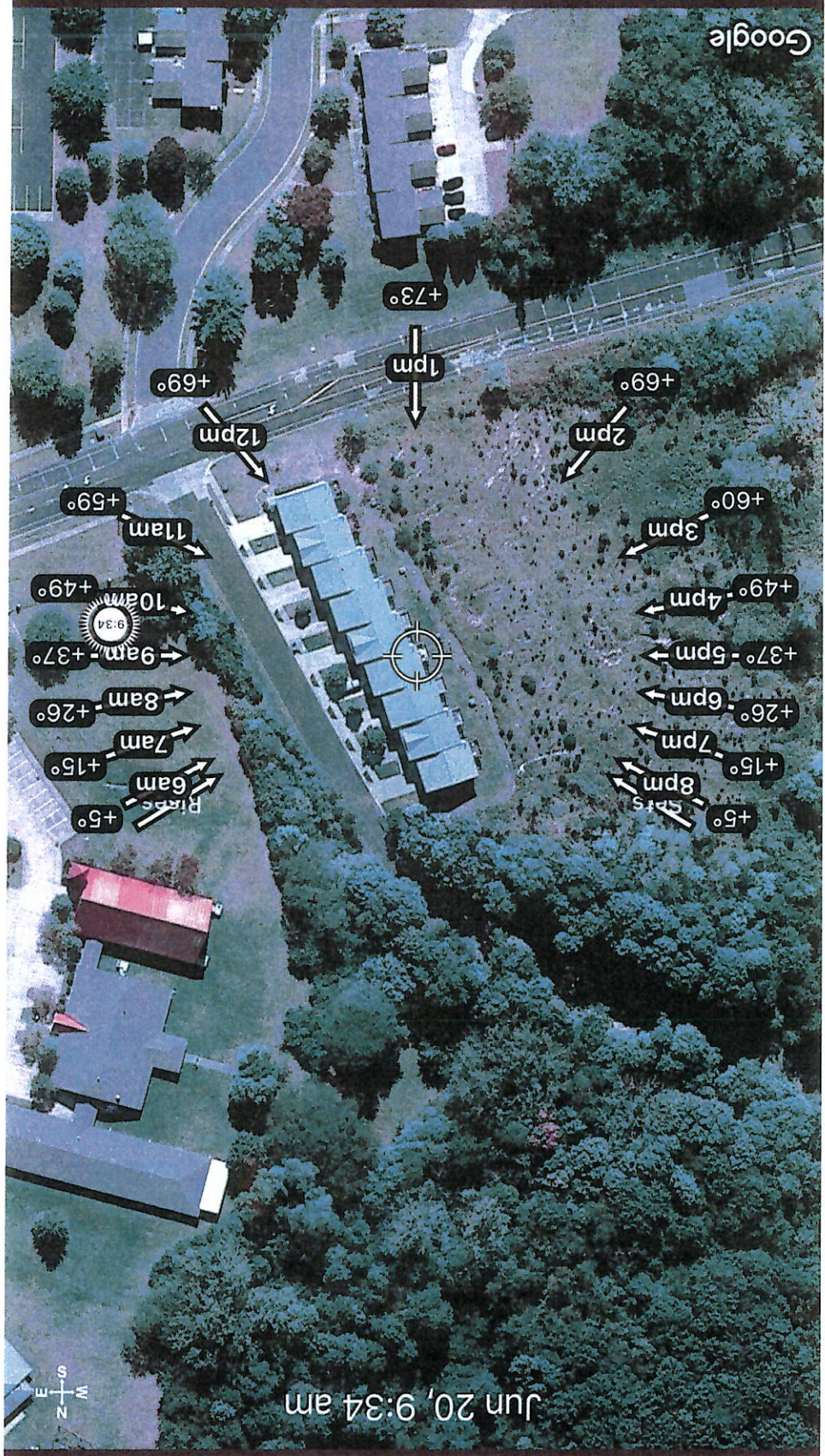


Exhibit A1

Exhibit #2-A

Google Maps W Reservoir Blvd

Peoria, Illinois

Google Street View

Jul 2022 See more dates



Image capture: Jul 2022 © 2023 Google

W Saymore Ln

Les Petits

Exhibit # 2B

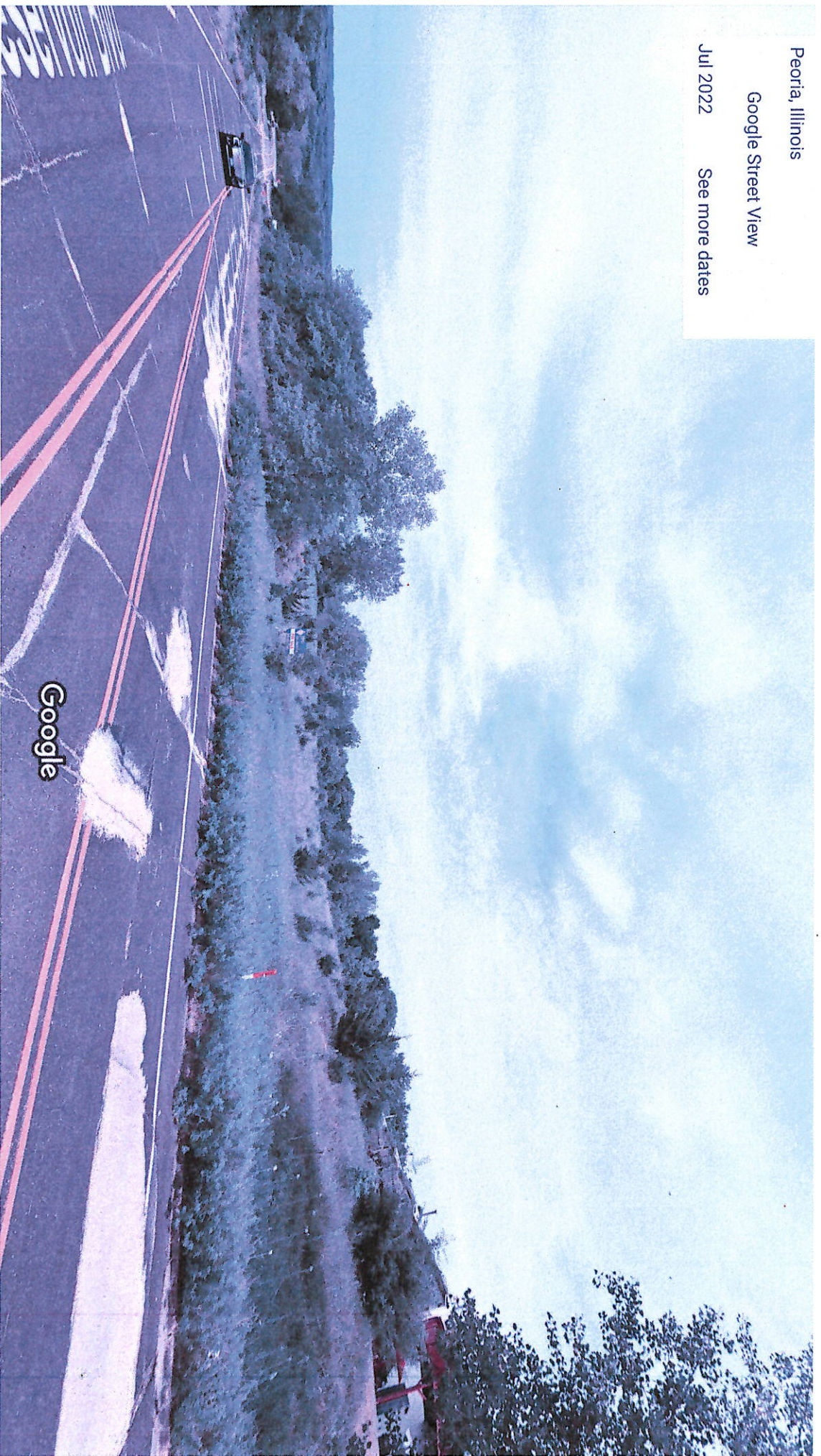


EXHIBIT #3



(https://www.pagerpower.com)

SOLAR PANEL GLARE

Overview

Solar Panel Glare occurs even though it is not expected because solar panels are designed to absorb sunlight, rather than reflect it. Solar Panel Glare is greater than expected because panels are good at absorbing light perpendicular to them but much less effective when the light is at a low angle.

[Pager Power's assessments \(https://www.pagerpower.com/what-we-do/glint-glare/\)](https://www.pagerpower.com/what-we-do/glint-glare/) can predict the timing and intensity of solar glare for solar PV installations near airports, railways, highways and dwellings.

What is solar panel glare?

By Mike Watson
(https://www.pagerpower.com/news/author/mike/)

July 2, 2020

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Solar Panel Glare occurs when an observer sees a direct reflection of the sun caused by a specular (mirror-like) reflection from the surface of one or more solar panels.

(<https://twitter.c>
[url=https://www.pagerpower.com/news/solar-panel-glare/](https://www.pagerpower.com/news/solar-panel-glare/))

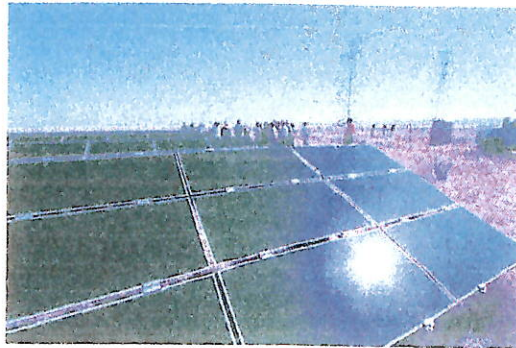


Figure 1: Solar Panel Glare

What information is required for assessments?

When assessing solar panel glare (</news/overview-pager-powers-glint-glare-charts/>) accurately it is important to know:

1. Location of the solar panels
2. Location of the observer
3. Azimuth and elevation angle of the solar panels
4. Optical characteristic of the panels

Do anti-reflective coatings stop solar panel glare?

②

Whilst it is often claimed that anti-reflective coatings prevent harmful glare in reality they reduce glare levels - but often not when the sun is at a low angle when direct solar reflections are most likely.

How does solar panel glare compare with glare from other sources?

Other sources of glare include:

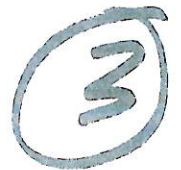
1. Direct exposure to the sun
2. Reflections from water
3. Reflections from windows and glass
4. Reflections from highly polished steel
5. Reflection from wet paved surfaces

The intensity of solar panel glare is often less than the intensity of the above - however the size of the solar development can mean that solar panel glare can be deemed unacceptable.

Can solar panel glare be mitigated?

The most effective ways of reducing solar panel glare are:

1. Choosing a panel with a rougher surface
2. Reorienting the panels



3. Shielding the panels so they cannot be seen
4. Changing the panel layout to reduce visibility

What is typically included in a Glint and Glare assessment?

Glint and Glare assessments typically determine the times at which solar panel glare will occur. They also predict the intensity of glare in accordance with US Federal Aviation Administration guidance.

Download our [glint and glare guidance document](#)

(https://www.pagerpower.com/wp-content/uploads/2020/02/Pager_Power_Glint_and_Glare_Guidance_2020.p

which includes a standardised methodology for PV developers, planners and stakeholders to follow.

Conclusion

Solar panel glare is a common occurrence which is not fully mitigated by anti-reflective coatings.

Pager Power can predict glint and glare effects on airports, railways, highways and dwellings. There are a number of mitigation options available to solar developers.



Image accreditation: "First Array

(<https://www.flickr.com/photos/ferriday/5816508950/>)"

by Russ Ferriday

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GLINT AND GLARE



PV SOLAR GLARE



SOLAR GLARE



SOLAR PANEL GLARE



SOLAR PANEL GLARE GUIDELINES



SOLR PV INSTALLATIONS GLINT A

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0

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[text=Solar+Panel+Glare&url=https%3A%2F%2Fwww.pagerpower.com%2Fnews%2Fpanel-glare%2F](http://twitter.com/share?text=Solar+Panel+Glare&url=https%3A%2F%2Fwww.pagerpower.com%2Fnews%2Fpanel-glare%2F))



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More by Mike
(<https://www.pagerpower.com/news/author/mike/>)
Watson

0 COMMENTS

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Exhibit B 4

February 12, 2021 Power

Reflecting on Solar Panel Glare and How to Mitigate It

by AXEL OLSON

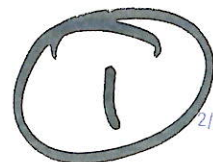
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Airline passengers would never want their pilot to be blinded by reflected light as the landing aircraft is approaching the runway. The same concern would apply to air traffic controllers in their tower, directing traffic across an entire airport and in the sky around it. Vision is essential to safety, and unexpected glare can take that away.

While urban legends stress the dangers of laser pointers, solar photovoltaic (PV) arrays can unintentionally pose a more common, persistent and significant safety threat.

Solar energy production has a key role to play in a decarbonized energy economy, but one frequently overlooked aspect of these installations is the impact of the large flat pieces of glass in PV modules reflecting sunlight on their surroundings. One common misconception is that modules with antireflective coating would not have this issue. That coating's primary purpose, however, is to improve module efficiency; it can actually worsen the glare impact on the surrounding area by dispersing the reflected light over a larger area, which in turn takes up more of an observer's field of view.



As more solar projects are developed in increasingly urban environments, the overall issue of glare is gaining attention. The most notable codification of these concerns to date has been regarding the effects of reflected light on airport operations.

Mandating Analysis

Solar projects located on or within close proximity of airport property are subject to Federal Aviation Administration (FAA) **regulations** to mitigate any adverse impacts on pilots and air traffic control towers. Those regulations require a glare analysis, with results to be submitted to the FAA.

The regulations were inspired by an unfortunate situation that played out at Manchester-Boston Regional Airport in New Hampshire. After a project put solar panels atop an airport parking garage, authorities were surprised to find light being reflected into the air traffic control tower. The airport ultimately put tarps over the panels because they were preventing the controllers from doing their work safely. In hindsight, the problem seems obvious, but it simply had not occurred to anyone before then.

One catch to the FAA's parameters: There is no precise definition of what project size or how close is close enough to call for the required study. Within five miles of an airport has emerged as a good rule of thumb to consider the impact of glare, though distance and the size of the installation are somewhat correlated. The bigger the array, the farther it can be from the airfield and still trigger the FAA-required glare analysis.

When a study is needed, there is one highly specialized, commercially available tool. That product by **ForgeSolar** utilizes the underlying Solar Glare Hazard Analysis Tool that the FAA requires and developed in conjunction with Sandia National Laboratories to assess glare. A properly trained glare specialist can typically run the analysis within a day and obtain preliminary results. If engaged early enough in a project, this can help guide design and technology decisions and avoid costly changes and rework.

Mitigating the Risks

In the event a glare study does identify significant impacts from PV glare, solar project developers do have options to mitigate the risk. The first is to select a new location for the

2

arrays that is farther away from runways and airport traffic control towers. Naturally, this is not a popular choice.

A second option is to alter the choice of tracking technology. Typical utility-scale solar PV farms are built using single-axis tracking with backtracking, enabling the panels to rotate during the day and follow the sun through the sky while reducing row-to-row shading at dawn and dusk. Unfortunately, the increased production from backtracking algorithms, which are increasingly being utilized in single-axis tracking installations, also positions the modules to reflect more glare into the surrounding area with an increased incident angle of reflection during those hours. There are numerous tracking considerations and scenarios that factor into a project's development, but the selection and control of the technology do offer some possibilities for reducing impacts, depending on the position of the solar PV farm in relation to the airport.

The third option is called suboptimal positioning. Fixed-tilt arrays in North America are generally faced due south, with the north edge tilted up to maximize solar exposure. By

1898 
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production.

By sacrificing perhaps 5%-10% of annual energy production with suboptimal positioning, it might be possible to achieve FAA compliance without changing the project location or tracking technology utilized. No one wants to sacrifice performance, but that may be preferable to accepting that a project cannot be built on the intended site. An optimization analysis can go deeper than the glare study, identifying at what point an installation would be compliant if some operational parameters were adjusted and what the anticipated impact on the annual energy production would be.

Withstanding the Glare

The potential of solar power is helping drive rapid growth in installations. As remote greenfield sites become harder to secure, these installations will increasingly encroach upon population centers. Airports have been among the first to discover the risks of reflected light, but they are not alone.

3

Other ground-level observers, such as residential developers or roadway planners, may raise objections to glare from solar panels. Solar project developers need to be aware of their options. Glare and optimization analyses can help in identifying and mitigating impacts, but finding acceptable and allowable parameters for surrounding-area impacts is heavily dependent upon the local authorities having jurisdiction. Unlike the FAA regulations, these localized scenarios are not uniform and are rarely codified as of yet.

Having an integrated engineer-procure-construct (EPC) partner working on a solar installation can position projects for success by coordinating permitting measures and identifying risks such as glare early in the process, when it is easier and less costly to make any necessary adjustments.

Interest in solar is high, but the changing marketplace is complicating the development of utility-scale solar farms. Having an integrated EPC contractor can help avoid common pitfalls in solar construction projects.

[READ THE WHITE PAPER](#)

Power

by AXEL OLSON



Axel Olson is a technical advisory consultant at 1898 & Co., part of Burns & McDonnell. With bachelor's and master's degrees in electrical engineering, he has aided clients with assessment of glint and glare from solar photovoltaic sites. He also has experience with interconnection applications, energy production estimation studies, cable partial discharge testing, due diligence evaluations of proposed projects, and renewable energy generation design and planning.



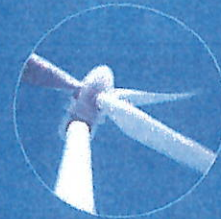
Solar Photovoltaic Development - Glint and Glare Guidance

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October, 2018 - Second edition



EXECUTIVE SUMMARY

Overview and Purpose

The purpose of this guidance document is to provide solar photovoltaic (PV) developers, planners and stakeholders with an assessment process for determining the effects of glint and glare (solar reflections) upon receptors surrounding a proposed solar PV development.

Glint and glare is a relatively new planning consideration thus there is little formal guidance regarding the issue. This guidance document has therefore been produced to bridge this knowledge gap pertaining to the assessment of glint and glare. The aim is to produce a standardised assessment process for developers, planners and stakeholders to reduce the element of risk associated with glint and glare.

The guidance presented is based on the following:

- Reviews of existing guidance in a variety of areas;
- Glint and glare assessment experience and industry knowledge;
- An overview of available solar reflection studies.

This guidance document is based on knowledge initially gained through analysis within the UK and Irish markets however the methodologies are deemed applicable, and have been used, for worldwide solar PV development.

Key Receptors

Glint and glare can significantly affect nearby receptors under particular conditions. The key receptors with respect to glint and glare are residents in surrounding dwellings, road users, train infrastructure (including train drivers), and aviation infrastructure (including pilots and air traffic controllers). Other receptors do exist, however this guidance considers the four most common receptor types.

Modelling Requirements

A geometric glint and glare assessment model must include the following:

- The Earth's orbit around the Sun;
- The Earth's rotation;
- The Earth's orientation;
- The location of the solar PV development including the reflector (solar panel) area;
- The reflector's 3D orientation including azimuth angle of the solar panel (the orientation of the solar panels relative to north and the solar panel elevation angle);
- Local topography including receptor and panel heights above mean sea level.

For increased accuracy, the model should account for the following:

- Terrain at the visible horizon;
- Local time zone and daylight savings times;
- Consideration of sunrise and sunset times;
- Determine which solar panels create the solar reflection within the solar PV development;
- Azimuth range of the Sun¹ when a solar reflection is geometrically possible;
- Vertical elevation range of the Sun when a solar reflection is geometrically possible;
- High-resolution analysis i.e. undertaking multiple geometric calculations within the given solar PV development area. For example, at intervals of between 1 and 20 metres;
- The intensity² of any solar reflection produced.

Assessment Inputs – Receptors

The following paragraphs set out the key distances for identifying receptors and the height data which should be included.

Dwellings within approximately 1km of a proposed solar PV development that may have a view of the PV panels should be assessed. Terrain heights and an additional height to account for the solar panel and eye level within the relevant floor of the dwelling should also be considered.

Roads within approximately 1km of a proposed solar PV development that may have a view of the PV panels should be assessed. Terrain heights and an additional height to account for the solar panel and eye level of a road user should also be considered.

Railway infrastructure within approximately 100m of a proposed solar PV development that may have a view of the PV panels should be assessed. Terrain heights and an additional height to account for the solar panel and eye level of a train driver or the height of a railway signal should also be considered. Include an assessment of railway signals that utilise incandescent bulb³ technology and/or where no hood is attached.

Aviation receptors out to 30km⁴ from a proposed PV development should be considered to determine the requirement for assessment, if any. The typical receptors include the Air Traffic Control (ATC) tower and a 2-mile approach path for the relevant runway approaches. Additional receptors may be included where a solar reflection may be deemed a hazard to safety e.g. helipad approaches and the visual manoeuvring area (VMA).

¹ The azimuth range is the angle between the Sun and North, measured clockwise around the receptor's horizon. The Sun azimuth range shows the location of the Sun when a geometric solar reflection is possible. Therefore, it is possible to determine whether the Sun and the solar reflection are both likely to be visible to a receptor.

² In W/cm² at the retina, for example.

³ Non-LED.

⁴ Aviation stakeholders can and have requested a glint and glare assessment beyond 30km.

Assessment process

6.5 The following process should be used for modelling glint and glare for the identified dwelling receptors:

1. Define the solar PV development panel area;
2. Undertake geometric calculations, as outlined within Section 4 of this guidance;
3. Produce a solar reflection chart to determine whether a solar reflection is geometrically possible, and if so at what time/duration;
4. Assess the results of the geometric glint and glare assessment in the context of the following:
 - a. Sun location relative to the solar panels;
 - b. Location of the reflecting solar panels relative to the dwelling;
 - c. Existing screening;
 - d. Proposed screening;
5. Determine whether a solar reflection is significant;
6. Consider mitigation, if required.

Discussion of significant effects

6.6 There are many solar PV developments where solar reflections are geometrically possible and visible from surrounding dwellings. Experiencing a solar reflection does not, however, guarantee a significant effect requiring mitigation will occur. Assuming the solar PV development is visible from a window of a room occupied during daylight hours, the duration of time for which a solar reflection could last is considered to be the most significant characteristic.

6.7 Other factors that could be considered when determining whether a solar reflection is significant include:

- Whether the solar reflection is incident to direct sunlight and the location;
- Whether the dwelling has a window facing the solar PV development;
- The room within the dwellings from which a solar reflection may be visible i.e. is it occupied for a long period during daylight hours;
- The time of day when a solar reflection is geometrically possible.

6.8 The duration of time for which a solar reflection is possible is considered to be the overall defining characteristic when determining whether mitigation is required. Defining a minimum duration for effects to become significant is, however, subjective. For static receptors, the length of time for which a solar reflection is geometrically possible and visible will determine its significance upon residential amenity. Therefore, it is appropriate to choose a duration

beyond which solar reflections become significant and where mitigation is required. Applying a strictly scientific approach is difficult however because:

- Most models generally show a worst-case scenario of glint and glare, often predicting solar reflections for a much greater length of time than will be experienced in reality;
- The scenario in which glint and glare occurs will vary for each dwelling;
- The effects of glint and glare are subjective and the significance will vary from person to person.

6.9 In order to quantify and determine where a significant impact is expected, previous glint and glare assessment experience has been drawn upon as well as a review of existing guidance with respect to light based environmental impacts, these include:

- Previous glint and glare assessment experience;
- Shadow flicker guidance for wind turbines²⁴. Guidance has been produced which sets durations beyond which a significant impact on residential amenity is expected and mitigation is required.

Previous experience of glint and glare dwelling assessments

6.10 It is common for dwellings to be located within 1km of a proposed solar PV development. Assessment experience means that typical results for proposed ground mounted solar PV developments²⁵ are known. It is common for solar reflections to be possible in the mid-morning (~06:00-08:00GMT) and again in the early evening (~17:00-19:00GMT). There are many examples of dwellings located where a solar reflection is geometrically possible however, a solar reflection could only ever be significant where the solar reflection is visible from the dwelling. Assuming a solar reflection is geometrically possible and the reflecting solar panels are visible, a solar reflection would be experienced when the following conditions are met:

1. An observer is located at a point within the dwelling where a solar reflection is possible e.g. located at a kitchen window at the time of the day when a solar reflection is geometrically possible;
2. The weather at the particular time of the day when a solar reflection is geometrically possible is clear and sunny.

6.11 The likelihood of these conditions being met varies both person to person and geographically based on local climate conditions. However, it illustrates that a predicted

²⁴ Shadow flicker, like glint and glare, is considered a detrimental effect created through the manipulation of sunlight. Therefore the guidance has been used for comparative purposes.

²⁵ At typical solar panel azimuth and inclinations. Defined as panel elevation angle 15-30 degrees and south facing in the UK and Ireland.

geometric solar reflection does not guarantee a visible solar reflection when considering real world conditions.

Exhibit # 26



Solar Farm

Sandia Drive

Amenemen Substation

Exhibit #7

From: Cuffle, Brian D BCuffle@ameren.com
Subject: RE: [EXTERNAL] Solar farm hookup into an old feeder line with zoning board meeting time crunch.
Date: February 7, 2023 at 11:51 AM
To: PAUL KLUBER kchroma@aol.com
Cc: Cuffle, Brian D BCuffle@ameren.com



Paul, we actually don't have a solar application at this point regarding the project that you are discussing. We had a pre-application, which is not a real application. A pre-application just gives the application a 30000 foot view of what is out there capacity wise etc. With our hosting capacity maps that we have on our website (which was required by legislation) actually helps developers more than the pre-application. A lot of the developers end up using both to help with them determine if they want to move forward to a real application.

Couple things to address:

- 1) If there are continued power issues in the area (outside the solar end etc), then engineering is where to address those possible issues. They would need to keep evaluating and reviewing what is out there and maybe there is opportunity to update the system where needed with the continued failures.
- 2) Ameren Illinois has no role in telling customers where they can install a solar field, windmill etc. As stated above, we try to assist in giving them indications where it might be easier, financially, for them to install one, but we can't say no to an applicant. When an application comes in, we follow the ICC IL Admin Code Part 466 or 467 Interconnection Rules to evaluate and review the proposed installation and determine what upgrades on the Ameren Illinois system would need to accommodate the proposed system and keep our grid safe and reliable for our customers. Anything that we have to do to accommodate the installation, the applicant has to pay for.

Hope this helps answer some questions that you might have regarding this. thx. Let me know.

Brian Cuffle :: DER Integration and Strategies :: Supervisor Distribution Design :: M 217.341.5696
Ameren Illinois :: 2105 E State Rte 104 :: Pawnee, IL 62558

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-----Original Message-----

From: PAUL KLUBER <kchroma@aol.com>
Sent: Monday, February 6, 2023 6:26 PM
To: Cuffle, Brian D <BCuffle@ameren.com>
Subject: Re: [EXTERNAL] Solar farm hookup into an old feeder line with zoning board meeting time crunch.

Hello:

A woman, but I've forgotten her name. Once she said I had the wrong person to answer further questions, my mind moved on.

Thanks,
Paul

On Feb 6, 2023, at 11:21 AM, Cuffle, Brian D <BCuffle@ameren.com> wrote:

Paul, who from engineering did you talk to regarding thi

Brian Cuffle :: DER Integration and Strategies :: Supervisor
Distribution Design :: M 217.341.5696 Ameren Illinois :: 2105 E
State Rte 104 :: Pawnee, IL 62558
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-----Original Message-----

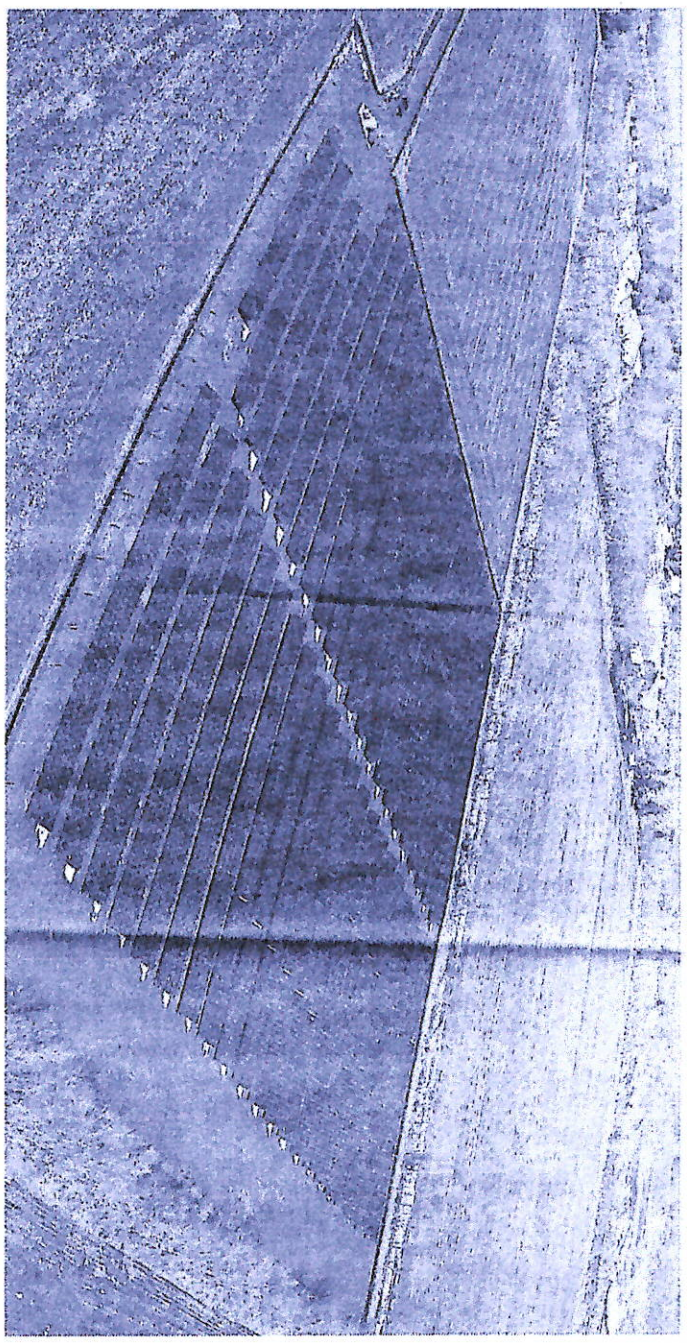
From: PAUL KLUBER <kchroma@aol.com>
Sent: Tuesday, January 31, 2023 3:35 PM
To: renewablesillinois <renewablesillinois@ameren.com>
Subject: [EXTERNAL] Solar farm hookup into an old feeder line with zoning board meeting time crunch.

Exhibit 28

Journal Star

TUESDAY, JANUARY 31, 2023 | P.J.STAR.COM

USA TODAY NETWORK



In this supplied file photo, an 11-acre community solar farm at the northeast edge of Lacon began generating electricity in December of 2020 as the first project of its type in Marshall County. A similar project is in the works for property on West Reservoir Boulevard on Peoria's western border. COURTESY OF SUMMIT RIDGE ENERGY LLC

The future looks bright

How a company plans to address concerns

In order to proceed, the project will need a special use permit from the city of

6th officer relieved of duty in Nichols arrest

Adrian Sainz
 ASSOCIATED PRESS

MEMPHIS, Tenn. - The Memphis Police Department has disciplined an officer involved in the arrest, beating and death of Tyre Nichols, the department said Monday, widening the circle of punishment for a killing that has already led to the murder indictment of five officers and outraged the nation with another display of police brutality.

Officer Preston Hemphill, who is white, was relieved of duty shortly after Nichols' Jan. 7 arrest, the department said. Five Black officers were fired and charged last week with second-degree murder and other offenses