

Illinois Power Agency
160 North LaSalle Street
Chicago, Illinois 60601

InClimate, Inc. - Program Administrator

Response to Request for Follow-Up Comments on the ABP Block 1 Lottery Proposal

CSG greatly appreciates the opportunity to participate in the comment process and would like to thank the IPA for opening up a response to comment period.

Interconnection Application Submission Cutoff

CSG would like to support the solution proposed in the JSP comments on this issue. This solution allows for the cutoff date on interconnection application submission of September 10th, 2018 to be applied to project switching out, but not to project eligibility. Said differently projects with interconnection applications submitted after September 10, 2018 should be allowed to participate in the lottery and should be allowed to be swapped into a winning spot, but should not be allowed to be swapped out of a winning spot.

This limitation accomplishes two things. The first is that it does not discriminate against good projects, that have met all of the ABP application requirements and intend to be constructed, from participating in the lottery process. The second is that it disincentivizes new projects, with no chance of being constructed, to be used as extra lottery chances only.

It is important that all projects, which have met the requirements to be submitted to the APB and intend to move forward with project construction, are allowed to participate in the lottery process. Retroactively applying a due date that prevents projects from participating in the lottery would harm some projects that were submitted in time to meet all of the posted ABP requirements, with every intent of moving forward as a quality project.

Conversely the structure of the lottery does incentivize the submission of projects that are “complete” for participation in the ABP but not viable for actual project construction and completion. Although we are not accusing anyone of being a bad actor, developers were incentivized to submit interconnection applications for projects that were able to meet the requirements for submission to the ABP lottery, without being a viable project for some other reason. The proposed solution will allow quality projects in, while putting up hurdles to prevent non-viable projects from being used as extra lottery chances.

Allocation of Discretionary 25%

The likely initial rush of applications to the ABP, system swapping, and interconnection queue congestion make the allocation of the IPA's discretionary 25% a key piece in the initial implementation of the program. Because of this CSG urges the IPA to allocate these discretionary RECS as soon as possible. Knowledge of this allocation will be necessary for developers to make logical decisions in regards to project switching. We also urge the IPA to consider all market segments when allocating these RECS. The success of the program requires robust participation from residential, C and I, and community solar projects. Not all of these sectors will be ready to the same extent at program launch, but continued REC availability is vital to each. This is especially important to the C and I and residential developers. Developers and installers of smaller projects rely on a steady stream of incentives to maintain consistent business.

That being said the IPA has a long history of encouraging growth in the solar industry in Illinois and we are confident that they will wisely allocate the additional 25% in a way that leads to a successful launch to the ABP.

Grouping of Projects

CSG has no issue with multiple projects being grouped together as long as the group of projects does not exceed 2MW AC total and the group of projects is only given one lottery chance.

45 Day Lottery

CSG is concerned that a potential lottery up to 45 days after program launch will be a hindrance to the successful launch of the ABP. The potential of a lottery looming over projects that have been awarded a REC contract will essentially serve to extend uncertainty for an additional month. We understand that there needs to be limits to the program size at launch and the budget cannot support unlimited REC contracts, but the potential for a lottery to remove REC contracts from successful program applicants should only be used as a last resort if at all.

Sincerely,



Dylan DeBiasi