



@oneenergyinc

oneenergy
renewables
.com

October 17, 2018

VIA: COMMENTS@ILLINOISABP.COM

InClime, Inc.
Program Administrator, Adjustable Block Program

RE: REPLY COMMENTS - LOTTERY STAKEHOLDER PROCESS

PROGRAM ADMINISTRATOR:

OneEnergy Development, LLC (“OneEnergy”) provides the following comments related to the Request for Follow-Up Comments on the Adjustable Block Program Draft Lottery Guidelines.

Project Substitution/Reallocation

OneEnergy supports the option for Approved Vendors, and their affiliates, to swap their project’s ordinal ranking to allow for the prioritization of the most economic projects. This option should extend both to selected and non-selected projects on the waitlist.

Such reallocation should be permitted for a period that aligns with an interconnection transparency process that allows developers to understand the actual upgrade costs for their projects prior to finalizing their REC contracts. This interconnection transparency process may take the form of a re-study and decision-making waterfall, as petitioned by ComEd in Docket 18-1583, in which projects proposed first on each substation, or feeder, are tendered updated interconnection results and then required to pay a deposit or move to the end of the queue. Given the widespread implications project swapping may have on interconnection results, OneEnergy recommends limiting project swapping to this initial period of interconnection transparency.

Synchronization of the IPA Lottery with the Utility Interconnection Queue Process

To synchronize the lottery with the interconnection queue process, Approved Vendors must be allowed the time required to truly understand their interconnection costs prior to executing a REC contract or swapping project positions. Although such an interconnection transparency process may prolong the development timeline for participating projects, it will provide developers with much-needed clarity to enable an informed and efficient solar market.

However, if a project is removed from the interconnection queue due to its determination not to move forward with a required deposit, that project should be deemed no longer eligible for the purposes of the Adjustable Block Program lottery. Otherwise, the lottery will become clogged with stale projects, which will prevent advanced projects on the waiting list to move forward.



Reducing Applications from Speculative Projects

OneEnergy supports efforts to enact stringent project eligibility requirements to mitigate speculative projects' impact on the lottery. OneEnergy opposes a significant bid deposit—non-refundable or otherwise—to serve this purpose, as was proposed by a number of commenters. Such a *pay-to-play* mechanism is likely to better serve larger, well-funded Approved Vendors and may unfairly discriminate against smaller regional or local developers. Instead, OneEnergy supports more stringent documentation requirements, including proof of achievement of discretionary permits (e.g., conditional use permit) and proof of site control.

Grouping of Projects into a Single Lottery Entry

OneEnergy requests the Proposal be clarified to ensure community solar projects eligible for co-location are treated as two distinct projects for the purposes of the lottery process. Projects eligible for co-location should not be treated in an all-or-nothing manner, which could diminish their chances within the lottery process. Moreover, OneEnergy opposes any de-prioritization of project sites with the potential for co-location as this option may allow for more efficient siting and cost-effective interconnection. Developers must already weigh these potential advantages against the lower REC contract value assigned to co-located projects.

Discretionary Capacity

OneEnergy supports the prompt allocation of discretionary capacity, as outlined in the Commission's Order approving the Long-Term Renewables Resources Procurement Plan. The Agency should allocate the remaining capacity in proportion to the relative oversubscription of the various Block and Group categories.

We appreciate the opportunity to provide reply comments on this matter and look forward to ongoing processes related to the Adjustable Block Program's implementation.

Sincerely,

STEVE GRIFFITH
PROJECT MANAGER
ONEENERGY