

Subject: [External] Joint Solar Parties Comments on Draft Project Information Release Protocols



Strong, Michael R. <mstrong@fvldlaw.com>

Fri, May 31, 3:35 PM (7 days ago)

to Granahan, Brian, Nakhia Morrissette, Sean Gallagher (SGallagher@SEIA.org), EXT Passera, Laurel, EXT McCain, Lesley

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Good afternoon, Brian,

The Joint Solar Parties appreciate the opportunity to comment on the IPA's draft project information release protocols. The Joint Solar Parties have two limited comments.

First, the Joint Solar Parties recommend that residential customer addresses be protected from disclosure. While the IPA has committed to do so previously, it appears that for the few residential customers whose systems qualified for the over 10 kW DG category that their address may have been posted. The Joint Solar Parties understand that over a quarter of the systems (by number of systems, not capacity) submitted to the over 10 kW DG categories may be residential. Going forward, the Joint Solar Parties recommend that any behind the meter system designated as residential—whether that system is above or below 10 kW (AC)—be shielded from disclosing the address of the system. The Joint Solar Parties also recommend revision of existing lottery order lists to remove those addresses.

In addition, the Joint Solar Parties recommend that the IPA not release RECs under contract on a system-by-system basis. Disclosure of RECs under contract—combined with both AC and DC information—will lead to disclosure of the capacity factors that Approved Vendors selected. While the Joint Solar Parties recognize that some number of projects are likely to have used the standard program capacity factor, others are likely to have used custom capacity factors. The Joint Solar Parties do not wish to overemphasize the competitively sensitive nature of this information, it does provide competitors intelligence about each other that is not otherwise generally available for smaller projects. Although not necessarily germane for the Adjustable Block program, frequently Approved Vendors compete with each other for separate commercial opportunities, both inside and outside of Illinois. The Joint Solar Parties have no objection to providing aggregated or anonymized data about RECs under contract.

Thank you.

Michael

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