

Subject: [External] AES Solar - Response to ABP System Design Criteria Feedback Request



Shariff Shakir [REDACTED]

to IPA.Solar

Wed, May 12, 10:42 AM

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AES Solar - Response to ABP System Design Criteria Feedback Request.

Question A: system efficiency

1. No we should not limit system participation based on the percentage of an ideal system.
2. This is also not needed.

If a person wants to buy a solar system and it will generate RECs then let the RECs stand. As long as the homeowner and AV understand the implications then there is no reason to limit people from participating in the program.

Question B: Capacity Factor

1. No. RECs are RECs. If a system has a low capacity factor it is still contributing to the overall goal and the system owner should be rewarded even if it is just one REC per year.
2. No. There is no value in limiting someone's participation so long as AVs do their job.
3. We should look at first year production. The PVWatts capacity factor is different from what the program uses. 1st year production should be the standard. A lot of confusion would be ended if first year production was the only discussed metric. RECs are RECs.

Question C: Azimuth limitation

1. Lets not limit systems and require proper modeling. With current PV costs and other constraints azimuths that once seemed forbidden are possible. A low slope at 45 degrees may still generate well and produce RECs that benefit the program. RECs are RECs

Question D: Payback period

1. No. This will force AVs to adjust the price of the system or cut corners.

It is also very much dependent on Net billing policy in place. A utility could just lower the payback for a kWh sent to the grid and make it extremely difficult for systems to participate in the ABP in their territory. With that one move a utility could drastically limit solar going on their grid beyond just the poor return from the kWh credits. Checking to ensure that AVs are doing modeling correctly will be dubious at best. Even with best intentions ROI, Payback period and the like are ESTIMATES when talking about real time reconciliation. It is impossible to know and needs a disclaimer of "assuming you self consume X%" is really needed.

2. No

Please feel free to reach out for clarifications.



Shariff Shakir
Chief Executive Officer

T: [REDACTED]
E: [REDACTED] | www.aessolar.com
1804 Supply Rd | Carterville, IL, 62918

