



Illinois Adjustable Block Program

Monday, May 10, 2021

Request for Stakeholder Feedback: System Design Criteria for Distributed Generation Systems

A. System Efficiency as Compared to an Ideal System

1. Yes. The percentage should be 80%. Additionally, the minimum panel efficiency should be 19.5% and rated by professional standards.
2. No. Disqualify anything below 19.5% panel efficiency.

B. Capacity Factor

1. No.
2. No.
3. No.

C. Azimuth

1. Yes. We suggest that less than 120 or more than 230 be disqualified.

D. Payback Period for Purchased Systems

1. No. Payback calculations are difficult to standardize. It would be better to establish a maximum cost per DC Watt. That number would be different for rooftops vs. ground and tracking vs. fixed.
2. No. Same problem with calculation of simple payback.

E. Distributed Generation Disclosure Form

1. Every comment we have offered applies to system purchase or lease and applies to systems of any size. Everything we have suggested above should be disclosed on the Disclosure Form.
2. No.

F. Financing Structure

1. We would suggest disclosure of cost per DC Watt for the entire system. We would also suggest that the minimum panel efficiency apply to everything regardless of financing structure. We would further suggest that leases and PPA's be reviewed by ABP to assure that the customer has received a fair deal. We see vendors getting customers to sign long-term leases that make the ultimate cost higher than their current electricity costs, while at the same time the customer does not acquire equity in the system.

Thank you for the opportunity to provide feedback.

Ag Technologies, Inc.