



---

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

April 22, 2021

The Illinois Power Agency's Long-Term Renewable Resources Procurement Plan contains a commitment to consumer protection for the Adjustable Block Program. Nevertheless, the Agency and Program Administrator have observed some distributed generation systems submitted to the Program have an engineering design or financing structure which allows for customers to receive suboptimal value from participating distributed generation projects, potentially producing negative customer experiences.

Through this Request for Stakeholder Feedback, the Agency and Program Administrator are examining options to minimize sub-optimal system participation and seek stakeholder feedback on system design criteria options.

**Responses to this Request for Stakeholder Feedback should be submitted to the IPA by May 14, 2021 by emailing written responses to [IPA.Solar@illinois.gov](mailto:IPA.Solar@illinois.gov) with the subject "Responder's Name - Response to ABP System Design Criteria Feedback Request."**

All responses will be made public and published on the [Adjustable Block Program website](#). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions of its comments.

### STAKEHOLDER FEEDBACK QUESTIONS

Items below are organized by topic, although stakeholders are also encouraged to provide additional options or thoughts on system design requirements.

#### A. System Efficiency as Compared to an Ideal System

One option would be to prohibit program participation from systems failing to meet a threshold efficiency standard. For example, if a system with a given location and size with an ideal azimuth and tilt would create 100 RECs per year, a system that creates less than 75 RECs per year would be prohibited from participation. Under this construct, the ideal system calculation for a given location would be performed automatically by the application portal using PVWatts data.

---

### Illinois Adjustable Block Program

(877) 783-1820 | [admin@illinoisabp.com](mailto:admin@illinoisabp.com)  
[www.illinoisabp.com](http://www.illinoisabp.com) | [www.illinoisshines.com](http://www.illinoisshines.com)

*The Adjustable Block Program is a state-administered solar incentive program developed and managed by the Illinois Power Agency and administered through its third-party Program Administrator, InClima Solutions.*



1. Should an ABP system be compared to a system with an ideal azimuth and tilt for that system's location and be limited to a certain percentage of the production of an ideal system? If so, what would be an acceptable threshold percentage? **No, each system should be independently contracted based on design criteria. Since this is a production based incentive, there is no need for more limitations- just verification that the inputs upon which production estimates are based are correct.**
2. Rather than prohibiting participation, could a disclosure requirement scoring that system based on its percentage of optimal efficiency achieve the same goals? **I don't believe an additional disclosure is even needed.**

#### B. Capacity Factor

A project's capacity factor is used to calculate a project's REC delivery estimate, and thus its overall incentive value.

1. Should there be a minimum capacity factor for projects submitted? **No**
2. Should an absolute range be drawn for each tracking type (fixed tilt, 1-axis tracking, 2-axis tracking)? **No** If so, what range?
3. Alternatively, should capacity factors that deviate from the imputed PVWatts capacity factor by more than a certain percentage be disallowed? If so, what percentage? **Not disallowed, just subject to additional review for accuracy.**

#### C. Azimuth

Currently, ABP systems are not limited to any particular azimuth or azimuth range.

1. Should there be a required azimuth range for ABP systems? If so, what should that range be? (for example, should all of or portions of systems with an azimuth less than 90 degrees or greater than 270 degrees be prohibited?) **Yes, any reputable developer would not do a system with azimuths less than 90 degrees or greater than 270 degrees. So, required range should be 90-270 degrees.**

#### D. Payback Period for Purchased Systems

1. Should there be a maximum payback period for ABP systems? If so, how many years/months would constitute an unacceptable payback period? **No, this is up to the buyer of the system as to what they think is acceptable.**
2. Should an internal rate of return ("IRR") be allowed as a substitute for simple payback, and if so, what minimum IRR should be set? **Again, up to the buyer to determine if this works for them. Not up to the ABP to regulate.**

#### DI. Distributed Generation Disclosure Form

One or more of the items above might require additional disclosure language on the Distributed Generation Disclosure Form. Please specify to which version of the Distributed Generation Disclosure Form your comments relate in your submission ([system purchase](#), [lease](#), [PPA](#), [greater than 25kW](#)). **System purchase/greater than 25kW**

---

### Illinois Adjustable Block Program

(877) 783-1820 | [admin@illinoisabp.com](mailto:admin@illinoisabp.com)  
[www.illinoisabp.com](http://www.illinoisabp.com) | [www.illinoisshines.com](http://www.illinoisshines.com)

*The Adjustable Block Program is a state-administered solar incentive program developed and managed by the Illinois Power Agency and administered through its third-party Program Administrator, InClima Solutions.*



1. Which, if any, of the criteria should be disclosed to customers through the Distributed Generation Disclosure Form if this/these condition(s) are understood by the Program to be sub-optimal? **None- keep it simple.**
2. Additionally, are there any elements of the Distributed Generation Disclosure Form that would benefit from reconsideration, possible removal, or should any additional information be included that is absent from the form? **Everyone is accustomed to the form now. I think it adequately covers the information the consumer needs to know as is.**

**F. Financing Structure**

1. Should any of the requirements contemplated herein vary based on financing structure (ownership vs. leases vs. PPAs)? Why might leases or PPAs be handled differently in protecting consumer interests? **I do not do PPAs or leases so I have no comment.**

**NEXT STEPS**

The changes contemplated herein will be considered for possible inclusion in the next revision of the Agency's Long-Term Plan (or possibly sooner, where appropriate), acknowledging that all Group/category combinations for the Program are only accepting applications to a waitlist at this time.

---

**Illinois Adjustable Block Program**

(877) 783-1820 | [admin@illinoisabp.com](mailto:admin@illinoisabp.com)

[www.illinoisabp.com](http://www.illinoisabp.com) | [www.illinoisshines.com](http://www.illinoisshines.com)

*The Adjustable Block Program is a state-administered solar incentive program developed and managed by the Illinois Power Agency and administered through its third-party Program Administrator, InClima Solutions.*