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NOVEMBER 12, 2020

Response to Waitlisted Community Solar Capacity Allocation Request for Stakeholder Feedback Request

On behalf of: SolarStone Illinois LLC

Submitted by: Daniel Enderton
Chief Operating Officer
SolarStone Illinois LLC

[Redacted]

Chase Ford
Development Manager
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Dear Program Director,

SolarStone Illinois LLC (“SolarStone”) submits these comments to the Illinois Power Agency (“IPA”) in response to the November 3rd, 2021, Waitlisted Community Solar Capacity Allocation Request for Stakeholder Feedback.

SolarStone applauds the IPA for their work in establishing and administering the Adjustable Block Program (“ABP”). SolarStone submitted 47 community solar projects (94 MWac) into the initial round of the ABP, the majority of which are on the waitlists.

Please find below SolarStone’s responses to a subset of the questions posed by the IPA:

Question:

- A. *After allocations, but prior to Approved Vendors providing project portfolios back to the IPA, should Approved Vendors be permitted to transfer allocated capacity to other Approved Vendors?*
 - a. *If transfers of allocated capacity are permitted, what documentation should the transferor and transferee be required to provide to the Program Administrator to substantiate the transfer? Would an acknowledgement form executed by both transferor and transferee that outlines the amount of capacity transferred and includes the Approved Vendors’ information be sufficient?*
 - b. *Should the IPA impose limitations on the amount of capacity that can be transferred? Should the Agency instead ensure that only marginal shares of allocations that would otherwise not be filled may be transferred (and if so, at what threshold would a share be considered “marginal”)?*

Response:

Yes, Approved Vendors should be permitted to transfer allocated capacity to other Approved Vendors prior to providing project portfolios to back to the IPA. Because most Approved Vendors expect to be awarded fractional capacity, this will allow them to transfer capacity to achieve projects closer to the 2 MWac cap, and hence help the program implement much closer to the full 250 MW envisioned by the legislation, and do so in the most efficient way possible.

An acknowledgement form executed by both transferor and transferee that outlines the amount of capacity transferred and includes the Approved Vendors' information would be appropriate to document and substantiate the transfer.

We recommend that the IPA not impose limitations on the amount of capacity that can be transferred. A concerning case is that if enough of an Approved Vendor's waitlist projects in one Group have, or are reasonably anticipated to have, interconnect costs that exceed \$0.30/Wac, it would be easier to transfer the allocated capacity than to cycle through interconnection studies. However, if the Agency insists to capping any transfers, they should be capped at no less than 1 MWac per Group. This would allow Approved Vendors with fractional capacity above 1 MWac to seek additional capacity to achieve 2 MWac. Conversely, for Approved Vendors with fractional capacity below 1 MWac, they could seek to transfer this capacity to another Approved Vendor.

Question:

D. *Are the Agency's proposed guidelines for project nameplate capacity and expected production adjustments appropriate?*

Response:

We recommend that an Approved Vendor be allowed to adjust their point of interconnection and/or project footprint (whether or not they adjust their nameplate capacity) so long as the project remains on the same parcel(s) shown as evidence of site control. This will allow Approved Vendors to accommodate changes in landowner preferences, lessons learned from interconnection of the first wave of projects, etc. We also support the proposed structure to change the expected production for waitlisted projects.

Thank you for the opportunity to provide comment. Please contact us with any questions.

Regards,

/s/ Daniel Enderton

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