



Illinois Power Agency
160 North LaSalle Street
Chicago, Illinois 60601

InClimate, Inc. - Program Administrator

Comments on ABP Block Closing Protocol

Dear ABP Administrator and the IPA, thank you for the extensive opportunities to comment on the development of the program rules and requirements. As an overall introduction to these comments we appreciate the approach the ABP has taken thus far with block closing. In general the more transparency and consistency we can have in block sizes and procedures the easier it is for the industry and customers to navigate.

A. Is the Agency's proposed adjustment to Large and Small Distributed Generation Block sizes sufficient to allow ongoing market activity while still consistent with the legislative intent of block opening sizes and flexibility?

We generally agree with the block sizes proposed by the IPA.

B. For the other categories (other than Traditional Community Solar, where the split is statutorily mandated), is any split of capacity other than 30% Group A, 70% Group B appropriate? Is there any justification for expanding the initial block capacity of these categories?

We find the 70/30 split to be a good starting point for the allocation of block capacity, however, if the quantity of applications greatly differs we believe this ratio should be adjusted as it has been in the past.

C. Does an additional 5 MW per block for the “soft close” of each category (excluding the block of 250MW for waitlisted Traditional Community Solar projects) constitute an appropriate amount of additional capacity? What other approaches should be considered? Please provide supporting rationale.

5MW should be sufficient for the small DG category, however a time based approach as has been taken in the past is preferable. We also would like to note that the large DG category could have the soft close filled by only one project, this could leave many smaller projects on the waitlist submitted near the same time.

D. Should the capacity available during the soft close be proportional to the initial capacity of the block? For example, blocks that have lower initial capacity at block opening would have lower soft close capacity.

As long as there is sufficient capacity or time in the “soft close” period to allow developers to have an opportunity to submit projects that were ready at the time of block closing, there is no issue with a weighted soft close size.

E. Should the agency consider a soft close period that is governed by just a capacity cap (i.e., 5 MW of capacity allotted during soft close, no matter how long it takes for this capacity to fill) rather than governed by time (mirroring previous practice) and a set capacity cap (i.e., a set number of calendar days or 5 MW of capacity, whichever may come first)?

Our preference would be that the Agency take a time based approach to the “soft close” over a size based approach, but we understand that may not be feasible.

I am happy to follow up with more information or answer any questions you may have.

Sincerely,

Dylan DeBiasi