

From: [REDACTED]
To: IPA.Solar
Subject: [External] SunVest Solar - Response to TCS Scoring Strawman Proposal Feedback Request
Date: Friday, September 16, 2022 6:43:20 PM

Hello

SunVest Solar thanks the IPA for its diligent work to launch the next phase of the Community Solar program and submits the below comment in response to the IPA's TCS Scoring Strawman Proposal. SunVest is developer of commercial/industrial and Community Solar projects. The company is a member of the Joint Solar Parties (JSP) and we support that group's comments on the IPA's proposal.

In addition to the JSP recommendations, we urge the Agency to consider allowing projects that are already on the waitlist to update their scores and advance their waitlist position accordingly. The Strawman discusses a scoring rubric that will assess projects at the time of application for purposes of selection in the initial block and placement on the waitlist, but it is silent whether a project will move up if it achieves additional criteria while on the waitlist. For instance, a project could apply to the program before it has an interconnection agreement, be scored and placed on the waitlist based on its characteristics at that time. At some point in the coming weeks or months, that project could execute its ICA, or form a partnership with an EEC. Such a project would at that point have a more "demonstrable path to completion" and/or would serve the policy goals of CEJA than it did when first applying, but the waitlist would not reflect that reality.

Because the Commission Order "recognizes that obtaining a signed ICA remains a critical step in the project development process," SunVest asserts that a project which executes its ICA or otherwise achieves new points while on the waitlist should see its score and waitlist position updated. Such updates would only be available to projects that are already on the waitlist, not to new projects that apply after a waitlist has been created. To minimize administrative burden, the Procurement Administrator would only need to update the waitlist monthly or quarterly.

This proposal encourages Vendors to continually achieve key development milestones and policy goals, and advance projects them toward completion. This approach is also different than the Joint NGO's proposal to "rescore" projects when a new block opens, as updated scoring would not allow new projects to be assessed on the same footing as existing waitlist projects.

Again, SunVest thanks IPA for its work on this important issue and we look forward to the launch of the next phase of the state's Community Solar program.

Respectfully,

Kevin Borgia | Director of Government Affairs | SunVest Solar LLC