

TCS Score Audit and Appeal Update, REC Pricing Updates, Application Processing Update

March 31, 2023

Program News

• Traditional Community Solar Score Audit and Appeal Update

In accordance with the <u>TCS scoring guidelines</u>, the Program Administrator has scored all TCS projects submitted on November 1, 2022 that are Part I verified. These scores will be used to determine which projects will be selected for a REC contract once random selection (if needed) takes place and the 20% developer cap is applied. The scores and a full announcement regarding the scoring process were posted on the Program website on the <u>Solar Project Categories page</u> under the Traditional Community Solar sub-section. A deadline of March 24, 2023 was provided for Approved Vendors to appeal decisions made by the Program Administrator on the scoring their projects. As the determination of appeals may influence a project's final score, and thus possibly the final selection of projects, all appeals must be reviewed by the Agency within a distinct timeframe. The Agency intends to have all submitted appeals determined by April 21, 2023, subject to the quantity and substance of appeals submitted.

This week, the Program Administrator updated the scores of a project, and uploaded an updated project scores report to the Program website. The Approved Vendor with the impacted application has been contacted and informed of the scoring error.

A full review of scores is continuing to ensure no further errors exist in the published scores. The PA will publish updated scores after this audit is completed, if needed. There will be an allowance for additional appeals after that process concludes, if any additional errors are uncovered. As the errors uncovered thus far decrease the scores of the impacted projects and thus do not have a negative impact upon other AVs, the deadline for appeal submission of March 24th did not change for AVs that are not impacted by errors in scoring. Those AVs who had a score change as a result of the errors have been notified of the change in scores and been given an additional two weeks to appeal their corrected scores.

- **REC Pricing Updates** The Agency is conducting two processes to update REC prices for the Illinois Shines Program and the Illinois Solar for All Program:
 - Proposed 2023-2024 REC Prices The Agency received nine comments on the Illinois Shines (Adjustable Block Program) and Illinois Solar for All Program Proposed Renewable Energy Credit Prices for the 2023-2024 Program Year Request for Stakeholder Feedback that were due March 24, 2023. The Agency is in the process of reviewing the comments and plans to finalize next program year's REC prices by mid-April.
 - O Update to REC Pricing Model & REC Prices for Subsequent Years This second process is a review of the REC pricing approaches for consideration of changes in methodology to be included in the next Long-Term Renewable Resources Procurement Plan ("LTRRPP"). On March 7, 2023, Sustainable Energy Advantage, the independent consultant reviewing the methodology used to establish future REC prices for the Adjustable Block Program and the Illinois Solar for All Program released a Request for Feedback on policy design issues and options, and implications of the Inflation Reduction Act on REC pricing. Responses were due on March 24, 2023. That deadline has now been extended to April 4, 2023. Please see the Request for Feedback for more information and how to respond.

Ongoing Operations Updates

• Schedule B Generation and Availability via Approved Vendor SharePoint Folders

March REC invoicing is closed, and as the Program Administrator resumes verification of Part II applications,
Schedule Bs are being generated weekly and placed in Approved Vendor SharePoint folders. The Program
Administrator will send Approved Vendors an email for each project that is verified, to include confirmation of



verification status and date. March 26, 2023 was the last valid Part II verification date for March to allow time to generate April REC invoices. Review of applications will continue throughout the last week of March, with Part II verification dates finalized in April.

Application Processing Updates

• The Program Administrator is now updating the application processing table at IllinoisABP.com/project-application-reports/ on Mondays, Wednesdays, and Fridays. On March 17, 2023, the PA released a detailed plan addressing the application backlog and remediation plans, and the Program Administrator is developing a Special Announcement Application Processing Update, to be published early next week, including the addition of re-forecasted and expanded application processing tables, and additional details and updates.

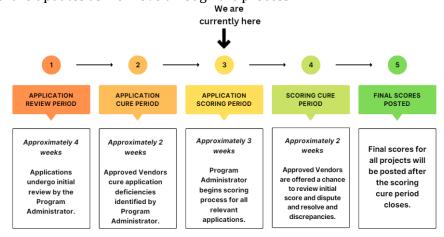
For questions about specific project applications, please contact the PA at admin@illinoisabp.com.

Application Processing as of Friday, March 31, 2023						
Project Category	Application Type	Reviewing Applications Submitted As Of:**	Applications in Process Queue			
Small Distributed Generation	Part I	December 21, 2022 4,349				
Small Distributed Generation	Part II	January 18, 2023 3,690				
Large Distributed Generation	Part I	December 19, 2022 102				
Large Distributed Generation	Part II	January 18, 2023	57			
Traditional Community Solar – Waitlist Reallocation	Part I	None submitted at this time	4			
Traditional Community Solar – Waitlist Reallocation	Part II	December 19, 2022	7			
Traditional Community Solar – November 2022*	Part I	Scores announced	262			
Traditional Community Solar – November 2022*	Part II	None submitted at this time; Part I applications in scoring process	0			
Community-Driven Community Solar	Part I	In scoring period	67			
Community-Driven Community Solar	Part II	None submitted at this time; Part I applications in scoring process	0			
Public Schools	Part I	December 19, 2022	4			
Public Schools	Part II	None submitted at this time	0			
Equity Eligible Contractor	Part I	November 1, 2022	86			
Equity Eligible Contractor	Part II	None submitted at this time	0			

^{*}Includes only applications submitted on November 1, 2022. ****Reviewing Batched Paid applications submitted as of the week indicated. Applications actively in review may be in process or in need of information to proceed to verified stage. Additional application processing resources have been added toward making significant progress in reducing the application backlog the coming weeks. Throughout March, the queue of applications reported for each category of Part II applications inaccurately reflected all submitted Part II applications including those in Verified and Needs Info statuses. Queue data has been corrected to accurately represent only Part II applications for which review

• Community-Driven Community Solar Application Review and Scoring Process Effective February 20, 2023, Community-Driven Community Solar entered the Scoring phase, which was

originally expected to last for approximately three weeks, from February 20 – March 10, 2023; the scoring period is extended for additional time, and is expected to last throughout the month of April. The PA will continue to share updates as we move through the process.





Ongoing Program Portal Updates

• Ongoing portal updates can be found at <u>IllinoisABP.com/portal-updates/</u>, and a library of diverse, updated portal help guides can be found at <u>IllinoisABP.com/portal-help/</u>.

Updates on Portal Issues, Improvements, and Future Releases

- With user support, the Program Administrator continued a nightly, planned system maintenance window for the Program portal through March 23, 2023. Beginning the week of April 3, 2023 and onward, the weeknight planned system maintenance window will shift to, and only include, Tuesday and Thursday evenings, from 8:00 p.m. to 10:00 p.m. CPT each night. During these maintenance windows, the Portal is expected to be unavailable to users, which the PA and Agency hope will be minimally disruptive to Program participants. Any users working in the portal should save their work prior to the 8:00 p.m. CPT start of the system maintenance window each day, as any unsaved information will be lost when the system is moved into maintenance mode. In the event that portal restoration is unexpectedly incomplete as of 10:00 p.m. CPT on a given evening, an update notice will be sent to Approved Vendors and Designees.
- On **Saturday April 8, 2023**, a planned portal maintenance period will begin at 6:00 p.m. CPT, and is expected to last up to 12 hours, until 6:00 a.m. CPT, Sunday April 9, 2023. During this window, the portal is expected to be unavailable to users. Any users working in the portal should save their work prior to the 5:00 p.m. CPT start of the maintenance period. A notice of system restoration will be posted to the Program website.

Development Focus	Details	Planned or Actual Delivery			
Enhancements, Features and Bug Fixes					
Disclosure Form Remediation	DF enhancements continue to be implemented, with information forthcoming on the impact to the DF Leniency Period that remains in effect.	Enhancements ongoing			
Community Solar DF API	The first version of this functionality will be released soon, pending beta testing. On March 7, 2023, the latest CS DF API Working Group met, reviewing the draft Developer's Guide and discussing beta testing.	Now planned for week of April 3, following upcoming beta testing			
Part I and Part II Applications	Features, enhancements, and data updates including: Functionality to allow AVs to download any documents they previously uploaded in both Part 1 and Part 2 of Project Applications; REC Project Applications in "Verified" status will now reflect that status in the [Part 2 Status] column of the AV Project Workbench, along with the existing values of "In Progress" and "Submitted" – restoration of visibility of the "Withdrawn", "Review" and "Updated" statuses will be resolved in an upcoming release.	March 30, 2023			
Re-batching Functionality	On/off toggle, ability to create batches by project and by batch Screen, export Batch Shuffling and Batch Audit Log	TBD – Tentatively planned for Q2 2023			
Required Functionality					
Program Year (PY) 2023-2024 Updated Disclosure Forms	Implementation of updated English and Spanish Disclosure Forms covering all DG and CS	June 1, 2023 for Program Year opening			
Equity Accountability System Compliance Plans and Waivers	Submission of mandatory EAS Compliance Plan or Waiver Request for 2023-2024 Program Year	April 2023. See MES Compliance Training webinar detail below.			
		For Program Year 2023-24 MES Compliance Plans and Waivers will be completed off-portal, with more information to come.			

Requirements and Reminders

• Systems Out of Compliance for Failure to Deliver RECs - 90 Days to Comply
Per Section 6(a) of the 2019 REC Delivery Contract, and 4.1(a) of the 2021 REC Delivery Contract, all systems must be registered in either the GATS or M-RETS tracking registry. For systems larger than 5 kW, the first REC



must be delivered within 90 days of the date the system is Energized/Part II verified. For systems equal to or less than 5 kW, the first REC must be delivered within 180 days of the date the system is Energized/Part II verified. According to Section 12(e) of the 2019 REC Delivery Contract, and 2.3(e) of the 2021 REC Delivery Contract, "Seller shall upload meter readings to PJM-EIS GATS or M-RETS at least annually prior to the registry cutoff to produce RECs for generation occurring in May as well as all previous months for which generation has not been recorded."

The PA has identified systems that are out of compliance with the REC contract for not delivering a REC and updating the tracking registry within one year of Part II verification. These systems have been communicated with AVs over SharePoint and/or email. Projects will be removed from the Program if they do not deliver a REC within 90 days of notice from the PA for failure to comply with requirements of the REC Contract. Deadline to comply is April 4, 2023.

- Minimum Equity Standard Compliance Plans and Waivers
 - On March 13, 2023, the Agency and Program Administrator held a webinar, Minimum Equity Standard (MES): Compliance Plan and Waiver Request Training, for stakeholders, in support of upcoming release of the Compliance Plan form in April, 2023 for the 2023-2024 Program Year. The webinar followed two earlier webinars held on the Equity Accountability System on October 4 and November 15, 2022, and included information on prior presentations, the MES Compliance Plan process and draft form, the Energy Workforce Equity Portal, and the Waiver Request Process. A recording of each webinar, the presentation slides, and relevant Q&A documents can be found at the Equity Accountability System page of the Program website, along with the final MES Waiver and the MES Waiver Rationale document.
 - The Agency has released <u>updated forms for MES Waiver requests</u>. The <u>original MES waiver</u> was released on March 10, 2023 and has been updated to correct a few clerical errors. The rationale to accompany the final decisions can be found here: https://illinoisabp.com/wp-content/uploads/2023/03/MES-Waiver-Rationale-31722-v002.pdf.
 - Additional information about the release of Compliance Plan materials and other resources will be added to the Equity Accountability System page of the Program website in April 2023.

• Stakeholder Feedback - This table outlines current and forthcoming proposals and feedback requests:

Proposal or Feedback Topic	Request for Comment Released	Deadline for Comment	Details of Proposal/Feedback Request Available at:
Minimum Equity Standards (MES) Waiver Process	February 8, 2023	February 22, 2023. Comments have been shared at Program website	Final waiver and rationale found here: https://illinoisabp.com/equity-accountability-system/
Public Schools (Multiple topics, including anchor tenant requirement)	February 22, 2023	March 3, 2023. Comments have been shared at Program website	https://illinoisabp.com/solar-project- categories/#public-schools
REC Pricing Update for 2023-24 Program Year	March 1, 2023	March 24, 2023. Comments have been shared at the Agency's website and are under review	Final REC prices expected release by mid-April
New DG Disclosure Forms – Project Performance ("Efficiency") Disclosures	March 2, 2023	March 10, 2023. <u>Comments have</u> been shared at <u>Program website</u> and are under Agency review.	https://illinoisabp.com/consumer- protection/
REC Price Modeling Update for Next Long-Term Plan	March 7, 2023	Deadline extended to April 4, 2023	Request for feedback here: https://illinoisabp.com/2023/03/07/i ndependent-rec-pricing-review- request-for-written-comments/
Program Guidebook updates for Program Year 2023-24	March 14, 2023	April 3, 2023	Draft version for public comment here: https://illinoisabp.com/2023/03/14/ draft-guidebook-released-for- feedback-comments-due-april-3- 2023/ and Redline to past version of Guidebook



• EEC Block Capacity - Long-Term Plan Reopening

The Illinois Commerce Commission approved the request to re-open the 2022 Long-Term Plan in <u>Docket No.</u> <u>22-0231</u>, and stakeholders are invited to interact with the docket in accordance with the ICC's rules of practice, with the following schedule in effect:

- o Objections to the Agency's proposal Due February 2, 2023
- o Responses to objections Due February 16, 2023
- o Replies to responses Due March 2, 2023
- o Proposed Order Due March 29, 2023
- o Brief on Exceptions Due April 7, 2023
- o Reply to Briefs on Exceptions Due April 14, 2023
- With the docket open, the Agency will seek to provide an update on the question of dealing with applications submitted on November 1, 2022 in EEC Group A once the above schedule has concluded; the Program Administrator may hold Group B applications for ICC approval if it appears possible that Commission action may impact Group B capacity.

• 3G Cell Pack Switch Out

The IPA is aware that, as of about May 2022, inverters with communication modules using 3G cellular are no longer supported by internet service companies. These inverters will have to be upgraded with a 4G or 5G cellular module, Wi-Fi connection, or some other replacement communication protocol. If an inverter is not upgraded, the solar array's ability to auto-report production data will cease, or has already ceased. Since some customers may not be aware that an inverter for their array may stop auto-reporting production data, many AVs have been notifying affected customers and assisting with inverter updates where needed. As a reminder, AVs are responsible for entering system production in the tracking registry where the system is registered. If the process in upgrading inverters has posed an issue in production data reporting, please contact your sector strategist to explain the barrier and the steps being taken to resolve the issue.

• Program Administrator Office Hours

AVs and Designees experiencing technical difficulties with use of the portal or in resolving other challenges are invited to utilize open Office Hours that the PA offers via Zoom, using a waiting room format to support meetings with individual AV or Designee teams for privacy. Upcoming Office Hours include the following dates and times with more dates expected to follow, using Join link: https://energy-solution.zoom.us/j/95588710302Co

- o Wednesday, April 5 10:00 a.m. 11:00 a.m. CPT
- Wednesday, April 12 10:00 a.m. 11:00 a.m. CPT
- Wednesday, April 19 10:00 a.m. 11:00 a.m. CPT

<u>REMINDER:</u> All transition updates can be found on the <u>ABP Transition Hub webpage</u>, and a new <u>Events & Engagement</u> page at the Program website provides a calendar of upcoming webinars, meetings, support, feedback requests, key dates, holidays, and more. Please visit <u>IllinoisABP.com/events-engagement/</u> for continuous updates.

<u>CONTACT US</u>: For portal, application, or Program-specific questions and inquiries, please contact <u>admin@illinoisabp.com</u> or call 877-783-1820.