

# Program Guidebook Feedback Posted, Energy Workforce Equity Portal Training, Application Processing Update

# April 7, 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 of 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. As previously shared, a full audit of scores continues, and the Program Administrator will publish updated scores after this audit is completed, if needed. An allowance for additional appeals after that process concludes will be made for any impacted Approved Vendors, if any additional errors are uncovered.

As previously shared, the Agency will utilize a random selection process to break ties between projects that received the same scores and where those scores would impact project selection, or waitlist placement. This process will occur after the appeal process is complete and all scores are confirmed, and currently, the Agency intends to hold the random selection reordering event in early May 2023, with further details to come.

- **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.
  - **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 requested feedback on policy design issues and options, and implications of the Inflation Reduction Act on REC pricing. Responses were originally due on March 24, 2023, an extension was provided to accept feedback until April 4, 2023 Sustainable Energy Advantage received four comments and is currently reviewing the feedback submitted.
- **Program Guidebook Feedback** The Agency received feedback on the Program Guidebook, and comments have been posted to the Program website's <u>Resources page</u>. The Agency is reviewing the feedback received and on April 17, 2023 will release a final version of the Guidebook, 45 days in advance of the start of the 2023-2024 Program Year, for Approved Vendors and Designees to become fully compliant with new requirements by June 1, 2023.
- **Energy Workforce Equity Portal Training** The Agency hosted an Energy Workforce Equity Portal training on April 4, 2023. The training is designed to enable participants to get acquainted with the Equity portal and its various functionalities, including the ability of solar employers to advertise jobs and search for registered Equity Eligible Persons seeking employment. A recording of the training is posted <u>here</u> and can be found on the Agency's Diversity, Equity, and Inclusion page at <u>https://ipa.illinois.gov/diversity-equity-and-inclusion.html</u>.



### **Ongoing Operations Updates**

- Schedule B Generation and Availability via Approved Vendor SharePoint Folders As the Program Administrator verifies 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. April 23, 2023 is the last valid Part II verification date for April to allow time to generate May REC invoices. Review of applications will continue throughout the last week of April with Part II verification dates finalized in May.
- April REC Invoicing Opened April 1, 2023 REC invoices and Quarterly Netting Statements were made available for download from AV SharePoint folders on April 1, 2023. Invoices must be submitted to the utility by April 10, 2023 to receive payment for the April invoice period. Any invoice amounts not submitted to the utility by April 10, 2023 will be carried forward and included in the next invoice period (July 2023).
- **Confirm Contact Information** The Program Administrator uses the primary email on file for many day-today email confirmation messages (such as invoicing, application verification confirmation emails, batch submission and approval etc.). This primary email address will also be used for communications regarding requirements for the upcoming Annual Report. The Program Administrator encourages Approved Vendors to contact us at <u>admin@illinoisabp.com</u> to confirm and/or provide the primary email addresses to use for such program communications.

#### **Application Processing Updates**

• The Program Administrator is now updating the application processing table at <u>IllinoisABP.com/project-application-reports/</u> on Mondays, Wednesdays, and Fridays. On April 4, 2023, the Program Administrator published a special announcement with <u>an updated, detailed plan</u> that provided additional tables across project categories, re-forecasted processing to resolve the application backlog, and other updates on staffing and automation improvements.

Application Processing as of Friday, April 7, 2023							
Project Category	Application	Reviewing Applications Submitted As App		Apps	Apps		
	Туре	Of:**	Process	Submitted	Reviewed		
			Queue	This Week	This Week		
Small DG	Part I	February 6, 2023	4,411	692	581		
Small DG	Part II	January 20, 2023	3,804	404	271		
Large DG	Part I	February 6, 2023	96	2	9		
Large DG	Part II	January 18, 2023	56	1	2		
TCS – Waitlist Reallocation	Part I	None submitted at this time	4	0	0		
TCS – Waitlist Reallocation	Part II	December 19, 2022	7	0	0		
TCS – November 2022*	Part I	Scores announced	262	0	0		
TCS – November 2022*	Part II	None submitted at this time; Part I 0		0	0		
		applications in scoring					
Community-Driven CS	Part I	In scoring period	67	0	0		
Community-Driven CS	Part II	None submitted at this time; Part I 0 0		0	0		
		applications in scoring					
Public Schools	Part I	February 8, 2023 5		0	2		
Public Schools	Part II	None submitted at this time 0 0		0			
Equity Eligible Contractor	Part I	November 1, 2022 87 0		0	0		
Equity Eligible Contractor	Part II	None submitted at this time	0	0	0		

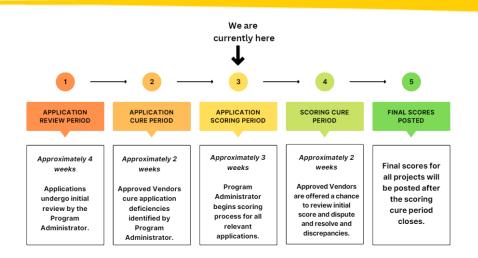
• For questions about specific project applications, please contact the PA at <u>admin@illinoisabp.com</u>.

\*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 has not yet begun.

#### 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 Program Administrator 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. As of the week of April 3, 2023 and onward, the weeknight planned system maintenance window shifted to, and now only includes, 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 6:00 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.	Due to continued QA testing, beta testing is now projected to begin the week of April 10				
Part I and Part II Applications	<ul> <li>Features, enhancements, and data updates including:</li> <li>CS DF CSV upload will include vendor ID, subscriber state=IL, and data formatting</li> <li>Calculation of PV Watts values when bi-facial panel is updated</li> </ul>	April 6, 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 14, 2023. See MES Compliance Training webinar				



	section below for further details. 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 <u>2019 REC Delivery Contract</u>, and 4.1(a) of the <u>2021 REC Delivery Contract</u>, all systems must be registered in either the GATS or M-RETS tracking registry. According to Section 12(e) of the <u>2019</u> <u>REC Delivery Contract</u>, and 2.3(e) of the <u>2021 REC Delivery Contract</u>, "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 Program Administrator 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. The deadline for projects to comply with REC Contract requirements was April 4, 2023. These systems have been communicated with AVs over SharePoint and/or email and next steps have been provided.

#### • Minimum Equity Standard – Compliance Plans and Waivers

As previewed in the March 13, 2023, Minimum Equity Standard (MES): Compliance Plan and Waiver Request Training webinar, the MES Compliance plan form will be made available to Program participants on Friday, April 14, 2023. In addition to the webinar content, the Program Administrator and Agency will also provide updated instructional content at the Program website, a Guide to the Equity Accountability System, FAQs on the Minimum Equity Standard, a blank sample of the Plan to allow vendors to review all questions, and direct support from Sector Strategists including forthcoming expanded office hours. Recordings of the three Equity Accountability System webinars hosted, 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.

• 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. <u>Comments have</u> <u>been shared at Program website</u>	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. <u>Comments have been</u> <u>shared at Program website</u>	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 <u>Agency's website</u> 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> <u>been shared at 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	April 4, 2023. Comments are under review.	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. <u>Comments have been</u> <u>shared on Program website</u>	<u>https://illinoisabp.com/program-</u> <u>resources/</u>



# • 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:

- Objections to the Agency's proposal Due February 2, 2023
- Responses to objections Due February 16, 2023
- Replies to responses Due March 2, 2023
- Proposed Order Due March 29, 2023
- o Brief on Exceptions Due April 7, 2023
- 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, though if the inverter has been operating normally, but just not auto reporting, most commonly-used inverters in the industry (excluding Micro-inverters) have an option to view their LMR (lifetime meter read) on their control panels. AVs are advised to request LMR from customers who may be experiencing this problem, then update production values using that data. 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: <u>https://energy-solution.zoom.us/j/95588710302Co</u>

- o Wednesday, April 12 10:00 a.m. 11:00 a.m. CPT
- o Wednesday, April 19 10:00 a.m. 11:00 a.m. CPT
- o Wednesday, April 26 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.