

From: [Chuck Sutton](#)
To: [IPA.Solar](#)
Cc: [MC2 Solar](#)
Subject: [External] Stakeholder Feedback on Program Guidebook Deadline – April 3, 2023
Date: Friday, March 31, 2023 9:48:45
Attachments: [REDACTED]

Dear IPA ABP Administrator,

Thank you for the opportunity to provide comments to the proposed changes to the IPA ABP Illinois Shines' Program Guidebook. MC Squared Energy Services, LLC (MC2) has been a program Designee for many years representing and providing subscription management, enrollment, billing, and customer care services on behalf of multiple approved vendors and traditional community solar projects/gardens behind ComEd and Ameren within the program. To the end, we support the efforts of the program administrator to update the Program Guidebook to advance the benefits of the program for all stakeholders.

Our feedback is centered on the proposed new restriction within the definition of an eligible "small subscriber" as stated within Section 6 – Subsection (C) Community Solar Under the REC Contract at the end of the section on page 119 of 191 (redlined version). In particular, the added language below in redline will have wide reaching and devastating impacts to the ongoing success of the program:

To be considered a small subscriber in the Program, the utility account number associated with the subscription may not sum to larger than 25 kW AC across a single or multiple Community Solar projects, if multiple subscriptions exist for the associated utility account.

This new restriction will financially harm subscribers from realizing the maximum potential savings available from the community solar savings opportunity under the Illinois Shines program. In addition to residential subscribers and small business accounts, non-profit organizations including institutional, educational, and municipal subscribers within the eligible "small" utility rate classes will be restricted to a maximum subscription size of 25 kW AC per utility account which will limit their potential to maximize the value of the program.

In other words, eligible small subscribers who are currently able to leverage their subscription opportunities across multiple community solar projects to achieve valuable cost savings will now be restricted and limited to a maximum collective subscription size of 25 kW AC under the proposed new rule. This proposed change will most certainly financially harm residential subscribers as well as school districts, municipalities, libraries, and businesses from achieving their savings potential as eligible small subscribers.

Further, this proposed new language will be operational difficult and cumbersome for approved vendors and designees to manage on a commercial basis. To wit, the approved vendors and designees do not have access to the confidential subscription size of a potential subscriber who has an existing subscription with another unaffiliated community solar project to ascertain whether the utility account has exceeded the proposed limitation of 25 kW AC at the account level which will cause confusion and frustration for the subscribers who enroll into a new project only to learn that their request has been rejected and terminated.

This new language is harmful and discriminatory to the potential subscribers as well as operationally difficult and inefficient. Therefore, MC Squared Energy Services respectfully recommends that this specific language be removed from the proposed changes to the Program Guidebook. Thank you. Chuck

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From: Illinois Adjustable Block Program Administrator <admin@illinoisabp.com>
Sent: Wednesday, March 29, 2023 2:41 PM
To: Illinois Adjustable Block Program Administrator <admin@illinoisabp.com>
Subject: [EXTERNAL] Reminder: Stakeholder Feedback on Program Guidebook Deadline – April 3, 2023



Illinois Adjustable Block Program

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Reminder: Stakeholder Feedback on Program Guidebook Deadline – April 3, 2023

March 29, 2023

On March 14, 2023, the Illinois Power Agency released a draft Program Guidebook for the Illinois Shines program for stakeholder feedback. Both [a clean version of the draft](#) as well as a [redline comparison](#) between the October 18, 2022 (current Program Guidebook) and March 14, 2023, versions can be found at the Program website's [Resources](#) page. This draft Guidebook will undergo stakeholder feedback, and the Agency will review comments submitted, and on April 17, 2023, will release a final version of the Guidebook, 45 days in advance of the start of the 2023-24 Program Year, which commences on June 1, 2023. **Comments are due April 3, 2023, and should be emailed to IPA.Solar@illinois.gov.**

Please note: changes to Program requirements via edits to the Program Guidebook as published on April 17, 2023 will not take effect until June 1, 2023.

Thank you!
Illinois Adjustable Block Program
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