



Geronimo Energy Response on the Illinois Adjustable Block Program Approved Vendor Application and Standards Draft

October 19, 2018

On October 3, 2018, the Illinois Power Agency (“IPA”) released a draft Vendor Application and Standards Draft of the information collected from prospective Approved Vendors and the evaluation criteria for Approved Vendors. Geronimo Energy is pleased to submit the following additional comments.

Geronimo Energy is a renewable energy developer, owner, and operator with 2,000 MW of successful experience and is currently active in the Illinois market with both utility-scale and distributed generation development assets in various stages of development and construction.

In general, Geronimo believes that the IPA’s proposed process for determining how the vendors will be approved and evaluated will result in fair and impartial selection of approved vendors. However, Geronimo is concerned there are portions of the proposed standards that are unclear and unnecessarily broad and others that seem somewhat onerous.

Topic 1: Contracts

1. The process of how a project would move from one approved vendor to another approved vendor if assets are transferred is unclear. It is critical this is transparent and straightforward.
2. When will the contract that the approved vendors sign with the utility be available?
3. We wish to emphasize for financial backing of these projects that it is crucial that two Approved Vendors can assign a project freely from one entity to another and that the transfer is not contingent on the discretionary approval or consent of a third party so long as both parties are Approved Vendors.

Topic 2: Company and Legal Information

1. Does the Parent Company of the special purpose entity have to be registered to do business in Illinois or just the special purpose entity? Is the parent company required to have a PJM-GATS or M-RETS account?
2. The special purpose entity will not have a meaningful P&L and balance sheet. What will be required in this case?
3. Reporting requirements that include any kind of criminal conviction misdemeanors or proposed actions or investigations is onerous. Disclosure should be limited to work

related conduct or convictions. This would eliminate speeding tickets and those type of items that should not be considered disqualifying. In addition, the tracking of such information would be unnecessarily onerous.

4. We would expect the company references we are required to submit would be considered confidential and not subject to FOIA requirements.
5. We would also request clarification, in the case of a newly-formed Single Project Approved Vendor, whether it will be exempt from the requirement to provide 3 customer references or other requirements for the established businesses.