



October 16<sup>th</sup>, 2018

**Response to Request for Follow-Up Comments  
Regarding Adjustable Block Program Block 1 Lottery**

*On behalf of:* SolarStone Development, LLC

*Submitted by:* Daniel Enderton  
Chief Operating Officer  
SolarStone Development, LLC  
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Dear Director Star,

SolarStone Development, LLC, (“SolarStone”) submits these comments to the Illinois Power Agency (“IPA”) and InClimate Solutions (“Administrator”) in response to the October 5<sup>th</sup>, 2018, request for follow-up comments regarding the Adjustable Block Program Block 1 Lottery (“Lottery”). SolarStone is a community solar developer based in Minneapolis, MN, and to date has developed approximately 70 MWac of projects.

**Project Substitution/Reallocation**

- We support the following project substitution and reallocation provisions:
  - “Allowing switching of non-winning projects in the lottery waitlist as well as switching of winning projects.”
  - “Clarifying that reallocation can occur between projects owned by the same developer or their affiliate (rather than only by the same “Approved Vendor”)”
- Regarding the synchronization of the Lottery with the utility interconnection queue process, it is important that any reallocation occur before the utilities require deposits (especially considering ComEd’s proposed deposits of \$500,000, \$250,000 of which is non-refundable). We recommend that the Agency and Administrator closely coordinate with the utilities on this point.

**Reducing Application from Speculative Projects**

- We support requiring proof substantiating the 50% small subscriber commitment. Example proof could include:
  - Demonstrate having acquired 1 MWac+ of small subscribers in another state
  - Having a contract in place with a subscription acquisition vendor
- Regarding proof of use permits or zoning approval (“use/zoning permit”), we recommend that Approved Vendors:
  - Provide a copy of their use/zoning permit



- When a use/zoning permit not required, provide letter from relevant jurisdiction indicating that proposed project does not require a use/zoning permit
- When jurisdiction unwilling to provide such a letter, attest no such use/zoning permit is required and provide appropriate jurisdictional contact information
- We support requiring a signed lease or option to demonstrate host acknowledgement.
- We do *not* support limiting entries into the lottery to projects with an interconnection application date prior to Sept. 10<sup>th</sup>. We – along with developers we know of -- were told by one utility well before Sept. 10th that if interconnection applications were submitted prior to Sept. 15th, that they were confident they could process the application in time for the lottery. We support a cutoff date only if it is after Sept. 15<sup>th</sup>. Projects with an interconnection application date on or prior to Sept. 15<sup>th</sup> should benefit both from participation in the Lottery and benefit from the project reallocation following the lottery.

### **Discretionary Capacity**

- We recommend the following: Hold any lottery 45 days from when Block 1 opens (rather than the 35 days currently contemplated). If one category incurs a lottery but others don't, pull discretionary capacity forward into said category lottery. The minimum discretionary capacity pulled forward into the lottery for a category should be 1/3 of the overall ABP discretionary capacity. The IPA could consider pulling forward more of the discretionary capacity subject to the volumes of applications in the other categories. The more discretionary capacity the IPA pulls forward, the more effective project reallocation and utility restudy would be.

Thank you for the opportunity to provide comments. Please contact us with any questions.

Regards,

/s/

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