

Illinois Power Agency  
160 North LaSalle Street  
Chicago, Illinois 60601

InClimate, Inc. - Program Administrator

## **CSG's Comments on the IPA Block 1 Lottery Proposal**

Carbon Solutions Group (CSG) would like to thank the IPA and the Program Administrator for the opportunity to comment on their proposed lottery strawman. CSG is not proposing any changes to the lottery process other than the privacy concerns listed in the second section of our comments. But, we would like to offer some general comments to help give perspective on the impacts that changes to the proposed lottery process may have on the market segments we are most familiar with.

### **Lottery Rules and Restrictions**

The events to trigger a lottery occur when a block of the program is oversupplied. Queue numbers provided by the utilities have shown oversupply to be largely concentrated in the Community Solar segment of the APB. Because of this, and rightfully so, much of the focus in the lottery process is coming from Community Solar developers with a large interest in the program. CSG aggregates projects from smaller developers, installers, and system owners whom also have a significant interest in the success of the APB and the lottery process.

These smaller systems and developers have different timelines and hurdles than other market participants. We understand that there must be barriers and standards to be met to ensure that only quality projects are submitted to the program. Measures should be taken to prevent projects that will not be completed from entering in the ABP and clogging up the process. The final LTRRPP does a good job of creating these barriers, but as developers and utilities have been engaged in developing solar, new issues have arisen. As these new issues are taken into account during this Lottery stakeholder process it is important that none of the requirements to enter the APB discriminate against smaller project developers and systems. This is especially important because this abbreviated lottery development process doesn't allow for the same level and variety of stakeholder input as the LTRRPP development process did.

For example smaller (but still larger than 25kW) DG and Community solar systems may have much quicker interconnection application and approval process relative to larger systems. These same projects may also have a longer lead time or have system owners that required more program certainty before committing to move forward with the project. These system owners and developers also generally have more limited resources than their larger counterparts. This often manifests as these systems having a longer development timeline. Because of this, there are some quality systems will not have all of the requirements to enter into the APB met until very close to the opening of the program.

### **Privacy Concerns**

The Block 1 Lottery Strawman Proposal includes the following:

Each project participating in the Block 1 lottery will be identified by a name provided by the Approved Vendor; for all Block 1 lottery participants, that project name, the project size, the physical address, the Approved Vendor name, any small subscriber commitment status, and the random ordinal number assigned to the project through the lottery will be made public.

Publishing names and addresses of homeowners and businesses would be problematic for many people and businesses interested in solar. Individuals may have privacy and safety concerns with their information included in any kind of public list of lottery results. Businesses share these with the additional concern that in many cases power use, building location, and power price are proprietary.

To address this we propose that the lottery entrants and results are published based on the Approved Vendor that submitted the systems. Similar to the IPA's competitive procurement results, publishing the Approved Vendor and the project size(s) would allow for a transparent program that does not impose any privacy concerns on system owners or hosts.

Thank you for considering these comments. We look forward for more opportunities to be a stakeholder in the implementation of the ABP and a participant in the program itself.

Sincerely,

Dylan DeBiasi  
Carbon Solutions Group, LLC