



October 16, 2018

GreenKey Solar, LLC  
73 W Monroe St  
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**Re: Adjustable Block Program Block 1 Lottery Request for Follow-Up Comments dated October 5, 2018.**

**I. Introduction**

GreenKey Solar (“GreenKey”) appreciates the opportunity to provide additional comments in response to the ABP request for follow-up comments dated October 5, 2018. GreenKey has been actively involved in developing Community Solar projects in Illinois since 2017. This process has involved ongoing discussions with landowners, neighbors, community members, electric utility companies, and county permitting personnel.

Our approach to selecting sites for solar installations is grounded in finding projects that are attractive/inexpensive from an interconnection perspective, where we intend to submit applications for projects that we actually believe will be high quality developments. These projects generally have less than 0.25 miles in required reconductoring and are listed first in the substation queue.

The IPA’s introduction of the “Contract Reallocation” policy to the lottery for Community Solar encouraged certain developers to submit a huge number of interconnection applications as a method to obtain “tickets” for the upcoming lottery, even if those projects they were submitting applications for are not actually going to be built.

Not only does this “Contract Reallocation” provision encourage developers to submit these (non-viable) projects to the lottery simply in order to obtain an additional “ticket” that they could re-allocate to a different (economically viable) project, but it also places an additional unfair burden of uncertainty and wasted time on landowners, state and local governments, and utility companies.

In sum, we believe that the current Community Solar lottery proposal’s “Contract Reallocation” policy has encouraged developers to submit applications for projects that they have no intention of building. This has encouraged gaming of the system, as it rewards certain developers with lottery tickets for projects they have submitted that are not feasibly going to be built. Many of these projects are going to be prohibitively expensive from an interconnection perspective, especially given the required expected reconductoring expenses and relative position of those projects in the local substation’s queue.

## II. Comments

We believe that the lottery should award RECs to projects that have a feasible possibility of being built. Given our understanding that certain solar developers intend to submit non-viable projects simply as a means to obtain a lottery ticket, we believe that the current lottery pool will be inundated by applicants where the project is not economically viable. We would like to suggest the following adjustments to the Lottery process to help ensure that the projects being awarded RECs from the lottery are economically viable projects:

- (1) Applications for projects that are listed at the **FIRST** position of the substation queue should be given a lottery priority status over projects that are listed later in the substation queue. Giving lottery priority to projects listed first in the substation queue helps to ensure that the most viable projects which win these lottery tickets are the same projects that actually get built. This would eliminate instances where (non-viable) projects that are listed in the 10<sup>th</sup> position in the substation queue are awarded RECs that are then re-allocated to a more attractive project located first in the queue. This would also encourage wider geographic dispersion of solar developments across a larger number of substations.
- (2) While we believe it is important to avoid awarding RECs to non-viable projects that are positioned late in the substation queue, the IPA lottery should also prioritize projects that have low interconnection costs in proportion to the average interconnection costs for the applicable utility company. To encourage the development of higher-quality, lower-cost projects, we recommend that projects that require less than 0.25 miles of reconductoring be given priority over projects with more required reconductoring.

For example, a project could be #1 in the substation queue but be located 10 miles from the substation, which would require millions of dollars in reconductoring expenses. Despite that project's status as #1 in the substation queue, their reconductoring expenses will render that project non-viable and the RECs awarded to that project will simply be swapped to a different project. The interconnection costs and required reconductoring for projects that are #1 in the queue are fairly well understood by the time the IPA selects projects.

The projects with unfeasibly high interconnection costs due to large reconductoring expenses should not be awarded tickets to the lottery, even if they are listed as #1 in the substation queue, as they are not going to be built due to their high reconductoring expenses.

In conclusion, we believe that Community Solar lottery should prioritize projects that meet the following two criteria:

- (1) Projects listed as #1 project in the substation queue
- (2) Projects that have less than 0.25 miles of required reconductoring.

We believe that joint consideration of both of these factors will help ensure projects being awarded RECs are the same projects that get built.

We recommend that the first 75% of the Community Solar RECs awarded through the lottery should only be given to the subset of projects that meet BOTH of the criteria listed above.

Thanks again for your consideration of our follow-up comments.

Comments Submitted by:

A handwritten signature in blue ink, appearing to read "John Hunter Strader". The signature is fluid and cursive, with a large initial "J" and "S".

John Hunter Strader  
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