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September 28, 2018

VIA: COMMENTS@ILLINOISABP.COM

InClime, Inc.  
Program Administrator, Adjustable Block Program

RE: LOTTERY STAKEHOLDER PROCESS

**PROGRAM ADMINISTRATOR:**

OneEnergy Development, LLC (“OneEnergy”) provides the following comments related to the Block 1 Lottery Strawman Proposal (the “Proposal”) released via illinoisabp.com on September 10, 2018. OneEnergy understands the challenging task of creating a transparent and equitable process for allocating the limited contracts for renewable energy certificates (“RECs”) and appreciates the opportunity to provide feedback on the Proposal.

*Lottery Process*

OneEnergy acknowledges and supports the transparency sought by the Administrator in the Proposal by making public the fundamental details of each project participating in the lottery, including project name, size, and location. OneEnergy recognizes this information may also allow Approved Vendors to make more informed decisions related to projects’ interconnection positions.

OneEnergy supports the preferential treatment described in the Proposal to those community solar projects that have a small subscriber commitment. Conducting a first lottery round solely for those projects that commit to 50% offtake from small subscribers will ensure *robust participation opportunities* for residential and small commercial customers, as codified in the Illinois Power Agency Act (20 ILCS 3855/1-75(c)(1)(N)).

OneEnergy requests the Proposal be clarified to ensure community solar projects eligible for co-location are treated as two distinct projects for the purposes of the lottery process. Projects eligible for co-location should not be treated in an all-or-nothing manner, which could diminish their chances within the lottery process.

*Reallocating Contracts*

OneEnergy supports the Proposal’s allowance of a one-time option for Approved Vendors to replace selected systems with non-selected systems. This option allows Approved Vendors to prioritize the most economically viable projects. OneEnergy recognizes the Administrator’s intention to progress projects through the Adjustable Block Program in a timely manner and avoid unnecessary administrative delays. However, OneEnergy requests the 7-day window for contract reallocation, as stated in the Proposal, be expanded to 10 business days. Lottery results will have direct implications on the interconnection queue and the costs currently assigned to



projects within the queue. OneEnergy estimates 10 business days, at a minimum, are required to allow Approved Vendors to conduct the necessary post-lottery analysis of potential modifications to the queue and estimated project interconnection upgrade costs.

OneEnergy requests clarification on how the one-time option affects the ordinal ranking of the selected and non-selected projects. OneEnergy recommends the projects involved in a contract reallocation simply swap ordinal rankings, as opposed to losing the ordinal ranking of the initially non-selected project. Swapping projects' ordinal rankings along with REC contract selection avoids penalizing an Approved Vendor for prioritizing the most economic projects.

OneEnergy requests the Proposal be clarified to preserve an Approved Vendor's ability to assign selected projects to another Approved Vendor at any time. It is common for energy developers to transact project ownership at various points within the development process. Such transaction occurs, in part, to ensure project viability by pooling projects to reduce the development costs associated with key economic drivers (e.g., EPC).

*Reply Comments*

OneEnergy recognizes the Administrator has not designated a reply comments period as part of this Proposal process. OneEnergy requests, however, that a reply comments period of at least 10 business days be provided to stakeholders in the event that substantial modifications are made to the Proposal as a result of the comment period.

Sincerely,

STEVE GRIFFITH  
PROJECT MANAGER  
ONEENERGY