



**Comments and Proposed Changes  
SGC Power  
Adjustable Block Program Lottery**

September 28, 2018

Dear Illinois Power Agency,

The following comments are in response to the IPA's proposed Lottery plan. As a developer and implementor of solar energy assets with a history of being an Approved Vendor in multiple solar markets across the US, including those that held a lottery, we would like to offer the following comments. We understand and appreciate the ICC's and IPA's position as they work hard to create a program that meets the original intent of the Future Energy Jobs Act and the responsibility to create a program that allows for equal opportunity for all participants in the various levels of the program. SGC's interest in the program pertains to the Adjustable Block Community Solar program of the LTRPP.

Over the course of the past couple of months as the program shapes out and the final regulations are decided, we have had the opportunity to discuss the various options with a number of stakeholders. It has become evident that many industry groups are taking positions which manipulate the program in order to benefit their most influential member's submissions. The IPA will be presented with a large number of options, some of which are from collective solar associations and others from individuals, and we would caution the IPA to take in to account that some of the organizations providing comment may be heavily swayed by special interest group and those associations do not necessary speak for the entire solar community.

**Bidder Fee – Not Supported**

We do not support the idea of adding a bidding fee to the applications. The addition of a bidding fee separates large, well-funded developers from smaller companies thus creating an unequal divide. It goes against the intent of the program of equal opportunity, and this may be an attempt by special interest groups influence the program administrator while also getting a leg up on the program.

**Institute an Approved Vendor Cap in Community Solar - Supported**

We support instituting a rule that an Approved Vendor cannot win more than 20% of the available capacity. Due to the high interest in the program as derived from the amount of interconnection applications being reported by utilities like ComEd, we see an Approved Vendor cap as an excellent way to address a number of issues that the program may be facing. This will prevent successful gaming of the program and promote equal opportunity.

**Co-Location – Modification Supported**

We support instituting a rule to remove Co-Located projects from Block 1 of the program. Co-location was not part of the original program and it was introduced late in the game, too late some may argue. To aligned with this late introduction, we believe those projects should be separated from the first submissions into the program (Block 1) and should be allowed to be submitted in later blocks (Blocks 2 and 3).



Project Grouping (or Batching) – Supported

We do not oppose the idea of project grouping; however, certain considerations need to be including in order to prevent gaming of the program. We imagine this notion came about as entities, such as schools, said certain projects would not be viable unless they were part of a greater portfolio of projects. We suggest, the following simple clarification.

- 1 lottery ticket for 1 project.
- The one project can include multiple smaller projects (and multiple parcel numbers)
- The one project cannot exceed the 2MW cap

Project Swapping - Supported

We support the ability of being able to swap projects after a project has won in the lottery; however, additional considerations need to be recognized. Given the unusually high interconnection costs provided by the utilities, swapping is an excellent solution to this problem; however, it needs to be implemented with proper care and consideration. **We strongly recommended the IPA qualify and verify the original awarded project is, in fact, a real project prior to swapping.** A project that has won a place in the lottery needs to have the proper due diligence performed and qualified prior to being allowed to swap. The reason being, this is an opportunity for gaming and opens an opportunity for applicants to submit a 'fake project' into the lottery. For example: What is to stop an Applicant from switching a parcel number on an interconnection document? And submitting an extra application knowing that the project will have the ability to be swapped prior to project diligence by the IPA.

Project Privacy Issue – No Opinion

We are impartial on the idea of releasing project winners publicly; however, we would suggest that this be done after the lottery ticket has been swapped and the location is finalized.

In conclusion, we appreciate the opportunity to offer these comments back and we applaud the IPA for the implementation of the program thus far. There are a number of markets that have faced the same issues that the ICC and the IPA are facing now as these new ideas and program rules are considered. We would suggest that the IPA continue to communicate with these other market administrators for advice of the impact of these important final rules. Thank you for the opportunity to provide these comments.

Sincerely,

SGC Power