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## AES DE DevCo NC, LLC comments to the Adjustable Block Program Guidebook and Lottery Guidance

1 message

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Mon, Dec 10, 2018 at 4:59 PM

To: "comments@illinoisabp.com" <comments@illinoisabp.com>

Cc: Andrew Brentan <andrew.brentan@aes.com>, Rebecca Langton <rebecca.langton@aes.com>

Dear InClime,

In response to the release of the draft Adjustable Block Program Guidebook, we have the following questions and recommendations for improvement as relates specifically to Community Solar projects.

Regarding Required Information for Part II (p23 of Guidebook)

### 1. Variations in plot placement that impact *more than 5% of total surface area*:

We recommend that this limitation be removed entirely as it is impractical and non-consequential to successful delivery on the REC contracts, as long as the projects stay on the same proposed land parcel(s). We recommend this for the following reasons:

- At a minimum, if two co-located projects are submitted into the AB program - Solar I and II for example - and Solar II is selected for award and Solar I is not, then the landowner should have a say in where they would prefer the awarded solar array to be located. As proposed, the landowner could be stuck with a solar array located in the middle of their land having originally anticipated one project would be located closest to a parcel boundary and the second project located adjacent. Developers should be able to swap out the site plan of Solar II with Solar I in order to honor landowner preference and allow them to maximize the remaining use of their land for ongoing agricultural uses or other desires.
- Furthermore, we want to work iteratively with landowners and neighbors for best site plan placement, which may include increasing setbacks or slightly changing array design within approved special use permit guidelines and restrictions.
- Lastly, discovery of uncatalogued wetlands, drain tiles, or geotechnical results may require adjustments to plot plans beyond those submitted in Part I. It is impractical to expect developers to perform all such studies prior to notice of award. While it is unlikely the results of such studies would have the potential to make a project site unfeasible, in some cases it may require system layout modification, which could exceed 5% of the plot plan in Part I.

Please note that we do **not** object to the limitation to a variation of no more than 5% of AC capacity.

2. Regarding the 20% developer cap, will a single system that partially pushes a developer's award over 20% for a given block be rounded up to total system size?
  - For example, if 20% is 8.8 MW, and the developer has five 2 MW projects awarded, will they retain 10 total awarded MW, be forced to forgo the 5th system's award for that block, or have to resize the 5<sup>th</sup> system down to 800 kW?

Regarding Required Information for Part I (p23-24 of Guidebook)

3. **Installer name and contact information:** At time of project submission for Part I, we will not have contracted for the installer of projects to be awarded, which will go to competitive bid among shortlisted EPC firms upon notice of award. We recommend that this be optional at submission, and allow for providing installer name and contact prior to construction. We will be the owner/operator of these projects and want to ensure the best selection of an installer partner who will also meet the Illinois DG Solar Installer certification requirement.
4. **Project Cost:** We would like to ask why this is being requested? Furthermore, final project costs will only be known once the utilities have provided final, post-lottery interconnection estimates, an EPC firm has been selected, and materials are procured. We can provide estimates of all of these, but recommend not requiring this piece of information in Part I, if at all.
5. **Technical Project Information:** Expected modules and inverters can be provided, but will be subject to change. Should they ultimately be changed, there should be no penalty, as long as inverters still meet requirements for the Smart Inverter Rebate.
6. **Subscriber Commitment:** Please confirm that prior to award and at time of Part I submission, a project only needs to commit to subscribing *at least* 50% small subscribers in order to participate in the initial lottery, and will only need to commit to a final choice of at least 50% or 75% of small subscribers prior to REC contract execution?
  - Please also confirm that target subscription levels need to be met on an annual basis, and that brief dips below the target level throughout the year will not be penalized subject to the terms specified on page 8 and 22.
7. **Required Uploads – Proof that brochure was provided to customer:** We recommend removing this requirement from Part I. Community solar projects submitted into the program will not have subscribed any customers prior to award. Customer acquisition will begin once specific projects and their locations are known to have secured REC awards in order to offer customers subscriptions to the projects closest to them and the certainty that they will indeed have a project to subscribe to.

We appreciate your review and consideration of our comments and recommendations. If further clarification or conversation is needed to understand our intent on these issues, please give me a call.

Regards,

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