



## Geronimo Energy Response to InClime request for Comments on Illinois Adjustable Block Program Draft Guidebook and Opening Lottery Procedure

On November 28, 2018, the Illinois Power Agency (“IPA”) and the IPA Adjustable Block Program (“ABP”) Administrator (“InClime”) published the draft Illinois Adjustable Block Program Guidebook (“Guidebook”) and the APB Opening Lottery Procedure. The IPA has requested additional written feedback from stakeholders on the draft Guidebook, and as such, Geronimo Energy submits the following comments. Geronimo Energy is a renewable energy developer, owner, and operator with 2,000 MW of successful experience and is currently active in the Illinois market with both utility-scale and distributed generation development assets in various stages of development and construction.

### **REC Quantity Calculation**

*Guideline Reference:* ABP Draft Guidebook Section 4. Page 15.

*Concern:* The guidebook states: “Any proposed alternate capacity factor that is calculated using a proprietary third-party software tool will require the Approved Vendor to provide a copy of the third-party software tool with appropriate licenses to the Program Administrator as well as providing all inputs to the tool in a manner which will allow the Program Administrator to replicate the generation claimed.”

The requirement to provide a third-party software license to the program administrator is not practical, unwieldy, and potentially expensive. To implement the proposal in the guidebook legally would typically require the purchase of another software license for a package for which the ABP administrator may not be trained and would have a difficult time verifying the results independently. Geronimo Energy views this provision as burdensome on both the ABP Program Administrator and Approved Vendor alike. The risk of REC under or over delivery lies primarily with the Approved Vendor and should be reasonably governed by the REC Contract between the Approved Vendor and Utility in the form of the collateral requirement which can be drawn upon in the event of under production.

*Suggested Edit:* Geronimo Energy believes the accuracy of the REC calculation is the responsibility of the Approved Vendor and proposes that Approved Vendors must submit the output documentation or report from the third-party tool showing the expected production, input parameters, degradation, and shading assumptions which should correspond with the requested REC quantity.

### **ABP Lottery Procedure**

Geronimo Energy supports the IPA’s updated ABP Lottery Procedure document. If the IPA were open to making minor changes to the proposed process, Geronimo Energy would recommend allowing for more flexibility for the Approved Vendor to change the project layout more than 5% if needed (as proposed in Section E.2.) and treating co-located project applications as one “lottery ticket” under a lottery scenario to give a greater chance that either all or none of the project is awarded a contract to take advantages of the scale efficiency.