



ABP Administrator InClime <admin@illinoisabp.com>

Comment - Draft Guidebook Section 4

1 message

gargiulo.keith@gmail.com <gargiulo.keith@gmail.com>
To: comments@illinoisabp.com

Thu, Nov 29, 2018 at 9:09 AM

Hello,

My comment pertains to the following component of the Draft Guidebook:

Draft Guidebook November 28, 2018

Co-location of DG projects

The total capacity of distributed generation systems enrolled in the Adjustable Block Program at a customer's location will be considered a single system. (For example, three 100 kW systems at a single location will be considered a 300 kW system.) For purposes of determining the system's REC price, a system's location is considered to be a single building (regardless of the number of utility accounts at the location) for rooftop installations, and a single property parcel for ground-mounted systems (if a property had both rooftop and ground-mounted systems, it will be considered a single system). Additionally, systems located on multiple different rooftops on the same parcel will be considered a single system if each system is owned by the same entity or its affiliates.

If two projects on one roof are separately owned and serve to offset the load of separate occupants (residential or commercial) of a building, then in order to have these arrays considered as two separate projects, an Approved Vendor must provide proof that the occupants are not affiliated entities and each has a separate utility meter and separate utility billing.

The intent seems to be to prevent people from "gaming the system" by splitting what is truly one system, meant to provide power for one user, into multiple systems of smaller size that would then qualify for higher SREC payments. That goal makes sense.

The 2nd paragraph seeks to allow for exceptions, however it only allows exceptions for multiple projects on a single roof. There is at least one other very common example of acceptable multiple projects at a single address that is not covered by the words as-written. This is the case where there are many different buildings at a single address with both residential and commercial use and multiple projects are offsetting the load of separate occupants. The concept of calling everything at a single postal address "a single building" seems far too limiting in this case.

The commercial entity might be owned and operated by the property resident or the property resident might be a landlord and lease the other buildings out as a commercial enterprise to others. Particularly in the case where the commercial activity is leased to others, but in my opinion also when the commercial activity is run by the property owner, as long as proof (e.g. signed lease, taxes, separate commercial/residential meters, commercial insurance, commercial depreciation rules) exists, then the residential and commercial projects should be considered separate regardless of whether they are installed on the same roof, different roofs, a mix of ground and roof, concurrently, or sequentially. The only requirement should be that there are in fact two projects with each one connected to either the residential or the commercial meter so

the two entities continue to remain separate even though physically at a single postal address.

Treating these as separate projects, each qualified for SRECs, is consistent with the goal of the program to increase DG and is also consistent with the interpretation taken in at least one nearby state.

Thanks for your time. I'd be happy to talk on the phone if desired.

Keith Gargiulo

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