

Adjustable Block Program Request for Feedback - Updated Batching Process

April 15, 2020

Background

Section 6.14.1 of the IPA's filed Revised Long-Term Renewable Resources Procurement Plan proposed the following revision to the Adjustable Block Program's batch approval process:

Under the Initial Plan, Approved Vendors were required to submit projects bundled into batches. For this Revised Plan, the Agency proposes a simplification of the batch process. For a new Approved Vendor, there will still be the requirement for a submittal of a first batch of at least 100 kW of projects, and that 75% of the capacity of that batch must be verified to be approved. However, for established Approved Vendors that have had a contract approved by the Commission, projects may be submitted on a rolling basis, and as projects are verified, the Program Administrator will place them into new batches that will result in a contract and/or new confirmations with one utility. Utilities may use one master agreement with multiple confirmations (one confirmation per batch) from an Approved Vendor, rather than having multiple contracts with the same vendor. The systems within the batch/confirmation will be listed on a schedule (or product order) attached to the contract and may not be substituted once approved.

During the proceeding to approve the Revised Plan, the Joint Solar Parties (JSP) proposed a modification to this approach through which Approved Vendors could select which verified project applications to put in a given batch.

In response to that Joint Solar Parties proposal, the IPA suggested that Approved Vendors be given the opportunity to specify how their verified systems are batched prior to being submitted to the Commission, provided that those batches of verified systems are at least 100 kW in size. For Approved Vendors who do not desire to assemble batches into portfolios in this way, the Agency's proposed rolling batch approach would be used. This approach (the IPA's response, as informed by the Plan and JSP filing) was adopted by the ICC in its Final Order in Docket No. 19-0995 approving the Revised Long-Term Plan (and will be reflected in the *final* Revised Long-Term Plan, which the IPA expects to issue on April 20, 2020).

Request for Feedback

In implementing ABP portal updates to accommodate these changes, the Program Administrator seeks feedback on the questions listed below.

1. Would you prefer that the Part I application include an option granting the Program Administrator discretion to form batches from an Approved Vendor's Part I verified

systems that have made this election, provided that the Approved Vendor has at least 100 kW of Part I verified projects? Under this approach, if this option was not selected on the Part I application, then the project would not be submitted to the ICC until the Approved Vendor placed the project into a batch and requested that the Program Administrator submit the batch to the ICC.

2. Would you instead prefer that, upon being notified of a project's Part I verification, the Approved Vendor is allotted a certain amount of time (perhaps ten business days) to bundle that project into a batch (including the option of a single project batch) or to request that the project be held until other Part I verified projects are available to batch with it? If the Approved Vendor were to make the latter selection, the project would not be submitted to the ICC until the Approved Vendor placed the project into a batch and requested that the Program Administrator submit the batch to the ICC. Absent an affirmative request from the Approved Vendor to specify the batch or hold the project, the Program Administrator would use its discretion to place verified projects into batches for submission to the ICC.
3. Are there other process or procedural aspects of the batching process that you would like to provide comments on?

Please email your comments on the above questions and any other comments on the new batching process to admin@illinoisabp.com with the subject line "Batching Process Stakeholder Comments – [STAKEHOLDER NAME]" no later than Wednesday, April 29, 2020, at 5 PM Central Daylight Time.