Illinois Power Agency
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InClime, Inc. - Program Administrator

<u>Comments on Proposed Batching Procedure</u>

General comments

Thank you for the opportunity to comment on the batching process. Carbon Solutions is excited for the implementation of the updated process. The temporary update has already helped speed up application processing and we are looking forward to the final process that we think will improve the batching process even more.

In general we find the most important aspect of the updated batching process to be the mechanics of actually submitting batches. The two options laid out in the request for comment are helpful, but in both cases the way the information entered in the portal is the biggest factor in feasibility. That being said we find the current batching process available on the ABP Portal to work well and ideally the new process would stick as closely as possible to the existing structure, just with updated and improved timing.

To that end batching of systems currently serves two purposes that will be broken up in time. The first is for payment of the ABP application fee and the second is submission to the ICC. For clarity's sake we will refer to these as Payment Batching and ICC Batching going forward in these comments.

For payment batching we recommend that the current process of being able to group systems together is maintained, however, since this will serve for payment only we recommend that the Payment Batches can be over 2MW in size and have no bearing on the eventual ICC batching. This should speed up the initial payment process when larger numbers of systems are being submitted at once.

In regards to ICC batching we again recommend that the updated ABP portal sticks as closely to the current batching process as possible. We recommend that a sortable field with a check

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box "Ready for ICC Batching" appears once a system is Pt 1 verified. This box would then disappear once the batch has been made and submitted by the AV.

Option 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.

Position

We support the adoption of this system. We feel it has the benefit of allowing systems to move forward automatically without additional input from AV's in cases where it is not needed. It also has the additional benefit of allowing AV's to wait for another system to be Pt 1 Approved so that batches may be better created. The benefit of having this option, ensuring that batches proceed unencumbered to the ICC once 100kW is part 1 verified, outweighs the risk of accidentally selecting the option, and that accidental selection having a material negative impact.

Implementation
- I would propose that it's made clear to the Approved Vendor by way of bold red that this option is selected and that the batching for the project would be left to the program administrator.
- Additionally or alternatively, the election should not be easy to accidentally select, and it may be helpful to provide an option to input the ABP ID of the project in order to confirm the selection
- Alternatively Approved Vendors could submit to the Program Administrator a default preference - to allow batching by the program administrator, or not. This would set the default value for a given AV.

Option 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.

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Position

We are not in favor of requiring affirmative requests for batching or requesting a project be held within a specific time frame, else having the program administrator batch projects without AV input. The quantity of notifications could be difficult to track and onerous to administer creating the requirement of dozens of responses per week. This could lead to projects being batched by the program admin simply because an email was missed. This option also has less flexibility and may result in systems being batched in a sub-optimal mix due to strict deadlines.

Implementation

If this option were implemented we would welcome the addition of a column to the project report dashboard indicating the time remaining before a batch decision needs to be made, and some sort of automated method for bulk notifying the program admin on the preference for each project. The "check boxes" that currently exist could be multi-purpose, and could be used not only to "Create a Batch", but also to, "Request Project be Held for Future Batch" or "Create a Batch of Verified Project".

Are there other process or procedural aspects of the batching process that you would like to provide comments on

Position

If the program admin does take on the role of batching projects, we would like the criteria for batch creation to be transparent. For example, if batches are being created ordinally based on project ID until at least 100kW of verified applications are batched together, that would be one method.

Finally, we would welcome the criteria for batch creation to include the system seller. We acknowledge this may be burdensome to implement, especially with respect to other requests, and the benefit would only be marginal. If this were simple to implement we would be in favor of this criterion as well.

Conclusion

Thank you for the opportunity to comment on the batching process. We are looking forward to the implementation of the new system. Please feel free to reach out if you have any questions or need additional clarification on our comments.

Sincerely,

Dylan DeBiasi and Rhett Gopaul

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