

To: admin@illinoisabp.com

Thank you for soliciting stakeholder comments related to the draft updated ABP Program Guidebook. Cypress Creek would like to comment on section 4, J (REC Quantity Calculation). Paragraph 5 states:

Any capacity factor that is approved for Part I of an application will be the maximum capacity factor that the system may use even if changes to the final as-built system would result in a higher capacity factor. However, any changes to the system between the Part I and Part II approval that would lower the capacity factor will result in a capacity factor reevaluation and the new, lower Part II capacity factor must be used. The Part II capacity factor cannot be greater than the Part I capacity factor. If there is a new, lower Part II capacity factor, again stated relative to the system size in AC, it will be used, rather than the Part I capacity factor, for calculating payments under the REC Contract and the annual REC delivery obligations under the REC Contract.

Paragraph 4 reads:

*The Administrator will evaluate systems using **non-standard** technologies such as bifacial panels or seasonally adjusted tilt on a case by case basis.*

The term “non-standard” is highlighted here to illustrate how quickly the technology evolves in the solar (and other renewables) industry. In the time between the issuance of the last Program Guidebook and this draft, bifacial panels have become common and quite standard.

With quickly shifting technology, Cypress Creek does not think it is appropriate to expect specifications and equipment selections made at the program onset to hold at all points in the future when a project can eventually advance to the Part II application stage and ultimately detailed design and construction. Depending on the length of time between Part I application and Part II application, significant technological advances- such as increased panel efficiency- could alter the project’s output and efficiency. With this comment, Cypress Creek requests that the IPA initiate a process to allow modifications of the Part I application.

Thank you again for the opportunity to provide feedback.

Regards,

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