



ABP Administrator InClime &lt;admin@illinoisabp.com&gt;

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**Re: Program Guidebook Update – Request for Stakeholder Comment**

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**Sameer H. Doshi**

Thu, Aug 6, 2020 at 5:54 PM

To: Illinois ABP &lt;admin@illinoisabp.com&gt;

Cc: "anthony.star@illinois.gov" &lt;anthony.star@illinois.gov&gt;, "brian.granahan@illinois.gov" &lt;brian.granahan@illinois.gov&gt;

Good afternoon,

My typical disclaimers (I represent nobody in Illinois and am strictly writing as a concerned individual) apply.

Here's what I noticed here. Page numbers refer to the clean version of the draft Guidebook.

Section 1.C (Lottery Procedure) on page 6: it says that both Community Solar and Group A Large DG were in the April 10, 2019 lotteries, but then it mentions Community Solar waitlists but not a Large DG waitlist. A reader could be confused if s/he didn't know the full story; you could clarify that the lottery for Group A Large DG did not result in any eligible projects being waitlisted, but that such category eventually formed a waitlist in 2020.

Section 1.E on page 8, you might make this edit for clarity: “For Community Solar and Large DG the **Block 4** prices, shown are applicable to projects selected off waitlists.”

Section 1.F on page 10, re small subscriber adders: reconcile the size thresholds in your table here with the new size thresholds per Table 6-4 of the Revised Plan. (The new size thresholds are based on “50% or greater” defining a category, not “over 50%”.) And edit the phrase “over 50% small subscribers” in the text below the table.

Section 4.D.1, page 29, delete the word “certification” after “Distributed Generation Installer”

Consider codifying your March 27th and May 5th, 2020 blog posts about energization extension and/or force majeure requests in light of COVID19 (I do see that on page 44 of the Guidebook you mention that “the IPA has issued separate guidance”).

On page 50, in Guidebook § 5.F, look at the sentence “Community solar projects will receive adders for small subscriber subscription levels as described in Section 1 regardless of selection made here, and thus may still receive an adder for small subscriber subscription levels above 50% despite an initial commitment of only 50%.” This needs some refinement with the Revised Plan, § 6.5.3 now in place. Perhaps modify to something like this: “**Any community solar project will receive an adder, if applicable, for actual small subscriber subscription levels as described in Section 1.F regardless of selection made here; moreover, any community solar project already selected into the Program prior to the ICC's approval of the Revised Plan on February 18, 2020 may still receive the highest small subscriber pricing adder for greater than 75% small subscriber level if it actually attains that level, despite having made an initial commitment of only 50% in its Part I application.**” Or something along those lines.

Also in the same paragraph on page 50, edit: “This ~~is was~~ only for the purposes of ~~any potential the~~ **April 10, 2019** initial lottery.”

Section 6.B, page 56, edit: “The first assignment of a product order ~~of or~~ contract [...]”

Thank you.

On Thursday, August 6, 2020, 01:05:43 PM CDT, Illinois ABP <[admin@illinoisabp.com](mailto:admin@illinoisabp.com)> wrote:



## New Posts Published to the Illinois ABP Website

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### Program Guidebook Update – Request for Stakeholder Comment

A draft updated Adjustable Block Program Guidebook has been released for stakeholder feedback. The draft updated Program Guidebook and a redlined document showing changes from the May 31, 2019 version can be found [here](#) . As detailed in Section 9 of the current Program Guidebook, the Program Administrator is requesting comments on the changes in this draft version of the Program Guidebook. In lieu of hosting a webinar to discuss any changes made to this version of the Guidebook, the IPA and its Program Administrator are happy to provide answers to any questions or otherwise receive less formal input or feedback outside of the formal comment process, if necessary.

Stakeholders should email comments to [admin@illinoisabp.com](mailto:admin@illinoisabp.com) by Friday, August 21st. In general, responses will be made public and published on the ABP's website (<https://illinoisabp.com/>). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions of their comments. The Program Administrator has provided a Word document version of the draft Program Guidebook in the case that stakeholders wish to edit the document directly and send an edited version of this document to the Program Administrator.

**Key changes in this draft version of the Program Guidebook include, among others:**

- **Updates to conform with the Revised Long-Term Renewable Resources Plan**
  - **Information on Designee Registration**
  - **Clarification on the Program’s disciplinary process**
  - **Removal of stale sections that are no longer relevant to the Program as it exists today**
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