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## **Comments on The Second Round of the IPA Workshop**

Thank you for the opportunity to give feedback. We are focusing our answers on the most relevant questions to our business. Please see below for our responses.

*Slide 10: Block Structure. . What changes should be considered to block structures?*

- a. If legislation does not establish an annual block structure, what are appropriate future block sizes and REC price changes between blocks?*
- b. Should additional Groups to increase geographic granularity be considered?*
- c. For Large DG, should there be additional division of blocks by project size?*

CSG supports maintaining the current block structure, groups, and divisions. Given the current budget situation and the unlikelihood of new blocks opening in the near term absent legislation it is difficult to contemplate any changes to the basic block structure.

*2. What ongoing verification should be required for projects to maintain waitlist positions?*

CSG is not in favor of additional ongoing verification to maintain waitlist positions. The current structure of confirming projects before accepting a spot from the waitlist. There would be significant administrative burden without causing much actual attrition to the waitlist by adding in additional verification. This is especially true for smaller projects and residential systems.

Slide 12: Industry Structure and Business Models

*3. Does the current Approved Vendor/Designee model appropriately address the roles and responsibilities of types of firms involved in solar projects? What alternative approaches could the IPA consider?*

CSG supports the current AV/Designee model. We do not support any changes to the current structure at this time.

Slide 13: Project Financing Models and Program Requirements

*4. Should the Program provide increased differentiation of application requirements for projects based on that project's financing model (Purchase, Lease, PPA)? If so, why and how?*

CSG finds the current distinctions in the Standard Disclosure Forms to adequately explain the differences between financing models. We are not in favor of adding additional requirements or complications to creating and sending Disclosures.

*a. Should program requirements vary between Residential/Non-residential projects? If so, why and how?*

The current size category distinctions do a sufficient job at distinguishing between project types and readiness criteria. There is not a significant difference between the system design or sales process for small businesses or residential customers. The current criteria adequately address the necessary information.

Slide 16: System Design Standards and Consumer Disclosure

*9. Non-optimally designed systems generally feature lower capacity factors and thus lower REC payments compared to a more-optimally designed system. a. How should this be disclosed/conveyed to customers? b. What else should be conveyed to the customer? For instance, should disclosure be required that a customer may receive decreased net metering benefits associated with reduced system production?*

We are not aware of any installers that are intentionally designing systems to less than-optimal criteria. Generally when there are systems that are designed with arrays that have less than ideal orientation or tilt it is due to the size, shape and direction of the roof.

Many customers want to offset a larger percentage of their electric load than they are able to with only their south-facing roof. In these cases customers request that panels be added to other parts of the roof in order to offset a higher percentage of their electricity.

The lowered production is already reflected in the Standard Disclosure form and Capacity Factors for these systems, so customers are being made aware of the trade-offs on putting solar in less than ideal tilts and orientations.

There could be an additional paragraph added to the Disclosure form explaining the consequences of putting solar panels on parts of their roof with less than ideal conditions. However, we do not believe that system owners should be discouraged from putting solar in less ideal locations if they understand the costs and benefits and wish to offset more of their power usage.

Thank you again for these stakeholder feedback opportunities. We look forward to continuing to engage as the LTRRPP is developed.

Sincerely,

Dylan DeBiasi