



MEMORANDUM

To: Illinois Solar for All Program Administrator
From: Central Road Energy, LLC
Date: January 7, 2019
Subject: Approved Vendor Registration Assessment Criteria Comments

This memorandum provides comments on the Illinois Solar for All (ILSfA) Program Administrator's (PA's) draft rubric for the Approved Vendor Registration Assessment. We greatly appreciate the effort and thought that went into the rubric and the opportunity to comment.

The PA identified specific areas of interest for which they are seeking input. These have been included in their entirety followed by our response:

1. *Are there any perceived barriers or concerns with the proposed two-stage registration process; i.e. first qualifying for the Adjustable Block Program, then registering for IL Solar for All?*

We see no issues with the proposed two-stage registration process.

2. *Will the online portal approach streamline or complicate the registration process?*

We support the proposed online portal approach.

3. *Does the proposed Approved Vendor registration assessment rubric approach allow for the right level of detail and expectation?*

We feel the Approved Vendor registration process should only focus on those issues that qualify the applicant to be a counterparty to an ILSfA REC contract. We would rather see something in the vein of the Adjustable Block Program vendor registration process; that is, a pass-fail approach. It is our opinion that the questions that the PA has proposed in the scoring rubric are better addressed at the project application level and the scoring that will take place there.

4. *The administrator evaluated several methods for developing assessment criteria for individual registration questions, including 1) binary, pass/fail, 2) a weighted score and 3) a rubric approach. Are there other assessment methods not accounted for here?*

We support a pass/fail system and, as such, have no comment on this question.

5. *Are the category weights used in the proposed rubric appropriate?*

We support a pass/fail system and, as such, have no comment on this question.



6. *Is it realistic that Approved Vendors will know the communities they will target at the registration stage?*

While many people seeking ILSfA Approved Vendor status may have specific projects in mind, we feel it is not realistic to assume that all ILSfA Approved Vendor applicants will have projects at the Approved Vendor registration phase. Central Road Energy would like to team with community groups that want to do ILSfA projects and are trying to identify developers that can help them. By being an approved vendor, CRE can demonstrate to the community group that we understand the ILSfA program and have met the criteria necessary to hold an ILSfA REC contract. Consequently, Central Road Energy intends to pursue ILSfA vendor status whether we have a project or not. However, please know that we do feel very strongly that any project that is applying for an ILSfA REC contract should have their target community identified. Furthermore, we feel their interaction and coordination with the community group for that project should be an important factor in project scoring.

7. *Is it appropriate to weight the future engagement plan higher than past experience?*

We feel that this type of evaluation and scoring should take place at the project level rather than the Approved Vendor registration level.

8. *Is the “probability of meeting requirements” an appropriate measurement for the required responses to the Applicants proposed outreach and engagement plan?*

If this evaluation takes place at the project scoring level rather than the approved vendor application stage, the issue of trying to evaluate the “probability of meeting requirements” is eliminated.

9. *With what degree of accuracy can vendors project the ratio of low-income subscribers for community solar projects at registration? Is this an appropriate indicator to be measured?*

This information should be provided at the project application stage rather than the approved vendor stage. At that point, the degree of accuracy for that projection can be scored for that particular project. Some projects may know exactly how many subscribers they will have while some may only have a target subscriber defined.

10. *Are the intended anchor types likely to be known at registration?*

Not in all cases. This is again project specific and should be scored/evaluated at the project application level.

11. *Is a three year plan for meeting job training requirements realistic at registration?*

We feel that the Approved Vendor Applicant should be required to attest to an understanding of and commitment to the requirements of the ILSfA program for job training. However, for community solar, any jobs plan would be meaningless until the approved vendor has a project. We feel a jobs plan should be required with every project submitted for an ILSfA REC contract and the plan scored as part of the project evaluation.



- 12. Is it more appropriate to ensure job training plans are detailed or realistic? Can these be appropriately measured at registration?*

See response to Comment 11

- 13. What is the right level of detail for submitting proposed business models, including illustrating approaches to savings, no upfront costs and financing terms?*

We feel the specifics of these issues are project dependent. The target subscribers and the community organization team member needs will likely be different for each project resulting in varying levels of savings and financing terms. We do feel it is appropriate for an Approved Vendor applicant to attest to understanding and committing to meeting the minimum standards, where defined in the ILSfA program, for these requirements.

- 14. Attestations are required for minimum site suitability and for sharing resources with participants. Is this understood and appropriate?*

We feel attestations are appropriate for demonstrating the applicant's understanding of and commitment to the minimum requirements of the program. These attestations may need to be more specific. We feel the follow up questions are not appropriate for the vendor application but should be included for the project application.

- 15. Is the minimum score requirement of at least 70% of total possible score realistic and appropriate considering the rubric?*

We support a pass/fail system and, as such, have no comment on this question.

If you need any clarification on our comments, please contact Jay Corgiat at 630-561-2077 or by email at jaycorgiat@centralroadenergy.com.