

JOINT SOLAR PARTIES COMMENTS ON CHAPTER 3

TOPIC 1: RPS Information Presentation

Questions

1. How can the Agency improve the presentation of information addressed Chapter 3? This can be through refinements or clarifications to the narration, additional analyses, added charts, or visuals not currently included in the Chapter.

JSP RESPONSE: The Joint Solar Parties generally believe the presentation of information is helpful, but it is useful to understand some of the assumptions for expenditure timing as it relates to energization dates. That context is important in understanding risk in future years—as an example, the “solar cliff” of June 1, 2021 under FEJA was caused by a hardcoded date for refunding RPS funds that were committed but for a variety of reasons had not yet been spent. Similarly—in light of the risk of budget shortfalls during the term of REC Contracts to be procured under the plan according to some scenarios studied by the IPA—timing of energization could impact timing of expenditures and thus potential shortfalls. 2. Can the Agency better elaborate or explain on the information or analysis presented in Chapter 3 that could be added to aid stakeholders in understanding current and future progress towards RPS goals and targets?

JSP RESPONSE: The Joint Solar Parties do not have any proposals regarding this issue. However, in addition to the analyses currently included regarding budgets, the additional information might be helpful:

- Under Section 3.4.5 or 3.4.6, the Joint Solar Parties recommend that the LTRRPP also provide information and data on the fees that are collected by Approved Vendor submissions (i.e. Part 1 application fees) and assignment fees that go to covering administrative costs and the impact on the administrative budget.
- Whether in Chapter 3 or elsewhere, the Joint Solar Parties recommend analysis of projects and subscribers located in Equity Investment Eligible Communities.

TOPIC 2: RPS Planning Assumptions

Questions:

1. Should the Agency use different assumptions for changes over time to REC prices for both indexed RECs and the Adjustable Block Program, as well as for the timelines for project energization rates?

JSP RESPONSE: The Joint Solar Parties generally support the different scenarios set out by the IPA—to the extent that a particular market participant wants to model using different assumptions to test their risk based on their own forward projections, the Joint Solar Parties note that providing the model in native format is sufficient. The Joint Solar Parties reserve their right to make specific arguments about the impact of these scenarios on planning and procurement at a later time.

The Joint Solar Parties do believe that scenarios around energization—both in terms of volumes and dates—would make the results more realistic and thus provide better information. The Joint Solar Parties note that ongoing delays in transmission-level interconnection processes (particularly in PJM) mean that delivery may be significantly delayed for some systems, while others—as historically been the case—may never deliver their first REC for a range of reasons.

2. Should the Agency include a scenario analysis in Chapter 3 comparable to the April 2023 budget update? If so, would a high-low method be sufficient or would a regression analysis be preferred?

JSP RESPONSE: Yes, this information is important for long-term planning purposes and thus should be included.