

Azimuth Renewables - Response to Utility-Scale and Brownfield Site Photovoltaic Procurement Comment Request

To whom it may concern,

We appreciate the opportunity to provide feedback to facilitate IPA's 2022 Plan.

1. Procurements should occur at least twice a year. In regards to time of year, it would be best if procurement deadlines fell after the MISO Study milestones. See attached schedule. Unfortunately, MISO deadlines can and do slip. The next cycle is set to start in December.
2. The most effective way to optimize the procurement from projects in Energy Transition Community Grant (ECTG) areas is to provide an economic incentive i.e. index REC + a set REC payment, more favorable contract terms. The next best option would be to weight the project selection in favor of projects in these areas. One challenge to consider is that many of the best sites in these areas are going to be on property owned by the existing coal plant owners or coal mine owners. Weighting selection criteria towards these areas may discourage new entrants by putting their projects at a disadvantage. A lot will depend on the definition of the ETCG areas and how far they can be from existing facilities / mines.
3. No comment
4. A stair step schedule for collateral requirements that is tied to project milestones is a workable option. The agency must factor in the possibility of interconnection study and construction delays. These items are outside the developer's control and can cause significant delays to commercial operation dates.
5. No comment
6. The IPA should reset the REC target.
7. A 5 minute settlement period is not practical.
8. No comment
9. We believe the IPA proposed approach is correct
10. No comment
11. No comment
12. Any effort to incorporate utilization of equity eligible contractors in bid evaluation should be done as an incentive to bids that demonstrate high utilization rather than as a penalty for bids that have lower utilization. Many projects that participate will not have a final EPC contractor and may have difficulty determining any additional costs for using equity eligible contractors. Many bidders will find it extremely difficult to quantify the impact on project economics at the time of the bid.

Thanks,
David Bunge

President
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