



September 30, 2019

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RE: Comments on the Draft Revised Long-Term Renewable Resources Procurement Plan

Section 6.3.3.1 Community Solar Waitlist Management and Project Selection

To whomever it may concern,

Community Energy Solar (CES) appreciates everything the IPA has done to ensure a robust methodology for allocating Community Solar REC awards. Thank you for your consideration of our comments below.

The ordinal ranking system has established a robust waitlist of projects that meet the maturity requirements to receive a Community Solar REC award. Our understanding is that others may propose that further maturity requirements be adopted for projects to remain eligible to receive a Community Solar REC award. CES proposes that the ordinal ranking system remain in effect under its current rules, in order to maintain consistency. Our company disagrees with any proposal that removes currently eligible projects from the ordinal ranking system or sets additional maturity requirements for projects that allow those projects to leapfrog existing projects with an ordinal rank on the waitlist. For the avoidance of doubt, we support any rules that require projects with an ordinal rank on the waitlist to periodically demonstrate that they still meet those maturity requirements.

If the lottery had never occurred, and ordinal ranks were never assigned, our position may be different, and we would likely be sympathetic to the implementation of a project maturity based methodology or interconnection time-stamp methodology to assigning Community Solar REC awards. However, the lottery was the chosen path, and the ordinal ranking system was deployed. Ever since, our company has made business decisions based on the ordinal ranking system rules, and our hope is that the rules remain consistent.

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