

July 22, 2019

Illinois Power Agency 105 W. Madison St. Suite 1401 Chicago, IL 60602

RE: LTRRPP Request for Comment

Hexagon Energy is pleased to provide comments as part the IPA's Request for Comments on the 2019 Long-Term Renewable Resources Procurement Plan Update. Hexagon is an independent renewable energy development firm based in Charlottesville, Virginia. We develop solar and wind projects across the U.S. with projects under development in 15 states.

We submitted five projects into the Community Solar category through the Adjustable Block Program. The corresponding approved vendors are as follows:

- Marlow Solar, LLC (Group A, Block 1)
- Shabbona Creek Solar, LLC (Group A, waitlist)
- Sunswept Solar, LLC (Group A, waitlist)
- Ice Plant Solar, LLC (Group A, waitlist)
- Divided Sky Solar, LLC (Group A, waitlist)

Generally, our interests are aligned with that of the broader industry. Stated briefly, creating market certainty via recurring procurement windows, transparent capacity targets, REC values that allow projects to achieve market returns, and adhering to the program policies and guidelines that underlie the at-risk capital deployed to-date will continue to give us confidence to invest in the IL solar market.

In light of this, we would like to provide specific comment on item D1 of the LTRRPP Request for Comments. It is our view that continuing to award projects based on the ordinal number of their waitlist position provides the highest degree of fairness. We believe the amount invested into the IL solar market by each developer was reflected in the probability of award through the ABP lottery, thus, the waitlist was fairly constructed.

Sincerely

Daniel Bulka,

Director of Operations

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