



[REDACTED]

Specifically, for each historical procurement event, the IPA should determine the number of additional bids that would have been selected in each event had the benchmark price for that technology been higher by (i) 10%, (ii) 20% and (iii) 25%.

[REDACTED]

If the results of this analysis show that a significant number of additional projects and RECs would have been selected over time (i.e., would have been selected had the benchmark price been higher by 10%, 20% or 25%), this would suggest the need to include an “all other factors” component of the benchmark development process going forward.

[REDACTED]

[REDACTED]