Dear Director Star,

Thank you for updating the Adjustable Block Program's batch approval process in response to the Joint Solar Parties' proposal. The process described in the Final Revised Plan on Page 153 is indeed a significant improvement over the previous process.

"Approved Vendors will be allowed to select which batches approved systems are placed into, so that they can better manage their financing portfolios. Once systems' Part I applications are verified, and before they are sent to the Commission for approval, an Approved Vendor will be consulted and given the opportunity to specify how its verified systems are batched, so long as those batches of verified systems are at least 100 kW in size."

We interpret both options presented in the April 15th Request For Feedback to allow for Approved Vendors to affirmatively place a Part 1 verified project into a specific batch before it is submitted to the ICC for approval. Both options maintain the permissibility of single-project batches, and both options allow Approved Vendors some control over the timing of when a batch is submitted to the ICC for approval. We have a slight preference for Option 1, because there appears to be a slightly reduced risk that we could accidentally miss the window to select how our projects are batched (if, for instance, there is staff turnover during the ten business days and an email is missed). We could work with either option.

Thank you for your consideration,

Madeleine Klein

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