



201 California Street, Suite 630 San Francisco, CA 94111  
www.srectrade.com | Phone and Fax: (415) 763-7732

Adjustable Block Program  
Draft Project Information Release Protocols  
May 23, 2019

Dear Mr. Brian Granahan:

SRECTrade, Inc. (“SRECTrade”) appreciates the opportunity to provide feedback on the Proposed Information Disclosure from the Draft Project Information Release Protocols. It is an exciting and pivotal time in the development of the Adjustable Block Program (“ABP”) with project applications and batch applications now receiving approval from the Illinois Commerce Commission (“ICC”).

SRECTrade bases its feedback on its view that the proposed downloadable spreadsheets should provide ABP stakeholders with sufficient market and project status information, without revealing unnecessary or confidential information which would negatively affect project owners and Approved Vendors.

At this stage, SRECTrade has received concerns from ABP customers and Approved Vendor Designees that the current approval information provided by the Program Administrator is often not sufficient for securing financing or giving confidence to project owners to move forward with development. Providing ABP customers with an official form and/or notice of project contract approval is essential for ABP customers, project financing entities, and other project stakeholders to move forward with their project installations.

At present, SRECTrade is notified of project contract approval with 1) an email from InClime, Inc. (“InClime”) and 2) ‘Part 1 Status’ and ‘Batch’ updates in its Illinois ABP portal account. Conversely, ABP customers are not directly notified of any project contract approval; ABP customers are required to contact their Approved Vendors for more information.

Thus SRECTrade proposes that ABP customers, project financing entities, and other project stakeholders have direct access to sufficient project contract status information to continue project development. It seems best that this be provided in the form of 1) project contract approval notification being emailed to the project owner on the Disclosure Form directly by InClime and 2) the ‘Project Applications Approved by the ICC’ spreadsheet containing sufficient information for a third-party to identify project contract approvals. Providing these official forms and/or notices of project contract approval will improve consumer protection in a similar fashion as the Disclosure Form does.

From the ‘Project Applications Approved by the ICC’ section of the Proposed Information Disclosure, SRECTrade recommends the following changes to the ‘Project Fields’ list:

1. Remove ‘contract number’
  - a. The ‘contract number’ field refers to a private contract between the Approved Vendor and the Utility and does not provide any benefit by being made public knowledge.
2. Remove ‘project address’ (remove for all Block Categories)
  - a. Regardless of Block Category, including the ‘project address’ field could lead to ABP customers being solicited for unwanted products and services. SRECTrade advises program administrators to keep this information confidential. Even during the ABP Block 1 Lottery process, SRECTrade and some of its ABP customers were solicited for services based on information provided in ‘Lottery Results’ report.



201 California Street, Suite 630 San Francisco, CA 94111  
www.srectrade.com | Phone and Fax: (415) 763-7732

3. Add 'project name' from the 'Projects' tab of the Approved Vendor ABP online account
  - a. ABP customers, project financing entities, and other project stakeholders need an official form and/or notice of project contract approval from the primary source. ABP stakeholders should be able to identify associated projects from the spreadsheet without project address being disclosed.

SRECTrade also bases its feedback on the Massachusetts Department of Energy Resources ("DOER") Qualified Generation Units reports at the link below. For example, the 'Solar Carve-Out II Qualified Units' downloadable report provides only essential, high-level project information that market stakeholders might need to reference. Solar Carve-Out II Applicants are also directly notified of project application status changes.

<https://www.mass.gov/service-details/qualified-generation-units>

Thank you for your time and consideration.

Sincerely,

Cameron Bernhardt