



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

Adjustable Block Program  
Publishing of Consumer Complaints  
Request for Comments  
September 18, 2019

Dear Mr. Kevin Quilliam and InClime, Inc.:

SRECTrade, Inc. (“SRECTrade”) appreciates the opportunity to provide feedback on the Request for Comments on the Publishing of Consumer Complaints. SRECTrade provides its responses to the “Specific Questions for Stakeholder Feedback” below.

Q: What information should be published regarding complaints received (i.e. Approved Vendor/Designee name, nature of the complaint, time and date of receipt of complaint, resolution of the complaint, identity or role of the complainant, etc.)?

A: Published information should only include the name of the party(ies) that the complaint was filed against. For example, if a complaint was filed against an Approved Vendor, the published information should only include the Approved Vendor’s name. If a complaint was filed against an Approved Vendor Designee, the published information should only include the Approved Vendor Designee’s name. If a complaint was filed against both an Approved Vendor and an Approved Vendor Designee, the published information should include both names. Further, SRECTrade recommends including a reference to the specific program rule/parameter that was violated for clarity. SRECTrade also recommends allowing information on complaints to be published with the complainant's identity anonymous.

Q: Should complaints be published when received (and thus not reviewed), or only after the complaint has been investigated (and responsive actions taken by the Program Administrator, if warranted)?

A: The complaints should only be published after the complaint has been investigated. In prior instances, a stakeholder(s) has filed a complaint that was due to their own misunderstanding of/issue with ABP parameters, after the Approved Vendor and/or Approved Vendor Designee did not actually violate any parameters. For this reason, publishing information on complaints only after receipt, and not after review, seems to inappropriately penalize the party that the complaint was against.

Q: Should complaints only be published from customers? Or should competitors be allowed to report on the misconduct of other Approved Vendors/designees?

A: Any ABP stakeholder should be able to file a complaint against any other ABP stakeholder, including Approved Vendors/Designees against other Approved Vendors/Designees. Again, it is SRECTrade’s recommendation to only publish information on a complaint after it has been investigated.

Q: Should Approved Vendors (and/or their designees) be allowed to provide a response to be included in the public database?



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A: Approved Vendors/Designees should not be allowed to provide a response to be included in the public database. The investigation into the complaint and relevant information posted in the database should be sufficient in summarizing the issue and actionable items.

Q: Should this database be located at the Adjustable Block Program website, the IllinoisShines.com website, or both?

A: The database should be located on both the Adjustable Block Program website and the IllinoisShines.com website. This will help accomplish the database's purpose of reaching the largest potential volume of stakeholders and helping inform their market decisions.

Thank you for your time and consideration on SRECTrade's comments and please contact us with any questions.

Sincerely,

Cameron Bernhardt  
SRECTrade, Inc.