



RESPONSE TO CONSUMER PROTECTION PROPOSALS FOR PUBLIC COMMENT

Thank you for the public comment period, we appreciate the opportunity to give our inputs in advance of implementation of these new requirements. We are focusing our comments on Proposal #2. The two areas we are most focused on are the implementation of the new requirements and the issues that these requirements may cause for customers with systems sold or installed by Designees that do not meet the AV's vetting requirements.

Response to Proposal #2

Question: Is this the right scope and set of options to be included in a Designee Management Plan?

Generally we find the scope to be correct, however some of the requirements may be best implemented by Designees on their sub-Designees. There are many different AV business models that will partner with different types of Designees. Carbon Solutions works with a wide range of solar companies across the state. Some of these companies are very small with only a few employees, while some are national companies that work with thousands of vendors, sales organizations, and installers. These large partners are better positioned to vet and manage sales materials and scripts with their sub-Designees than the AV is.

Question: Are there additional elements that should be required in a Designee Management Plan?

There are no additional elements we think should be included.

Question: Do Approved Vendors or Designees anticipate hurdles to including and/or implementing any of the proposed elements above?

The two biggest hurdles we anticipate in the implementation of this proposal is the administration of these requirements within the required timeline and the impact they may have on customers that worked with Designees that do not meet an AV's requirements.

It will take considerable time and effort to implement across a broad range and network of Designees. It would be helpful if the IPA or Program Administrator published an example criteria or set of minimum criteria required of AV's to use as a starting point with AV's implementation. We would also like to request at least 3 months after the final requirements are published before they take full effect.

The second issue we are seeing pop up now as solar companies are leaving the market or going out of business. This has resulted in a lot of stranded customers that have solar in some stage of installation, and are having difficulties meeting the requirements to be submitted to the ABP. These additional requirements and vetting will result in more Designee companies that are no longer able to submit projects through an AV. This will result in more stranded customers. Additional guidance from the IPA and Program Administrator on how to deal with customers from Designees that do not meet the vetting criteria or are under disciplinary review, would be very helpful.

Thank you again for the opportunity to comment.

Sincerely,

Dylan DeBiasi