

**From:** [Leah Pardeshi](#)  
**To:** [IPA.Solar](#)  
**Cc:** [>IGS\\_CommunitySolarOperations](#)  
**Subject:** [External] Draft Program Guidebook Feedback  
**Date:** Monday, March 24, 2025 5:04:25 PM  
**Attachments:** [image.png](#)

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Hello,

Thank you for the opportunity to provide feedback on the Program Guidebook. Here are our comments:

- Page 94 (Footnote): "50 This [Signature Bundling] feature is not currently supported by the Program portal but it is planned for release soon."
  - The Program Guidebook has said that this feature will be released soon. Would it be possible to have a date for when this feature will be available for commercial community solar customers?
- Page 107: "Ongoing Quarterly and Semiannual Subscriber Verification Processes"
  - We appreciate that this specifies some differences in requirements based on REC contracts, but it would be helpful if this could be consolidated into a table for better clarity. Bullet one talks about the 15-year contract, bullet two talks about the 20-year contract, bullet three talks about both but with different requirements for each, then another paragraph adds the layer of the contract year. We saw a table with this information on a call with the ABP at one point and it was much more straight-forward.
- Page 107: "The subscriber reports due on the 10th of the month should always reflect subscribers to projects as of the end of the Quarterly Period (i.e., last day of the preceding month) for projects on the 15-year contracts or the first business day of June or December for projects on the 20-year contracts."
  - In practice, these deadlines mean that we need to have our projects completely full in the utility portal at the end of May and November. The utility portals don't always let us drop subscribers and backfill them in the same day, so it's a two-day process at minimum to get a project up-to-date and full. On top of that, we usually try to get it done at least a few days in advance in case any submissions get rejected or there are any issues with the utility portal, such as subscriptions getting stuck in a "pending" status. Because of these dates, we end up having to do this work over Memorial Day and Thanksgiving holidays, which also means the utilities have fewer resources available if there is an issue. It wouldn't be a big deal if the utility portals always worked and we knew we could add and drop subscribers easily in the same day, but it ends up being a multi-day process to make sure everything is perfectly full and clean, and almost always over a holiday week. Shifting both of these deadlines by even one week would be thoughtful.

Please let us know if you have any questions about this feedback.

Thank you