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October 26, 2018

SENT VIA ELECTRONIC MAIL

RE: Comments on Adjustable Block Program Marketing Material and Marketing Behavior Draft Guide

Dear Program Administrator,

SRECTrade appreciates the opportunity to comment on the ABP Marketing Material and Marketing Behavior Draft Guide. Below are our comments on both the existing requirements set forth in the draft document as well as general commentary on the process in which these material should be evaluated.

Comments on proposed requirements – Guidelines for Marketing Behavior

#7. On-Site visit requirement. There are many tools available to installers to pre-design a system using software and satellite images which are often used to give customers an initial idea of what size solar system may fit on their home. While we do feel an on-site visit prior to contract signing is reasonable we do not think this requirement should prohibit the use of such marketing tools as they are cost effective and beneficial to customers when doing initial research.

#9. d. Criminal Background Checks. While SRECTrade supports the idea of ensuring high quality employees are installing solar the proposed background check requirement only serves to add cost and complexity to the hiring process without protecting the customer. The requirement states that a background check must be performed, but also that a running list of these checks be kept by the Approved Vendor. However, it does not specify what level of background check an employee must pass and it is not clear what would prevent an individual from being employed from a solar company. SRECTrade would not support adding specific requirements (no previous felons for example) as some solar companies actively hire such individuals as part of re-habilitation programs. For these reasons we believe that this requirement should be waived as it is sure to raise costs while not providing a clear benefit to the consumer.

#13. d. Utility Account Numbers. SRECTrade believes this requirement should be waived as Utility Account numbers can be used as a cost-effective way to generate solar proposals and give a more accurate representation of the benefits of solar.

#17. a. iv. Identification of sales people. SRECTrade does not feel it is reasonable or practical to require salespeople to include the logo of the Approved Vendor on their ID card. The main reason being that one installer or sales person may utilize several different Third Party Approved Vendors and these relationships are not exclusive. It is also common that the customer themselves will make the decision on which Approved Vendor they would like to utilize even if the installer recommends a company. If this requirement were to remain as is, it is feasible that installers would need to include the logo of all Third Party Approved Vendors to ensure they are covered. This is clearly not practical, and we do not see the immediate benefit to the customer.

General Process Comments:



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SRECTrade appreciates and understands the need to include and enforce strict marketing guidelines for the protection of the customer and benefit of the ABP program. However, we believe that the process for collecting, reviewing, and enforcing these requirements needs to be improved to accommodate Third Party Approved Vendors.

Currently there is only one place to upload marketing materials to the Approved Vendor application. As a Third Party Approved Vendor we intend on working hundreds of different installers throughout the course of the program. We recommend creating a more robust process where marketing material can be provided on an installer by installer basis. This would make reviewing the information easier for the program administrator and will allow for the administrator to single out installation companies rather than deeming the entire Approved Vendor's materials inappropriate. Ideally, the Approved Vendor would be able to continue operating and submitting applications for compliant installers while the correction is being made to the materials that do not meet the requirements.

These improvements will continue to protect customers while allowing for efficient and effective administration of the program.

We appreciate the opportunity to provide any additional feedback or comments as needed throughout the process.

Best Regards,

Tom MacKenty

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SRECTrade, Inc.