



ABP Administrator InClime <admin@illinoisabp.com>

Question re: approved vendor questions

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To: ABP Administrator InClime <admin@illinoisabp.com>, Alex Rein <alex.rein@inclimesolutions.com>

Cc: Betsy Scherzer <Betsy.Scherzer@sunpower.com>

Hi InClime team (+Alex),

We have a specific question in response to the following question posed regarding Approved Vendors:

Q. What if the project is sold, but the Approved Vendor does not change—is that permissible, and what requirements or conditions apply? A sale of the project itself (or a majority equity share in the project) that results in a new system owner but not a new Approved Vendor is allowed while the project remains unselected for a REC contract; in such a case, the Approved Vendor is expected to contact the Program Administrator in order to update the ownership data for the project in the ABP portal. This project ownership change would not change any previous determination that the project was co-located, and it could, if applicable, cause the project to newly be considered co-located.

Is this policy designed to apply to residential leases? If not, what would be the impact on residential leases that potentially could be sold at some point in their life cycle (ie, selling to an investment vehicle, securitization, or bought out by a customer, etc.). Does the timing matter (i.e. whether project is or isn't yet selected for a REC contract at time that lease ownership changes)?

Ideally, from our perspective, the best policy would be to not require updates to ownership data for leases, as long as the approved vendor is the same. Regardless, we just want to make sure we understand the rules and be clear that it isn't a problem for ownership to change after the project is under a REC contract.

Thank you,

Suzanne

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