



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

Adjustable Block Program
Request for Stakeholder Feedback – Updated Batching Process
April 29, 2020

Dear Illinois Power Agency & Program Administrator,

SRECTrade, Inc (“SRECTrade”) appreciates the opportunity to provide feedback on the Updating Batching Process for projects submitted to the Adjustable Block Program (ABP). SRECTrade provides our comments on the questions listed in the notice dated April 15, 2020:-

SRECTrade supports the proposed change for projects to be submitted on a rolling basis, and as projects are Part I verified, for the projects to be placed into new batches that will result in a contract and/or new confirmations with one utility. SRECTrade also agrees with the usage of one master agreement per utility with multiple confirmations from an Approved Vendor, rather than having multiple contracts between a utility and Approved Vendor.

SRECTrade also supports the option granting the Program Administrator discretion to form batches once there is more than 100 kW of Part 1 Verified projects. The option should be made available in the Part I application as a field or a checkbox. Alternative, SRECTrade also requests the option to be able to create batches manually, following these suggested workflows listed below.

If we select the option to allow the Program Administrator to select projects to be batched:-

1. Projects are submitted to the Program by SRECTrade
2. Projects are Part I Verified by the Program
3. 13 business days before batches are to sent to the ICC, the Program Administrator will form a batch of all Part I Verified projects and inform the Approved Vendor in writing with a request for the application fee payment. This is with the understanding that batches are sent 8 business days before the ICC meeting.
4. The Approved Vendor will have 5 business days from receipt of notice to submit the application fee payment
5. The batch is submitted to the ICC to be assigned a utility contract

If we choose to manually batch projects upon Part I verification:-

1. Projects are submitted to the Program with the option for SRECTrade to create a batch manually
2. Projects are Part I verified by the Program
3. At our discretion, SRECTrade will create and submit a batch, following the existing batching process
4. The application fee payment will be submitted within 10 business days of batch submission
5. The batch is sent to the ICC

Additionally, we request a clear and concise breakdown of the process, in regards to these items listed below:-

1. Batch Timing – If the Program Administrator forms batches, the frequency of batching and selection of projects will need to be clarified to ensure consistency in the process. The turnaround time from SRECTrade reaching 100 kW of Part I Verified projects to the creation of a batch by the Program Administrator must also be clarified. SRECTrade suggests that batches are created 13 business days before they are sent to the ICC, assuming 100 kW of Part 1 Verified projects are reached.



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

2. Block Closure Deadlines – Once a block reaches its closure, the determination of which projects were submitted before closure will be made based on the submission date and time of individual projects, instead of by batch submission
3. Monitoring of Status – SRECTrade suggests the creation of a clear platform for Approved Vendors, Designees, and Customers to view the status of their projects in the application queue, to allow for better transparency in the process.
4. Application Fee Payment – SRECTrade suggests that application fee payments are submitted by batch, upon the formation of a batch. This will avoid additional administrative burden and maintain the existing process of application fee submissions.

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

Sincerely,

SRECTrade, Inc.