

*Though I understand the reasonableness and desire for efficient SREC Administration, the batch size minimum of 50 KW (AC) for ILSFA contracts is a sub-program barrier and as a result the major reason that the Small DG portion of the ILSFA program is underutilized.*

As a result this limits the opportunities for small "Income Eligible Households" to benefit from what are generally well designed and utilized programs. Since the average individual household will need only 6-8 Kw of solar capacity entails an approved vendor/installer to gather about 8 homes that unless are adjacent are both time wise and administratively difficult to gather. As publicly disclosed, only one contact was been awarded thru this subprogram as of 04/18/2020.

Though it is difficult to do in a dense urban environment it is even more difficult in the smaller urbanized "downstate " regions".

Moving forward, I would expect the general past pent up demand would soon slow the contracts rush to the IPA, so there might be room for a relaxation of the 50 Kw batch size to test this assumption--- or view it as a pilot to assess if this is a barrier or not and to review its impact on the Administrative burdens.

Thank you for the opportunity to comment on this small but impactful situation.

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