



201 California Street, Suite 630, San Francisco, CA 94111
www.srectrade.com | 415.763.7732

October 26, 2018

SENT VIA ELECTRONIC MAIL

RE: Comments on Adjustable Block Program Disclosure Forms

Dear Program Administrator,

SRECTrade appreciates the opportunity to comment on the ABP Draft Disclosure Forms. 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 forms should be completed and distributed.

PV System Purchase Disclosure Form:

SRECTrade recognizes that many of the fields listed on this form are required by the final plan and are non-negotiable however we do have the following comments and request for clarification on the following items:

- System Warranty/Maintenance Provider. It is not clear if this is a requirement of the ABP. Specifically, are Maintenance Providers required, and if so, for what duration?
- Expected Value of REC Incentive Payment. It should either be very clear that this value is not guaranteed or allow for a range to be provided. There are a variety of factors that could change the value or result in no value at all from ABP. Block price changes, size changes, and end of program are some examples. SRECTrade also recommends including a calculation for the 5% collateral which will be withheld.
- Non-connection internet fee. It is not clear from the plan if this is a requirement or if there is an associated fee with Non-connection. If this is not required, we recommend striking it from the form.

General Comments on the Disclosure Form Process:

SRECTrade is extremely concerned with the proposed plan to only allow Approved Vendors access to this form. In our view this form is intended to be used by installers to complete and provide to the customer during the sales process, prior to contract signing, as per the plan. By requiring installers to submit this information through their Approved Vendor an additional step will be added which will add cost and unnecessary administrative burden on all parties. We also believe the proposed process will increase the likelihood of inaccurate or out of date information to be given to the client. Disclosure forms completed by installers could be linked directly to the appropriate Approved Vendor as the "Approved Vendor" is a required field on the form itself. It would then be clear to the program administrator which forms can be displayed to each Approved Vendor, retaining the benefit of pre-capturing this information for final application purposes.

SRECTrade also recommends creating clear guidelines for updating information that may have changed between the initial disclosure form and the final install application. To reduce administrative burden, we recommend having an acceptable size variation of +/-5% which would not require a new form to be



201 California Street, Suite 630, San Francisco, CA 94111
www.srectrade.com | 415.763.7732

signed (a similar process was allowed for in the IPA SPV and DG programs). We also believe the equipment changes should not require an update unless it changes the overall system cost. It is very common for equipment to change from proposal to install based on a variety of factors. If the total system cost and performance expectations do not change we believe it is reasonable to allow such changes without requiring new signatures. In general, we believe the IPA and Program Administrator should evaluate each requirement of the disclosure form and determine which must be updated if there are changes in the final install. We recommend doing so with the goal of protecting the customer from changes that will impact cost and performance, while ensuring no unnecessary administrative burden be put on installers, Approved Vendors, system owners, or the Program Administrator.

We believe that the implementation of this form will have the single biggest impact on the administrative costs of participating in the Adjustable Block Program. It is for this reason that we strongly recommend the IPA and Program Administrator carefully evaluate how the Disclosure Form is implemented and dedicate the necessary resources to ensure it is done effectively.

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

Best Regards,

Tom MacKenty

Tom MacKenty

SRECTrade, Inc.