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Draft Lottery Comments

Overall the lottery process appears to create a transparent and understandable system for allocating projects in the event a block is over subscribed. With this in mind, any changes to the draft lottery process should be made to specific block sizes. There are issues specific to different block sizes, and creating a process to apply to all blocks will create a variety of other issues. Disclosing project specific details in the residential and C&I space are both invasive and unnecessary for the program's transparency.

It is important to all customers to stay committed to the current publically available dates and proposed program timeline. There are a number of potential customers (C&I and residential) who have decided to wait until more details of the program (approved vendor process, finalized contracts, etc) become available prior to committing to projects. They have formed expectations around the January 15th, 2019 proposed roll out. To change any dates related to the application process now would not be in the spirit, nor the intent, of the program. Applications for unviable projects, which are made with the specific goal of swapping at a later date in the community solar space, should not impact the other blocks and the would be participants of those blocks. If economically questionable applications are an area of concern in the community solar space, any additional curtailment to gaming of the system should happen on its own timeline.