



October 19, 2018

Summit Ridge Energy Comments on Approved Vendor Registration Requirements

General Comments

Summit Ridge Energy (SRE) appreciates the opportunity to comment on the IPA's Approved Vendor applications and standards for the Adjustable Block Program. Our comments are outlined below under the corresponding subject headings from the IPA's Draft for Stakeholder Comments released on October 3, 2018.

SRE understands the need for and supports Approved Vendor standards being implemented to ensure the proper functioning of the Adjustable Block Program. On the whole, while we appreciate the intent of the IPA to be thorough and comprehensive in collecting information in support of this goal, SRE is in general agreement with the comments issued by the Joint Solar Parties (JSP) on this matter. We feel that a balance can and should be struck between ensuring that enough information is collected to perform the proper due diligence, while not becoming unnecessarily burdensome to Approved Vendor applicants.

List of Information Collected in Approved Vendor Application

Company Background

6. Ownership structure, including any affiliated businesses either owned or partially owned by the proposed Approved Vendor or who have ownership of all or part of the Approved Vendor
 - As noted in the JSP comments, requiring this broad of an array of information can quickly become burdensome, especially as it relates to the complex structures that renewable energy development companies often employ. SRE supports the JSP's alternative that the term "affiliate" should only apply to entities that will be materially involved in developing Adjustable Block Program-eligible assets in Illinois.

14. Provide company balance sheet and profit and loss statement for the last full fiscal year.
 - SRE agrees with the JSP's assessment that this requirement should be removed. If these documents will not be solely relied upon as a measure of suitability "absent any other negative information" as stated in the draft guidelines, we fail to see the need to provide them (especially if there is a lack of any other negative information).

Moreover, this requirement may unduly penalize newer entities without long financial histories that are otherwise very qualified to serve as counterparties to ABP REC contracts.

15. List three current or prior customers who can act as references.

- SRE supports the JSP's position that the IPA should remove the requirement for three references. As the Agency can appreciate, some entities have been formed recently enough that even though they have a very deep pool of former customers who can serve as references, in many instances, these customers may not be clients of the new development entity.