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December 10th, 2018

SENT VIA ELECTRONIC MAIL

RE: Comments on Adjustable Block Program: Program Guidebook Draft

Dear Program Administrator,

SRECTrade appreciates the opportunity to comment on the ABP Program Guidebook Draft. 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 material should be evaluated.

**Comments on proposed requirements – Program Guidebook**

Section 4: System Eligibility

(pg 14 of 33) Site Control – SRECTrade would recommend that examples of the acceptable document forms (i.e. Deed) are included in the guidebook

SRECTrade would recommend that capacity factors that are lower than the default be exempt from this additional review/requirement.

Section 5: Project Applications

(page 18 of 33) Batches – SRECTrade would recommend that a CSV upload option is available to assign individual applications to a batch for submission

(page 24 of 33) Required Information – Part 1 – SRECTrade would recommend that for the Proof of Brochure requirement, a checkbox is included in the Disclosure Form for the owner to confirm receipt of the brochure and therefore eliminate the requirement for a separate document.

(page 25 of 33) Required Information – Part 2 - Name of qualified person who conducted the installation. This seems like excessive information after already providing Installer Name in Part 1, verifying Installer name in Part 2, and providing final invoice from Installer in Part 2.

SRECTrade recommends that it be clarified that Energized systems who submit Part 1 and Part 2 will not be required to post cash collateral and can opt to have the 5% withheld from the first REC payment.

**General Comments:**

SRECTrade would recommend that the application is made available to Approved Vendors for review prior to the opening of the application on January 15, 2019. The purpose would be to ensure the information and documents we are collecting align with the application.

Recommend the fields that can be uploaded via CSV are made available to Approved Vendors prior to the opening of the application on January 15, 2019. The purpose would be to develop our CSV file in time for the application opening.

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

Best Regards,

Tom Mackenty

SRECTrade, Inc.