

[Commenter 17] appreciates the opportunity to submit the following comments on the Draft REC Contract. We appreciate the immense task of creating one contract that can cover any number of business models and financing structures, let alone market segments. Unfortunately, we believe that the draft contract does not reflect the realities of the solar market and will make financing of the majority of systems expensive, if not impossible. We understand via recent communication with [redacted] that the IPA and InClime are considering options related to the assignment provisions of the contract. We appreciate the IPA and InClime's recognition of this issue as critical to the successful financing and construction of many projects, and we provide the following comments as background on the issue from our perspective, as well as suggested remedies. We agree with the comments submitted by [redacted] in both the first and second round of comments and want to reiterate the necessity of making individual batches or product orders assignable, instead of limiting the assignment to only the entire Master REC Contract. Further, the obligations for REC delivery, collateral, and reporting, as well as any other project-specific obligations, must follow the assignment of the batch and fall on the new owner of the system.

The information below details our specific business practice, and as such we request that it be treated as confidential and be redacted in full.