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Comments on ABP Draft Project Information Release Protocols

Thank you for the opportunity to comment on the information published. We agree with the majority of the data points proposed to be published with two modifications.

No Publishing Residential Addresses

We do not think that the distinction between large and small DG is sufficient to keep residential addresses from being published. The lottery result spreadsheet already has a number of residential addresses. We think these may have been published inadvertently, but we recommend that residential addresses are removed from the published results, and that the ABP does not continue to publish residential addresses. From our experience we have seen over 30% of the systems (# of systems not MW) are residential in this category. We recommend one of the following approaches to fix this:

1. Don't publish addresses for systems under 25kW
2. Don't publish an address for any system that is submitted as "residential". This data point is already collected as part of the Pt 1 application so it may be relatively simple to use this as a filter.
3. Don't publish street addresses for any systems. Location of systems can be listed by County and or Zip code.

Do not Publish Number of RECS along with System Sizes

Publishing both the number of RECS on the contract and the system sizes allows other developers to back out capacity factors and production estimates from competitors. Not every developer has the same strategy around the capacity factor they use when proposing systems. Some choose to be more



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conservative to help avoid collateral draw down. This information could give other developers and advantage when pitching a job against the other company as well as give developers information about their competition in other markets.

Thank you for considering these comments. Please contact me if you have any questions or are interested in any further detail.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dylan DeBiasi".

Dylan DeBiasi