

ABP Admin,

Per your request for comments on the below updates to the batching process, please see our responses listed below:

“Under the Initial Plan, Approved Vendors were required to submit projects bundled into batches. For this Revised Plan, the Agency proposes a simplification of the batch process. For a new Approved Vendor, there will still be the requirement for a submittal of a first batch of at least 100 kW of projects, and that 75% of the capacity of that batch must be verified to be approved. However, for established Approved Vendors that have had a contract approved by the Commission, projects may be submitted on a rolling basis, and as projects are verified, the Program Administrator will place them into new batches that will result in a contract and/or new confirmations with one utility. Utilities may use one master agreement with multiple confirmations (one confirmation per batch) from an Approved Vendor, rather than having multiple contracts with the same vendor. The systems within the batch/confirmation will be listed on a schedule (or product order) attached to the contract and may not be substituted once approved.”

1. Would you prefer that the Part I application include an option granting the Program Administrator discretion to form batches from an Approved Vendor’s Part I verified systems that have made this election, provided that the Approved Vendor has at least 100 kW of Part I verified projects? Under this approach, if this option was not selected on the Part I application, then the project would not be submitted to the ICC until the Approved Vendor placed the project into a batch and requested that the Program Administrator submit the batch to the ICC. This is not a preferred option as often times there are certain projects that us as a vendor, prefers to have batched with certain others. There also may be further projects that the vendor is working on adding to the 100kw that have already had the Part I’s submitted for, and if those get batched prematurely, than this may not leave a large enough size remaining, that the vendor is still working on, to get to another 100kw.

2. Would you instead prefer that, upon being notified of a project’s Part I verification, the Approved Vendor is allotted a certain amount of time (perhaps ten business days) to bundle that project into a batch (including the option of a single project batch) or to request that the project be held until other Part I verified projects are available to batch with it? If the Approved Vendor were to make the latter selection, the project would not be submitted to the ICC until the Approved Vendor placed the project into a batch and requested that the Program Administrator submit the batch to the ICC. Absent an affirmative request from the Approved Vendor to specify the batch or hold the project, the Program Administrator would use its discretion to place verified projects into batches for submission to the ICC. This is also not a preferred option, as the same issue mentioned above can have the potential of happening. This can cause certain projects to be delayed while waiting to obtain enough projects to get to another 100 kw.

3. Are there other process or procedural aspects of the batching process that you would like to provide comments on? We as a vendor feel as though this change is counter-intuitive to the current process in place. With the need to still have 100kw submitted to the ICC, and the Program Administrator’s discretion to move and reassign projects to certain batches, this can

cause more delays for the submission for projects that the vendor submits, if they do not have enough kw AC ready to be batched, and this can cause some projects to be separated in batches, that the installers prefer to have submitted together for timeline purposes.

Thank you for your feedback request,

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Solar Incentive Administrator

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