

**Subject:** Comments on the Coordinated Competitive Power Procurement Draft Work Plan  
**Date:** Thursday, August 30, 2012 10:58:33 AM Eastern Daylight Time  
**From:** Kevin Quilliam  
**To:** MickiBertrand@nescoe.com  
**Category:** Comments - Renewable Power

Dear Micki Bertrand:

SRECTrade, Inc. would like to make the following comments on the Coordinated Competitive Power Procurement Draft Work Plan.

The Coordinated Competitive Power Procurement Draft Work Plan is a good description of a stakeholder based process to carry out the Coordinated Competitive Power Procurement. SRECTrade would note that the process outlined is very similar to the Delaware Renewable Energy Taskforce, which successfully planned and carried out a similar renewable statewide solicitation for Delaware, and would suggest that this successful program be used as a partial model for the NESCOE RFP.

One aspect of the Delaware program that is missing from this draft work plan is the use of a professional outside firm to run the actual RFP process. This would include advertising the RFP, setting up a website to describe the program details and post questions and answers online as they are asked, manning a phone line during normal business hours and providing an email address to answer questions about the RFP, running informational webinars, setting up a secure online platform to collect bidders proposal information and bids, screening bids to ensure all information is complete and collecting any bid deposits or performance guarantees required prior to placing a bid, keeping bidders apprised of the status of their applications (complete, pending additional information...), evaluating bids based on Procurement Team developed criteria, publishing results, and enrolling successful bidders including tracking contract signing, collection of performance guarantees, tracking project completion, and if necessary tracking generation and making monthly payments to generators.

The Draft Work Plan designates the Procurement Team as responsible for the RFP process, however it also notes that many members of NESCOE have conflicts of interest which may interfere with their ability to conduct the RFP. Using an independent outside firm experienced in running renewable RFPs would allow the Procurement Team to draft detailed rules for conducting the RFP while avoiding any conflicts of interest when the actual RFP is conducted. An experienced professional team can also provide a proven online platform to run the RFP, which NESCOE presumably doesn't currently possess, as well as bringing considerable experience to the process, which is far more complex than the Draft Work Plan seems to acknowledge. Interest is already high in this procurement and it will most probably face an unprecedented amount of attention and scrutiny given the impact that it may have on a significant portion of the renewable industry in the U.S. This is not the kind of RFP that should be put on the shoulders of an already stretched Procurement Team made up of members from disparate organizations who are not able to devote their full time and attention to the RFP during the entire process, who may not have had extensive experience actually running RFPs of this type, and who would have to reinvent the wheel in terms of an RFP platform to collect, analyze, and award bids.

As a result, we strongly recommend that NESCOE plan to hire an experience outside firm who has successfully completed renewable energy RFPs in the past to run the actual RFP. The modest investment will pay dividends in increased participation, decreased chances of challenges from unsuccessful participants, a more smoothly run RFP, and possibly even reduced overall cost because the RFP infrastructure doesn't have to be reinvented. We look forward to continuing to participate in this process and hopefully seeing a successful RFP in 2013.

Best Regards,

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