UNITED STATES OF AMERICA
BEFORE THE
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT COMPANY ACT OF 1940
Release no. 33090 / May 1, 2018

In the Matter of

BENEFIT STREET PARTNERS BDC, INC.
PROVIDENCE FLEXIBLE CREDIT ALLOCATION FUND
BUSINESS DEVELOPMENT CORPORATION OF AMERICA
PROVIDENCE TMT DEBT OPPORTUNITY FUND II L.P.
PECM STRATEGIC FUNDING L.P.
PROVIDENCE DEBT FUND III L.P.
PROVIDENCE DEBT FUND III MASTER (NON-US) L.P.
BENEFIT STREET PARTNERS CAPITAL OPPORTUNITY FUND L.P.
BENEFIT STREET PARTNERS CAPITAL OPPORTUNITY FUND II L.P.
BENEFIT STREET PARTNERS SMA LM L.P.
PROVIDENCE EQUITY CAPITAL MARKETS L.L.C.
BENEFIT STREET PARTNERS L.L.C.
BDCA ADVISER, LLC
BENEFIT STREET PARTNERS SMA-C L.P.
BENEFIT STREET PARTNERS SENIOR SECURED OPPORTUNITIES FUND L.P.
BENEFIT STREET PARTNERS SENIOR SECURED OPPORTUNITIES MASTER FUND (NON-US) L.P.
BENEFIT STREET PARTNERS SENIOR SECURED OPPORTUNITIES (U) FUND (NON-US) L.P.
BENEFIT STREET PARTNERS SENIOR SECURED OPPORTUNITIES (U) MASTER FUND (NON-US) L.P.
BSP SPECIAL SITUATIONS MASTER A L.P.
BSP SPECIAL SITUATIONS MASTER B L.P.
BENEFIT STREET PARTNERS DEBT FUND IV L.P.
BENEFIT STREET PARTNERS DEBT FUND IV MASTER (NON-US) L.P.
BENEFIT STREET PARTNERS SMA-T L.P.

9 West 57th Street, 49th Floor
New York, NY 10019

SEI ENERGY DEBT FUND, LP
SEI INVESTMENTS MANAGEMENT CORPORATION

One Freedom Valley Drive
Oaks, PA 19456
ORDER UNDER SECTIONS 17(d) AND 57(i) OF THE INVESTMENT COMPANY ACT OF 1940 AND RULE 17d-1 UNDER THE ACT


On April 6, 2018, a notice of the filing of the application was issued (Investment Company Act Release No. 33068). The notice gave interested persons an opportunity to request a hearing and stated that an order disposing of the application would be issued unless a hearing was ordered. No request for a hearing has been filed, and the Commission has not ordered a hearing.

The matter has been considered and it is found, on the basis of the information set forth in the application, as amended, that participation by the Regulated Funds in the proposed transactions is consistent with the provisions, policies and purposes of the Act and is on a basis no less advantageous than that of other participants.

Accordingly,

IT IS ORDERED, under sections 17(d) and 57(i) of the Act and rule 17d-1 under the Act, that the relief requested by Benefit Street Partners BDC, Inc., et al. (File No. 812-14601) is granted, effective immediately, subject to the conditions contained in the application, as amended.

For the Commission, by the Division of Investment Management, under delegated authority.

Eduardo A. Aleman
Assistant Secretary