



April 27, 2020

Anthony Star, Director
Illinois Power Agency
105 West Madison Street, Suite 1401
Chicago, IL 60602

Delivered electronically to IPA.Solar@illinois.gov

Dear Director Star:

Please find below Certasun's comments regarding the Adjustable Block Program Draft Marketing Guidelines. The numbering below refers to the numbering in the document titled, "Adjustable Block Program Guidelines for Distributed Generation DRAFT Marketing Materials and Marketing Behavior."

Guidelines for marketing materials:

4.c. (Customer Testimonials): It is reasonable that testimonials cannot include language that make false claims or promise savings and that the IPA may request documentation to validate the accuracy of testimonials including verification of the identity of the testifier. However, we believe it is excessive that all testimonials must include a disclaimer that user experience may differ. We believe it is common sense that a customer testimonial or quote is representative only of that individual's experience and is not a guarantee that all customers will have the same experience.

7.c.v. (Appealing Disciplinary Determination): We believe that the process for addressing marketing violations detailed in section 7 is a significant improvement to the current process. This section would be strengthened further by inclusion of details pre-determining which entity or entities will handle appeals made by Approved Vendors. We believe appeals should be handled by an entity separate from the entity that makes the initial disciplinary determination in order to reduce bias.

The numbering below refers to the numbering in your request for comments posted on April 3, 2020.

4. The proposed rules for use of the Illinois Shines logo in marketing materials do seem viable and we are in favor of marking it available for use by Approved Vendors. We think a cleaner solution would be for the program to create an Illinois Shines Approved Vendor Badge/Logo, which only approved vendors would be allowed to use. This would be an easily recognizable and self-explanatory badge that Approved Vendors could use on their website and marketing materials to distinguish themselves from Non-Approved Vendors.

Sincerely,

Jesse Feinberg, VP Sales & Marketing

Certasun