



CARBON SOLUTIONS GROUP
1130 W Monroe
CHICAGO, ILLINOIS 60607
888.499.1456 TEL
312.803.1833 FAX
carbonsolutionsgroup.com

Illinois Power Agency
160 North LaSalle Street
Chicago, Illinois 60601

InClimate, Inc. - Program Administrator

Comments on Publishing of Consumer Complaints

CSG would first like to thank the IPA and program Admin for inviting stakeholder feedback as a consumer complaint interface is developed. We strongly believe that effective communication and consumer complaint resolution is imperative to the continued success of the ABP. This is especially important as the residential and community solar subscriber market segments grow. We have had a lot of experience in fielding consumer complaints and questions in the months since the launch of the ABP and hope to give helpful comments to the published questions.

Before we respond to the specific questions we would like to frame the approach we view as most beneficial to consumers. Instead of viewing the consumer complaints as information to be conveyed to market, it is important to focus on properly addressing consumer complaints and questions. CSG, as well as the vast majority of solar companies, strive to address and reconcile complaints with consumers before they make it to a formal process. Adding on to this point, we would like to commend the Program Admin for their approach to consumer questions and complaints thus far. They have been effective in connecting the consumer to the appropriate entity to get their concerns addressed. We see this remaining the most important role the Admin will play in consumer complaints going forward as well.

One other common theme throughout our comments is the proper classification of consumer complaints. It is often hard to fully distinguish between an inquiry and a complaint. For example questions such as "When can I expect my REC payment?", "When can I expect my REC payment? Why is it taking so long my system has been energized for two days?", and "When can I expect my REC payment? My installer has not answered my calls for months." can be very hard to categorize in any kind of objective way. Without further inquiry and communication with the other parties involved it is almost impossible to tell if a consumer reaching out is an inquiry or a complaint.

Furthermore this classification gets even more difficult to make with the number of parties involved in the ABP. Consumers often are not sure of the right entity to address complaints to. We commonly receive questions and complaints from consumers on topics as varied as micro vs string inverters, utility

net-metering policies, REC Contract duration, local permitting, and utility interconnection policies. We are sure that the Program Admin and IPA also field emails and calls on all of these topics and more. Because of these factors and more we will address later in our comments it is necessary to have significant investigation, pruning, and attempts a resolution before publishing complaints to ensure that the information that is published is actually representative of real issues and digestible by consumers.

What Information Should be Published?

We recommend that only complaints that were founded, unresolved, and applicable to the party the complaint is against are published. These complaints should then only be published as the aggregate number of complaints over a set period of time similar to Plug In Illinois. They should also be weighted based on the number of consumers the AV or Designee handles as larger AV's and residential focused companies will receive a disproportionate level of inquiries and complaints.

We are strongly against publishing any of the direct communication between consumers and the Program Admin, Designee or AV. This communication often contains sensitive or private information from the consumer as well as potentially proprietary or privileged information from the AV or Designee. Also, from our experience many of these disputes can take several phone calls and emails to resolve, so it would require pages or hours of audio published for each complaint. Beyond privacy and other issues that arise with this approach, this is simply not helpful to consumers to review that volume of information.

With this aggregate data approach we would like to reiterate our comments from earlier, it is very important that only real complaints that are founded, apply to the party being complained about, and unresolved are included in the tally. Designees that focus on areas that have more complicated interconnection rules or on residential customers will have more incoming complaints regardless of fault of the AV or Designee and regardless if these are resolved effectively or not.

The published information should be clear concise and easy to digest by consumers attempting to use it. The more detailed this information is the harder it is for consumers to use and comprehend it. To the same point publishing or counting inquires of resolved complaints to consumers also can be confusing and send the wrong message to other consumers.

Pre-Review Publishing of Complaints

For all of the reasons we have already listed complaints must be reviewed before they should be published. Publishing the raw incoming stream of complaints will be harmful to some Approved Vendors

and Designees, misleading to consumers, and not effective an effective way to present information. Additionally publishing unreviewed complaints opens up a host of other problems. Consumers often include personal or private information in complaints or inquiries that they may not want published. Many complaints will just be questions not complaints. Many complaints will be made that are outside of the purview of the program. Also, any complaint or inquiry box on a website is susceptible to spam and bots filling the public feed with useless information.

Consumer vs Competitors

To maintain the validity and integrity of the complaint data published competitors should not be allowed to complain about one another. If a company has a valid concern or complaint about a competitor they should be able to make this to the Admin and if it is found to be valid and it results in discipline it can be published on the ABP website under the "Disciplinary Actions Report". But these should not be included with customer complaints.

Redacted Information

We recommend that the IPA follow the ICC's approach and just publish aggregate numbers of complaints and not the actual text of complaints.

Comprehensive Database

The Program Administrator and the IPA are best equipped to address ABP complaints. It is not useful to work with other entities on compiling complaints. We believe this would just confuse customers further and exacerbate the categorization issues we have already addressed. Other agencies do not have the same ABP experience and knowledge that the Program Admin and IPA have. This leads to issues with inquires being categorized as complaints or unfounded complaints getting counted i.e. "My neighbor has a 5 year REC contract why is mine 15 years?"

We also know that many customers will reach out to several different entities about the same concern. This would potentially result in a lot of double counting of the same complaints. These complaints also often get resolved with the appropriate entities, so a resolved complaint may appear unresolved.

Risks

We have addressed many of the big risks earlier in our comments but wanted to reiterate some here. The risks fall into two broad categories. The first category is that the information published is not usable or useful to consumers. The second is that information is unfairly harmful to Approved Vendors or Designees. There is a lot of overlap between these two categories as it is not a consumer's best interest to get a bad impression of a good company just because of the way complaints are collected and published.

The first major risk we will call the "Youtube Comment section" risk. If information is published in an unfiltered or immediate manner it runs the risk of becoming totally useless to the consumers seeking it out. Too much information on varied topics quickly becomes indecipherable to anyone outside of the solar industry.

The second big risk is that companies with certain business models will look disproportionately bad compared to others. For example a community solar company that focuses on residential subscribers only, that is a very good actor will still have many many more complaints brought against them than a bad actor community solar company that primarily deals with large C and I subscribers.

A third risk is that the publishing of complaints prematurely can get in the way of effectively resolving issues. As complaints become public the window of possible resolutions to issues becomes narrower and narrower. For example, it may be appropriate to make exceptions for customers with unique circumstances. However, if the complaints and resolutions are made public companies become much more limited in the possible resolutions.

A fourth risk is publishing of sensitive consumer information. Many complaints contain personal information as well as other details the consumer may not wish to be made public. It will be very difficult and time consuming to weed through complaints and resolutions and remove any personal or proprietary information.

Finally there is a risk in not properly reflecting successful resolutions. The vast majority of complaints will be successfully resolved. Not properly accounting for this resolution will both potentially harm companies and mislead consumers.



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Where should they be published?

Publishing on both the ABP website and IllinoisShines.com would be most effective.

Thank you for reviewing our comments. We look forward to continuing to participate as new stakeholder opportunities arise.

Regards,

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

Dylan DeBiasi